

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

October 21, 2016

**PERMIT TO INSTALL
173-16**

**ISSUED TO
SMW Manufacturing Inc.**

**LOCATED AT
25575 Brest Road
Taylor, Michigan**

**IN THE COUNTY OF
Wayne**

**STATE REGISTRATION NUMBER
P0754**

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 10, 2016	
DATE PERMIT TO INSTALL APPROVED: October 21, 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)	Installation Date / Modification Date	Flexible Group ID
EU-AMMONIA	A single anhydrous ammonia storage tank and any associated handling process. The nominal tank storage capacity shall not exceed 1,000 gallons.	TBD	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: EU-AMMONIA

DESCRIPTION: A single anhydrous ammonia storage tank and any associated handling process. The nominal tank storage capacity shall not exceed 1,000 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, EU-AMMONIA 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. **(R 336.1901)**
2. The permittee shall not operate EU-AMMONIA unless the inspection and maintenance program specified in Appendix A has been implemented and maintained. **(R 336.1901)**
3. The permittee shall not operate EU-AMMONIA 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. At least once each year, the permittee shall review this plan with the local fire department or emergency response agency and make any necessary updates. **(R 336.1901)**
4. EU-AMMONIA shall be located a minimum of 50 feet from the property line, 215 feet from any existing places of residence or private or public assembly, 500 feet from a school, apartment building, or institutional occupancy, and not less than 1,000 feet from a hospital or nursing home. **(R 336.1901)**
5. The permittee shall not operate EU-AMMONIA 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. **(R 336.1901)**
6. Vapor return lines shall be employed whenever necessary to ensure an accidental release from pressure relief valves will not occur during ammonia transfer operations. **(R 336.1901)**
7. Nitrogen stabilizer shall not be added to any permanent stationary storage tank or to rail or truck transport tanks. **(R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. All containers shall be fitted with safety relief valves in accordance with Rule 7801(b)(9). Such valves shall be stamped with the date manufactured, and shall be replaced, or re-tested and re-certified, at least every five years or more often if there is evidence of damage or deterioration. **(R 336.1225, R 336.1901)**
2. The permittee shall not operate EU-AMMONIA 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. **(R 336.1225, R 336.1901)**
3. The permittee shall not operate EU-AMMONIA unless a bulkhead, anchorage, or equivalent system is used at each transfer area so that any break resulting from a pull will occur at a predictable location while retaining intact the valves and piping on the plant side of the transfer area. **(R 336.1225, R 336.1901)**
4. The permittee shall not operate EU-AMMONIA unless any liquid lines in rail and transport transfer areas are equipped with back pressure check valves and all liquid lines not requiring a back check valve and all vapor lines are equipped with properly sized excess flow valves. These valves shall be installed on the main container side of the predictable break point at the bulkhead. **(R 336.1225, R 336.1901)**
5. All hoses shall be replaced five years after date of manufacture or more often if there is evidence of damage or deterioration. **(R 336.1225, R 336.1901)**
6. 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. Safety water shall not be used for this purpose. **(R 336.1225, R 336.1901)**
7. A sign shall be present and conspicuously placed at the facility entrance stating the emergency phone numbers for the owner, primary operator, local and state police, local fire department, and ambulance service. **(R 336.1901)**

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 keep, in a satisfactory manner, records of the date, duration, and description of any malfunction or spill occurring from EU-AMMONIA, including the estimated amount of ammonia released into the atmosphere. Do not include trace amounts from normal hose coupling bleed downs. All records shall be kept on file and made available to the Department upon request. **(R 336.1201(3))**
2. 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. **(R 336.1201(3))**

VII. REPORTING

1. The permittee shall notify the Pollution Emergency Alert System (PEAS) 1-800-292-4706 and/or the AQD District Supervisor immediately of any abnormal release of anhydrous ammonia from EU-AMMONIA. A normal release includes only hose coupling bleed downs, operation of hydrostatic relief valves, and normal pressure relief from the safety relief valve(s). Relief due to overfilling is not normal. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1201(3), R 336.1901)**

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:

NA

IX. OTHER REQUIREMENTS

NA

Footnotes:

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

Appendix A – Page 1 of 2
Inspection and Maintenance Program
 Nurse and Applicator Tanks

Inspections to be performed daily and documented at the permittee's discretion. Permittee shall document all maintenance and repairs.

Tank Identification:	Satisfactory?			Satisfactory?			Satisfactory?		
	Yes	No	Date *	Yes	No	Date *	Yes	No	Date *
1. Tank free of leaks									
2. Paint in good condition									
3. Valves and fittings free from leaks and in good condition									
4. Protective guards in place and in good condition									
5. Outlet openings on valves and lines free of dirt and rust with protective caps in place									
6. Safety relief valves free of debris with rain caps installed									
7. Gages, pressure and liquid level, are operable									
8. Excess flow valves installed and in good condition									
9. Valves properly labeled "liquid" and "vapor"									
10. Vapor and liquid hoses are proper ammonia-type and free of damage or deterioration									
11. Hoses securely clamped to the nipples									
12. Hoses suitably racked to prevent kinking and hose on delivery tanks securely fastened to prevent dragging									
13. Tanks securely attached									
14. Trailer tongues, hitches, and safety chains in sound condition									
15. Five gallon or larger can filled with clean water for transport vehicles									
16. Quick disconnects annually reconditioned									

Date Inspected: _____

Inspector: _____

* For each tank, check if condition is satisfactory or not satisfactory. If condition is not satisfactory, include date when corrected. If condition is not applicable, write NA.

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Inspection and Maintenance Program
 Permanent Ammonia Storage Tank

Permittee shall conduct inspections and complete form at least twice per year, prior to spring and fall application seasons.

Tank Identification:	Satisfactory?					Satisfactory?			
	Yes	No	Date*			Yes	No	Date*	
1. Tank free of leaks						16. Protective gloves, boots, suits or slickers available and in good condition			
2. Tank supports in good condition (no cracked or crumbled concrete, etc.)						17. Gas masks with ammonia type canisters and refill canisters within date limits available			
3. Paint in good condition						18. Emergency clean water, shower or 75 gallon tank available nearby			
4. Equipment locked when not in use						19. Hoses in good condition			
5. Tank properly labeled						20. Hoses no older than 5 years from date of manufacture and marked			
6. Valves and fittings free from leaks and in good condition						21. Vapor and liquid hoses are proper ammonia- type and free of damage or deterioration			
7. Piping properly supported and guards in place						22. Hoses suitably racked to prevent kinking			
8. Pipes free of physical damage and rust and properly painted						23. Hoses securely clamped to the nipples			
9. Employees trained in proper filling procedures						24. Gages, pressure and liquid level, operable			
10. Provisions provided for bleeding of transfer hose from the transport truck						25. Valves properly labeled "liquid" and "vapor"			
11. Wheels properly chocked on the transport truck or rail tank car while unloading						26. Safety relief valves within 5 years of manufacture or recertification and marked			
12. Information and warning signs displayed and in good condition						27. Outlet openings on valves and lines free of dirt and rust with protective caps in place			
13. Area free of weeds, trash and other unsafe conditions						28. Safety relief valves free of debris with rain caps installed			
14. Unused equipment stored out of the way						29. Safety relief valve manifold operable			
15. Chemical safety goggles available and in good condition						30. Remote shut-off valve in working order			

Date Inspected: _____ Inspector: _____

* For each item, check if condition is satisfactory or not satisfactory. If condition is not satisfactory, include date when corrected. If condition is not applicable, write NA.