

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

June 24, 2020

PERMIT TO INSTALL
50-18A

ISSUED TO
Mercury Displacement Industries

LOCATED AT
25028 U. S. 12 East
Edwardsburg, Michigan 49112

IN THE COUNTY OF
Cass

STATE REGISTRATION NUMBER
N5886

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. 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: September 9, 2019	
DATE PERMIT TO INSTALL APPROVED: June 24, 2020	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

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 Environment, Great Lakes, and Energy, 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 Rule 210 (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 Rule 219 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 Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(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 Rule 301, 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 Rule 303 (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 Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT 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 (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EU-WELDROOM	Two (2) welding machines	06-01-1974 / 06-01-1984, 08-26-1988 / 09-06-2018 / 06-24-2020	FG-MDI
EU-FILLSTATION	Mercury dispensing / fill stations	04-01-1984 / 09-06-2018 / 06-24-2020	FG-MDI
EU-SOLDERSTATION	Soldering station	06-01-1974 / 09-06-2018 / 06-24-2020	FG-MDI
EU-EPOXYPOURING	Epoxy pouring	09-10-1988 / 09-06-2018 / 06-24-2020	FG-MDI
EU-CURINGOVENS	Two epoxy curing ovens	10-01-1985 / 06-01-1987 / 09-06-2018 / 06-24-2020	FG-MDI
EU-STORAGE	Storage area	06-15-1993 / 09-06-2018 / 06-24-2020	FG-MDI

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 336.1291.

FLEXIBLE GROUP SPECIAL CONDITIONS

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
FG-MDI	All operations for the manufacture of mercury relays/switches and handling of mercury.	EU-WELDROOM, EU-FILLSTATION, EU-SOLDERSTATION, EU-EPOXYPOURING, EU-CURINGOVEN, EU-STORAGE

**FG-MDI
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

All operations for the manufacture of mercury relays/switches and handling of mercury.

Emission Unit: EU-WELDROOM, EU-FILLSTATION, EU-SOLDERSTATION, EU-EPOXYPOURING, EU-CURINGOVEN, EU-STORAGE

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Mercury	10,000.0 ng/m ³	Test Protocol*	EU-SOLDERSTATION, (SV-SOLDERSTATION)	SC V.1	R 336.1224, R 336.1225
2. Mercury	40,000.0 ng/m ³	Test Protocol*	EU-FILLSTATION, (SV-FILLSTATION)	SC V.1	R 336.1224, R 336.1225
3. Mercury	4,000.0 ng/m ³	Test Protocol*	EU-EPOXYPOURING, (SV-EPOXYPOURING)	SC V.1	R 336.1224, R 336.1225
4. Mercury	10,000.0 ng/m ³	Test Protocol*	EU-CURINGOVEN, (SV-CURINGOVENS-02)	SC V.1	R 336.1224, R 336.1225

*Test Protocol shall specify averaging time.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not manufacture more than 1,560 switches in EU-WELDROOM on a calendar day basis.¹ **(R 336.1225)**
2. The equipment in FG-MDI shall be installed, maintained, and operated in a satisfactory manner to minimize mercury emissions to the ambient air, including the prevention of spilled mercury and the prompt, proper clean-up of spilled mercury.¹ **(R 336.1224, R 336.1225)**
3. The permittee shall handle all mercury and/or mercury-containing materials in a manner to minimize the generation of fugitive emissions, including following the BMPP as specified in SC III.5.¹ **(R 336.1224, R 336.1225)**
4. The permittee shall not operate FG-MDI, with the exception of EU-STORAGE, more than eight hours in a calendar day.¹ **(R 336.1224, R 336.1225)**
5. The permittee shall not operate FG-MDI unless a best management practices plan (BMPP) for housekeeping and spillage of mercury or mercury-containing materials has been submitted within 45 days of permit issuance and is implemented and maintained. The BMPP shall, at a minimum, specify the following:

- a) A detailed plan for housekeeping activities, including identification of the supervisory personnel responsible for overseeing these activities, a description of the items or conditions that shall be addressed by these activities, and the frequency at which the housekeeping activities are performed.
- b) A detailed plan for addressing mercury spills, including recording the date, description, estimated amount of mercury spilled, and estimated amount of mercury released into the atmosphere (not including mercury emitted due to normal operations) from a spill. For mercury spills greater than 100 grams, the permittee shall conduct interior mercury monitoring and report results as specified in SC VII.1.
- c) A description of the corrective procedures or operational changes that shall be taken in the event of a failure to follow the housekeeping activities and/or procedures for proper clean-up a mercury spill.

If at any time the BMPP fails to address or inadequately addresses an event that meets the housekeeping activities and or properly clean up a mercury spill, the permittee shall amend the BMPP within 45 days after such an event occurs. The permittee shall also amend the BMPP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the BMPP and any amendments to the BMPP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the BMPP or amended BMPP 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.¹ **(R 336.1224, R 336.1225)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Within 60 days of issuance of this permit, the permittee shall verify mercury concentrations from FG-MDI (EU-SOLDERSTATION, EU-FILLSTATION, EU-EPOXYPOURING, and EU-CURINGOVEN) as listed in SC I.1-SC I.4 on a monthly basis by periodic monitoring through mercury data collection at the owner's expense in accordance with the Department requirements. Mercury data collection shall be performed during operation of that portion of FG-MDI and using procedures, instrumentation, quality assurance, and data recording approved by the AQD District Supervisor and the AQD Technical Programs Unit. Periodic monitoring shall be performed on a monthly basis for a minimum of 12 months. If all readings meet the limits in SC I.1-I.4 for 12 consecutive months, the permittee may request to change the frequency of monitoring with the approval of the AQD District Supervisor. If any subsequent monitoring results are above the respective limits in SC I.1-I.4, the frequency will go back to monthly until 12 consecutive measurements meet their respective mercury concentrations.

No less than 30 days prior to the initial periodic monitoring event, the permittee shall submit a monitoring plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to periodic monitoring, including any modifications to the monitoring plan that are proposed after initial submittal. The permittee shall send a notification to the AQD District Supervisor 7 days prior to subsequent monitoring. The permittee must submit a complete report of the monitoring results to the AQD Technical Programs Unit and District Office within 30 days following the last date of monitoring. **(R 336.1224, R 336.1225, R 336.2001, R 336.2003, R 336.2004)**

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 and description of any spill occurring from FG-MDI, including the estimated amount of mercury spilled and the estimated amount of mercury released into the atmosphere (not including mercury emitted due to normal operations). All records shall be kept on file and made available to the Department upon request.¹ **(R 336.1224, R 336.1225)**
2. The permittee shall keep records of operating hours for FG-MDI on a daily basis.¹ **(R 336.1224, R 336.1225)**
3. The permittee shall keep records of all test results performed per SC V.1 on file.¹ **(R 336.1224, R 336.1225)**

4. The permittee shall keep records of the following for EU-WELDROOM on a daily basis:
 - a) Number of common switches produced.
 - b) Number of small switches produced.
 - c) Total number of switches produced.

The records shall be kept on file at the facility and provided to the AQD District Supervisor upon request.¹
(R 336.1224, R 336.1225)

5. The permittee shall keep records of the number of pounds of mercury purchased on a monthly basis. The records shall be kept on file at the facility and provided to the AQD District Supervisor upon request.¹
(R 336.1225)

VII. REPORTING

1. The permittee shall notify the AQD within 48 hours of any mercury spill estimated to be 100 grams or greater. The permittee shall send a written report within 10 days of the spill incident that shall include: **(R 336.1224, R 336.1225)**
 - a) Date of the spill.
 - b) Description of the spill.
 - c) Estimated amount of mercury spilled.
 - d) Interior mercury concentration monitoring results in ng/m³.
 - e) Description of corrective actions taken, including amending the BMPP, if necessary.
2. The permittee shall submit semi-annual reports to the AQD District Supervisor that consist of the following:
 - a) Daily records of switch production for EU-WELDROOM.
 - b) Daily hours of operation for FG-MDI.
 - c) Monthly mercury purchase records.
 - d) Test results performed per SC V.1.

For January 1 through June 30 of a calendar year, the semiannual report shall be submitted prior to July 31 of the same calendar year. For July 1 through December 31 of a calendar year, the semi-annual report shall be submitted prior to January 31 of the following calendar year.¹ **(R 336.1225)**

VIII. STACK/VENT RESTRICTION(S)

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-SOLDERSTATION	13	25	R 336.1225
2. SV-FILLSTATION	13	35	R 336.1225
3. SV-WELDROOM-01*	0.75	7.8	R 336.1225
4. SV-WELDROOM-02*	0.75	7.5	R 336.1225
5. SV-EPOXYPOURING*	12 x 12	6	R 336.1225
6. SV-CURINGOVENS-02	30	25	R 336.1225

*This stack discharges horizontally.

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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