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

August 24, 2020

PERMIT TO INSTALL 64-20

ISSUED TOMobex Global, Inc.

LOCATED AT 14638 Apple Drive Fruitport, Michigan 49415

IN THE COUNTY OF Ottawa

STATE REGISTRATION NUMBER B6261

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:				
SIGNATURE:				
SIGNATURE:				
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

SKIN State Registration in

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 absolute

psia 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 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.

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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.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Flexible Group ID
EUPLIBRICOMM1	Plibrico Reverberatory Melting Furnace No. 1. 2.5 ton/hour maximum melt rate; 25,000 lb holding capacity. Natural gas-fired, 8.8 MMBtu/hr heat input.	FGLINEA
EUPLIBRICOMM2	Plibrico Reverberatory Melting Furnace No. 2. 2.5 ton/hour maximum melt rate; 25,000 lb holding capacity. Natural gas-fired, 8.8 MMBtu/hr heat input.	FGLINEA
EUWESTCAST	West Cast Launder System for EUPLIBCOMM1 and EUPLIBCOMM2, Six Electric Holding Furnaces, 11 Electric Crucible Furnaces, Core Shakeout	FGLINEA
EUPLIBRICOMM3	Plibrico Reverberatory Melting Furnace No. 3. 3 ton/hr maximum melt rate; 40,000 lb holding capacity. Natural gas-fired, 12 MMBtu/hr heat input.	FGLINEB
EUPLIBRICOMM4	Plibrico Reverberatory Melting Furnace No. 4. 3 ton/hr maximum melt rate; 40,000 lb holding capacity. Natural gas-fired, 12 MMBtu/hr heat input.	FGLINEB
EUEASTCAST	East Cast Launder System for EUPLIBCOMM3 and EUPLIBCOMM4, Six Electric Holding Furnaces, 12 Electric Crucible Furnaces	FGLINEB
EUPLIBRICOMM6	Plibrico Reverberatory Melting Furnace No. 6. 3 ton/hr maximum melt rate; 40,000 lb holding capacity. Natural gas-fired, 12 MMBtu/hr heat input.	FGLINEC
EUPLIBRICOMM7	Plibrico Reverberatory Melting Furnace No. 7. 12 ton/hr maximum melt rate; 120,000 lb holding capacity. Natural gas-fired, 24 MMBtu/hr heat input.	FGLINEC
EUPLIB6CAST	Casting Launder System for EUPLIBCOMM6 and EUPLIBCOMM7, Eight Electric Holding Furnaces, 12 Electric Crucible Furnaces, Core Shakeout	FGLINEC

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
FGLINEA	Includes two natural gas-fired reverberatory furnaces to melt aluminum, a casting line with holding furnaces and electric casters to use sand cores and a core shakeout room where a rattler (vibrating) device is utilized	EUPLIBRICOMM1, EUPLIBRICOMM2, EUWESTCAST
FGLINEB	Includes two natural gas-fired reverberatory furnaces to melt aluminum, a casting line with holding furnaces and electric casters	EUPLIBRICOMM3, EUPLIBRICOMM4, EUEASTCAST
FGLINEC	Includes two natural gas-fired reverberatory furnaces to melt aluminum, a casting line with holding furnaces and electric casters to use sand cores and a totally enclosed core knockout machine with an internal cartridge collected that vents into the general in-plant environment	EUPLIBRICOMM6, EUPLIBRICOMM7, EUPLIB6CAST

FGLINEA FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Includes two natural gas-fired reverberatory furnaces to melt aluminum, a casting line with holding furnaces and electric casters to use sand cores and a core shakeout room where a rattler (vibrating) device is utilized.

Emission Unit: EUPLIBRICOMM1, EUPLIBRICOMM2, EUWESTCAST

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

		Time Period / Operating		Monitoring / Testing	Underlying Applicable
Pollutant	Limit	Scenario	Equipment	Method	Requirements
1. PM	0.188 lb/ton	Hourly	EUPLIBRICOMM1,	SC II.1,	R 336.1225,
	chargea		EUPLIBRICOMM2	SC II.2,	R 336.1331,
	for each EU			SC II.3,	40 CFR 52.21(c) & (d)
				SC V.1	
2. PM10	0.188 lb/ton	Hourly	EUPLIBRICOMM1,	SC II.1,	R 336.1225,
	chargea		EUPLIBRICOMM2	SC II.2,	R 336.1331,
	for each EU			SC II.3,	40 CFR 52.21(c) & (d)
				SC V.1	
3. PM2.5	0.188 lb/ton	Hourly	EUPLIBRICOMM1,	SC II.1,	R 336.1225,
	chargea		EUPLIBRICOMM2	SC II.2,	R 336.1331,
	for each EU			SC II.3,	40 CFR 52.21(c) & (d)
				SC V.1	
4. PM	0.0123 lb/lb	Hourly	EUWESTCAST	SC II.4,	R 336.1225,
	flux ^b			SC II.5,	R 336.1331,
				SC V.1	40 CFR 52.21(c) & (d)
5. PM10	0.0123 lb/lb	Hourly	EUWESTCAST	SC II.4,	R 336.1225,
	flux ^b			SC II.5,	R 336.1331,
				SC V.1	40 CFR 52.21(c) & (d)
6. PM2.5	0.0123 lb/lb	Hourly	EUWESTCAST	SC II.4,	R 336.1225,
	flux ^b			SC II.5,	R 336.1331,
				SC V.1	40 CFR 52.21(c) & (d)
7. PM	1.10 lb/ton of	Hourly	EUWESTCAST	SC II.4,	R 336.1225,
	metal			SC II.6,	R 336.1331,
				SC V.1	40 CFR 52.21(c) & (d)
8. PM10	0.77 lb/ton of	Hourly	EUWESTCAST	SC II.4,	R 336.1225,
	metal			SC II.6,	R 336.1331,
				SC V.1	40 CFR 52.21(c) & (d)
9. PM2.5	0.77 lb/ton of	Hourly	EUWESTCAST	SC II.4,	R 336.1225,
	metal			SC II.6,	R 336.1331,
				SC V.1	40 CFR 52.21(c) & (d)

^a Limit was established using the average of three 6-hour test runs.

The emission limit represents the total combined emissions for the 19 stacks identified in SC VIII. 3-21 and was established using the average of three 4-hour test runs.

II. MATERIAL LIMIT(S)

		Time Period /		Monitoring /	
Material	Limit	Operating Scenario	Equipment	Testing Method	Underlying Applicable Requirements
1. Aluminum	51 ton/day	Calendar Day	EUPLIBRICOMM1,	SC VI.2	R 336.1205,
	for each EU		EUPLIBRICOMM2		R 336.1331,
					40 CFR 52.21(c) & (d)
2. Total flux	61.2 lb/day	Calendar Day	EUPLIBRICOMM1,	SC VI.2	R 336.1205,
	for each EU		EUPLIBRICOMM2		R 336.1225,
					R 336.1331,
					40 CFR 52.21(c) & (d)
3. Fluorinated flux	10.2 lb/day	Calendar Day	EUPLIBRICOMM1,	SC VI.2	R 336.1205,
	(included in	•	EUPLIBRICOMM2		R 336.1225,
	total flux)				R 336.1331,
	for each EU				40 CFR 52.21(c) & (d)
4. Aluminum	71.4 ton/day	Calendar Day	EUWESTCAST	SC VI.2	R 336.1205,
		-			R 336.1331,
					40 CFR 52.21(c) & (d)
Total flux	433.50 lb/day	Calendar Day	EUWESTCAST	SC VI.2	R 336.1205,
					R 336.1225,
					R 336.1331,
					40 CFR 52.21(c) & (d)
6. Fluorinated flux	55 lb/day	Calendar Day	EUWESTCAST	SC VI.2	R 336.1205,
	(included in				R 336.1225,
	total flux)				R 336.1331,
					40 CFR 52.21(c) & (d)
Core material	2,500 lb/hr	Calendar Day	EUWESTCAST	SC VI.3	R 336.1205,
					R 336.1225,
					R 336.1331,
					40 CFR 52.21(c) & (d)

- 8. The permittee shall not melt in FGLINEA any material other than clean charge, or internal scrap, as defined by 40 CFR Part 63, Subpart RRR. 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)
- 9. The permittee shall only burn pipeline quality natural gas in the burners within FGLINEA. (R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall complete the core shakeout/knockout process of EUWESTCAST in an enclosure with a bottom opening for gravity feed of remnant material to a hopper. (R 336.1225, R 336.1331)
- 2. The permittee shall not operate the core shakeout/knockout process of EUWESTCAST unless the baghouse is installed, maintained, and operated in a satisfactory manner. (R 336.1205, R 336.1224, R 336.1225, R 336.1331)
- 3. The permittee shall not pour from EUPLIBRICOMM1 and EUPLIBRICOMM2 simultaneously. (R 336.1331, 40 CFR 52.21(c) & (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

V. TESTING/SAMPLING

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

 Upon request from the AQD Supervisor, the permittee shall verify PM, PM10, and/or PM2.5 emission rates from EUPILBRICOMM1 and/or EUPLIBRICOMM2 and/or EUWESTCAST by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10 / PM2.5	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 30 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 336.1224, R 336.1225, R 336.2001, 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 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 monitoring/recordkeeping special condition. (R 336.1205, R 336.1702(a))
- 2. The permittee shall keep, in a satisfactory manner, daily records of the weight and description of all charge materials and fluxing materials or agents added to each emission unit within FGLINEA. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1225, R 336.1301, R 336.1331)
- 3. The permittee shall keep, in a satisfactory manner, daily records of the weight of core material processed (based on the nominal weight per core used) in EUWESTCAST. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1225, R 336.1301, R 336.1331, R 336.1702)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

	Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SVPLIB1	21	47	R 336.1225 40 CFR 52.21(c) & (d)
2.	SVPLIB2	21	47	R 336.1225, 40 CFR 52.21(c) & (d)
3.	SVWCV8	45 ^{a,b}	27	R 336.1225, 40 CFR 52.21(c) & (d)

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
4. SVWCV9	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
5. SVWCV10	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
6. SVWCV12	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
7. SVWCV13	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
8. SVWCV14	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
9. SVWCV15	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
10. SVWCV16	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
11. SVWCV17	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
12. SVWCV18	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
13. SVWCV19	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
14. SVWCV21	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
15. SVWCV22	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
16. SVWCV23	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
17. SVWCV6SQR	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
18. SVWCV5RND	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
19. SVWCV6RND	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
20. SVWCV7RND	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)
21. SVWCV24RND	45 ^{a,b}	27	R 336.1225,
			40 CFR 52.21(c) & (d)

^a The exhaust gases shall be discharged to the ambient air from a minimum of ten of the stacks listed above. ^b Equivalent diameter for square vent (40 inches x 40 inches) with rain cap.

IX. OTHER REQUIREMENT(S)

NA

FGLINEB FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Includes two natural gas-fired reverberatory furnaces to melt aluminum, a casting line with holding furnaces and electric casters

Emission Unit: EUPLIBRICOMM3, EUPLIBRICOMM4, EUEASTCAST

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

		Time Period / Operating		Monitoring / Testing	Underlying Applicable
Pollutant	Limit	Scenario	Equipment	Method	Requirements
1. PM	0.124 lb/ton	Hourly	EUPLIBRICOMM3,	SC II.1,	R336.1331,
	chargea		EUPLIBRICOMM4	SC II.2,	40 CFR 52.21(c) & (d)
	for each EU			SC II.3,	
				SC V.1	
2. PM10	0.124 lb/ton	Hourly	EUPLIBRICOMM3,	SC II.1,	R336.1331,
	chargea		EUPLIBRICOMM4	SC II.2,	40 CFR 52.21(c) & (d)
	for each EU			SC II.3,	
				SC V.1	
3. PM2.5	0.124 lb/ton	Hourly	EUPLIBRICOMM3,	SC II.1,	R336.1331,
	chargea		EUPLIBRICOMM4	SC II.2,	40 CFR 52.21(c) & (d)
	for each EU			SC II.3,	
				SC V.1	
4. PM	0.0123 lb	Hourly	EUEASTCAST	SC II.4,	R 336.1205,
	PM/lb flux ^b			SC V.1	R 336.1331,
					40 CFR 52.21(c) & (d)
5. PM10	0.0123 lb	Hourly	EUEASTCAST	SC II.4,	R 336.1205,
	PM10/ lb flux ^b			SC V.1	R 336.1331,
					40 CFR 52.21(c) & (d)
6. PM2.5	0.0123 lb	Hourly	EUEASTCAST	SC II.4,	R 336.1205,
	PM2.5/ lb flux ^b			SC V.1	R 336.1331,
					40 CFR 52.21(c) & (d)

a Limit was established using the average of three 6-hour test runs.

^b The emission limit represents the total combined emission limit for the six stacks identified in SC VIII. 3-8 and was established using the average of three 4-hour test runs.

II. MATERIAL LIMIT(S)

		Time Period /		Monitoring /	Underlying Applicable
Material	Limit	Operating Scenario	Equipment	Testing Method	Underlying Applicable Requirements
1. Aluminum	64.8 ton/day	Calendar Day	EUPLIBRICOMM3,	SC VI.2	R 336.1205,
	for each EU	•	EUPLIBRICOMM4		R 336.1331,
					40 CFR 52.21(c) & (d)
Total flux	72 lb/day	Calendar Day	EUPLIBRICOMM3,	SC VI.2	R 336.1205,
	for each EU	-	EUPLIBRICOMM4		R 336.1225,
					R 336.1331,
					40 CFR 52.21(c) & (d)
Fluorinated flux	18 lb/day	Calendar Day	EUPLIBRICOMM3,	SC VI.2	R 336.1205,
	(included in		EUPLIBRICOMM4		R 336.1225,
	total flux)				R 336.1331,
	for each EU				40 CFR 52.21(c) & (d)
Total flux	357 lb/day	Calendar Day	EUEASTCAST	SC VI.2	R 336.1205,
					R 336.1225,
					R 336.1331,
					40 CFR 52.21(c) & (d)
Fluorinated flux	70 lb/day	Calendar Day	EUEASTCAST	SC VI.2	R 336.1205,
	(included in				R 336.1225,
	total flux)				R 336.1331,
					40 CFR 52.21(c) & (d)

- 6. The permittee shall not melt in FGLINEB any material other than clean charge, or internal scrap, as defined by 40 CFR Part 63, Subpart RRR. 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)
- 7. The permittee shall only burn pipeline quality natural gas in the burners within FGLINEB. (R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not pour from EUPLIBRICOMM3 and EUPLIBRICOMM4 simultaneously. (R 336.1225, R 336.1331, 40 CFR 52.21(c) & (d))

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))

 Upon request from the AQD Supervisor, the permittee shall verify PM, PM10, and/or PM2.5 emission rates from EUPILBRICOMM3 and/or EUPILBRICOMM4 and/or EUEASTCAST by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10 / PM2.5	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 30 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 336.1224, R 336.1225, 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 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 monitoring/recordkeeping special condition. (R 336.1205, R 336.1702(a))
- 2. The permittee shall keep, in a satisfactory manner, daily records of the weight and description of all charge materials and fluxing materials or agents added to each emission unit within FGLINEB. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1225, R 336.1301, R 336.1331)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

	Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SVPLIB3	36	53.5	R336.1225, 40 CFR 52.21(c) & (d)
2.	SVPLIB4	36	52.7	R336.1225, 40 CFR 52.21(c) & (d)
3.	SVECV33RND	42	51	R336.1225, 40 CFR 52.21(c) & (d)
4.	SVECV34RND	42	51	R336.1225, 40 CFR 52.21(c) & (d)
5.	SVECV36RND	42	51	R336.1225, 40 CFR 52.21(c) & (d)
6.	SVECV37RND	42	51	R336.1225, 40 CFR 52.21(c) & (d)
7.	SVECV38RND	42	51	R336.1225, 40 CFR 52.21(c) & (d)
8.	SVECV39RND	42	51	R336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

FGLINEC FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Includes two natural gas-fired reverberatory furnaces to melt aluminum, a casting line with holding furnaces and electric casters to use sand cores and a totally enclosed core knockout machine with an internal cartridge collected that vents into the general in-plant environment

Emission Unit: EUPLIBRICOMM6, EUPLIBRICOMM7, EUPLIB6CAST

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.188 lb / ton charge	Hourly	EUPLIBRICOMM6	SC II.1, SC II.2, SC II.3, SC V.2	R 336.1331, 40 CFR 52.21(c) & (d)
2. PM10	0.188 lb / ton charge	Hourly	EUPLIBRICOMM6	SC II.1, SC II.2, SC II.3, SC V.2	R 336.1331, 40 CFR 52.21(c) & (d)
3. PM2.5	0.188 lb / ton charge	Hourly	EUPLIBRICOMM6	SC II.1, SC II.2, SC II.3, SC V.2	R 336.1331, 40 CFR 52.21(c) & (d)
4. PM	0.188 lb / ton charge	Hourly	EUPLIBRICOMM7	SC II.4, SC II.5, SC II.6, SC V.1, SC V.2	R 336.1331, 40 CFR 52.21(c) & (d)
5. PM10	0.188 lb / ton charge	Hourly	EUPLIBRICOMM7	SC II.4, SC II.5, SC II.6, SC V.1, SC V.2	R 336.1331, 40 CFR 52.21(c) & (d)
6. PM2.5	0.188 lb / ton charge	Hourly	EUPLIBRICOMM7	SC II.4, SC II.5, SC II.6, SC V.1, SC V.2	R 336.1331, 40 CFR 52.21(c) & (d)
7. PM	0.0123 lb PM/ lb flux	Hourly	EUPLIB6CAST	SC II.7, SC II.8, SC II.9, SC V.2	R 336.1331, 40 CFR 52.21(c) & (d)
8. PM10	0.0123 lb PM10/ lb flux	Hourly	EUPLIB6CAST	SC II.7, SC II.8, SC II.9, SC V.2	R 336.1331, 40 CFR 52.21(c) & (d)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
9. PM2.5	0.0123 lb	Hourly	EUPLIB6CAST	SC II.7,	R 336.1331,
	PM2.5/ lb flux	-		SC II.8,	40 CFR 52.21(c) & (d)
				SC II.9,	
				SC V.2	

II. MATERIAL LIMIT(S)

		Time Period /		Monitoring /	
		Operating		Testing	Underlying Applicable
Material	Limit	Scenario	Equipment	Method	Requirements
1. Aluminum	61.2	Calendar Day	EUPLIBRICOMM6	SC VI.2	R 336.1205,
	tons/day	•			R 336.1331,
					40 CFR 52.21(c) & (d)
2. Total flux	68 lb/day	Calendar Day	EUPLIBRICOMM6	SC VI.2	R 336.1205,
		•			R 336.1225,
					R 336.1331,
					40 CFR 52.21(c) & (d)
3. Fluorinated flux	8.5 lb/day	Calendar Day	EUPLIBRICOMM6	SC VI.2	R 336.1205,
	(included in	•			R 336.1225,
	total flux)				R 336.1331,
	,				40 CFR 52.21(c) & (d)
4. Aluminum	122.4	Calendar Day	EUPLIBRICOMM7	SC VI.2	R 336.1205,
	ton/day	•			R 336.1331,
	-				40 CFR 52.21(c) & (d)
Total flux	119 lb/day	Calendar Day	EUPLIBRICOMM7	SC VI.2	R 336.1205,
	_				R 336.1225,
					R 336.1331,
					40 CFR 52.21(c) & (d)
6. Fluorinated flux	34 lb/day	Calendar Day	EUPLIBRICOMM7	SC VI.2	R 336.1205,
	(included in				R 336.1225,
	total flux)				R 336.1331,
	,				40 CFR 52.21(c) & (d)
7. Aluminum	122.4	Calendar Day	EUPLIB6CAST	SC VI.2	R 336.1205,
	ton/day				R 336.1331,
	-				40 CFR 52.21(c) & (d)
8. Total flux	265.2 lb/day	Calendar Day	EUPLIB6CAST	SC VI.2	R 336.1225,
	-	•			R 336.1331,
					40 CFR 52.21(c) & (d)
9. Fluorinated flux	69.7 lb/day	Calendar Day	EUPLIB6CAST	SC VI.2	R 336.1225,
	(included in	•			R 336.1331,
	total flux)				40 CFR 52.21(c) & (d)
10. Core material	702.1 pph	Calendar Day	EUPLIB6CAST	SC VI.3	R 336.1225,
		•			R 336.1331,
					R 336.1702,
					40 CFR 52.21(c) & (d)

^{11.} The permittee shall not melt in FGLINEC any material other than clean charge, or internal scrap, as defined by 40 CFR Part 63, Subpart RRR. 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)

^{12.} The permittee shall only burn pipeline quality natural gas in the burners within FGLINEC. (R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall complete the core shakeout/knockout process of EUPLIB6CAST in an enclosure with a bottom opening for gravity feed of remnant material to a hopper. (R 336.1225, R 336.1331)
- The permittee shall not operate the core shakeout/knockout process of EUPLIB6CAST unless the baghouse is installed, maintained, and operated in a satisfactory manner. (R 336.1205, R 336.1224, R 336.1225, R 336.1331)
- 3. The permittee shall not pour from EUPLIBRICOMM6 and EUPLIBRICOMM7 simultaneously. (R 336.1225, R 336.1331, 40 CFR 52.21(c) & (d))

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

NA

V. TESTING/SAMPLING

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

1. Within 180 days after commencement of initial startup, the permittee shall verify PM, PM10, and PM2.5 emission factors used to calculate emissions from EUPLIBRICOMM7, by testing at the owner's expense, in accordance with Department requirements. After a test has been conducted, any resulting increase in an emission factor shall be implemented to calculate PM, PM10, and PM2.5. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference			
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules			
PM10 / PM2.5	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 336.1331, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))

 Upon request from the AQD Supervisor, the permittee shall verify PM, PM10, and/or PM2.5 emission rates from EUPLIBRICOMM6 and/or EUPLIBRICOMM7 and/or EUPILB6CAST by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference				
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules				
PM10 / PM2.5	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 30 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 336.1224, R 336.1225, R 336.2001, 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 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 monitoring/recordkeeping special condition. (R 336.1205, R 336.1702(a))
- 2. The permittee shall keep, in a satisfactory manner, daily records of the weight and description of all charge materials and fluxing materials or agents added to each emission unit within FGLINEC. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1225, R 336.1301, R 336.1331)
- 3. The permittee shall keep, in a satisfactory manner, records of the weight of core material processed (based on the nominal weight per core used) in EUPLIB6CAST 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 336.1225, R 336.1301, R 336.1331, R 336.1702)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPLIBRICOMM6	36	66	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVPLIBRICOMM7	48	66	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVPLIB6CAST1	42	32.0	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVPLIB6CAST2	42	32.0	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVPLIB6CAST3	42	32.0	R 336.1225, 40 CFR 52.21(c) & (d)
6. SVPLIB6CAST4	42	32.0	R 336.1225, 40 CFR 52.21(c) & (d)
7. SVPLIB6CAST5	42	32.0	R 336.1225, 40 CFR 52.21(c) & (d)
8. SVPLIB6CAST6	42	32.0	R 336.1225, 40 CFR 52.21(c) & (d)
9. SVPLIB6CAST7	42	32.0	R 336.1225, 40 CFR 52.21(c) & (d)
10. SVPLIB6CAST8	42	32.0	R 336.1225, 40 CFR 52.21(c) & (d)
11. SVPLIB6CAST9	42	32.0	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)