MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

December 18, 2018

PERMIT TO INSTALL 99-15B

ISSUED TO

Mold Masters Injectioneering, LLC

LOCATED AT 29111 Stephenson Highway Madison Heights, Michigan

> IN THE COUNTY OF Oakland

STATE REGISTRATION NUMBER P0609

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).

| November 26, 2018 | | | |
|----------------------------------|------------|--|--|
| DATE PERMIT TO INSTALL APPROVED: | SIGNATURE: | | |
| December 18, 2018 | | | |
| 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

Department/department Michigan Department of Environmental Quality

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

MDEQ Michigan Department of Environmental Quality

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

CO2e Carbon Dioxide Equivalent dscf Dry standard cubic foot dscm Dry standard cubic meter Personal Per

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 abso

psia Pounds per square inch absolute psig Pounds per square inch gauge

scf Standard cubic feet

 $\begin{array}{ccc} \text{sec} & \text{Seconds} \\ \text{SO}_2 & \text{Sulfur Dioxide} \end{array}$

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 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 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 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 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)) | Installation Date / Modification Date | Flexible Group ID |
|------------------|---|---------------------------------------|-------------------|
| EUFLUIDCLEAN | Dinamec Fluid Clean Fluidized Bed Type F-42.12.12 natural gas-fired cleaning furnace used for removal of plastic residues from plastic extrusion tooling. Emission controls include a natural gas-fired afterburner zone and a cyclone. | Date of PTI Issuance | NA |
| EUMINICLEAN | Dinamec Systems LLC DMC 450-400V cleaning furnace, manufactured in 2007, equipped with an electrically heated cleaning chamber used for removal of plastic residues from plastic extrusion tooling. Emission controls include a lime cartridge filter followed by a natural gasfired afterburner chamber. | 10/13/2017 | 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.

EUFLUIDCLEAN EMISSION UNIT CONDITIONS

DESCRIPTION

Dinamec Fluid Clean Fluidized Bed Type F-42.12.12 natural gas-fired cleaning furnace used for removal of plastic residues from plastic extrusion tooling. Emission controls include a natural gas-fired afterburner zone and a cyclone.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

A cyclone separator for the removal of particulate matter from the exhaust stream.

I. EMISSION LIMIT(S)

| | | | T. D / | | | Underlying |
|----|-----------|-----------------|--------------------|--------------|-----------------|------------------|
| | | | Time Period / | | Monitoring / | Applicable |
| | Pollutant | Limit | Operating Scenario | Equipment | Testing Method | Requirements |
| 1. | PM | 0.083 lb per | Hourly | EUFLUIDCLEAN | GC 13, SC VI.4, | R 336.1331(1)(c) |
| | | 1000 lbs of dry | | | SC VI.5 | |
| | | exhaust gas | | | | |
| 2. | PM10 | 1.52 pph | Hourly | EUFLUIDCLEAN | GC 13, SC VI.4, | 40 CFR 52.21(c) |
| | | | | | SC VI.5 | & (d) |
| 3. | PM2.5 | 1.52 pph | Hourly | EUFLUIDCLEAN | GC 13, SC VI.4, | 40 CFR 52.21(c) |
| | | | - | | SC VI.5 | & (d) |

 Visible emissions from EUFLUIDCLEAN shall not exceed a six-minute average of 10 percent opacity. (R 336.1301(1)(c))

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee not shall process any material in EUFLUIDCLEAN other than metal parts with small amounts of cured residues of the following approved types of plastics: polyethylene, polypropylene, polystyrene, polycarbonate, polyamide, acrylonitrile-butadiene-styrene (ABS), polysulfone, and polyethersulfone. The amount of plastic residue on each part shall be minimized by removing as much residue as possible using hand tools.¹ (R 336.1224, R 336.1225)
- 2. The permittee shall not operate EUFLUIDCLEAN unless the sand bed is preheated to 850°F before parts are loaded into the sand bed for processing. (R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)
- 3. The permittee shall not operate EUFLUIDCLEAN unless the exhaust airflow is preheated to 445°F before parts are loaded into the sand bed for processing. (R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUFLUIDCLEAN unless the natural gas-fired afterburner zone and the cyclone system are installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes operating the sand bed and the air pollution control systems in accordance with the manufacturer's recommendations. (R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1910, 40 CFR 52.21(c) and (d))

- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a negative pressure switch in the duct before the fan in the cyclone control system for EUFLUIDCLEAN on a continuous basis. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))
- 3. The permittee shall not operate EUFLUIDCLEAN unless the manufacturer's automatic temperature control system for the sand bed and exhaust air flow are installed, maintained and operated according to the manufacturer's specifications. (R 336.1224, R 336.1225, R 336.1702(a))

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 and make them available 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 336.1702, 40 CFR 52.21(c) and (d))
- 2. The permittee shall maintain a current listing from the customer of the chemical composition of each material being removed from the parts being processed in EUFLUIDCLEAN. 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 the records on file, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702)
- 3. The permittee shall record, on a calendar day basis, the sand bed temperature in EUFLUIDCLEAN for each batch. The permittee shall keep the records on file, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702(a))
- 4. The permittee shall monitor cyclone control system to verify it is operating properly, by taking visible emission readings for EUFLUIDCLEAN a minimum of once per calendar month. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If any visible emissions (other than uncombined water vapor) are observed, the permittee shall immediately inspect the cyclone control system and perform any required maintenance. (R 336.1301, R 336.1910)
- 5. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for EUFLUIDCLEAN. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, and status of visible emissions. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1301, R 336.1910)
- 6. The permittee shall keep, in a satisfactory manner, records of the date, duration, and description of any malfunction of the cleaning furnace, any maintenance performed and any testing results for EUFLUIDCLEAN. The permittee shall keep the records on file and make them available to the Department upon request. (R 336.1910, R 336.1911)
- 7. The permittee shall record on a calendar day basis, the date, time, duration, and sand bed temperature and the exhaust air flow temperature at equally spaced intervals, not to exceed 15 minutes per interval, of EUFLUIDCLEAN for each batch of materials processed. The permittee shall keep the records on file, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (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 all equipment in EUFLUIDLCEAN. (R 336.1201(7)(a))

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. SVFLUIDCLEAN | 21 | 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).

EUMINICLEAN EMISSION UNIT CONDITIONS

DESCRIPTION

Dinamec Systems LLC DMC 450-400V cleaning furnace, manufactured in 2007, equipped with an electrically heated cleaning chamber used for removal of plastic residues from plastic extrusion tooling.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

A lime cartridge filter followed by a natural gas-fired afterburner chamber.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee not shall process any material in EUMINICLEAN other than metal parts with small amounts of cured residues of the following approved types of plastics: polyethylene, polypropylene, polystyrene, polycarbonate, polyamide, acrylonitrile-butadiene-styrene (ABS), polyvinyl chloride (PVC), polysulfone, polyethersulfone, and any of these plastics containing brominated additives (e.g., compounds of bromine such as bromine-based fire retardants, etc.) provided that the plastic contains no more than 1 percent by weight total bromine content. The amount of plastic residue on each part shall be minimized by removing as much residue as possible using hand tools.¹ (R 336.1224, R 336.1225)
- 2. The permittee shall not operate EUMINICLEAN for more than 880 hours per 12-month rolling time period as determined at the end of each calendar month. (R 336.1224, R 336.1225, R 336.1702(a))
- 3. The permittee shall not operate EUMINICLEAN unless the furnace operator preheats the afterburner chamber to 1560°F prior to charging parts to the cleaning chamber. (R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate EUMINICLEAN unless the natural gas-fired afterburner chamber and the lime cartridge filter are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the afterburner includes maintaining a minimum temperature of 1560°F in the chamber and operating the air pollution control systems according to manufacturer's recommendations. (R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)
- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the temperature in the afterburner chamber for EUMINICLEAN on a continuous basis. (R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)
- 3. The permittee shall not operate EUMINICLEAN unless an interlock system is installed, maintained and operated in a satisfactory manner. The interlock system shall shut down the cleaning chamber heater when the afterburner chamber is not operating properly such as detection of a loss of afterburner flame or detection of low natural gas supply pressure to the afterburner. (R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)

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 and make them available 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)
- 2. The permittee shall maintain a current listing from the customer of the chemical composition of each material being removed from the parts being processed in EUMINICLEAN. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep the records on file, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702)
- 3. The permittee shall keep, in a satisfactory manner, temperature data records for the afterburner chamber on EUMINICLEAN. The temperature data shall be recorded at least once every 15 minutes. The records shall be kept on file and made available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)
- 4. The permittee shall keep, in a satisfactory manner, a record of the hours of operation of EUMINICLEAN on a monthly basis and on a 12-month rolling time period as determined at the end of each calendar month. The records shall be kept on file and made available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702(a))
- The permittee shall keep, in a satisfactory manner, records of the date, duration, and description of any malfunction of the cleaning furnace, any maintenance performed and any testing results for EUMINICLEAN. The permittee shall keep the records on file and make them available to the Department upon request. (R 336.1910, R 336.1911)

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 all equipment in EUMINICLEAN. (R 336.1201(7)(a))

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. SVMINICLEAN | 8 | 45 | 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).