# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

February 22, 2018

PERMIT TO INSTALL 67-05C

**ISSUED TO**McLaren Performance Technologies, Inc.

LOCATED AT 32233 West Eight Mile Road Livonia, Michigan

> IN THE COUNTY OF Wayne

# STATE REGISTRATION NUMBER A8217

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:  December 21, 2017			
DATE PERMIT TO INSTALL APPROVED: February 22, 2018	SIGNATURE:		
DATE PERMIT VOIDED:	SIGNATURE:		
DATE PERMIT REVOKED:	SIGNATURE:		

# **PERMIT TO INSTALL**

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# **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	СО	Carbon Monoxide	
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot	
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter	
CO <sub>2</sub> e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit	
СОМ	Continuous Opacity Monitoring	gr	Grains	
EPA	Environmental Protection Agency	Hg	Mercury	
EU	Emission Unit	hr	Hour	
FG	Flexible Group	H <sub>2</sub> S	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	MW	Megawatts	
MAERS	Technology Michigan Air Emissions Reporting System	ng	Nanogram	
MAP	Malfunction Abatement Plan	NO <sub>x</sub>	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 <sub>2</sub>	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	

<sup>\*</sup> 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 SUMMARY TABLE**

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

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU-TESTCELL10	A dynamometer cell with a catalytic converter servicing as a primary control device.	5-1-87/ 4-25-05	N/A
Changes to the equipment described in this table are subject to the requirements of R 336 1201, except as			

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: EU-TESTCELL10

## **DESCRIPTION**

Test cell Number 10 with a catalytic converter servicing as a primary control device

Flexible Group ID: N/A

# POLLUTION CONTROL EQUIPMENT

Catalytic Converter

#### I. <u>EMISSION LIMITS</u>

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. CO	709.2 lb/day	Daily	EU-TESTCELL10	SC VI.3	R 336.1205(1)(a) & (3), 40 CFR 52.21(d)
2. CO	16 tpy	12-month rolling time period as determined at the end of each calendar month.	EU-TESTCELL10	SC VI.2	R 336.1205(1)(a) & (3), 40 CFR 52.21(d)
3. 1,3- Butadiene <sup>1</sup>	8.28 lb/yr	12-month rolling time period as determined at the end of each calendar month.	EU-TESTCELL10	SC VI.2	R 336.1224, R 336.1225

<sup>\*</sup>Limits are based on the worst-case controlled emission factors as determined by testing in condition V(1) and as follows:

CO = 1.45 lb/gal; 1,3-Butadiene = 0.000375 lb/gal

#### II. MATERIAL LIMITS

- 1. The permittee shall burn only unleaded gasoline, diesel, kerosene, compressed natural gas (CNG), and liquid petroleum gas (LPG) in EU-TESTCELL10. (R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))
- 2. The fuel usage for EU-TESTCELL10 shall not exceed 489 total combined gallons per calendar day. (R 336.1205(1)(a) &(3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))
- 3. The fuel usage for EU-TESTCELL10 shall not exceed 22,069 total combined gallons per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205(1)(a) &(3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))

## III. PROCESS/OPERATIONAL RESTRICTIONS

N/A

#### IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip and maintain EU-TESTCELL10 with a catalytic converter. (R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 52.21(c) & (d))

#### V. TESTING/SAMPLING

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

1. Verification of CO emission rates from EU-TESTCELL10, by testing at owner's expense, in accordance with Department requirements, will be required. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. Testing should be performed no later than 1 year prior to the renewable operating permit renewal. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD 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 336.2001, 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))

- The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))
- 2. The permittee shall keep the following information on a monthly basis for EU-TESTCELL10:
  - a) A record of the days of operation.
  - b) Total combined gallons used per month and 12-month rolling time period.
  - c) CNG and LPG use calculations determining the annual usage rate in gallons, converted from cubic feet, per 12-month rolling time period as determined at the end of each calendar month.
  - d) CO emission calculations determining the monthly emission rate in tons per calendar month.
  - e) CO emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
  - f) 1,3-Butadiene emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21(c) & (d))

- 3. The permittee shall keep the following information on a monthly basis for EU-TESTCELL10:
  - a) Daily fuel used calculations based upon the total combined gallons used divided by the number of days EU-TESTCELL10 operated during the calendar month.
  - b) Daily CO emission calculations based upon the monthly CO emissions divided by the number of days EU-TestCell10 operated during the calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21(c) & (d))

## VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EU-TestCell10. (R 336.1201(7)(a))

## **VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-13	12	36	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

### IX. OTHER REQUIREMENTS

N/A

## Footnotes:

<sup>&</sup>lt;sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).