

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

May 16, 2018

PERMIT TO INSTALL
343-08B

ISSUED TO
Cal Grinding, Inc.

LOCATED AT
2525 14th Avenue North
Escanaba, Michigan

IN THE COUNTY OF
Delta

STATE REGISTRATION NUMBER
N2563

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:

April 26, 2018

DATE PERMIT TO INSTALL APPROVED:

May 16, 2018

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO _{2e}	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.

12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EUCHROME A	Hard chrome electroplating tank with a multi-stage composite mesh pad scrubber system, fourth stage HEPA filters, and plastic beads on the tank surface for control. Rectifier capacity is 70,560,000 amp-hr/year.	May 19, 2009	FGCHROMEAB
EUCHROME B	Hard chrome electroplating tank with a multi-stage composite mesh pad scrubber system, fourth stage HEPA filters, and plastic beads on the tank surface for control. Rectifier capacity is 70,560,000 amp-hr/year.	July 7, 2009	FGCHROMEAB
EUCHROME C	Hard chrome electroplating tank with a multi-stage composite mesh pad scrubber system and HEPA filters. Rectifier capacity is 70,560,000 amp-hr/year.	TBD	
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

The following conditions apply to: EUCHROME C

DESCRIPTION: Hard chrome electroplating tank with a multi-stage composite mesh pad scrubber system and HEPA filters. Rectifier capacity is 70,560,000 amp-hr/year.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Multi-stage composite mesh pad scrubber system and HEPA filters

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Total chromium	0.006 mg/dscm ^a	Two Hour Average	EUCHROME C	SC V.1, VI.1, VI.2, VI.3	40 CFR Part 63 Subparts A & N
^a Corrected to 70°F and 29.92 inches Hg					

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. Within 30 calendar days of the date of permit approval, the permittee shall submit to the AQD District Supervisor, an approvable operation and maintenance plan for EUCHROMECC. The plan shall contain all information required by 40 CFR 63.342(f)(3)(i), which includes the following: **(R 336.1910, 40 CFR Part 63 Subparts A & N)**
 - a) Operation and maintenance criteria for EUCHROMECC, add-on control device(s), and for the process and control device(s) monitoring equipment as well as a standardized checklist to document the operation and maintenance of the equipment;
 - b) The work practice standards for the add-on control device(s) and monitoring equipment;
 - c) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and
 - d) A systematic procedure for identifying process equipment, add-on control device(s) and monitoring equipment malfunctions and for implementing corrective actions to address such malfunctions.
 - e) The plan shall include housekeeping practices as specified in 40 CFR 63.342(f)(3)(i)(F), Table 2, as applicable to EUCHROMECC.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUCHROMECC unless the multi-stage composite mesh pad scrubber system and HEPA filters are installed, maintained, and operated in a satisfactory manner. **(40 CFR Part 63 Subparts A & N)**
2. The permittee shall equip and maintain the multi-stage composite mesh pad scrubber system and HEPA filters with a differential pressure monitoring device. **(R 336.1910, 40 CFR 63.343(c))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Within 180 days after commencement of trial operation, the permittee shall verify the total chromium emission rates from EUCHROMECC, by testing at owner's expense, in accordance with 40 CFR Part 63 Subparts A and N. The emission concentration during testing shall be determined by the average of the acceptable test runs performed in accordance with the method requirements. The permittee shall notify the AQD District Supervisor in writing of the intention to conduct a performance test, at least 60 calendar days before the test is scheduled to begin, in accordance with 40 CFR 63.347(d). Stack testing procedures and the location of stack testing ports shall be in accordance with the applicable federal Reference Methods, 40 CFR Part 63 Appendix A. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.2001, R 336.2002, R 336.2003, 40 CFR Part 63 Subparts A & N)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall perform inspections of the composite mesh pad (CMP) system as follows: **(R 336.1910, 40 CFR Part 63.342(f) and 63.343(c)(1)or(3))**
 - a) Determine pressure drop across the CMP system on a daily basis. If the pressure drop across the control varies by more than ± 2 inch of water gauge, from the pressure drop determined during compliance testing, the permittee shall document the variation, and review the operation and maintenance procedures. The permittee shall document any corrective action.
 - b) Visually inspect the CMP system, on a quarterly basis, to ensure there is proper drainage, no chromic acid build up on the pads, and no evidence of chemical attack on the structural integrity of the control device.
 - c) Visually inspect the back portion of the mesh pad closest to the fan, on a quarterly basis, to ensure there is no breakthrough of chromic acid mist.

- d) Visually inspect ductwork from tanks to the CMP system, on a quarterly basis, to ensure there are no leaks.
 - e) Perform wash-down of composite mesh pads in accordance with manufacturer's recommendations.
2. The permittee shall monitor emissions and operating and maintenance information in accordance with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and N. The permittee shall keep records of all source emissions and operating and maintenance information on file at the facility and make them available to the Department upon request. **(40 CFR Part 63 Subparts A & N)**
3. The permittee shall maintain records of inspections required to comply with applicable work practice standards of 40 CFR 63.342(f). Each inspection record shall identify the device inspected, the date, approximate time of inspection, and a brief description of the working condition of the device during the inspection. The permittee shall also record any actions taken to correct the deficiencies found during the inspection. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1910, 40 CFR Part 63 Subparts A & N)**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUCHROMECC. **(R 336.1201(7)(a))**
2. Permittee shall submit the following notifications to the Department in accordance with 40 CFR Part 63.347: **(40 CFR Part 63 Subparts A & N)**
- a) A notification of the date when construction was commenced, submitted no later than 30 calendar days after such date.
 - b) A notification of the actual date of startup of the source, submitted within 30 calendar days after such date.

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCHROMECC	20	45	40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGCHROMEAB	Two hard chrome electroplating tanks and associated control equipment	EUCHROMEAB, EUCHROMEBC

The following conditions apply to: FGCHROMEAB

DESCRIPTION:

Emission Units:

POLLUTION CONTROL EQUIPMENT:

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Hexavalent chromium	0.015 mg/dscm*	Test Method	Each tank in FGCHROMEAB	SC VI.1, VI.2, VI.3	R 336.1225, 40 CFR Part 63 Subparts A & N
2. Hexavalent chromium	0.00034 pph	Test Method	Each tank in FGCHROMEAB	SC VI.1, VI.2, VI.3	R 336.1225,

* corrected to 70°F and 29.92 inches Hg

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate FGCHROMEAB unless an approvable operation and maintenance plan is implemented and maintained. The plan shall contain all information required by 40 CFR 63.342(f)(3)(i), which includes the following: **(R 336.1225, 40 CFR Part 63 Subparts A & N)**
 - a) Operation and maintenance criteria for FGCHROMEAB, add-on control device(s), and for the process and control device(s) monitoring equipment as well as a standardized checklist to document the operation and maintenance of the equipment;
 - b) The work practice standards for the add-on control device(s) and monitoring equipment;
 - c) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and
 - d) A systematic procedure for identifying process equipment, add-on control device(s) and monitoring equipment malfunctions and for implementing corrective actions to address such malfunctions.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate either tank in FGCHROMEAB unless the plastic beads on the tank surface and the tank's associated multi-stage composite mesh pad system and the fourth stage HEPA filters are installed, maintained, and operated in a satisfactory manner. **(R 336.1225, 40 CFR Part 63 Subparts A & N)**
2. The permittee shall equip and maintain the composite mesh pad system with a differential pressure monitoring device. **(R 336.1225, R 336.1910, 40 CFR 63.343(c))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall perform inspections of the composite mesh pad (CMP) system as follows: (R 336.1225, R 336.1910, 40 CFR Part 63.342(f) and 63.343(c)(1)or(3))
 - a) Determine pressure drop across the CMP system on a daily basis. If the pressure drop across the control varies by more than ± 2 inches of water gauge, from the pressure drop determined during compliance testing, the permittee shall document the variation, and review the operation and maintenance procedures. The permittee shall document any corrective action.
 - b) Visually inspect the CMP system including the fourth stage HEPA filters, on a quarterly basis, to ensure there is proper drainage, no chromic acid build up on the pads, and no evidence of chemical attack on the structural integrity of the control device.
 - c) Visually inspect the back portion of the mesh pad closest to the fan, on a quarterly basis, to ensure there is no breakthrough of chromic acid mist.
 - d) Visually inspect ductwork from tanks to the CMP system, on a quarterly basis, to ensure there are no leaks.
 - e) Perform wash-down of composite mesh pads in accordance with manufacturer's recommendations.
2. The permittee shall monitor emissions and operating and maintenance information in accordance with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and N. The permittee shall keep records of all source emissions and operating and maintenance information on file at the facility and make them available to the Department upon request. (40 CFR Part 63 Subparts A & N)
3. The permittee shall maintain records of inspections required to comply with applicable work practice standards of 40 CFR 63.342(f). Each inspection record shall identify the device inspected, the date, approximate time of inspection, and a brief description of the working condition of the device during the inspection. The permittee shall also record any actions taken to correct the deficiencies found during the inspection. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1910, 40 CFR Part 63 Subparts A & N)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCHROME A	20	45	R 336.1225
2. SVCHROME B	20	45	R 336.1225

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).