

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

April 2, 2003

PERMIT TO INSTALL

537-89A

ISSUED TO

International Mill Service, Inc.

LOCATED AT

3000 East Front Street
Monroe, Michigan

IN THE COUNTY OF

Monroe

STATE REGISTRATION NUMBER

N1675

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: October 24, 2002	
DATE PERMIT TO INSTALL APPROVED: April 2, 2003	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, altered, 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, reconstruction, relocation, or alteration 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 person to whom this permit was issued, or the designated authorized agent, shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, PO Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or alteration 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. The written request 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 owner or operator of a source, process, or process equipment shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant in excess of standards for more than one hour, or of any air contaminant in excess of standards for more than two hours, as required in this rule, to the District Supervisor, Air Quality Division. The notice shall be provided no 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 District Supervisor within ten days, with the information required in this rule. **[R 336.1912]**
8. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future applicable requirements which may be promulgated under Part 55 of Act 451, PA 1994 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 Act 451, PA 1994, 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, a person 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. Except as allowed by Rule 285 (a), (b), and (c), permittee shall not substitute any fuels, coatings, nor raw materials for those described in the application and allowed by this permit, nor make changes to the process or process equipment described in the application, without prior notification to and approval by the Air Quality Division. **[R 336.1201(1)]**
14. 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	Stack Identification
EUMETALRECOVERY	Metal recovery plant including material storage piles, a hopper/feeder with grizzly, two shaker screens and several belt conveyors and stackers. Also may include a slag crusher with associated shaker screen and conveyors.	fugitive emissions
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: EUMETALRECOVERY

Visible Emission Limits

- 1.1 Visible emissions from the slag crushers shall not exceed a six-minute average of 15 percent opacity. **[R 336.1301, R 336.1331]**
- 1.2 Visible emissions from the belt conveyors, screens, and all transfer points on the belt conveyors shall not exceed a six-minute average of 10 percent opacity. **[R 336.1301, R 336.1331]**
- 1.3 Visible emissions from each of the material storage piles, including unprocessed material and material produced and maintained by EUMETALRECOVERY, shall not exceed five (5) percent opacity. **[Act 451, Section 324.5524, R 336.1301, R 336.1371]**

Process/Operational Limits

- 1.4 Visible emissions from all wheel loaders and all truck traffic, operated in conjunction with EUMETALRECOVERY, shall not exceed five (5) percent opacity. **[Act 451, Section 324.5524, R 336.1301, R 336.1371]**
- 1.5 The permittee shall implement the program for fugitive dust control specified in Appendix A. **[R 336.1371, Act 451 324.5524]**

Recordkeeping/Reporting/Notification

- 1.6 The permittee shall keep, in a satisfactory manner, daily records of dust control activities for EUMETALRECOVERY. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[Act 451, Section 324.5524, R 336.1301, R 336.1371]**

APPENDIX A

FUGITIVE DUST CONTROL PLAN

PURPOSE: This plan provides dust control strategies for the areas adjacent to and associated with the metal recovery plant.

1. SITE MAINTENANCE.

- a. The unpaved travel surfaces shall be treated with water, or other acceptable dust control agents as needed on a frequency sufficient to meet the visible emission opacity standard of 5% opacity specified in Michigan Act 451, Section 5524.
- b. Stock piling will be performed in a manner that minimizes freefall drop distance.
- c. Piles will be maintained to prevent fugitive dust. This may include the use of watering, covering and/or encrusting agents.
- d. Any scrap or slag material spillage on roads shall be removed immediately.

2. MANAGEMENT OF FRONT-END LOADER OPERATIONS.

The front-end loader operator shall be directed to avoid overfilling the bucket of the loader and the feed hoppers to prevent spillage, and to minimize the drop height of the materiel when loading the feed hoppers or transferring material to stockpiles.

3. RECORDKEEPING.

Records of dust control activities on storage piles, travel surfaces and other surfaces where fugitive dust emissions occur shall be kept on file for a period of at least five years and made available to MDEQ staff upon request. The records will indicate the date, time, what was observed or the reason for the dust control activity (routine or other), and what action was taken.