

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

June 28, 2019

PERMIT TO INSTALL
72-17A

ISSUED TO
Burr Oak Tool, Inc.

LOCATED AT
69777 White Street
Sturgis, Michigan

IN THE COUNTY OF
Saint Joseph

STATE REGISTRATION NUMBER
N1562

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 10, 2019	
DATE PERMIT TO INSTALL APPROVED: June 28, 2019	SIGNATURE:
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/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	Malfuction 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))	Installation Date / Modification Date	Flexible Group ID
EUETCH	A chrome reverse etch tank operating with a hexavalent chromic acid solution and bussed for a 500-amp rectifier. This tank is controlled by a common multi-stage composite mesh pad (CMP) system.	2017	FGCHROME
EUPLATE	Hard chrome electroplating tank operating with a hexavalent chromic acid solution and bussed for a 1,000-amp rectifier and two 500-amp rectifiers; each rectifier is in a separate section of the tank. This tank is controlled by a common multi-stage CMP system.	2017/2019	FGCHROME

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.

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
FGCHROME	One chrome reverse etch tank operating with a hexavalent chromic acid solution and bussed for a 500-amp rectifier and one hard chrome plating tank operating with a hexavalent chromic acid solution and bussed for a 1,000 amp rectifier and two 500-amp rectifiers; each rectifier is in a separate section of the tank. Both tanks are controlled by a common multi-stage CMP system and are exhausted through a common stack.	EUETCH, EUPLATE

**FGCHROME
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

One chrome reverse etch tank operating with a hexavalent chromic acid solution and bussed for a 500-amp rectifier and one hard chrome plating tank operating with a hexavalent chromic acid solution and bussed for a 1,000-amp rectifier and two 500-amp rectifiers; each rectifier is in a separate section of the tank. Both tanks are controlled by a common multi-stage CMP system and are exhausted through a common stack.

Emission Unit: EUETCH, EUPLATE

POLLUTION CONTROL EQUIPMENT

One Multi-Stage CMP System for both tanks.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. 1. Total chromium	0.006 mg/dscm ^a	Two Hour Average	FGCHROME	SC V.1, SC VI.4	40 CFR Part 63 Subparts A & N
^a corrected to 70°F and 29.92 inches Hg					

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Within 30 calendar days of the date of permit approval, the permittee shall submit to the AQD District Supervisor, an approvable operation and maintenance plan. The plan shall contain all information required by 40 CFR 63.342(f)(3)(i), which includes the following: **(R 336.1910, 40 CFR Part 63 Subparts A & N)**
 - a) Operation and maintenance criteria for FGCHROME, add-on control device(s), and for the process and control device(s) monitoring equipment as well as a standardized checklist to document the operation and maintenance of the equipment;
 - b) The work practice standards for the add-on control device(s) and monitoring equipment;
 - c) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
 - d) A systematic procedure for identifying process equipment, add-on control device(s) and monitoring equipment malfunctions and for implementing corrective actions to address such malfunctions; and
 - e) The plan shall include housekeeping practices as specified in 40 CFR 63.342(f)(3)(i)(F), Table 2, as applicable to FGCHROME.
2. The total rectifier output for all three rectifiers in EUPLATE combined shall not exceed 245 amp-hr/hr on an hourly average. **(40 CFR Part 63 Subparts A & N)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FGCHROME unless the CMP system is installed, maintained, and operated in a satisfactory manner. **(40 CFR Part 63 Subparts A & N)**
2. The permittee shall equip and maintain the CMP system with a differential pressure monitoring device. **(R 336.1910, 40 CFR 63.343(c))**

3. The permittee shall equip and maintain each rectifier in EUPLATE with a device to monitor and record the rectifier output in amp-hr and the operational (plating) hours. **(40 CFR Part 63 Subparts A & N)**

V. TESTING/SAMPLING

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

1. Upon request by the AQD District Supervisor, the permittee shall verify total chromium emission rates from FGCHROME, by testing at owner's expense, in accordance with 40 CFR Part 63 Subparts A and N. The permittee shall notify the AQD District Supervisor in writing of the intention to conduct a performance test, at least 60 calendar days before the test is scheduled to begin, in accordance with 40 CFR 63.347(d). Stack testing procedures and the location of stack testing ports shall be in accordance with the applicable federal Reference Methods, 40 CFR Part 63 Appendix A. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD. 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 within 90 days following the last date of the test. **(R 336.2001, R 336.2002, R 336.2003, 40 CFR Part 63 Subparts A & N)**

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 recordkeeping, reporting or notification special condition. **(40 CFR Part 63 Subparts A & N)**
2. The permittee shall perform inspections of the CMP system portion of FGCHROME as follows: **(R 336.1910, 40 CFR Part 63.342(f) and 63.343(c)(1)or(3))**
 - a) Determine pressure drop across the CMP system on a daily basis. If the pressure drop across the control varies by more than ± 2 inch of water gauge, from the pressure drop determined during compliance testing, the permittee shall document the variation, and review the operation and maintenance procedures. The permittee shall document any corrective action.
 - b) Visually inspect the CMP system, on a quarterly basis, to ensure there is proper drainage, no chromic acid build up on the pads, and no evidence of chemical attack on the structural integrity of the control device.
 - c) Visually inspect the back portion of the mesh pad closest to the fan, on a quarterly basis, to ensure there is no breakthrough of chromic acid mist.
 - d) Visually inspect ductwork from tanks to the CMP system, on a quarterly basis, to ensure there are no leaks.
 - e) Perform wash-down of CMPs in accordance with manufacturer's recommendations.
3. The permittee shall monitor emissions and operating and maintenance information in accordance with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and N. The permittee shall keep records of all source emissions and operating and maintenance information on file at the facility and make them available to the Department upon request. **(40 CFR Part 63 Subparts A & N)**
4. The permittee shall maintain records of inspections required to comply with applicable work practice standards of 40 CFR 63.342(f). Each inspection record shall identify the device inspected, the date, approximate time of inspection, and a brief description of the working condition of the device during the inspection. The permittee shall also record any actions taken to correct the deficiencies found during the inspection. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1910, 40 CFR Part 63 Subparts A & N)**
5. The permittee shall monitor and record, in a satisfactory manner, the amp-hours for each rectifier in EUPLATE on a continuous basis. The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR Part 63 Subparts A & N)**
6. The permittee shall record, in a satisfactory manner, the operational (plating) hours for each rectifier in EUPLATE for each batch processed. The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR Part 63 Subparts A & N)**

7. The permittee shall calculate and record the hourly average total rectifier output for EUPLATE in amp-hr/hr. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the District Supervisor. **(40 CFR Part 63 Subparts A & N)**

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 FGCHROME. **(R 336.1201(7)(a))**
2. Permittee shall submit the following notifications to the Department in accordance with 40 CFR Part 63.347: **(40 CFR Part 63 Subparts A & N)**
 - a) A notification of the date when construction was commenced, submitted no later than 30 calendar days after such date.
 - b) A notification of the actual date of startup of the source, submitted within 30 calendar days after such date.
3. Permittee shall prepare an ongoing compliance status report in accordance with 40 CFR 63.347(h)(1). **(40 CFR Part 63 Subparts A & N)**

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. SVCHROME	20	15	40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and N, as they apply to FGCHROME. **(40 CFR Part 63 Subparts A & N)**

Footnotes:

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