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

May 29, 2020

PERMIT TO INSTALL 45-20

ISSUED TOEdw. C. Levy Co. Plant 6

LOCATED AT 13800 Mellon Street Detroit, Michigan 48217

IN THE COUNTY OF Wayne

STATE REGISTRATION NUMBER B4243

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: April 16, 2020 | | | |
|--|------------|--|--|
| May 29, 2020 | 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 |
| EUDEISTERSCREEN | 7 |

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

SCRSelective Catalytic ReductionSNCRSelective Non-Catalytic ReductionSRNState 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 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 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

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

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 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 |
|------------------|--|--|-------------------|
| EUDEISTERSCREEN | A 350 Ton Per Hour Deister Screen designed to separate slag and related materials into various finished product sizes. This emission unit includes nine conveyors and three knuckle conveyors. All but two conveyors are located downstream of the screen. Equipped with water spray system and adjustable stacker height mechanism for air pollution control. | 04/17/1995 / 04/2020 | 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.

EUDEISTERSCREEN EMISSION UNIT CONDITIONS

DESCRIPTION

A 350 Ton Per Hour Deister Screen designed to separate slag and related materials into various finished product sizes. This emission unit includes nine conveyors and three knuckle conveyors. All but two conveyors are located downstream of the screen.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Equipped with water spray system and adjustable stacker height mechanism for air pollution control.

I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period/ Operating Scenario | Equipment | Monitoring/ Testing Method | Underlying Applicable Requirements |
|----------------------|-------------|------------------------------------|-----------------|----------------------------------|--|
| Visible emissions | 10% opacity | 6-Minute Average | EUDEISTERSCREEN | SC VI.4, SC VI.5 | R 336.1301(1)(c) |

II. MATERIAL LIMIT(S)

| Material | Limit | Time Period/ Operating Scenario | Equipment | Monitoring/ Testing Method | Underlying Applicable Requirements |
|---------------------|----------------------|---|-----------------|----------------------------------|--|
| Material throughput | 350 tons per hour | Hourly | EUDEISTERSCREEN | SC VI.1 | R 336.1301 |
| Material throughput | | 12-month rolling time period as determined at the end of each calendar month | EUDEISTERSCREEN | SC VI.3 | R 336.1205 |

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Materials shall be wetted with water sprays to minimize the fugitive emissions prior to entering the screening operations of EUDEISTERSCREEN. (R 336.1301(1)(c)

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

1. The permittee shall equip and maintain EUDEISTERSCREEN with water sprays for fugitive dust control. (R 336.1205, R 336.1301(1)(c))

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 the hourly tonnage of material throughput for EUDEISTERSCREEN. (R 336.1205, R 336.1301)
- 2. The permittee shall monitor and record the daily hours of operation of EUDEISTERSCREEN. (R 336.1205, R 336.1301)
- 3. The permittee shall monitor and record the total material throughput of EUDEISTERSCREEN on a monthly and 12-month rolling time period as determined at the end of each calendar month. (R 336.1205)
- 4. The permittee shall perform a Method 9 certified visible emission observation of a representative operating conveyor of EUDEISTERSCREEN at least once every two calendar weeks for a minimum of 15 minutes during screening operation. The permittee shall initiate corrective action upon observation of visible emissions in excess of the visible emission limitation in SC I.1 and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1205, R 336.1301)
- 5. The permittee shall activate the water sprays if visible emissions are observed during the regular non-certified visible emissions observations that are required to occur at least 5 days per week during representative operations, excluding non-operating days, during March through October. The permittee shall keep a record of corrective actions taken, if other than water sprays. (R 336.1205, R 336.1301)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA