

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

December 20, 2016

PERMIT TO INSTALL
291-09A

ISSUED TO
A123 Systems, LLC

LOCATED AT
38100 Ecorse Road
Romulus, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
P0024

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: October 4, 2016	
DATE PERMIT TO INSTALL APPROVED: December 20, 2016	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 ₂ e	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)	Flexible Group ID
EU5BOILER1	59.9 MMBTU/hr natural gas-fired boiler	NA
EU5ANODELINE1	Anode Coating Line 1. Two pass Anode Coater, Curing Oven and refrigerated condenser.	FG5ANODE
EU5ANODELINE2	Anode Coating Line 2. One pass Anode Coater, Curing Oven and refrigerated condenser.	FG5ANODE
EU5ANODEDISTIL	Anode Line solvent recovery by Distillation	FG5ANODE
EU5CATHODELINE1	Cathode Coating Line 1. Two pass Cathode Coater, Curing Oven and refrigerated condenser.	FG5CATHODE
EU5CATHODELINE2	Cathode Coating Line 2. Two pass Cathode Coater, Curing Oven and refrigerated condenser.	FG5CATHODE
EU5CATHODEDISTIL	Cathode Line solvent recovery by Distillation.	FG5CATHODE

The following conditions apply to: EU5BOILER1

DESCRIPTION: 59.9 MMBTU/hr natural gas-fired boiler

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Low NOx burners

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NO _x	2.9 lb/hr	*Test Protocol	EU5BOILER1	SC VI. 4	40 CFR 52.21(c) & (d)

*As Specified in the Test Protocol

II. MATERIAL LIMITS

1. The permittee shall burn only natural gas in EU5BOILER1. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EU5BOILER1 unless the boiler and associated emission control equipment are maintained and operated according to the manufacturer's instructions. **(R 336.1205, R 336.1224, R 336.1225, 40 CFR 52.21(c) and (d))**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EU5BOILER1 unless the associated low-NOx burners are installed, maintained, and operated in a satisfactory manner. **(R 336.1205, R 336.1224, R 336.1225, 40 CFR 52.21(c) and (d))**
2. The permittee shall not install burners in EU5BOILER1 which exceed a total capacity of 59.9 MMBTU/hr. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(c) and (d), 40 CFR Part 60 Subpart Dc)**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

1. The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.2802)**
2. The permittee shall keep, in a satisfactory manner, monthly fuel use records in accordance with 40 CFR 60.48c(g), and make them available to the department upon request.. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 60.48c(g), 40 CFR 52.21(c) & (d))**
3. The permittee shall maintain the manufacturer's written instructions for operating and maintaining the boiler and emission control equipment. The permittee shall maintain records of all maintenance performed on the boiler and control equipment. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))**
4. The permittee shall maintain the manufacturer's documentation certifying the MMBTU/Hr capacity of each burner installed in EU5BOILER1. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d), 40 CFR Part 60 Subpart Dc)**

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. SV5AE10	50.8	65.6	40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

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
FG5ANODE	Anode coating lines and solvent recovery system	EU5ANODELINE1, EU5ANODELINE2, EU5ANODEDISTIL
FG5CATHODE	Cathode coating lines and solvent recovery system	EU5CATHODELINE1, EU5CATHODELINE2, EU5CATHODEDISTIL

The following conditions apply to: FG5ANODE

DESCRIPTION: Anode coating lines and solvent recovery system

Emission Units: EU5ANODELINE1, EU5ANODELINE2, EU5ANODEDISTIL

POLLUTION CONTROL EQUIPMENT: Refrigerated condensers, scrubber

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	39.3 lb/day	calendar day	FG5ANODE	SC VI.2, SC VI.3	R 336.1205, R 336.1225, R 336.1702(a)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate FG5ANODE unless the condenser is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the condenser includes maintaining the exhaust gas temperature below 21 degrees C. If the exhaust gas temperature increases above 21 degrees C, the permittee shall immediately implement corrective action to lower the exhaust gas temperature back below 21 degrees C. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
2. The permittee shall not operate FG5ANODE unless the packed bed wet scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the packed bed wet scrubber includes maintaining the makeup water flow rate above 3 liters per minute. If the makeup water flow rate falls below 3 liters per minute, the permittee shall immediately implement corrective action to raise the makeup water flow rate back above 3 liters per minute. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1224, R 336.1225, R 336.1702(a))**
2. The permittee shall continuously monitor and record once per operating day the exhaust gas temperature of the condenser in a format acceptable to the AQD District Supervisor and make these records available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
3. The permittee shall continuously monitor and record once per operating day the makeup water flow rate of the packed bed wet scrubber in a format acceptable to the AQD District Supervisor and make these records available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**

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. SV5AE12	56	47	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: FG5CATHODE

DESCRIPTION: Cathode coating lines and solvent recovery system

Emission Units: EU5CATHODELINE1, EU5CATHODELINE2, EU5CATHODEDISTIL

POLLUTION CONTROL EQUIPMENT: Refrigerated condensers, scrubber

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	39.3 lb/day	calendar day	FG5CATHODE	SC VI.2, SC VI.3	R 336.1205, R 336.1225, R 336.1702(a)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate FG5CATHODE unless the condenser is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the condenser includes maintaining the exhaust gas temperature below 21 degrees C. If the exhaust gas temperature increases above 21 degrees C, the permittee shall immediately implement corrective action to lower the exhaust gas temperature back below 21 degrees C. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
2. The permittee shall not operate FG5CATHODE unless the packed bed wet scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the packed bed wet scrubber includes maintaining the makeup water flow rate above 3 liters per minute. If the makeup water flow rate falls below 3 liters per minute, the permittee shall immediately implement corrective action to raise the makeup water flow rate back above 3 liters per minute. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall continuously monitor and record once per operating day the exhaust gas temperature of the condenser in a format acceptable to the AQD District Supervisor and make these records available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
3. The permittee shall continuously monitor and record once per operating day the makeup water flow rate of the packed bed wet scrubber in a format acceptable to the AQD District Supervisor and make these records available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**

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. SV5AE12	56	47	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA