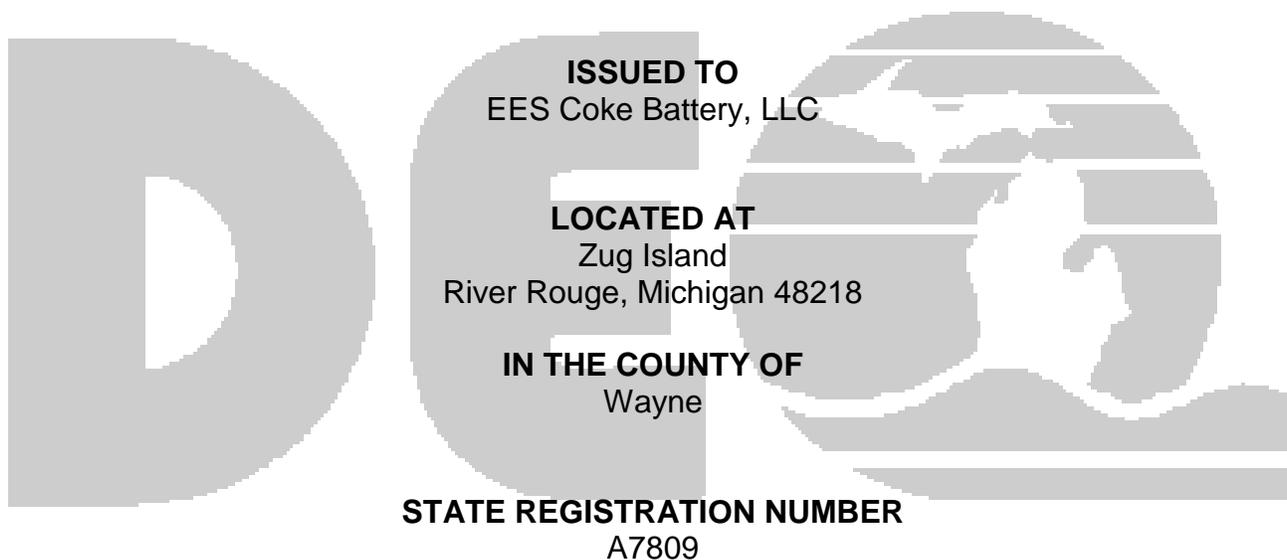


**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

July 31, 2009

PERMIT TO INSTALL

No. 124-09



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: 7/20/2009	
DATE PERMIT TO INSTALL APPROVED: 7/31/2009	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Common Abbreviations / Acronyms

Common Acronyms		Pollutant/Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
ANSI	American National Standards Institute	°C	Degrees Celsius
BACT	Best Available Control Technology	CO	Carbon Monoxide
CAA	Clean Air Act	dscf	Dry standard cubic foot
CEM	Continuous Emission Monitoring	dscm	Dry standard cubic meter
CFR	Code of Federal Regulations	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H ₂ S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality	PM	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM10	PM less than 10 microns diameter
MSDS	Material Safety Data Sheet	PM2.5	PM less than 2.5 microns diameter
NESHA P	National Emission Standard for Hazardous Air Pollutants	pph	Pound per hour
NSPS	New Source Performance Standards	ppm	Parts per million
NSR	New Source Review	ppmv	Parts per million by volume
PS	Performance Specification	ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge
PTI	Permit to Install	scf	Standard cubic feet
RACT	Reasonably Available Control Technology	sec	Seconds
ROP	Renewable Operating Permit	SO ₂	Sulfur Dioxide
SC	Special Condition	THC	Total Hydrocarbons
SCR	Selective Catalytic Reduction	tpy	Tons per year
SRN	State Registration Number	µg	Microgram
TAC	Toxic Air Contaminant	VOC	Volatile Organic Compounds
TEQ	Toxicity Equivalence Quotient	yr	Year
VE	Visible Emissions		

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (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, 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 AQD District Supervisor shall be notified, in writing, of a change in ownership or operational control of the stationary source or emission unit(s) authorized by this Permit to Install pursuant to R 336.1219. The notification shall include all of the information required by R 336.1219(1)(a) and (b). In addition, a new owner or operator must submit a written statement pursuant to R 336.1219(1)(c), agreeing to and accepting the terms and conditions of this Permit to Install, and shall notify the AQD District Supervisor of any change in the contact person for this Permit to Install. **(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)	Flexible Group ID
EUTARSLUDGERECYC	Heavy tar sludge recycling process. Heavy tar sludge settles to the bottom of the tar decanters, process tanks, settling tanks and is recovered as process residuals from other processes inherent with by-product recovery and processing operations. Heavy tar sludge from the tar decanter is scraped continuously bringing the sludge to an exit on the tank where it is transferred by screw conveyor to a heated tank (TK-1). Tank bottoms and other process residuals are manually fed into TK-1. The materials in TK-1 are mixed with #4 fuel oil or coal tar in TK-1 until it is flowable. It is then transferred to a second mix tank (TK-2), and then mixed with coal in the coal mixer. The coal, mixed with liquefied tar sludge, is charged to the coke battery.	NA
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: EUTARSLUDGERECYC

DESCRIPTION: Heavy tar sludge recycling process. Heavy tar sludge settles to the bottom of the tar decanters, process tanks, settling tanks and is recovered as process residuals from other processes inherent with by-product recovery and processing operations. Heavy tar sludge from the tar decanter is scraped continuously bringing the sludge to an exit on the tank where it is transferred by screw conveyor to a heated tank (TK-1). Tank bottoms and other process residuals are manually fed into TK-1. The materials in TK-1 are mixed with #4 fuel oil or coal tar in TK-1 until it is flowable. It is then transferred to a second mix tank (TK-2), and then mixed with coal in the coal mixer. The coal, mixed with liquefied tar sludge, is charged to the coke battery.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Gas blanketing when using coal tar to liquefy the heavy tar sludge.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	0.29 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTARSLUDGERECYC	SC VI.7	R 336.1225 R 336.1702(a)

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Heavy tar sludge	836,000 gallons per year	12-month rolling time period as determined at the end of each calendar month.	EUTARSLUDGERECYC	SC VI.5	R 336.1225 R 336.1702(a)

2. The sulfur content of coal tar used in EUTARSLUDGERECYC shall not exceed 3 percent by weight. **(R 336.1205)**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. While using coal tar in EUTARSLUDGERECYC, the permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 61 Subparts A, L, V, and FF as they apply to EUTARSLUDGERECYC. **(40 CFR Part 61 Subparts A, L, V, and FF)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. While using coal tar in EUTARSLUDGERECYC, the permittee shall equip and maintain each tar storage tank in EUTARSLUDGERECYC with a closed, positive pressure, gas blanketing system. **(R 336.1225, R 336.1702(a), 40 CFR 61.132(a)(2))**

V. TESTING/SAMPLING

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

1. While using coal tar in EUTARSLUDGERECYC, the permittee shall use the methods in 40 CFR 61.245(d) to determine whether or not a piece of equipment is in benzene service. **(40 CFR 61.137(b))**
2. While using coal tar in EUTARSLUDGERECYC, the permittee shall determine the sulfur content of the coal tar every six months. The frequency of the sulfur content determination may be reduced with the written approval of the AQD District Supervisor. **(R 336.1205)**

VI. MONITORING/RECORDKEEPING

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

1. While using coal tar in EUTARSLUDGERECYC, the permittee shall conduct monitoring as specified in 40 CFR 61.132(b). **(40 CFR 61.132(b))**
2. While using coal tar in EUTARSLUDGERECYC, the permittee shall conduct a maintenance inspection of the control system on an annual basis for evidence of system abnormalities, such as blocked or plugged lines, sticking valves, plugged condensate traps, and other maintenance defects that could result in abnormal system operation. The permittee shall make a first attempt at repair within 5 days, with repair within 15 days of detection. **(40 CFR 61.132(c))**
3. While using coal tar in EUTARSLUDGERECYC, the permittee shall keep information pertaining to the design of control equipment installed to comply with 40 CFR 61.132, as required by 40 CFR 61.138(a). **(40 CFR 61.138(a))**
4. While using coal tar in EUTARSLUDGERECYC, the permittee shall keep information pertaining to inspections of sources subject to 40 CFR 61.132, as required by 40 CFR 61.138(b). **(40 CFR 61.138(b))**

5. The permittee shall keep, in a satisfactory manner, separate monthly and 12-month rolling time period records of the heavy tar sludge, coal tar, and #4 fuel oil throughputs for EUTARSLUDGERECYC on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
6. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**
7. The permittee shall calculate the VOC emission rate from EUTARSLUDGERECYC monthly, for the preceding 12-month rolling time period, using a method acceptable to the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1702(a))**
8. The permittee shall keep a record of the applicability of 40 CFR Part 61 Subpart FF to EUTARSLUDGERECYC. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(40 CFR Part 61 Subpart FF)**
9. The permittee shall keep records of the coal tar sulfur content determinations obtained as required in SC V.2. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205)**

VII. REPORTING

1. When coal tar has been used in EUTARSLUDGERECYC during a reporting period, the permittee shall submit all reports required by 40 CFR 61 Subpart L. **(40 CFR 61.138)**

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. SV-TANKS*	NA	11 ¹	R 336.1225
* The exhaust gases from this stack are not required to be discharged unobstructed vertically upwards.			

IX. OTHER REQUIREMENTS

1. NA

Footnotes:

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