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

May 31, 2022

PERMIT TO INSTALL 748-90C

ISSUED TO Remarkable Foods Hospitality, LLC

LOCATED AT 715 North Main Street Lawton, Michigan 49065

IN THE COUNTY OF

Van Buren

STATE REGISTRATION NUMBER N2739

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:

May 19, 2022

DATE PERMIT TO INSTALL APPROVED: May 31, 2022	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS	2
POLLUTANT / MEASUREMENT ABBREVIATIONS	3
GENERAL CONDITIONS	4
EMISSION UNIT SPECIAL CONDITIONS	6
EMISSION UNIT SUMMARY TABLE	6
EUMOLDING	7
FGFACILITY CONDITIONS	10

COMMON ACRONYMS

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm BTU °C CO CO ₂ e dscf dscm °F gr HAP Hg hr HP H2S KW Ib m m mg mm MM MW NMOC NOx ng PM PM10 PM10 PM2.5 pph PM10 PM2.5 pph ppmv ppmv ppmv ppmv ppmv ppmv ppmv	Actual cubic feet per minute British Thermal Unit Degrees Celsius Carbon Monoxide Carbon Dioxide Equivalent Dry standard cubic foot Dry standard cubic meter Degrees Fahrenheit Grains Hazardous Air Pollutant Mercury Hour Horsepower Hydrogen Sulfide Kilowatt Pound Meter Milligram Millimeter Milligram Millimeter Million Megawatts Non-Methane Organic Compounds Oxides of Nitrogen Nanogram Particulate Matter Particulate Matter Particulate Matter Particulate Matter equal to or less than 10 microns in diameter Particulate Matter equal to or less than 2.5 microns in diameter Parts per million Parts per million Parts per million by volume Parts per million by volume Parts per square inch absolute Pounds per square inch gauge Standard cubic feet Seconds Sulfur Dioxide Toxic Air Contaminant Temperature Total Hydrocarbons Tons per year Microgram
	Tons per year
µm VOC	
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 condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). (R 336.1912)
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). (R 336.1301)
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
- 12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). (**R 336.1370**)
- The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. (R 336.2001)

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUMOLDING	Fiberglass parts manufacturing involving open and closed molding. Gelcoat application and open molding operations occur in a booth while closed molding occurs in the general production area. Cleaning operations, using acetone, are performed in both the booth and general production area. Particulate emissions from all operations are controlled by panel filters.	1990, January 1997, TBD	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.

EUMOLDING EMISSION UNIT CONDITIONS

DESCRIPTION

Fiberglass parts manufacturing involving open and closed molding. Gelcoat application and open molding operations occur in a booth while closed molding occurs in the general production area. Cleaning operations, using acetone, are performed in both the booth and general production area. Particulate emissions from all operations are controlled by panel filters.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Panel filters

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	VOC (including styrene)	8.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUMOLDING	SC VI.3	R 336.1702(a)
2.	Acetone (CAS No. 67-64-1)	9.1 tpy ¹	12-month rolling time period as determined at the end of each calendar month	EUMOLDING	SC VI.3	R 336.1224

II. MATERIAL LIMIT(S)

- 1. The styrene content of any resin used in EUMOLDING shall not exceed 46 percent by weight. (R 336.1225, R 336.1702(a))
- 2. The permittee shall not exceed the monomer content limits listed in the following table for EUMOLDING: (R 336.1225, R 336.1702(a))

Material	Maximum Styrene Content (wt %)	Maximum MMA* Content (wt %)
a) Production Gelcoats	35.0	5.0
b) Tooling Gelcoats	46.0	5.0
* MMA = Methyl methacrylate (CAS No. 80-62-6)		

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EUMOLDING and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1225, R 336.1702(a))

- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (R 336.1224, R 336.1225, R 336.1370)
- 3. The permittee shall handle all VOC and/or HAPs containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1224, R 336.1225, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate the open molding portion of EUMOLDING unless the exhaust filters are installed, maintained and operated in a satisfactory manner. (R 336.1301, R 336.1331)
- 2. The permittee shall equip and maintain EUMOLDING with the applicators listed in the following table or technology with equivalent or lower styrene emission rates: (R 336.1225, R 336.1702(a))

Material	Applicator Method
a) Resins	Manual Applicator
b) Gelcoats	Non-Atomized Applicator

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall 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 336.1702(a))
- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702(a))
- 3. The permittee shall keep the following information on a monthly basis for EUMOLDING:
 - a) The identity and amount (in pounds) of each material (including solvents) used.
 - b) The styrene content (in percent by weight) of each material used.
 - c) The MMA content (in percent by weight) of each gelcoat used.
 - d) The VOC (including styrene) content of each material used.
 - e) The acetone content of each material used.
 - f) The appropriate emission factors or calculation method for each raw material (resins, gelcoats, catalysts, cleanup solvents, etc) used as applicable:
 - The Unified Emission Factors (UEF) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2019, shall be used only for styrene and MMA emission calculations for open molding processes,
 - ii. The emission factor of 3% by weight of styrene emitted (from EPA-AP-42 Section 4.4 for Polyester Resin Plastics Production Fabrication) shall be used for closed molding processes,
 - iii. Mass balance used for non-styrene and non-MMA VOC emissions, or
 - iv. Alternate emission factors may be used with the approval of the AQD District Supervisor
 - g) Acetone mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

Remarkable Foods Hospitality, LLC (N2739) Permit No. 748-90C

h) VOC mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702(a))

VII. <u>REPORTING</u>

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
1. SVMOLDING	43	50	R 336.1225, 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).

FGFACILITY CONDITIONS

DESCRIPTION

The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
1.	Styrene (CAS No. 100-42-5)	6.5 tpy ¹	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1225(2)

II. MATERIAL LIMIT(S)

NA

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))

- 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.¹ (R 336.1225(2))
- 2. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Gallons or pounds of each styrene containing material used.
 - b) The styrene content, in percent by weight, of each material used.
 - c) The appropriate styrene emission factor for each material used
 - i. The Unified Emission Factors (UEF) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2009, shall be used only for styrene emission calculations for open molding processes,
 - ii. The emission factor of 3% by weight of styrene emitted (from EPA-AP-42 Section 4.4 for Polyester Resin Plastics Production Fabrication) shall be used for closed molding processes,
 - iii. Alternate emission factors may be used with the approval of the AQD District Supervisor.

d) Styrene emission calculations determining the monthly emission rate in tons per calendar month and tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ (R 336.1225(2))

VII. <u>REPORTING</u>

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).