

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

September 18, 2019

PERMIT TO INSTALL
242-10B

ISSUED TO
McCoig Materials, LLC – Springwells Plant

LOCATED AT
1441 and 1515 Springwells Court
Detroit, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
P1030

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: September 11, 2019 | |
| DATE PERMIT TO INSTALL APPROVED: September 18, 2019 | 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
 EUPROCESS 7
 EURTRUCKTRAFFIC 10
 EUSTORAGE 12
APPENDIX A..... 14

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 |
| Department/department/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 |
| IRSL | Initial Risk Screening Level |
| ITSL | Initial Threshold Screening Level |
| LAER | Lowest Achievable Emission Rate |
| MACT | Maximum Achievable Control Technology |
| MAERS | Michigan 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 |

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig

POLLUTANT / MEASUREMENT ABBREVIATIONS

| | |
|-------------------|--|
| acfm | Actual cubic feet per minute |
| BTU | British Thermal Unit |
| °C | Degrees Celsius |
| CO | Carbon Monoxide |
| CO ₂ e | Carbon Dioxide Equivalent |
| dscf | Dry standard cubic foot |
| dscm | Dry standard cubic meter |
| °F | Degrees Fahrenheit |
| gr | Grains |
| HAP | Hazardous Air Pollutant |
| Hg | Mercury |
| hr | Hour |
| HP | Horsepower |
| H ₂ S | 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 |
| SO ₂ | Sulfur Dioxide |
| TAC | Toxic Air Contaminant |
| Temp | Temperature |
| THC | Total Hydrocarbons |
| tpy | Tons per year |
| µg | 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.
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)**
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 |
|-------------------------|---|--------------------------|
| EUPROCESS | A totally enclosed ready mix concrete batch plant that utilizes a wet drum mixing process. The plant uses multiple fabric filters to control emissions from processing sources and utilizes a fugitive dust control plan to minimize fugitive emissions. | NA |
| EUTRUCKTRAFFIC | Truck traffic for delivery of material products to customers; truck traffic and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks at 1441 Springwells Court and 1515 Springwells Court, Detroit, Michigan. All commercial truck areas and unpaved road portions at 1441 Springwells Court and 1515 Springwells Court, Detroit, Michigan. | NA |
| EUSTORAGE | Open area stock piles of various material sizes and product types at 1441 Springwells Court and 1515 Springwells Court, Detroit, Michigan. Water spray of material products are used when necessary for material storage piles. | 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.

EUPROCESS EMISSION UNIT CONDITIONS

DESCRIPTION

A totally enclosed ready mix concrete batch plant that utilizes a wet drum mixing process.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

The plant uses multiple fabric filters to control emissions from processing sources and utilizes a fugitive dust control plan to minimize fugitive emissions.

I. EMISSION LIMIT(S)

1. Visible emissions from the Baghouse1 fabric filter control device shall not exceed a six-minute average of 5 percent opacity. **(R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**
2. Visible emissions from the Baghouse2 fabric filter control device shall not exceed a six-minute average of 5 percent opacity. **(R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**
3. Visible emissions from the Baghouse3 fabric filter control device shall not exceed a six-minute average of 5 percent opacity. **(R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**
4. Visible emissions from the drop point and transfer point portions of EUPROCESS shall not exceed 10 percent opacity. **(R 336.1301, 40 CFR 52.21(c) & (d))**

II. MATERIAL LIMIT(S)

1. The permittee shall not process any asbestos tailing or asbestos containing waste materials in EUPROCESS pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61 Subpart M. **(40 CFR Part 61 Subpart M)**
2. The permittee shall not process more than 430,400 cubic yards of material through EUPROCESS per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1901, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUPROCESS unless the fugitive dust control plan for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A, or an alternate plan approved by the AQD District Supervisor, has been implemented and is maintained. **(R 336.1371, R 336.1901)**
2. The permittee shall not operate EUPROCESS unless a malfunction abatement plan (MAP) as described in Rule 911(2), for each fabric filter, loading operation, and conveyor transfer point, has been submitted within 60 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.

- b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
- c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the cement weigh hopper portion, nor the truck loading station portions of EUPROCESS unless the Baghouse1 fabric filter control device is installed, maintained, and operated in a satisfactory manner. **(R 336.1901, R 336.1910, 40 CFR 52.21(c) & (d))**
2. The permittee shall not operate individual cement bins 1, 2, 4 & 5 of EUPROCESS unless the Baghouse 2 fabric filter control device is installed, maintained, and operated in a satisfactory manner. **(R 336.1901, R 336.1910, 40 CFR 52.21(c) & (d))**
3. The permittee shall not operate individual cement bins 3 & 6 of EUPROCESS unless the Baghouse3 fabric filter control device is installed, maintained, and operated in a satisfactory manner. **(R 336.1901, R 336.1910, 40 CFR 52.21(c) & (d))**
4. The permittee shall not operate EUPROCESS unless a gauge, which measures the pressure drop across Baghouse 1 and sounds an alarm when the pressure drop exceeds 6 inches water, is installed, maintained and operated in a satisfactory manner. **(R 336.1901, 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))**

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 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(40 CFR 52.21 (c) & (d))**
2. The permittee shall keep daily and monthly records of the amount of material processed through EUPROCESS. Further the permittee shall calculate on a monthly basis, the yearly throughput rate based upon the most recent 12-month rolling time period. The permittee shall keep records of the amount of material processed on file and make them available to the Department upon request. **(40 CFR 52.21 (c) & (d))**
3. The permittee shall keep records of all road sweeping and watering/dust suppressant applications on file at the facility and make them available to the AQD upon request. **(R 336.1371, R 336.1901)**
4. The permittee shall keep records of baghouse bag changes, bag inspections, and all maintenance conducted as described in the MAP. **(R 336.1301, R 336.1331, R 336.1910, R 336.1911, 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 |
|--|---|---|---|
| 1. SVBAGHOUSE1 ^a | 14 | 45 | R 336.1901, 40 CFR 52.21(c) & (d) |
| 2. SVBAGHOUSE2 ^a | 14 | 75 | R 336.1901, 40 CFR 52.21(c) & (d) |
| 3. SVBAGHOUSE3 ^a | 14 | 75 | R 336.1901, 40 CFR 52.21(c) & (d) |
| ^a This stack is not required to be discharged unobstructed vertically upwards to the ambient air. | | | |

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EURTRUCKTRAFFIC EMISSION UNIT CONDITIONS

DESCRIPTION

Truck traffic for delivery of material products to customers; truck traffic and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks at 1441 Springwells Court and 1515 Springwells Court, Detroit, Michigan. All commercial truck areas and unpaved road portions at 1441 Springwells Court and 1515 Springwells Court, Detroit, Michigan.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

The plant utilizes a fugitive dust control plan to minimize fugitive emissions.

I. EMISSION LIMIT(S)

1. Visible emissions from all wheel loaders and all truck traffic, operated in conjunction with EURTRUCKTRAFFIC, shall not exceed five (5) percent opacity. Compliance shall be demonstrated using Test Method 9D as defined in Section 324.5525(j) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). **(R 336.1301, 40 CFR 52.21(c) & (d))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EURTRUCKTRAFFIC unless the fugitive dust control plan for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A, or an alternate plan approved by the AQD District Supervisor, has been implemented and is maintained. **(R 336.1371, R 336.1372, Act 451 324.5524)**

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 keep records of all road sweeping and watering/dust suppressant applications on file at the facility and make them available to the AQD upon request. **(R 336.1371, R 336.1901)**

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).

| |
|---|
| EUSTORAGE EMISSION UNIT CONDITIONS |
|---|

DESCRIPTION

Open area stock piles of various material sizes and product types at 1441 Springwells Court and 1515 Springwells Court, Detroit, Michigan.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Water spray of material products are used when necessary for material storage piles and the plant utilizes a fugitive dust control plan to minimize fugitive emissions.

I. EMISSION LIMIT(S)

1. Visible emissions from each of the material storage piles maintained under EUSTORAGE, shall not exceed five (5) percent opacity. Compliance shall be demonstrated using Test Method 9D as defined in Section 324.5525(j) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). **(R 336.1301, 40 CFR 52.21(c) & (d))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUSTORAGE unless the fugitive dust control plan for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A, or an alternate plan approved by the AQD District Supervisor, has been implemented and is maintained. **(R 336.1371, R 336.1372, Act 451 324.5524)**

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 keep records of all road sweeping and watering/dust suppressant applications on file at the facility and make them available to the AQD upon request. **(R 336.1371, R 336.1901)**

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).

APPENDIX A

Fugitive Dust Control Plan

I. Site Roadways / Plant Yard

- A. The dust on the site roadways and the plant yard shall be controlled by applications of water, calcium chloride or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet all applicable emission limits. A record of all watering/dust suppressant applications shall be kept on file and be made available to the AQD upon request.
- B. All paved roadways and the plant yards shall be swept as needed between applications.
- C. Any material spillage on roads shall be cleaned up immediately.

II. Plant

The drop distance at each transfer point shall be reduced to the minimum the equipment can achieve.

III. Storage Piles

- A. Stockpiling of all materials shall be performed to minimize drop distance and control potential dust problems.
- B. Stockpiles shall be watered on an as needed basis in order to meet the opacity limit of 5 percent. Equipment to apply water or dust suppressant shall be available at the site. A record of all watering/dust suppressant applications shall be kept on file and be made available to the AQD upon request.

IV. Truck Traffic

On-site vehicles shall be loaded to prevent their contents from dropping, leaking, blowing or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within 6 inches of the top of any side board, side panel or tailgate. Otherwise, the truck shall be tarped.

V. AQD/EGLE Inspection

The provisions and procedures of this plan are subject to adjustment by written notification from the AQD if, following an inspection, the AQD finds the fugitive dust requirements and/or permitted emission limits are not being met.