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

July 10, 2019

PERMIT TO INSTALL 444-86E

ISSUED TO
Michigan Die Casting, LLC

LOCATED AT 51241 M-51 North Dowagiac, Michigan

IN THE COUNTY OF Cass

STATE REGISTRATION NUMBER B3640

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:				
June 27, 2019				
·				
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:			
July 10, 2019				
•				
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

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

IRSLInitial Risk Screening LevelITSLInitial Threshold Screening LevelLAERLowest Achievable Emission RateMACTMaximum Achievable Control TechnologyMAERSMichigan 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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm Actual cubic feet per minute

BTU British Thermal Unit °C Degrees Celsius CO Carbon Monoxide

CO2e Carbon Dioxide Equivalent dscf Dry standard cubic foot dscm Dry standard cubic meter Pegrees Fahrenheit

gr Grains

HAP Hazardous Air Pollutant

Hg Mercury hr Hour

HP Horsepower 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 SO₂ Sulfur Dioxide

TAC Toxic Air Contaminant

Temp Temperature

THC Total Hydrocarbons tpy Tons per year 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.
- 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))	Flexible Group ID
EUFURNACE1116	6.3 Million BTU/Hr Gas-Fired Melting Furnace	NA
EUFURNACE1107	Modern AL5000 Jet Melter: 6.8 MMBTU/hr natural gas fired aluminum melting furnace with a holding capacity of 9,924 lb and a maximum melt rate of 5,000 lb/hr.	NA

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

EUFURNACE1116 EMISSION UNIT CONDITIONS

DESCRIPTION

6.3 Million BTU/Hr Gas-Fired Melting Furnace

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	PM	0.10 lb/1000 lbs of exhaust gases, on a dry gas basis.	Hourly	EUFURNACE1116	SCV.1	R 336.1331

2. Visible emissions from EUFURNACE1116 shall not exceed a six-minute average of ten percent opacity. (R 336.1301)

II. MATERIAL LIMIT(S)

1. The permittee shall not exceed the melting rate of 3,000 pounds per hour in EUFURNACE1116. (R 336.1205)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not use more than 1.5 pounds of flux per ton of aluminum melted in EUFURNACE1116 or 54.0 pounds of flux per day.¹ (R 336.1224)

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))

 Upon request from the AQD District Supervisor, the permittee may be required to verify PM emission rates from EUFURNACE1116 by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1331, 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 complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.1224, R 336.1225)

- 2. The permittee shall keep, in a satisfactory manner, daily record of the flux usage rates for EUFURNACE1116, as required by SCIII.1. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R336.1205, R 336.1224, R336.1225)
- 3. The permittee shall keep, in a satisfactory manner, monthly records of the total weight of charge materials melted in EUFURNCACE1116. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205, R 336.1224, R 336.1225)

VII. REPORTING

NA

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:

		Maximum Exhaust Diameter / Dimensions	Minimum Height Above Ground	Underlying Applicable
	Stack & Vent ID	(inches)	(feet)	Requirements
1	. SVFURNACE1116	24	31	40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EUFURNACE1107 EMISSION UNIT CONDITIONS

DESCRIPTION

Modern AL5000 Jet Melter:

6.8 MMBTU/hr natural gas fired aluminum melting furnace with a holding capacity of 9,924 lb and a maximum melt rate of 5,000 lb/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	PM	0.203 pph	Hourly	EUFURNACE1107	SCV.1	40 CFR 52.21(c) & (d)
2.	PM10	0.203 pph	Hourly	EUFURNACE1107	SCV.1	40 CFR 52.21(c) & (d)
3.	PM2.5	0.203 pph	Hourly	EUFURNACE1107	SCV.1	40 CFR 52.21(c) & (d)

II. MATERIAL LIMIT(S)

	Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	Metal Processed	32,000 lb/ shift	Per 8 hour shift	EUFURNACE1107	SCVI.2	R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d)
2.	Metal Processed	8,760 tpy	12-month rolling time period as determined at the end of each calendar month	EUFURNACE1107	SCVI.3	R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d)
3.	Total Flux usage	15 lb/ shift 1	Per 8 hour shift	EUFURNACE1107	SCVI.2	R 336.1224, R 336.1225
4.	Total Flux usage	3,833 lb/yr ¹	12-month rolling time period as determined at the end of each calendar month	EUFURNACE1107	SCVI.3	R 336.1224, R 336.1225

- 5. The permittee shall melt only clean charge, customer returns, or internal scrap, as defined by 40 CFR Part 63 Subpart RRR. This condition is necessary to avoid requirements of 40 CFR Part 63 Subpart RRR, National Emission Standards for Secondary Aluminum Production. (R 336.1224, R 336.1225, 40 CFR Part 63 Subpart RRR)
- 6. The permittee shall keep, in a satisfactory manner, a record of the composition of all metal alloys and flux loaded into EUFURNACE1107. This record shall be updated daily upon use of any new metal formulations.¹ (R 336.1225)

7. The permittee shall only burn pipeline natural gas in the burners of EUFURNACE1107. (R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

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. Upon request from the AQD District Supervisor, the permittee may be required to verify PM, PM10, and PM2.5 emission rates from EUFURNACE1107 by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.2001, R 336.2004, 40 CFR 52.21(c) & (d))

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1224, R 336.1225, R 336.1301, R 336.1331)
- 2. The permittee shall keep, in a satisfactory manner, records of the flux and total weight of charge materials melted in EUFURNACE1107 per 8-hour shift. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d))
- 3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the flux and total weight of charge materials melted in EUFURNCACE1107. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d))

VII. REPORTING

NA

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
Stack & Vent ID	(illulies)	(ieet)	ivedan ements
1. SVFURNACE1107	24 ¹	45 ¹	R 336.1225

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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
FGMELTING	All aluminum melting furnaces at the facility, including equipment covered by other permits, grand-fathered	NA
	equipment and exempt equipment.	

FGMELTING FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All aluminum melting furnaces at the facility, including equipment covered by other permits, grand-fathered equipment and exempt equipment.

Emission Unit: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall melt only clean charge, customer returns, or internal scrap, as defined by 40 CFR Part 63 Subpart RRR in FGMELTING. This condition is necessary to avoid requirements of 40 CFR Part 63 Subpart RRR, National Emission Standards for Secondary Aluminum Production. (R 336.1224, R 336.1225, 40 CFR Part 63 Subpart RRR)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

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))

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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