

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

August 27, 2015

PERMIT TO INSTALL
147-14B

ISSUED TO
Metallurgical Processing LLC

LOCATED AT
23075 Warner Avenue
Warren, Michigan

IN THE COUNTY OF
Macomb

STATE REGISTRATION NUMBER
B1814

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: August 12, 2015	
DATE PERMIT TO INSTALL APPROVED: August 27, 2015	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	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO ₂ e	Carbon Dioxide Equivalent	°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
GHGs	Greenhouse Gases	kW	Kilowatt
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 (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

* 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 48909-7760, 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
EUAMTANK1	A single anhydrous ammonia storage tank used to supply ammonia to metal heat treatment lines. The nominal tank storage capacity is up to 2,000 gallons.	NA
EUSURFACEAHT	Surface A heat treating line consisting of 11 draw furnaces (one electric, 10 natural gas fired), four heat treating furnaces with integral oil quench, one atmosphere generator and two parts washers.	FGHEATTREAT
EUSURFACEBHT	Surface B heat treating line consisting of three natural gas fired draw furnaces, three heat treating furnaces with integral oil quench, one atmosphere generator and one parts washer.	FGHEATTREAT
EUBECKERHT	Becker heat treating line consisting of five natural gas fired draw furnaces, two heat treating furnaces with integral oil quench, one atmosphere generator and one parts washer.	FGHEATTREAT
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: EUAMTANK1

DESCRIPTION: A single anhydrous ammonia storage tank used to supply ammonia to metal heat treatment processes. The nominal tank storage capacity is up to 2,000 gallons.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. Except where specific requirements of these special conditions are applicable and more stringent, EUAMTANK1 shall comply with the Department of Labor and Economic Growth General Industry Safety Standards, Part 78. Storage and Handling of Anhydrous Ammonia – (1910.111) hereinafter Rule 7801. A copy of this document, which may be obtained by contacting the Michigan Occupational Safety and Health Administration, MIOSHA Standards Section, 7150 Harris Drive, P.O. Box 30643, Lansing, MI 48909-8143, shall be maintained for inspection at the facility.¹ **(R 336.1901)**
2. The permittee shall not operate EUAMTANK1 unless an emergency response plan, to be followed in the event of an emergency, has been approved by the local fire department or county emergency response agency and is implemented and maintained. As required, the permittee shall review this plan with the local fire department or emergency response agency and make any necessary updates.¹ **(R 336.1901)**
3. The permittee shall not operate EUAMTANK1 unless all transfer operations including transport deliveries are performed by a reliable person properly trained and made responsible for proper compliance with all applicable procedures.¹ **(R 336.1901)**
4. Vapor return lines shall be employed whenever necessary to ensure an accidental release from pressure relief valves will not occur during ammonia transfer operations.¹ **(R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUAMTANK1 unless a remotely operated internal or external positive shut-off valve is installed to allow access for emergency shut-off of all flow from stationary storage containers.¹ **(R 336.1225, R 336.1901)**
2. Any vapor or liquid line, exclusive of couplings, requiring venting after ammonia transfer shall be vented through a water trap of 55 gallons minimum size or other acceptable procedure that is equivalent or better, as determined by the Department. Safety water shall not be used for this purpose.¹ **(R 336.1225, R 336.1901)**

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 keep, in a satisfactory manner, records of the date of annual review and approval of the emergency response plan with the local fire department. All records shall be kept on file and made available to the Department upon request.¹ **(R 336.1901)**

VIII. STACK/VENT RESTRICTIONS

NA

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
FGHEATTREAT	Three heat treating lines that consist of nine heat treatment hardening furnaces with integral quench tanks, four parts washers, 19 draw furnaces and three endothermic generators (atmosphere generators) for surface treatment of metal parts.	EUSURFACEAHT, EUSURFACEBHT, EUBECKERHT

The following conditions apply to: FGHEATTREAT

DESCRIPTION: Three heat treating lines that consist of nine heat treatment hardening furnaces with integral quench tanks, four parts washers, 19 draw furnaces and three endothermic generators (atmosphere generators) for surface treatment of metal parts.

Emission Units: EUSURFACEAHT, EUSURFACEBHT, EUBECKERHT

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	8.7 tpy	12-month rolling time period as determined at the end of each calendar month	FGHEATTREAT	SC VI.3	R 336.1702(a)

II. MATERIAL LIMITS

- The permittee shall not exceed the net quench oil usage rate of 2420 gallons in FGHEATTREAT per year, based on a 12-month rolling time period as determined at the end of the calendar month. The net quench oil usage is defined as the amount of quench oil added to bring the quench oil levels up to starting levels less any amount of quench oil reclaimed, disposed of, or spilled/cleaned up. **(R 336.1225, R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

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 complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 30th 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))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each quench oil, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702)**
3. The permittee shall calculate the VOC emission rate from FGHEATTREAT for each calendar month, using a mass balance for quench oil usage in Appendix A:
 - a. Quench oil purchased or usage rate to replenish lost quench oil (column A)
 - b. Amount of spent oil sent off-site for recycling (column B).
 - c. Amount of spent oil or sludge sent off-site for disposal (column C).
 - d. Amount of oil spilled (column D).
 - e. Emission calculations determining the monthly emission rates in tons per calendar month (column E).
 - f. Emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records on file at the facility, in the format specified in Appendix A or an alternate format that has been approved by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

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. SVHT2	NA- Cupola	16.5**	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVHT3	NA – Cupola	16.5**	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVHT4	NA – Cupola	17**	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVHT5	NA - Cupola	17**	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVDRAWA	36	39.7	R 336.1225, 40 CFR 52.21(c) & (d)
6. SVHT6	18	31	R 336.1225, 40 CFR 52.21(c) & (d)
7. SVHT7	18	31	R 336.1225, 40 CFR 52.21(c) & (d)
8. SVBKRDRAW	36	38	R 336.1225, 40 CFR 52.21(c) & (d)
9. SVHT9	18	34	R 336.1225, 40 CFR 52.21(c) & (d)
10. SVHT10	18	34	R 336.1225, 40 CFR 52.21(c) & (d)
11. SVDRAW18-19	9	48.7	R 336.1225, 40 CFR 52.21(c) & (d)
12. SVDRAW20	9	48.7	R 336.1225, 40 CFR 52.21(c) & (d)
13. SVHT8	18	30	R 336.1225, 40 CFR 52.21(c) & (d)

**Discharged through cupolas

IX. OTHER REQUIREMENTS

NA

APPENDIX A

**MONTHLY QUENCH OIL BALANCE
 AND VOC EMISSION ESTIMATE**

<u>Month</u>	<u>A ⁽¹⁾ Oil Addition</u>		<u>B ⁽²⁾ Reclaimed</u>		<u>C ⁽³⁾ Disposed</u>		<u>D ⁽⁴⁾ Spill/Clean-Up</u>		<u>E ⁽⁵⁾ VOC Emitted</u>	
	Gal.	lbs.	Gal.	lbs.	Gal.	lbs.	Gal.	lbs.	Gal.	lbs.
VOC Emitted per calendar month (tons), F = E/2000									F:	
VOC Emitted per 12-month rolling time period (tons), G = F + TOTAL OF 11 PREVIOUS MONTHS									G:	

(1) New oil added/used to replenish lost quench oil.

(2) Spent oil transported to off-site reclamation (excludes water, solids, residues).

(3) Oil in sludge generated from tank cleaning; sent to off-site disposal facility.

(4) Oil lost to spill or used for clean-up.

(5) Balance of oil lost in air emissions: $E = A - B - C - D$.

Note: A, B, C, and D are the amounts or volumes of liquid oil only and should not include any solid content or residues. "lbs." in A, B, C, D, and E can be determined as follows: $lbs. = Usage (gal.) \times Density (lbs/gal)$