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

February 23, 2023

PERMIT TO INSTALL 34-23

ISSUED TO

Montague Metal Products, Inc.

LOCATED AT 4101 West Fruitvale Road Montague, Michigan 49437

> IN THE COUNTY OF Muskegon

STATE REGISTRATION NUMBER P1272

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:			
October 31, 2022			
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:		
February 23, 2023			
DATE PERMIT VOIDED:	SIGNATURE:		
DATE PERMIT REVOKED:	SIGNATURE:		

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD Air Quality Division

Best Available Control Technology **BACT**

CAA Clean Air Act

Compliance Assurance Monitoring CAM Continuous Emission Monitoring System **CEMS**

Code of Federal Regulations CFR

Continuous Opacity Monitoring System COMS

Department/department/EGLE Michigan Department of Environment, Great Lakes, and Energy

Emission Unit EU FG Flexible Group

GACS Gallons of Applied Coating Solids

General Condition GC **GHGs** Greenhouse Gases

HVLP High Volume Low Pressure*

ID Identification

IRSL Initial Risk Screening Level Initial Threshold Screening Level **ITSL** Lowest Achievable Emission Rate **LAER MACT** Maximum Achievable Control Technology **MAERS** Michigan Air Emissions Reporting System

MAP Malfunction Abatement Plan **MSDS** Material Safety Data Sheet

Not Applicable NA

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

Prevention of Significant Deterioration **PSD**

PTE Permanent Total Enclosure

Permit to Install PTI

RACT Reasonable Available Control Technology

Renewable Operating Permit **ROP**

SC **Special Condition**

Selective Catalytic Reduction SCR Selective Non-Catalytic Reduction SNCR State Registration Number

SRN

TBD To Be Determined

TEQ **Toxicity Equivalence Quotient**

USEPA/EPA United States Environmental Protection Agency

Visible Emissions VΕ

^{*}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 °F Degrees Fahrenheit

Grains gr

HAP Hazardous Air Pollutant

Hg Mercury hr Hour

ΗP Horsepower H_2S Hydrogen Sulfide

kW Kilowatt lb Pound Meter m Milligram mg Millimeter mm MM Million MW Megawatts

NMOC Non-Methane Organic Compounds

 NO_{x} Oxides of Nitrogen

Nanogram ng

PM Particulate Matter

Particulate Matter equal to or less than 10 microns in diameter PM10 Particulate Matter equal to or less than 2.5 microns in diameter PM2.5

Pounds per hour pph Parts per million ppm

ppmv Parts per million by volume ppmw Parts per million by weight

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

Standard cubic feet scf

Seconds sec Sulfur Dioxide SO_2

TAC **Toxic Air Contaminant**

Temp Temperature

THC Total Hydrocarbons Tons per year tpy Microgram μg

μm Micrometer or Micron VOC Volatile Organic Compounds

Year yr

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 condition 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))	Flexible Group ID
EUMELTFURNACE	Natural gas-fired aluminum melting furnace with a melting capacity of 650 lbs per hour.	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.

EUMELTFURNACE EMISSION UNIT CONDITIONS

DESCRIPTION

Natural gas-fired aluminum melting furnace with a melting capacity of 650 lbs per hour.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
Particulate Matter (PM)	0.5 pph*	Hourly	EUMELTFURNACE	SC V.1	R 336.1331, 40 CFR 52.21(c) & (d)
2. PM10	0.5 pph	Hourly	EUMELTFURNACE	SC V.1	40 CFR 52.21(c) & (d)
3. PM2.5	0.5 pph	Hourly	EUMELTFURNACE	SC V.1	40 CFR 52.21(c) & (d)
*The PM limit under Rule 331 is subsumed.					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
Chlorinated or fluorinated flux material	500 lbs/yr ¹	12-month rolling time period as determined at the end of each calendar month	EUMELTFURNACE	SC VI.3	R 336.1225

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall melt only clean charge, customer returns, 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)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall only burn natural gas in the burners of EUMELTFURNACE. (R 336.1224, R 336.1225, R 336.1301, 40 CFR 52.21(c) & (d))
- 2. The melt capacity of EUMELTFURNACE shall not exceed 650 lbs of metal an hour. (R 336.1224, R 336.1225, 40 CFR 52.21(c) & (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 may be required to verify PM, PM10, and PM2.5 emission rates from any furnace or furnaces in EUMELTFURNACE by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed below.

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 336.2001, 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 336.1224, R 336.1225)
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each fluxing material and metal processed in EUMELTFURNACE, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1225)
- 3. The permittee shall monitor and record, in a satisfactory manner, the flux throughput in EUMELTFURNACE on a monthly and 12-month rolling basis, as required in SC II.1. 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)

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. SVMELTFURNACE	12	30	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

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Footnotes:

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