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

April 3, 2020

PERMIT TO INSTALL 170-19

> ISSUED TO AluTech, LLC

LOCATED AT 1320 Paw Paw Avenue Benton Harbor, Michigan 49022

> IN THE COUNTY OF Berrien

STATE REGISTRATION NUMBER P0340

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: March 24, 2020				
April 3, 2020	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

IRSLInitial Risk Screening LevelITSLInitial Threshold Screening LevelLAERLowest Achievable Emission RateMACTMaximum Achievable Control TechnologyMAERSMichigan 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

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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 Pegrees Fahrenheit

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 absolute

psig Pounds per square inch absolut 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

µg Microgram

μm Micrometer or Micron
VOC Volatile Organic Compounds

yr Year

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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.

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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.

		Installation	
	Emission Unit Description	Date /	
	(Including Process Equipment & Control	Modification	
Emission Unit ID	Device(s))	Date	Flexible Group ID
EUREVERB2	Natural Gas Fired Aluminum Melting Furnace Holding Capacity: 78,600 pounds Melt Rate: 8,000 pounds/hour Natural Gas Firing Rate: 18,735 cf/hour Maximum Flux Rate: 86 pounds/day, used for cleaning	December 2012	FGFURNACES
EUREVERB3	Natural Gas Fired Aluminum Melting Furnace Holding Capacity: 78,600 pounds Melt Rate: 8,000 pounds/hour Natural Gas Firing Rate: 18,735 cf/hour Maximum Flux Rate: 86 pounds/day, used for cleaning	December 2012	FGFURNACES
EUREVERB5	Natural Gas Fired Aluminum Melting Furnace Holding Capacity: 66,600 pounds Melt Rate: 5,000 pounds/hour Natural Gas Firing Rate: 10.6 MMBtu/hr for melting and 0.8 MMBtu/hr for the afterburner Maximum Flux Rate: 86 pounds/day, used for cleaning	Permit Issue Date	NA
EUCRUCIBLE1	Electrically Heated crucible furnace Holding Capacity: 1,900 pounds Flux Rate: 0.8 pound/treatment with nitrogen degassing	August 31, 2012	FGCRUCIBLE
EUCRUCIBLE2	Electrically Heated crucible furnace Holding Capacity: 1,900 pounds Flux Rate: 0.8 pound/treatment with nitrogen degassing	August 31, 2012	FGCRUCIBLE
EUCRUCIBLE3	Electrically Heated crucible furnace Holding Capacity: 1,900 pounds Flux Rate: 0.8 pound/treatment with nitrogen degassing	August 31, 2012	FGCRUCIBLE
EUCRUCIBLE4	Electrically Heated crucible furnace Holding Capacity: 1,900 pounds Flux Rate: 0.8 pound/treatment with nitrogen degassing	August 31, 2012	FGCRUCIBLE
EUCRUCIBLE5	Electrically Heated crucible furnace Holding Capacity: 1,900 pounds Flux Rate: 0.8 pound/treatment with nitrogen degassing	August 31, 2012	FGCRUCIBLE
EUCRUCIBLE6	Thirty-two Electrically Heated crucible furnaces Holding Capacity: 1,900 pounds each Flux Rate: 0.8 pound/crucible furnace treatment with nitrogen degassing	August 31, 2012	FGCRUCIBLE

	Installation				
	Emission Unit Description	Date /			
	(Including Process Equipment & Control	Modification			
Emission Unit ID	Device(s))	Date	Flexible Group ID		
EUCRUCIBLE7	Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds				
	Flux Rate: 0.8 pound/treatment with nitrogen				
EUCRUCIBLE8	degassing Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
LOCKOOIDELO	Holding Capacity: 1,900 pounds	August 51, 2012	TOCKOODEL		
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE9	Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds				
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE10	Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds				
	Flux Rate: 0.8 pound/treatment with nitrogen degassing				
EUCRUCIBLE11	Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
LOOKOOIDEETT	Holding Capacity: 1,900 pounds	7 (agast 01, 2012	TOOKOOBLE		
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE12	Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds				
	Flux Rate: 0.8 pound/treatment with nitrogen				
EUCRUCIBLE13		August 31, 2012	FGCRUCIBLE		
EUCRUCIBLE14		August 31, 2012	FGCRUCIBLE		
		3			
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE15		August 31, 2012	FGCRUCIBLE		
FLICELICIEL F46		August 24 2012	ECCDLICIBLE		
EUCRUCIBLE 10		August 31, 2012	FGCKUCIBLE		
EUCRUCIBLE17		August 31, 2012	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds				
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE18		August 31, 2012	FGCRUCIBLE		
FUCRUCIBI F10		August 31 2012	FGCRUCIBLE		
		, lagast 01, 2012	· CONCOUNT		
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE14 EUCRUCIBLE15 EUCRUCIBLE16 EUCRUCIBLE17 EUCRUCIBLE18 EUCRUCIBLE19	degassing Electrically Heated crucible furnace Holding Capacity: 1,900 pounds Flux Rate: 0.8 pound/treatment with nitrogen degassing Electrically Heated crucible furnace Holding Capacity: 1,900 pounds Flux Rate: 0.8 pound/treatment with nitrogen degassing Electrically Heated crucible furnace Holding Capacity: 1,900 pounds Flux Rate: 0.8 pound/treatment with nitrogen degassing Electrically Heated crucible furnace Holding Capacity: 1,900 pounds Flux Rate: 0.8 pound/treatment with nitrogen degassing Electrically Heated crucible furnace Holding Capacity: 1,900 pounds Flux Rate: 0.8 pound/treatment with nitrogen degassing Electrically Heated crucible furnace Holding Capacity: 1,900 pounds Flux Rate: 0.8 pound/treatment with nitrogen	August 31, 2012 August 31, 2012	FGCRUCIBLE FGCRUCIBLE FGCRUCIBLE FGCRUCIBLE FGCRUCIBLE FGCRUCIBLE		

	Installation				
	Emission Unit Description	Date /			
	(Including Process Equipment & Control	Modification			
Emission Unit ID	Device(s))	Date	Flexible Group ID		
EUCRUCIBLE20	Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds				
	Flux Rate: 0.8 pound/treatment with nitrogen				
ELIOPLIQIBI EM	degassing	A	FOODLIGIDLE		
EUCRUCIBLE21	Electrically Heated crucible furnace Holding Capacity: 1,900 pounds	August 31, 2012	FGCRUCIBLE		
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE22	Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
2001100132222	Holding Capacity: 1,900 pounds	7 tagaot 0 1, 2012	1 0011001322		
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE23	Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds				
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE24	Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds				
	Flux Rate: 0.8 pound/treatment with nitrogen degassing				
EUCRUCIBLE25	Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
LOCKOCIDELES	Holding Capacity: 1,900 pounds	August 51, 2012	1 GOROGIDEE		
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE26	Electrically Heated crucible furnace	August 31, 2012	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds				
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE27	Electrically Heated crucible furnace	December 15,	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds	2012			
	Flux Rate: 0.8 pound/treatment with nitrogen degassing				
EUCRUCIBLE28	Electrically Heated crucible furnace	December 15,	FGCRUCIBLE		
LOCKOCIDELZO	Holding Capacity: 1,900 pounds	2012	1 GOROGIBLE		
	Flux Rate: 0.8 pound/treatment with nitrogen	2012			
	degassing				
EUCRUCIBLE29	Electrically Heated crucible furnace	December 15,	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds	2012			
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				
EUCRUCIBLE30	Electrically Heated crucible furnace	December 15,	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds	2012			
	Flux Rate: 0.8 pound/treatment with nitrogen				
EUCRUCIBLE31	degassing Electrically Heated crucible furnace	December 15,	FGCRUCIBLE		
LOCKOODLEST	Holding Capacity: 1,900 pounds	2012	1 GOLOGIBLE		
	Flux Rate: 0.8 pound/treatment with nitrogen	2012			
	degassing				
EUCRUCIBLE32	Electrically Heated crucible furnace	December 15,	FGCRUCIBLE		
	Holding Capacity: 1,900 pounds	2012			
	Flux Rate: 0.8 pound/treatment with nitrogen				
	degassing				

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUCASTING	Counter-pressure casting into permanent dies	August 2012	NA
EUHEATTREAT1	A 16.962 MMBtu/hr natural gas fired heat treat furnace with water quench. The emissions from the heat treat furnace are exhausted to ambient air through three stacks. There are three exhaust stacks which are SVHEATTREAT1, SVHEATTREAT2 and SVHEATTREAT3.	December 2012	FGHEATTREAT
EUHEATTREAT2	A 16.962 MMBtu/hr natural gas fired heat treat furnace with water quench. The emissions from the heat treat furnace are exhausted to ambient air through three stacks. There are three exhaust stacks which are SVHEATTREAT5, SVHEATTREAT6 and SVHEATTREAT7.	December 2012	FGHEATTREAT

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.

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EUREVERB5 EMISSION UNIT CONDITIONS

DESCRIPTION

Natural Gas Fired Aluminum Melting Furnace

Holding Capacity: 66,600 pounds Melt Rate: 5,000 pounds/hour

Natural Gas Firing Rate: 10.6 MMBtu/hr for melting and 0.8 MMBtu/hr for the afterburner

Maximum Flux Rate: 86 pounds/day, used for cleaning

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Low NOx burners for melting and the afterburner

I. <u>EMISSION LIMIT(S)</u>

	Pollutant	Limit (Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	PM	3.78 pph	Hourly	EUREVERB5	SC V.1	R 336.1301, R 336.1331
2.	PM10	2.51 pph	Hourly	EUREVERB5	SC V.1	40 CFR 52.21 (c) & (d)
3.	PM2.5	2.19 pph	Hourly	EUREVERB5	SC V.1	40 CFR 52.21 (c) & (d)
4.	Hydrogen fluoride	4.93 pph ¹	Hourly	EUREVERB5	SC V.2	R 336.1224, R 336.1225

5. The permittee shall allow no visible emissions from openings and vents of the building housing EUREVERB5. (R 336.1301, R 336.1321, R 336.1224, R 336.1225, R 336.2810)

II. MATERIAL LIMIT(S)

	Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	Fluxing materials added to furnace	86 lb/day ¹	Daily Basis	EUREVERB5	SC VI.2	R 336.1224, R 336.1225
2.	Fluxing materials added to furnace	17,888 lb/year	12-month rolling time period as determined at the end of each calendar month	EUREVERB5	SC VI.2	R 336.1224, R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d)

3. The permittee shall melt only clean charge, customer returns, or internal scrap, as defined by 40 CFR Part 63 Subpart RRR in EUREVERB5. This condition is necessary to avoid requirements of 40 CFR Part 63 Subpart RRR, National Emission Standards for Secondary Aluminum Production. (R 336.1224, R 336.1225, 40 CFR Part 63 Subpart RRR)

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4. The permittee shall only burn pipeline quality natural gas in the burners of EUREVERB5. (R 336.1224, R 336.1325, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

- 1. The permittee shall ensure only low NOx burners with total maximum burn rates of no more than 10.6 MMBtu/hr for melting and 0.8 MMBtu/hr for the afterburner are used in EUREVERB5. The permittee shall install, maintain, and operate these low NOx burners in a satisfactory manner. (R 336.1205, R 336.1910, 40 CFR 52.21(c) and (d))
- 2. The permittee shall not install or modify EUREVERB5 so that the maximum hourly melt rate exceeds 5,000 lb/hr. (R 336.1205, R 336.1224, R 336.1225R 336.1910, 40 CFR 52.21(c) and (d))

V. TESTING/SAMPLING

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

- 1. Upon request from the AQD District Supervisor, the permittee shall verify PM, PM10 and PM2.5 emission rates from EUREVERB5 by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an applicable approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules, or 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205, R 336.1331, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))
- 2. Upon request from the AQD District Supervisor, the permittee shall verify hydrogen fluoride emission rate from EUREVERB5 by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an applicable approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.2001, R 336.2003, R 336.2004, R 336.1224, R 336.1225)

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall keep, in a satisfactory manner, records of the weight and description of all charge materials and fluxing materials or agents added to EUREVERB5 on a daily basis. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21 (c) & (d))
- 2. The permittee shall calculate the total weight of all fluxing materials and agents used in EUREVERB5 on a daily, monthly, and rolling 12-month time period basis. 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 recordkeeping, reporting or notification special condition. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21 (c) & (d))

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3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each flux material used, including the weight percent of each component. 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 all records on file and make them available to the Department upon request.¹ (R 336.1224, R 336.1225)

4. The permittee shall keep a copy of the furnace manufacturer maintenance recommendations and a log of all maintenance and repairs performed on EUREVERB5. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205, R 336.1224 R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21 (c) & (d))

VII. REPORTING

1. Within 30 days after completion of the installation 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 is considered to occur not later than commencement of trial operation of EUREVERB5. (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. SVREVERB5	48	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).

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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
FGFURNACES	Two natural gas fired reverberatory furnaces. Only clean charge is melted in the furnaces. Periodic fluxing	EUREVERB2, EUREVERB3
FGCRUCIBLE	is conducted to clean the furnaces. Thirty-two Electrically Heated crucible furnaces Holding Capacity: 1,900 pounds each Flux Rate: 0.8 pound/crucible furnace treatment with nitrogen degassing	EUCRUCIBLE1, EUCRUCIBLE2, EUCRUCIBLE3, EUCRUCIBLE5, EUCRUCIBLE6, EUCRUCIBLE7, EUCRUCIBLE8, EUCRUCIBLE9, EUCRUCIBLE10, EUCRUCIBLE11, EUCRUCIBLE11, EUCRUCIBLE12, EUCRUCIBLE13, EUCRUCIBLE14, EUCRUCIBLE15, EUCRUCIBLE16, EUCRUCIBLE17, EUCRUCIBLE17, EUCRUCIBLE19, EUCRUCIBLE20, EUCRUCIBLE20, EUCRUCIBLE20, EUCRUCIBLE21, EUCRUCIBLE21, EUCRUCIBLE22, EUCRUCIBLE23, EUCRUCIBLE24, EUCRUCIBLE25, EUCRUCIBLE26, EUCRUCIBLE27, EUCRUCIBLE27, EUCRUCIBLE29, EUCRUCIBLE29, EUCRUCIBLE29, EUCRUCIBLE29, EUCRUCIBLE29, EUCRUCIBLE31, EUCRUCIBLE31, EUCRUCIBLE31,
FGHEATTREAT	Two heat treat furnace systems with combined heat input of 33.924 MMBTU/hr consisting of two solution furnaces, two heated water quench tanks, and two aging furnaces The emissions from the heat treat furnaces are exhausted to ambient air through six stacks.	EUHEATTREAT1, EUHEATTREAT2

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FGFURNACES FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two natural gas fired reverberatory furnaces. Only clean charge is melted in the furnaces. Periodic fluxing is conducted to clean the furnaces

Emission Unit: EUREVERB2, EUREVERB3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	PM	0.80 pph	Hourly	Each Furnace in FGFURNACES	SC V.1	R 336.1301, R 336.1331
2.	PM10	0.80 pph	Hourly	Each Furnace in FGFURNACES	SC V.1	40 CFR 52.21 (c) & (d)
3.	PM2.5	0.50 pph	Hourly	Each Furnace in FGFURNACES	SC V.1	40 CFR 52.21 (c) & (d)

II. MATERIAL LIMIT(S)

	Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	Aluminum charged to the furnace	96 tons/day	Daily basis	Each Furnace in FGFURNACES	SC VI.1	R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21 (c) & (d)
2.	Fluxing materials added to furnace	86 lb/day ¹	Daily basis	Each Furnace in FGFURNACES	SC VI.2	R 336.1224, R 336.1225
3.	Fluxing materials added to furnace	17,888 lb/year	12-month rolling time period as determined at the end of each calendar month	Each Furnace in FGFURNACES	SC VI.2	R 336.1224, R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21 (c) & (d)

- 4. The permittee shall melt only clean charge, customer returns, or internal scrap, as defined by 40 CFR Part 63 Subpart RRR in FGFURNACES. This condition is necessary to avoid requirements of 40 CFR Part 63 Subpart RRR, National Emission Standards for Secondary Aluminum Production. (R 336.1224, R 336.1225, 40 CFR Part 63 Subpart RRR)
- 5. The permittee shall only burn pipeline quality natural gas in the burners of FGFURNACES. (R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

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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))

1. Upon request from the AQD District Supervisor, the permittee shall verify PM, PM10, and PM2.5 emission rates from either furnace in FGFURNACES by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an applicable approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules, or 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205, R 336.1331, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall keep, in a satisfactory manner, records of the weight and description of all charge materials and fluxing materials or agents added to each furnace in FGFURNACES on a daily basis. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21 (c) & (d))
- 2. The permittee shall calculate the total weight of all fluxing materials and agents used in each furnace in FGFURNACES on a daily, monthly, and 12-month rolling time period basis. 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 recordkeeping, reporting or notification special condition. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21 (c) & (d))
- 3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each flux material used, including the weight percent of each component. 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 all records on file and make them available to the Department upon request.¹ (R 336.1224, R 336.1225)

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:

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Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVREVERB2	48	45	R 336.1225,
			40 CFR 52.21 (c) & (d)
2. SVREVERB3	48	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).

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FGCRUCIBLE FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Thirty-two electrically heated crucible furnaces, with the holding capacity of 1,900 lbs each.

Emission Unit: EUCRUCIBLE1, EUCRUCIBLE2, EUCRUCIBLE3, EUCRUCIBLE4, EUCRUCIBLE5, EUCRUCIBLE6, EUCRUCIBLE7, EUCRUCIBLE8, EUCRUCIBLE9, EUCRUCIBLE10, EUCRUCIBLE11, EUCRUCIBLE12, EUCRUCIBLE13, EUCRUCIBLE14, EUCRUCIBLE15, EUCRUCIBLE16, EUCRUCIBLE17, EUCRUCIBLE18, EUCRUCIBLE19, EUCRUCIBLE20, EUCRUCIBLE21, EUCRUCIBLE22, EUCRUCIBLE23, EUCRUCIBLE24, EUCRUCIBLE25, EUCRUCIBLE26, EUCRUCIBLE27, EUCRUCIBLE28, EUCRUCIBLE29, EUCRUCIBLE30, EUCRUCIBLE31, EUCRUCIBLE32

POLLUTION CONTROL EQUIPMENT

NA

I. <u>EMISSION LIMIT(S)</u>

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use more than a daily average of 15 lbs of flux per hour or 360 lbs of flux per day in FGCRUCIBLE. (R 336.1224, R 336.1225, 40 CFR 52.21 (c) & (d))

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 monitor and record, in a satisfactory manner, the flux usage rate in pounds per day for FGCRUCIBLE on a daily basis. The permittee shall keep all records on file and make them available to the Department upon request ¹ (R 336.1225)
- 2. The permittee shall monitor and record the hours of operation of FGCRUCIBLE on a daily basis. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225)
- 3. The permittee shall calculate average daily flux usage in lbs/hr for FGCRUCIBLE on a daily basis. The permittee shall keep all records on file and make them available to the Department upon request (R 336.1225)

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3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each flux material used, including the weight percent of each component. 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 all records on file and make them available to the Department upon request.¹ (R 336.1224, R 336.1225)

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).

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FGHEATTREAT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two heat treat furnace systems with combined heat input of 33.924 MMBTU/hr consisting of two solution furnaces, two heated water quench tanks, and two aging furnaces. The emissions from the heat treat furnaces are exhausted to ambient air through six stacks.

Emission Unit: EUHEATTREAT1 and EUHEATTREAT2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

- 1. The permittee shall only burn pipeline quality natural gas in FGHEATTREAT. (R 336.1225, R 336.1331, 40 CFR 52.21 (c) & (d))
- 2. The permittee shall not use quench oil, die lubricants, or release agents in FGHEATTREAT. (R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21 (c) & (d))

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))

NA

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:

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Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVHEATTREAT1	21	45	R 336.1225, 40 CFR 52.21 (c) & (d)
2. SVHEATTREAT2	21	45	R 336.1225, 40 CFR 52.21 (c) & (d)
3. SVHEATTREAT3	12	40	R 336.1225, 40 CFR 52.21 (c) & (d)
4. SVHEATTREAT5	21	45	R 336.1225, 40 CFR 52.21 (c) & (d)
5. SVHEATTREAT6	21	45	R 336.1225, 40 CFR 52.21 (c) & (d)
6. SVHEATTREAT7	12	40	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).