

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

July 24, 2018

PERMIT TO INSTALL
133-17A

ISSUED TO
PGP d.b.a. Voss Industries

LOCATED AT
7925 Beech Daly Road
Taylor, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
B3472

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 11, 2018

DATE PERMIT TO INSTALL APPROVED:

July 24, 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	PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM _{2.5}	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
EUTENSIONLEV	The tension leveler flexes and stretches the steel strip to make it flatter. Scale particles flake off during this process. Particulate matter is controlled by a cartridge type pulse-jet baghouse.	1997	NA
EUPICKLINGLINE	Steel pickling line: steel strip passes through four (4) pickle tanks. Pickle tanks and pickle tank reservoirs have a combined capacity of 36,000 gallons of pickle liquor. The line is controlled by a packed-bed wet scrubber, a plate scrubber, and a demister pad operating in series.	1968	FGSCRUBBERS
EUACIDTANK1	Fresh Acid Tank #1 is fiberglass with placarded capacity of 17,968 gallons. Vented to packed-bed wet scrubber, plate scrubber, and demister pad operating in series.	1997	FGSCRUBBERS
EUACIDTANK2	Fresh Acid Tank #2 is fiberglass with placarded capacity of 17,968 gallons. Vented to packed-bed wet scrubber, plate scrubber, and demister pad operating in series.	1997	FGSCRUBBERS
EUACIDTANK3	Fresh Acid Tank #3 is rubber lined steel with capacity of 15,000 gallons. Vented to packed-bed wet scrubber, plate scrubber, and demister pad operating in series.	1985 or earlier	FGSCRUBBERS
EUSPLTANK1	Spent Pickle Liquor Tank #1 is fiberglass with placarded capacity of 13,758 gallons but restricted to 4,504 gallons due to overflow line. Vented to packed-bed wet scrubber, plate scrubber, and demister pad operating in series.	12/2013	FGSCRUBBERS
EUSPLTANK2	Spent Pickle Liquor Tank #2 is fiberglass with placarded capacity of 17,058 gallons. Vented to packed-bed wet scrubber, plate scrubber, and demister pad operating in series.	05/2014	FGSCRUBBERS
EUSPLTANK3	Spent Pickle Liquor Tank #3 is fiberglass with placarded capacity of 13,013 gallons. Vented to packed-bed wet scrubber, plate scrubber, and demister pad operating in series.	2003	FGSCRUBBERS
EUSPLTANK4	Spent Pickle Liquor Tank #4 is fiberglass with placarded capacity of 14,196 gallons. Vented to packed-bed wet scrubber, plate scrubber, and demister pad operating in series.	2000	FGSCRUBBERS
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:
EUTENSIONLEV

DESCRIPTION: The tension leveler flexes and stretches the steel strip to make it flatter. Scale particles flake off during this process.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Particulate matter is controlled by a cartridge type pulse-jet baghouse.

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EUTENSIONLEV unless a malfunction abatement plan as described in Rule 911(2), for the baghouse, has been submitted within 90 days of permit issuance, and is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUTENSIONLEV unless the baghouse is installed, maintained, and operated in accordance with the manufacturer's recommendations. **(R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))**
2. The permittee shall not operate EUTENSIONLEV unless a pressure drop alarm for the baghouse is installed, maintained and operated in a satisfactory manner. **(R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))**

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 monitor and record, in a satisfactory manner, the pressure drop across the baghouse for EUTENSIONLEV on a once per operating shift basis. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))

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. SVTENSIONLEV*	NA	11	40 CFR 52.21(c) and (d)
*Exhausts horizontally.			

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
FGSCRUBBERS	Steel pickling line, fresh acid tanks, and spent pickle liquor (SPL) tanks. Emissions are controlled by a scrubber pollution control system consisting of a packed-bed wet scrubber, a plate scrubber, and a demister pad operating in series.	EUPICKLINGLINE, EUACIDTANK1, EUACIDTANK2, EUACIDTANK3, EUSPLTANK1, EUSPLTANK2, EUSPLTANK3, EUSPLTANK4
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

The following conditions apply to:
FGSCRUBBERS

DESCRIPTION: Steel pickling line, fresh acid tanks, and spent pickle liquor (SPL) tanks.

Emission Units: EUPICKLINGLINE, EUACIDTANK1, EUACIDTANK2, EUACIDTANK3, EUSPLTANK1, EUSPLTANK2, EUSPLTANK3, EUSPLTANK4

POLLUTION CONTROL EQUIPMENT: Scrubber pollution control system consisting of a packed-bed wet scrubber, a plate scrubber, and a demister pad operating in series

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. HCl	18 ppmv	Hourly	Existing affected continuous pickling line at a steel pickling facility	SC V.1	R 336.1224, R 336.1225
--OR--					
1. HCl	The mass emission rate that corresponds to a collection efficiency of less than 97 percent	Hourly	Existing affected continuous pickling line at a steel pickling facility	SC V.1	R 336.1224, R 336.1225

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate FGSCRUBBERS unless a malfunction abatement plan (MAP) as described in Rule 911(2) for the scrubber pollution control system is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee

shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1205(1)(a) and (3), R 336.1225, R 336.1910, R 336.1911)**

2. The permittee shall not operate FGSCRUBBERS unless the scrubber pollution control system consisting of a packed-bed wet scrubber, a plate scrubber, and a demister pad operating in series is installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining the scrubber pollution control system in accordance with an approved MAP as required in SC III.1. **(R 336.1205(1)(a) and (3), R 336.1224, R 336.1225, R 336.1910)**
3. The permittee shall use fresh water for the scrubber pollution control system make-up water and maintain the makeup water flow rate and the minimum recirculation water flow rate at or above the minimum rates specified in the MAP. **(R 336.1205(1)(a) and (3), R 336.1224, R 336.1225)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall install a closed-vent system for each hydrochloric acid storage vessel, which is each stationary vessel used for the bulk containment of virgin or regenerated hydrochloric acid. Loading and unloading shall be conducted through enclosed lines. **(R 336.1205(1)(a) and (3), R 336.1224, R 336.1225)**
2. The permittee shall install, operate, and maintain, in a satisfactory manner, systems for the measurement and recording of the scrubber makeup water flow rate and recirculation water flow rate. **(R 336.1205(1)(a) and (3), R 336.1910, R 336.1224, R 336.1225)**
3. The permittee shall install, operate, and maintain in a satisfactory manner a gauge to measure the pressure drop across the scrubber. **(R 336.1205(1)(a) and (3), R 336.1910, R 336.1224, R 336.1225)**

V. TESTING/SAMPLING

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

1. Upon request of the AQD District Supervisor, the permittee shall verify Hydrogen Chloride (HCl) emission rates from FGSCRUBBERS by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. If testing is required, the permittee shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation, the minimum recirculation water flow rate during the performance test. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. 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 336.1205, R 336.1224, R 336.1225, R 336.2001)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor the pressure drop across the scrubber on a continuous basis and record the pressure drop across the scrubber at least once per shift while the scrubber is operating, in order to identify changes that may indicate a need for maintenance. Records shall be kept in an acceptable format and made available to the AQD District Supervisor upon request. **(R 336.1205(1)(a) and (3), R 336.1224, R 336.1225, R 336.1910)**
2. The permittee shall monitor the scrubber makeup water flow rate and recirculation water flow rate on a continuous basis and record the scrubber makeup water flow rate at least once per shift while the scrubber is operating. Records shall be kept in an acceptable format and made available to the AQD District Supervisor upon request. **(R 336.1205(1)(a) and (3), R 336.1224, R 336.1225)**

3. The permittee shall keep records of the following:
- a. The occurrence and duration of each malfunction of operation (i.e., process equipment);
 - b. The occurrence and duration of each malfunction of the air pollution control equipment;
 - c. All maintenance performed on the air pollution control equipment;
 - d. Actions taken during periods of malfunction to minimize emissions and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation);
 - e. Records of performance test results and measurements;
 - f. Scrubber makeup water flow rate and recirculation water flow rate;
 - g. Calibration and manufacturer certification of monitoring devices;
 - h. Records of each maintenance inspection and repair, replacement, or other corrective action taken in accordance with the MAP and SC III.1.
 - i. Records of malfunctions, maintenance, and corrective actions in accordance with the MAP and SC III.1.

Records shall be kept in an acceptable format and made available to the AQD District Supervisor upon request. (R 336.1205(1)(a) and (3), R 336.1224, R 336.1225)

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. SVSCRUBBERS	36	78	R 336.1225, R 336.1901(a) and (b)

IX. OTHER REQUIREMENTS

NA

**The following conditions apply Source-Wide to:
 FGFACILITY**

DESCRIPTION: All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	8.9 tpy*	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.1	R 336.1205(1)(a) and (3)
2. Aggregate HAPs	22.4 tpy*	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.1	R 336.1205(1)(a) and (3)

*The enforceable restrictions that are associated with SC I.1 and SC I.2 are found in the special conditions for the flexible group FGSCRUBBERS.

II. MATERIAL LIMITS

NA

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 keep, in a satisfactory manner, monthly and 12-month rolling time period calculation records of each individual HAP and aggregate HAPs for FGFACILITY. The calculations for individual HAP and aggregate HAPs emission from FGSCRUBBERS shall be based on the results of the most recent acceptable stack test. The calculations for other emission units shall be based on AP-42 emission factors, or other emission factors as approved by the AQD District Supervisor. 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. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(1)(a) and (3))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA