STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE DIRECTOR

In the matter of administrative proceedings against **ASAMA COLDWATER MANUFACTURING**, a company organized under the laws of the State of Michigan and doing business at 180 Asama Parkway in the City of Coldwater, County of Branch, State of Michigan	AQD No. 14-2013 SRN: N5814

STIPULATION FOR ENTRY OF FINAL ORDER
BY CONSENT

This proceeding resulted from allegations by the Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) against Asama Coldwater Manufacturing (Company), a Michigan corporation located at 180 Asama Parkway in the City of Coldwater, County of Branch, State of Michigan, with State Registration Number (SRN) N5814. The MDEQ alleges that the Company is in violation of Code of Federal Regulations (CFR) Title 40, Part 63, Subpart EEEEE, National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries (NESHAP for Iron and Steel Foundries) and Permit to Install (PTI) 280-06A. Specifically, the MDEQ alleges that the Company exceeded the emission limitation in PTI 280-06A for Volatile Organic Hazardous Air Pollutants (VOHAP) from the emission unit identified as EU-MCS, as cited herein and in the Violation Notice dated October 1, 2012. The Company and MDEQ stipulate to the termination of this proceeding by entry of this Stipulation for Entry of a Final Order by Consent (Consent Order).

The Company and MDEQ stipulate as follows:

1. The Natural Resources and Environmental Protection Act, 1994 PA 451 (Act 451), MCL 324.101 *et seq.* is an act that controls pollution to protect the environment and natural resources in this State.

2. Article II, Pollution Control, Part 55 of Act 451 (Part 55), MCL 324.5501 *et seq.* provides for air pollution control regulations in this State.

3. The MDEQ was created as a principal department within the Executive Branch of the State of Michigan pursuant to Executive Order 2011-1 and has all statutory authority, powers, duties, functions and responsibilities to administer and enforce all provisions of Part 55.

4. The Director has delegated authority to the Chief of the AQD (AQD Chief) to enter into this Consent Order.

5. The termination of this matter by a Consent Order pursuant to Section 5528 of Part 55 is proper and acceptable.

6. The Company and the MDEQ agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by the Company that the law has been violated.

7. This Consent Order becomes effective on the date of execution (effective date of this Consent Order) by the AQD Chief.

8. The Company shall achieve compliance with the aforementioned regulations in accordance with the requirements contained in this Consent Order.

COMPLIANCE PROGRAM AND IMPLEMENTATION SCHEDULE

9. A. Permit

1. On and after the effective date of this Consent Order, the Company shall comply with the conditions specified in PTI 280-06B, as amended, which is attached as Exhibit A.

2. If after the effective date of this Consent Order the conditions of PTI 280-06B, as amended, are included in the Company's ROP, MI-ROP-N5814-2006, as amended, then the Company shall comply with any such conditions of PTI 280-06B incorporated into that ROP.

B. Control Program and Installation Schedule

1. By October 1, 2013, the Company shall have completed the installation of air pollution control equipment to enable the Company not to exceed the VOHAP emission rate from the EU-MCS of 20 ppmv, 3-hour flow weighted average, as specified in Special Condition I.1 of Exhibit A for EU-MCS, and shall have notified the AQD Kalamazoo District Supervisor in writing that the installation of the air pollution control equipment has been completed and operation of the equipment has commenced in accordance with the provisions of the permit to install issued pursuant to this paragraph 9 of this Consent Order.

C. Final Emission Limitations

1. On and after October 1, 2013, the VOHAP emission rate from the EU-MCS shall not exceed 20 ppmv, 3-hour flow weighted average, as specified in Special Condition I.1 of Exhibit A for EU-MCS.

GENERAL PROVISIONS

10. This Consent Order in no way affects the Company's responsibility to comply with any other applicable state and federal, or local laws or regulations, including without limitation, any amendments to the federal Clean Air Act, 42 USC 7401 *et seq.*, Act 451, Part 55 or their rules and regulations, or to the State Implementation Plan.

11. This Consent Order constitutes a civil settlement and satisfaction as to the resolution of the violations specifically addressed herein; however, it does not resolve any criminal action that may result from these same violations.

12. Within thirty (30) days after the effective date of this Consent Order, the Company shall pay to the General Fund of the State of Michigan, in the form of a check made payable to the "State of Michigan" and delivered to the Michigan Department of Environmental Quality, Financial and Business Services Division, Revenue Control, P.O. Box 30657, Lansing, Michigan 48909-8157, a settlement amount of $130,000.00, which includes AQD costs for investigation and enforcement. This total settlement amount shall be paid within thirty (30) days of the effective date of this Consent Order. To ensure proper credit, all payments made pursuant to this Consent Order shall include the Agreement Identification No. AQD40020 on the face of the check. This settlement amount is in addition to any fees, taxes, or other fines that may be imposed on the Company by law.

13. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.B.1 of this Consent Order, the Company is subject to a stipulated fine of up to $10,000.00 per violation. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.C.1 of this Consent Order, the Company is subject to stipulated fines of up to $5,000.00 per violation per day. On and after the effective date of this Consent Order, if the Company fails to comply with any other provision of Exhibit A or this Consent Order, the Company is subject to a stipulated fine of up to $1,500.00 per violation per day. The amount of the stipulated fines imposed

pursuant to this paragraph shall be within the discretion of the MDEQ. Stipulated fines submitted under this Consent Order shall be by check, payable to the State of Michigan within thirty (30) days of written demand and shall be delivered to the Michigan Department of Environmental Quality, Financial and Business Services Division, Revenue Control, P.O. Box 30657, Lansing, Michigan 48909-8157. To ensure proper credit, all payments shall include the Agreement Identification No. AQD40020-S on the face of the check. Payment of stipulated fines shall not alter or modify in any way the Company's obligation to comply with the terms and conditions of this Consent Order.

14. The AQD, at its discretion, may seek stipulated fines or statutory fines for any violation of this Consent Order which is also a violation of any provision of applicable federal and state law, rule, regulation, permit, or MDEQ administrative order. However, the AQD is precluded from seeking both a stipulated fine under this Consent Order and a statutory fine for the same violation.

15. To ensure timely payment of the settlement amount assessed in paragraph 12 and any stipulated fines assessed pursuant to paragraph 13 of this Consent Order, the Company shall pay an interest penalty to the State of Michigan each time it fails to make a complete or timely payment under this Consent Order. The interest penalty shall be determined at a rate of twelve percent (12%) per year compounded annually, using the full increment of amount due as principal, calculated from the due date specified in this Consent Order until the date that delinquent payment is finally paid in full. Payment of an interest penalty by the Company shall be made to the State of Michigan in accordance with paragraph 13 of this Consent Order. Interest payments shall be applied first towards the most overdue amount or outstanding interest penalty owed by the Company before any remaining balance is applied to subsequent payment amount or interest penalty.

16. The Company agrees not to contest the legal basis for the settlement amount assessed pursuant to paragraph 12. The Company also agrees not to contest the legal basis for any stipulated fines assessed pursuant to paragraph 13 of this Consent Order, but reserves the right to dispute in a court of competent jurisdiction the factual basis upon which a demand by MDEQ of stipulated fines is made. In addition, the Company agrees that said fines have not been assessed by the MDEQ pursuant to Section 5529 of Part 55 and therefore are not reviewable under Section 5529 of Part 55.

17. This compliance program is not a variance subject to the 12 month limitation specified in Section 5538 of Part 55.

18. This Consent Order shall remain in full force and effect for a period of at least three (3) years. Thereafter, the Consent Order shall terminate only upon written notice of termination issued by the AQD Chief. Prior to issuance of a written notice of termination, the Company shall submit a request, to the AQD Chief at the Michigan Department of Environmental Quality, Air Quality Division, P.O. Box 30260, Lansing, Michigan 48909-7760, consisting of a written certification that the Company has fully complied with all the requirements of this Consent Order and has made all payments including all stipulated fines required by this Consent Order. Specifically, this certification shall include: (i) the date of compliance with each provision of the compliance program and the date any payments or stipulated fines were paid; (ii) a statement that all required information has been reported to the AQD Kalamazoo District Office District Supervisor; (iii) confirmation that all records required to be maintained pursuant to this Consent Order are being maintained at the facility; and, (iv) such information as may be requested by the AQD Chief.

19. In the event Asama Coldwater Manufacturing sells or transfers the facility, with SRN N5814, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within thirty (30) calendar days, the Company shall also notify the AQD Kalamazoo District Office District Supervisor, in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser and/or transferee. As a condition of the sale, the Asama Coldwater Manufacturing must obtain the consent of the purchaser and/or transferee, in writing, to assume all of the obligations of this Consent Order. A copy of that agreement shall be forwarded to the AQD Kalamazoo District Office District Supervisor within thirty (30) days of assuming the obligations of this Consent Order.

20. Prior to the effective date of this Consent Order and pursuant to the requirements of Sections 5511 and 5528(3) of Part 55, the public was notified of a 30-day public comment period and was provided the opportunity for a public hearing.

21. Section 5530 of Part 55 may serve as a source of authority but not a limitation under which the Consent Order may be enforced. Further, Part 17 of Act 451 and all other applicable laws and any other legal basis or applicable statute may be used to enforce this Consent Order.

22. The Company hereby stipulates that entry of this Consent Order is a result of an action by MDEQ to resolve alleged violations of its facility located at 180 Asama Parkway, Coldwater, Michigan.

The Company further stipulates that it will take all lawful actions necessary to fully comply with this Consent Order, even if the Company files for bankruptcy in the future. The Company will not seek discharge of the settlement amount and any stipulated fines imposed hereunder in any future bankruptcy proceedings, and the Company will take necessary steps to ensure that the settlement amount and any future stipulated fines are not discharged. The Company, during and after any future bankruptcy proceedings, will ensure that the settlement amount and any future stipulated fines remain an obligation to be paid in full by the Company to the extent allowed by applicable bankruptcy law.

The undersigned certifies that he/she is fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

ASAMA COLDWATER MANUFACTURING

Keith R. Teachout, Plant Manager
Print Name and Title

Signature Date: 9-18-13

The above signatory subscribed and sworn to before me this 18th day of September, 2013.

Traci M. Risner
Notary Public - Michigan
Calhoun County
My Commission Expires Jan. 26, 2015
Acting in the County of Branch

Notary Public

Approved as to Content:

G. Vinson Hellwig, Chief
AIR QUALITY DIVISION
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Dated: 10/2/13

Approved as to Form:

Neil Gordon, Section Head
ENVIRONMENTAL REGULATION SECTION
ENVIRONMENT, NATURAL RESOURCES,
AND AGRICULTURE DIVISION
DEPARTMENT OF ATTORNEY GENERAL

Dated: 9/24/2013

FINAL ORDER

The Chief of the Air Quality Division having had opportunity to review the Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Environmental Quality pursuant to the provisions of Part 55 of Act 451 and otherwise being fully advised on the premises,

HAS HEREBY ORDERED that the Consent Order is approved and shall be entered in the record of the MDEQ as a Final Order.

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

G. Vinson Hellwig, Chief
Air Quality Division

Effective Date: 10/2/13

Exhibit A

Permit to Install 280-06B

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

June 20, 2013

PERMIT TO INSTALL
280-06B

ISSUED TO
Asama Coldwater Manufacturing, Inc.

LOCATED AT
180 Asama Parkway
Coldwater, Michigan

IN THE COUNTY OF
Branch

STATE REGISTRATION NUMBER
N5814

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: **June 17, 2013**	
DATE PERMIT TO INSTALL APPROVED: **June 20, 2013**	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

Section **Page**

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_2e	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_2S	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.

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_2e	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_2S	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 Identification

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-MP	Consists of two electric induction melting furnaces with an 11-ton holding capacity each and a monorail pouring station with three ladles. Emissions from melting and pouring processes are controlled by associated hoods, enclosures, ductwork, and a 37,500 acfm baghouse.		FG-NEWFOUNDRY
EU-MCS	Consists of the automated mold cooling conveyors and automated sand shakeout lines, including a flat deck shakeout system. Emissions from these processes are controlled by associated hoods, enclosures, ductwork, a baghouse, and a regenerative thermal oxidizer (RTO). The exhaust gas flow from this unit is approximately 61,200 acfm		FG-NEWFOUNDRY
EU-SS	Consists of the molding machine and related sand handling equipment. Emissions from the mold making process are controlled by associated hoods, enclosures, ductwork, and a 56,900 acfm baghouse.		FG-NEWFOUNDRY
EU-CCFBACK	Consists of the back section of casting cooling conveyors and a shot blast machine. Emissions from this emission unit are controlled by associated hoods, enclosures, ductwork, and a 65,360 acfm baghouse.		FG-NEWFOUNDRY

Flexible Group Identification

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-NEWFOUNDRY	All emission units of the new expansion foundry	EU-MP, EU-MCS, EU-SS, and EU-CCFBACK

The following conditions apply to: EU-MP

EU-MP
EMISSION UNIT CONDITIONS

DESCRIPTION

Two electric induction melting furnaces with an 11-ton holding capacity each and a monorail pouring station with three ladles.

Flexible Group ID: FG-NEWFOUNDRY

POLLUTION CONTROL EQUIPMENT

37,500 ACFM baghouse

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM ---OR--- Total Metal HAP	0.001 gr/dscf ---OR--- 0.00008 gr/dscf	Test Protocol	EU-MP	V.1, V.3, VI.1	**40 CFR 63.7690(a)(4)(i) or (ii) and (a)(6)(i) or (ii)**
2. PM-10	0.30 pph	Test Protocol	EU-MP	V.2, V.3	**40 CFR 52.21 (j)**
3. VOC	5.28 pph	Test Protocol	EU-MP	V.2, V.3	**40 CFR 52.21 (j)**
4. CO	44.55 pph	Test Protocol	EU-MP	V.2, V.3	**40 CFR 52.21 (j)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall implement procedures for igniting gases from mold vents in pouring areas and pouring stations that use a sand mold system as specified in the approved operation and maintenance (O&M) plan. These procedures may be waived if the permittee determines that the mold vent gases are not ignitable, ignite automatically, or cannot be ignited due to accessibility or safety issues. The permittee shall document and maintain records of this determination at the facility and make them available to the Department upon request. **(40 CFR 63.7710(b)(6))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-MP unless the associated capture system and baghouse control system are installed and operating in accordance with the approved operation and maintenance (O&M) plan. **(R 336.1224, R 336.1225, R 336.1910, 40 CFR 52.21(j), 40 CFR Part 63.6 (e)(1)(i), 40 CFR 63.7710)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.7753))**

1. Within 180 days after initial startup of FG-NEWFOUNDRY, the permittee shall conduct a performance test to demonstrate compliance with the applicable PM or THM emission rates from EU-MP according to the requirements in 40 CFR 63.7(e)(1), following the test methods and procedures in 40 CFR 63.7732(b) or (c), and (h). No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(40 CFR 63.7730(a), 40 CFR 63.7732)**

2. Within 180 days after initial startup of FG-NEWFOUNDRY, the permittee shall verify PM-10, VOC, and CO emission rates from EU-MP by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **[R 336.1205(1)(a) and (b), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(j)]**

3. The permittee shall conduct subsequent compliance testing to demonstrate compliance with all applicable emission limits no less frequently than every 5 years. This requirement does not apply if a CEMS is used to demonstrate continuous compliance. **(40 CFR 63.7731(a))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.7753)**

1. The permittee shall monitor the relative change in PM loading using a bag leak detection system for the EU-MP baghouse. **(40 CFR 63.7740(b))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

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 (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SV-MP	42	118	40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

The following conditions apply to: EU-MCS

EU-MCS
EMISSION UNIT CONDITIONS

DESCRIPTION

The automated mold cooling conveyors and automated sand shakeout lines, including a flat deck shakeout system.

Flexible Group IDs: FG-NEWFOUNDRY

POLLUTION CONTROL EQUIPMENT

Emissions from these processes are controlled by associated hoods, enclosures, ductwork, a baghouse, and a regenerative thermal oxidizer (RTO). The exhaust gas flow from this unit is approximately 61,200 acfm

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Volatile Organic HAP (VOHAP)	A flow-weighted average of 20 ppmv	Test Protocol	EU-MCS	IV.1, V.1, V.2, VI.1 – VI.3	**40 CFR 63.7690(a)(10)**
2. PM10	2.47 pph	Test Protocol	EU-MCS	V.2	**40 CFR 52.21(j)**
3. VOC	15.49 pph	Test Protocol	EU-MCS	V.2	**40 CFR 52.21(j)**
4. CO	62.70 pph	Test Protocol	EU-MCS	V.2	**40 CFR 52.21(j)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-MCS unless the associated capture system, regenerative thermal oxidizer (RTO), and baghouse control system are installed, operated and maintained in accordance with the approved operation and maintenance (O&M) plan. **(R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.1702, R 336.1910, 40 CFR 52.21(j), 40 CFR Part 63.6(e)(1)(i), 40 CFR 63.7690(b), 40 CFR 63.7710)**

2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor and record the temperature on a continuous basis, during operation of EU-MCS. The proper operation of the RTO is maintaining the combustion temperature at or above the minimum combustion temperature established during the most recent performance test that demonstrates compliance with the VOHAP emission standard in SC I.1. The permittee shall revise the approved O & M plan to include the minimum RTO combustion temperature based

on the most recent performance test that demonstrates compliance with the VOHAP emission standard in SC I.1. **(R 336.1205, R 336.1225, R 336.1299, R 336.1702)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.7753)**

1. Within 180 days of trial operation of EU-MCS with the RTO the permittee shall conduct a performance test to demonstrate compliance with the VOHAP emission rate from EU-MCS according to the requirements in 40 CFR 63.7(e)(1), following the test methods and procedures in 40 CFR 63.7732(f). No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(40 CFR 63.7730(a))**

2. The permittee shall conduct subsequent compliance testing to demonstrate compliance with all applicable emission limits (PM10, VOC, CO) no less frequently than every 5 years. This requirement does not apply if a CEMS is used to demonstrate continuous compliance. **(40 CFR 63.7731(a), R 336.1213(3))**

3. Within 180 days of trial operation of EU-MCS with the RTO, the permittee shall verify the performance of the capture system as defined in Section 4.2 of the facility MACT Operations and Maintenance Plan. **(R 336.1205, R 336.1299, R 336.1702, 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 336.1213(3)(b)(ii), 40 CFR 63.7753)**

1. The permittee shall install, operate, and maintain a continuous parameter monitoring system (CPMS) for each capture system associated with EU-MCS subject to the VOHAP emission limitation according to the requirements in 40 CFR 63.7740(a) and 40 CFR 63.7741(a). **(40 CFR 63.7740(a), 40 CFR 63.7741(a))**

2. The permittee shall install, operate, and maintain a CEMS in accordance with Appendix 3.

3. The permittee shall monitor at all times the 3-hour average VOHAP concentration using a CEMS according to the requirements of 40 CFR 63.7741(g) when EU-MCS is operating. **(40 CFR 63.7740(g))**

4. The permittee may request an alternative monitoring method to demonstrate compliance with the VOHAP emission limit according to the procedures in 40 CFR 63.7747. **(40 CFR 63.7747)**

5. The permittee shall monitor and keep records, in a satisfactory manner, of the MCS capture system baghouse fan amperage for the capture system for EU-MCS as defined in Section 4.2 of the facility MACT Operations and Maintenance Plan. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a))**

6. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a gauge to monitor and record the pressure drop across the EU-MCS baghouse on a continuous basis when the EU-MCS is operating. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1901, R 336.1910, 40 CFR 52.21(j))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

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 (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SV-MCS	60	118	40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

The following conditions apply to: EU-SS

EU-SS
EMISSION UNIT CONDITIONS

DESCRIPTION

The molding machine and related sand handling equipment.

Flexible Group ID: FG-NEWFOUNDRY

POLLUTION CONTROL EQUIPMENT

56,900 ACFM baghouse

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM-10	2.30 pph	Test Protocol	EU-SS	V.2, VI.1	**40 CFR 52.21 (j)**
2. VOC	4.00 pph	Test Protocol	EU-SS	V.2, VI.1	**40 CFR 52.21 (j)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-SS unless the associated capture system and baghouse control system are installed, operated and maintained in accordance with the approved operation and maintenance (O&M) plan. **(R 336.1224, R 336.1225, R 336.1910, 40 CFR 52.21(j))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Within 180 days after initial startup of FG-NEWFOUNDRY, the permittee shall verify PM-10, and VOC emission rates from EU-SS by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **[R 336.1205(1)(a) and (b), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(j)]**

2. The permittee shall conduct subsequent compliance testing to demonstrate compliance with all applicable emission limits, no less frequently than every 5 years. This requirement does not apply if a CEMS is used to demonstrate continuous compliance. **(R 336.2001, R 336.2003, R 336.2004, R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a gauge to monitor and record the pressure drop across the EU-SS's baghouse on a continuous basis when the baghouse is operating. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1901, R 336.1910, 40 CFR 52.21(j))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

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 (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SV-SS (NEW)	52	118	40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

The following conditions apply to: EU-CCFBACK

EU-CCFBACK
EMISSION UNIT CONDITIONS

DESCRIPTION

The back section of casting cooling conveyors and a shot blast machine. The total air flow exhausted from this emission unit is approximately 65,360 ACFM and routed to the CCF2 baghouse.

Flexible Group ID: FG-NEWFOUNDRY

POLLUTION CONTROL EQUIPMENT

CCF2 baghouse – approximate flow of 65,360 ACFM

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM-10	2.64 pph	Test Protocol	EU-CCFBACK	V.2, VI.1	**40 CFR 52.21 (j)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-CCFBACK unless the associated capture system and baghouse control systems are installed and operating in accordance with the approved operation and maintenance (O&M) plan. **(R 336.1224, R 336.1225, R 336.1910, 40 CFR 52.21(j))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Within 180 days after initial startup of FG-NEWFOUNDRY, the permittee shall verify PM-10 emission rate from the CCF2 Baghouse by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R 336.1205(1)(a) and (b), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(j))**

2. The permittee shall conduct subsequent compliance testing to demonstrate compliance with all applicable emission limits, no less frequently than every 5 years. This requirement does not apply if a CEMS is used to demonstrate continuous compliance. **(R 336.2001, R 336.2003, R 336.2004, R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a gauge to monitor and record the pressure drop across the CCF2 baghouse on a continuous basis when the baghouse is operating. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1901, R 336.1910, 40 CFR 52.21(j))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

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 (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SV-CCF2	54	118	40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

The following conditions apply to: FG-NEWFOUNDRY

FG-NEWFOUNDRY
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

The affected source is a new expansion facility adjacent to the existing iron foundry plant. The regulations cover emissions from metal melting furnaces, pouring areas, pouring stations, automated conveyor and cooling lines, automated shakeout lines, mold making lines, and fugitive emissions from foundry operations.

POLLUTION CONTROL EQUIPMENT

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Opacity	20% 6-min average, except for one 6-min average per hour that does not exceed 27%	Test Protocol	Buildings or Structures Housing Emission Source at FG-NEWFOUNDRY	III.1, III.2, III.3, V.I, V.2, VI.1 – VI.9	40 CFR **63.7690(a)(7)**
2. PM-10	27.0 tpy	12-Month Rolling Time Period	FG-NEWFOUNDRY	VI.10	**40 CFR 52.21 (j)**
3. CO	375.5 tpy	12-Month Rolling Time Period	FG-NEWFOUNDRY	VI.10	**40 CFR 52.21 (j)**
4. VOC	86.6 tpy	12-Month Rolling Time Period	FG-NEWFOUNDRY	VI.10	**40 CFR 52.21 (j)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Metal	115,500 tons per year	12-month rolling time period	FG-NEWFOUNDRY	VI.10	**40 CFR 52.21 (j)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Upon startup, the permittee shall submit to the AQD District Supervisor, for review and approval, an operation and maintenance (O&M) plan for each capture and collection system and control device for an emission unit or flexible group subject to an emission limit as described in 40 CFR 63.7710. The plan shall include, but is not limited to, the following:
   a) Monthly inspections of the equipment that is important to the performance of the total capture system. **(40 CFR 60 CFR 63.7710(b)(1))**

b) Operating limits for each capture system for an emission unit subject to a limit for VOHAP. **(40 CFR 60 CFR 63.7710(b)(2))**

c) Preventative maintenance plan for each control device, including a schedule. **(40 CFR 60 CFR 63.7710(b)(3))**

d) A site-specific monitoring plan for each bag leak detection system. **(40 CFR 60 CFR 63.7710(b)(4))**

e) Corrective action plan for each baghouse. **(40 CFR 60 CFR 63.7710(b)(5))**

f) Procedures for igniting gases from mold vents unless it is determined that the mold vent gases are not ignitable, ignite automatically, or cannot be ignited due to accessibility or safety issues. **(40 CFR 60 CFR 63.7710(b)(6))**

The permittee shall maintain and implement the approved O&M plan at all times. **(40 CFR 63.7710, 40 CFR 63.7745)**

2. The permittee shall comply with the emission limits, work practice standards, and operation and maintenance requirements at all times, except during periods of startup, shutdown, or malfunction. **(40 CFR 63.7720(a))**

3. The permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) in accordance with 40 CFR 63.6(e)(3). This plan must address the startup, shutdown and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The permittee shall operate in accordance with the SSMP when applicable. **(40 CFR 63.7720(c), 40 CFR 63.6(e)(3))**

4. For each segregated scrap storage area, bin or pile, the permittee shall prepare and operate at all times according to a written certification that the facility purchases and uses only charge material that does not include post-consumer automotive body scrap, post-consumer engine blocks, post-consumer oil filters, oily turnings, lead components, mercury switches, plastics or free organic liquids as specified in 40 CFR 63.7700 (b) –OR– the permittee shall prepare and operate according to an approved written plan for the selection and inspection of iron and steel scrap as specified in 40 CFR 63.7700(c). **(40 CFR 63.7700(a), 40 CFR 63.7700(b), 40 CFR 63.7700(c))**

5. For each capture system subject to the VOHAP limit, the permittee shall establish site-specific operating limits in the O&M plans according to the procedures specified in 40 CFR 63.7733 (a). **(40 CFR 63.7733 (a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.7753)**

1. Within 180 days after initial startup of FG-NEWFOUNDRY, the permittee shall conduct a performance test to demonstrate compliance with the opacity limit in 40 CFR 63.7690(a)(7), following the test methods and procedures in 40 CFR 63.7732(d). Subsequent compliance testing shall be conducted no less frequently than every 6 months. **(40 CFR 63.7730(a), 40 CFR 63.7731(b))**

2. No later than 30 calendar days after the compliance date specified in 40 CFR 63.7683, the permittee shall demonstrate initial compliance with each applicable work practice standard in 40 CFR 63.7700 and operation and maintenance requirement in 40 CFR 63.7710 for which a performance test is not used. **(40 CFR 63.7730(b))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.7753)**

1. During the period between the compliance date specified for FG-NEWFOUNDRY and the date when operating limits have been established during the performance test, the permittee shall maintain a log detailing the operation and maintenance of the process and control equipment. **(40 CFR 63.7720(b))**

2. The permittee shall keep all records specified in 40 CFR 63.7752(a)(1) through (4), records for each continuous emission monitoring system (CEMS) as specified in 40 CFR 63.7752(b)(1) through (4) and records required by 40 CFR 63.7743, 40 CFR 63.7744, and 40 CFR 63.7745, as applicable. **(40 CFR 63.7752)**

3. For the EU-MP baghouse that is applied to meet any PM or Total Metal HAP emission limit, the permittee shall install, operate, and maintain a bag leak detection system according to the requirements in 40 CFR 63.7741(b) and conduct inspections according to the requirements specified in 40 CFR 63.7740(b)(1) through (8). **(40 CFR 63.7740(b), 40 CFR 63.7741(b))**

4. For each emission unit in FG-NEWFOUNDRY, the permittee shall demonstrate initial compliance with the work practice standards and the operation and maintenance requirements as specified in 40 CFR 63.7735 and 40 CFR 63.7736. **(40 CFR 63.7735, 40 CFR 63.7736)**

5. The permittee shall monitor and collect data to demonstrate continuous compliance in accordance with 40 CFR 63.7742. **(40 CFR 63.7742)**

6. The permittee shall demonstrate continuous compliance with all applicable emission limitations in accordance with 40 CFR 63.7743. **(40 CFR 63.7743)**

7. The permittee shall maintain records that document continuous compliance with the requirements of 40 CFR 63.7700(b) or (c) as specified in 40 CFR 63.7744(a). **(40 CFR 63.7744 (a))**

8. The permittee shall keep the following information on a monthly basis for FG-NEWFOUNDRY:

   a. Tons of metal melted per month.
   b. Monthly and previous 12-month PM-10, CO, and VOC emission rates, calculated as follows:

      Monthly PM-10, CO and VOC emission rates shall be calculated using the following emission factors, or the emission factors established during the most recent tests, whichever is greater:

      EU-MP:
      0.018 lb PM-10/ton of melt
      2.70 lb CO/ton of melt
      0.32 lb VOC/ton of melt

      EU-MCS:
      0.15 lb PM-10/ton of melt
      3.80 lb CO/ton of melt
      0.94 lb VOC/ton of melt

      EU-SS:
      0.14 lb PM-10/ton of melt
      0.24 lb VOC/ton of melt

      EU-CCFBACK:
      0.16 lb PM-10/ton of melt

Monthly melt rates shall be multiplied with the appropriate factors from above to determine the monthly PM-10, CO and VOC mass emissions from each baghouse. These monthly emission rates will be added to the previous 11-month total emission rates of each PM-10, CO and VOC to determine 12-month rolling emission rates in tons per year for PM-10, CO and VOC. [Note: Alternate CO and VOC emission factors may be used upon prior approval from the District Supervisor]

All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i)**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall report each instance, as applicable, in which each emission limitation and/or operating limit specified in 40 CFR 63.7690, each work practice standard specified in 40 CFR 63.7700, and each operation and maintenance requirement specified in 40 CFR 63.7710 was not met, in accordance with the requirements of 40 CFR 63.7751. **(40 CFR 63.7746, 40 CFR 63.7751)**

5. The permittee shall submit applicable notifications specified in 40 CFR 63.6(h)(4) and (5), 40 CFR 63.7(b) and (c), 63.8(e), 63.8(f)(4) and (6), and 63.9(b) through (h) for an initial notification, a notification of intent to conduct a performance test, and a notification of compliance status as specified in 40 CFR 63.7750. **(40 CFR 63.7750)**

6. The permittee shall submit all semiannual compliance reports and semiannual reports of monitoring and deviations from any emissions limitation or operation and maintenance requirement as required by 40 CFR 63.7751(a), (b), and (d). **(40 CFR 63.7751 (a), (b), and (d))**

7. If a startup, shutdown, or malfunction occurs during the semiannual reporting period, that is not consistent with the SSMP, the permittee shall submit an immediate SSM report according to the requirements of 40 CFR 63.10(d)(5)(ii). **(40 CFR 63.10(d)(5)(ii), 40 CFR 63.7751(c))**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart EEEEE for Iron and Steel Foundries by the initial compliance date. **(40 CFR Part 63, Subparts A and EEEEE)**

2. On and after the initial start up of FG-NEWFOUNDRY, the particulate emission limit in condition I for EUSHOTBLAST in ACM's ROP No. MI-ROP-N5814-2006 shall be revised to 0.01 pounds per 1,000 pounds of exhaust gases.

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

APPENDIX 3
VOC Monitoring
Continuous Emission Monitoring System (CEMS) Requirements

1. Within 30 calendar days after commencement of trial operation, the permittee shall submit two copies of a Monitoring Plan to the AQD, for review and approval. The Monitoring Plan shall include drawings or specifications showing proposed locations and descriptions of the required CEMS.

2. Within 150 calendar days after commencement of trial operation, the permittee shall submit two copies of a complete test plan for the CEMS to the AQD for approval.

3. Within 180 calendar days after commencement of trial operation, the permittee shall complete the installation and testing of the CEMS.

4. Within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating the CEMS complies with the requirements of Performance Specification (PS) 8.

5. The span value shall be 2.0 times the lowest emission standard or as specified in the federal regulations.

6. The CEMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 8 of Appendix B to 40 CFR Part 60.

7. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CEMS set forth in Appendix F of 40 CFR Part 60. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD in the format of the data assessment report (Figure 1, Appendix F).