From: Jarrett, Stephanie <sajarrett@fishbeck.com>
Sent: Friday, April 17, 2020 2:45 PM
To: EGLE-ROP
Cc: Zynda, Todd (EGLE); Smith, Fulton; Frank Buono; Dave Krause; Tina Sakalas
Subject: B5830 - ROP Renewal Application
Attachments: ROP_Renew_AMP_2020_0408_FNL.pdf; 05_ROP_Renew_MARK-UP_AMP.docx

Please find the ROP Renewal Application for the facility identified below attached to this email.

Ajax Metal Processing, Inc
4651 Bellevue Street
Detroit, Michigan
SRN: B5830

Application documents (including application forms, and supporting documentation) for ROP No. MI-ROP-B5830-2015b are attached to this email. An administratively complete application is due no later than May 12, 2020. A hard copy of the application with original signature should be mailed to the to the Cadillac District Office next week. If there is a delay in providing the hard copy we will notify the District office. If you have questions or problems opening the attached files, please contact me.

Thanks,
Stephanie

Stephanie A. Jarrett, P.E. | Senior Environmental Engineer
Fishbeck | w: 248.324.2146 | c: 248.417.9425| Fishbeck.com

From: Jarrett, Stephanie <sajarrett@fishbeck.com>
Sent: Friday, April 17, 2020 2:50 PM
To: Zynda, Todd (EGLE)
Cc: EGLE-ROP
Subject: RE: B5830 - ROP Renewal Application

Todd – The email below should have said the application will be mailed to the Detroit District office. I was thinking Cadillac Place as I typed the email. I have been stuck inside to long! Dave is set to mail the hard copy of his signature to our GR office, and they will send the hard copy packet out next week. I will let you know if anything gets delayed.

Thanks,
Stephanie

From: Jarrett, Stephanie
Sent: Friday, April 17, 2020 2:45 PM
To: 'EGLE-ROP@michigan.gov' <EGLE-ROP@michigan.gov>
Cc: 'Zynda, Todd (EGLE)' <ZyndaT@michigan.gov>; Smith, Fulton <fsmith@fishbeck.com>; Frank Buono <fbuono@ajaxmetal.com>; Dave Krause <DKRAUSE@ajaxmetal.com>; Tina Sakalas <tsakalas@ajaxmetal.com>
Subject: B5830 - ROP Renewal Application

Please find the ROP Renewal Application for the facility identified below attached to this email.

Ajax Metal Processing, Inc
4651 Bellevue Street
Detroit, Michigan
SRN: B5830

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Thanks,
Stephanie

Stephanie A. Jarrett, P.E. | Senior Environmental Engineer
Fishbeck | w: 248.324.2146 | c: 248.417.9425| Fishbeck.com

fishbeck
Engineers | Architects | Scientists | Constructors

39500 MacKenzie Drive, Suite 100
Novi, Michigan 48377

248.324.2090 | fishbeck.com

April 14, 2020
Project No. 200332

Jeff Korniski
Detroit District Office
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
Cadillac Place, Suite 2-300
3058 West Grand Boulevard
Detroit, MI 48202-6058

ROP Renewal Application for MI-ROP-B5830-2015b
Ajax Metal Processing, Inc., Detroit, Michigan

Dear Mr. Korniski:

Fishbeck has prepared a Renewable Operating Permit Renewal Application for Ajax Metal Processing, Inc. located at 4651 Bellevue Street, Detroit, Michigan (MI-ROP-B5830-2015b). The Renewal Application is due no later than May 12, 2020.

This Renewal Application includes:

- EGLE Form EQP 6000 ROP Application and associated Additional Information Forms.
- Marked up copy of MI-ROP-B5830-2015b

Minor ROP changes are being requested to align with the latest EGLE ROP templates. An electronic copy of the application and supporting documents will be provided to EGLE, which reduces the EGLE application administrative completeness review to 15 days.

If you have any questions or require additional information, please contact me at 248.324.2146 or sajarrett@fishbeck.com.

Sincerely,

Stephanie A. Jarrett

Stephanie A. Jarrett, PE
Senior Environmental Engineer

Attachments
By email
Copy: Todd Zynda – EGLE
David Krause – Ajax
Fulton D. Smith – Fishbeck

EGLE

RENEWABLE OPERATING PERMIT
RENEWAL APPLICATION FORM

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at http://michigan.gov/air (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

SRN	SIC Code	NAICS Code	Existing ROP Number	Section Number (if applicable)
B5830	3471	332813	MI-ROP-B5830-2015b	

Source Name
Ajax Metal Processing, Inc

Street Address
4651 Bellevue Street

City	State	ZIP Code	County
Detroit	MI	48207	Wayne

Section/Town/Range (if address not available)

Source Description
Ajax Metal Processing Inc. operates various processes including dip/spin and flow coat process lines, phosphating lines, electroplating lines, heat treating, and boilers for process heating. There are also numerous plating tanks, solution-holding tanks and solid waste holding bins.

☐ Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.

OWNER INFORMATION

Owner Name	Section Number (if applicable)
Ajax Metal Processing, Inc	

Mailing address (☒ check if same as source address)

City	State	ZIP Code	County	Country

☐ Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.

SRN: B5830	Section Number (if applicable):

PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name			Title	
David Krause			General Manager	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
313.267.2100		dkrause@ajaxmetal.com		

Contact 2 Name (optional)			Title	
Stephanie Jarrett			Senior Environmental Engineer	
Company Name & Mailing address (☐ check if same as source address)				
Fishbeck, 39500 MacKenzie Drive, Suite 100				
City	State	ZIP Code	County	Country
Novi	MI	48377	Oakland	United States
Phone number		E-mail address		
248.324.2146		sajarrett@fishbeck.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name			Title	
David Krause			General Manager	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
313.267.2100		dkrause@ajaxmetal.com		

Responsible Official 2 Name (optional)			Title	
Company Name & Mailing address (☐ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

☐ Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

SRN: B5830	Section Number (if applicable):

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

Listing of ROP Application Contents. Check the box for the items included with your application.	
☒ Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	☐ Compliance Plan/Schedule of Compliance
☒ Mark-up copy of existing ROP using official version from the AQD website (required)	☒ Stack information
☐ Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	☐ Acid Rain Permit Initial/Renewal Application
☒ Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	☐ Cross-State Air Pollution Rule (CSAPR) Information
☐ MAERS Forms (to report emissions not previously submitted)	☐ Confidential Information
☐ Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	☒ Paper copy of all documentation provided (required)
☐ Compliance Assurance Monitoring (CAM) Plan	☒ Electronic documents provided (optional)
☒ Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	☐ Other, explain:

Compliance Statement

This source is in compliance with **all** of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will meet in a timely manner applicable requirements that become effective during the permit term.	☒ Yes ☐ No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

Name and Title of the Responsible Official (Print or Type)

David Krause – General Manager

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.

David G. Krause — **Signature of Responsible Official**

4/8/2020 — **Date**

SRN: B5830	Section Number (if applicable):

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

C1.	Actual emissions and associated data from **all** emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes ☒ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	☐ Yes ☒ No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	☐ Yes ☒ No ☐ Yes ☒ No
C4.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO_2, VOC, lead) emissions? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No, criteria pollutant potential emission calculations do not need to be included.	☒ Yes ☐ No
C5.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No, HAP potential emission calculations do not need to be included.	☒ Yes ☐ No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	☐ Yes ☒ No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes ☒ No ☐ Yes ☒ No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to the MDEQ, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	☐ Yes ☒ No ☐ Yes ☒ No ☐ ☐
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes, then a copy must be submitted as part of the ROP renewal application.	☒ Yes ☐ No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	☒ Yes ☐ No

☒ Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: **AI-**Supplemental, **AI-**NonApp, **AI-**Plans, **AI-**PTE

SRN: B5830	Section Number (if applicable):

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. ☒ Yes ☐ No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	**Emission Unit Description**	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]	**Rule 201 Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]
EUCOGEN	500 kW natural gas-fired steam/electric IC engine. Maximum heat input capacity of 2.5 MMBtu/hr.	336.1212(4)(e)	R336.1285(g)
EUHCLTANK	6500 Gallon HCl tank, vented to scrubber	R336.1212(4)(i)	R336.1291
EUAIRMAKEUP	Four natural gas-fired air make up units each with a maximum heat input of 5.3 MMBtu/hr.	336.1212(4)(c)	R336.1282(2)(b)(i)
EUHEATTREAT1	Direct Fired Tempering Furnace on Line 1	336.1212(4)(c)	R336.1282(2)(a)(i)
EUHEATTREAT2	Direct Fired Tempering Furnace on Line 2	336.1212(4)(c)	R336.1282(2)(a)(i)
Plating Line #1 Dryer	Plating Line #1 Dryer	336.1212(4)(c)	R336.1282(2)(b)(i)
Plating Line #4 Dryer	Plating Line #4 Dryer	336.1212(4)(c)	R336.1282(2)(b)(i)
Plating Line #6 Dryer	Plating Line #6 Dryer	336.1212(4)(c)	R336.1282(2)(b)(i)
Plating Line 11 Bake Oven	Plating Line 11 Bake Oven	336.1212(4)(c)	R336.1282(2)(b)(i)
Phos #2 Dryer	Phos #2 Dryer	336.1212(4)(c)	R336.1282(2)(b)(i)

Comments:

Ajax plans to remove EUCogen in 2020; the cogen is not subject to the RICE MACT as it is greater than 500 HP and located at a major source of HAPs.

☐ Check here if an AI-001 Form is attached to provide more information for Part D. Enter AI-001 Form ID: **AI-**

SRN: B5830	Section Number (if applicable):

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to **all** emission units and **all** applicable requirements in the existing ROP.

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If Yes, identify changes and additions on Part F, Part G and/or Part H.	☒ Yes ☐ No
E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identity the stack(s) that was/were not reported on applicable MAERS form(s).	☒ Yes ☐ No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If Yes, complete Part F with the appropriate information.	☐ Yes ☒ No
E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	☐ Yes ☒ No

Comments:
Rule 290 conditions are being updated to EGLEs new template.

Stack information is provided on Table 4 of AI-Supplement

☒ Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID:
AI-Markup, AI-Supplement

SRN: B5830	Section Number (if applicable):

PART F: PERMIT TO INSTALL (PTI) INFORMATION

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to **all** emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. If No, go to Part G. ☐ Yes ☒ No

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (*Include Process Equipment, Control Devices and Monitoring Devices*)	Date Emission Unit was Installed/ Modified/ Reconstructed

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP. ☐ Yes ☐ No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP. ☐ Yes ☐ No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identity the stack(s) that were not reported on the applicable MAERS form(s). ☐ Yes ☐ No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form. ☐ Yes ☐ No

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: **AI-**

SRN: B5830	Section Number (if applicable):

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.

If Yes, identify the emission units in the table below. If No, go to Part H. ☐ Yes ☒ No

Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

Origin of Applicable Requirements	**Emission Unit Description – *Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices***	**Date Emission Unit was Installed/ Modified/ Reconstructed**
☐ Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
☐ Rule 287(2)(c) surface coating line		
☐ Rule 290 process with limited emissions		

Comments:

Existing Rule 290 sources are included in the existing ROP. The Rule 290 table has been updated to EGLEs new template.

☐ Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: **AI-**

SRN: B5830	Section Number (if applicable):

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If Yes, answer the questions below. **Updates to the Rule 290 applicable requirements have been made. This is identified in Part G.**	☐ Yes ☒ No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If Yes, describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	☐ Yes ☒ No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If Yes, identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	☐ Yes ☒ No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If Yes, on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify each state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	☐ Yes ☒ No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If Yes, list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.	☐ Yes ☒ No
H6. Does the source propose to add, change and/or delete **source-wide** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H7. Are you proposing to **streamline** any requirements? If Yes, identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	☐ Yes ☒ No

SRN: B5830	Section Number (if applicable):

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete **emission limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H9. Does the source propose to add, change and/or delete **material limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H10. Does the source propose to add, change and/or delete **process/operational restriction** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H11. Does the source propose to add, change and/or delete **design/equipment parameter** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H12. Does the source propose to add, change and/or delete **testing/sampling** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H13. Does the source propose to add, change and/or delete **monitoring/recordkeeping** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H14. Does the source propose to add, change and/or delete **reporting** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15.	Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H16.	Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H17.	Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No

☒ Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: AI-Supplement, AI-Markup

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

	SRN: B5830	Section Number (if applicable):

1. Additional Information ID
AI-Supplemental

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Supplemental information prepared by Fishbeck which explains additions and modifications associated with the ROP Renewal Application for Ajax Metal Processing, Inc. is attached.

Renewable Operating Permit Renewal Application

Supplemental Information

Ajax Metal Processing, Inc.
Detroit, Michigan

Project No. 200332
April 8, 2020

fishbeck
Engineers | Architects | Scientists | Constructors

fishbeck
Engineers | Architects | Scientists | Constructors

39500 MacKenzie Drive, Suite 100
Novi, Michigan 48377

248.324.2090 | fishbeck.com

Renewable Operating Permit Renewal Application

Supplemental Information

Prepared For:
Ajax Metal Processing, Inc.
Detroit, Michigan

April 8, 2020
Project No. 200332

Table of Contents

List of Tables

List of Abbreviations/Acronyms

3C	40 CFR Part 63 Subpart CCC
4M	40 CFR Part 63 Subpart MMMM
4Z	40 CFR Part 63 Subpart ZZZZ
5D	40 CFR Part 63 Subpart DDDDD
6W	40 CFR Part 63 Subpart WWWWWW
AI	Additional Information (EGLE Form)
AMP	Ajax Metal Processing, Inc.
Btu	British thermal units
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CSAPR	Cross-State Air Pollution Rule
°F	degrees Fahrenheit
EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	emission unit
FG	flexible group
HAP	hazardous air pollutant
HCl	hydrochloric acid
HP	horsepower
kW	kilowatt(s)
lb/mo	pounds per month
MACT	Maximum Achievable Control Technology
MAP	Malfunction Abatement Plan
MAERS	Michigan Air Emissions Reporting System
MMBtu/hr	million Btus per hour
NESHAP	National Emission Standards for Hazardous Air Pollutants
PTE	Potential to Emit
PTI	Permit to Install
RICE	reciprocating internal combustion engine
ROP	Renewable Operating Permit
tpy	tons per year
USEPA	U.S. Environmental Protection Agency
VOC	volatile organic compound

1.0 Executive Summary

Ajax Metal Processing, Inc (AMP) provides metal finishing services, which include heat treating, plating, and the application of locking and sealing materials on metal parts, primarily fasteners. The plant is located at 4651 Bellevue Street, Detroit, Michigan.

AMP is subject to the Michigan ROP Program because it has a PTE greater than 10 tpy single HAP and greater than 25 tpy aggregate HAPs. The site is considered a major source for HAPs.

AMP operates in compliance with its ROP, No. MI- ROP-B5830-2015b. An administratively complete application for renewal of this ROP is due between May 12, 2019 and May 12, 2020.

2.0 Compliance Plan/Schedule of Compliance (Part B)

AMP is and will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, or other applicable requirements not currently contained in the existing ROP.

3.0 Source Requirement Information (Part C)

The following sections provide additional information as applicable to Part C of the ROP Application.

3.1 Michigan Annual Emissions Reporting System

Tables 1 and 2 identify all the permitted and exempt emission units that require actual emissions to be reported as part of the ROP renewal application.

AMP has submitted actual emissions and associated data for all emission units required to be reported to MAERS.

3.2 Potential to Emit Criteria and HAPs

AMP has added and modified equipment since the last ROP renewal, which has altered the facility's PTE criteria pollutants or HAPs.

On June 21, 2016, PTI 47-16 was issued for the addition of emission unit EUDIPSPIN2 and the modification of the plating tank on EUPLATINGLINE11.

On March 30, 2017, PTI 47-16A was issued for the addition of rain caps on the stacks associated with EUDIPSPIN2.

The PTE resulting from these additions and modifications were provided in the relevant PTI Applications. NOTE: Emissions from EUDIPSPIN2 continue to meet the 2,000 lb/mo and 10 tpy limits in the existing ROP and AMP maintained the facility wide limit of 30 tpy VOC from coating lines; therefore, the coating operations' PTE did not change with the addition of EUDIPSPIN2. The PTE summaries for EUDIPSPIN2 and the modification to the plating in tank on EUPLATINGLINE11 can be found in AI-PTE.

3.3 CSAPR and Acid Rain Program

AMP is not subject to the CSAPR or the Acid Rain Program; therefore, renewal applications for these programs are not required.

3.4 Compliance Assurance Monitoring

CAM is applicable to emission units that use control devices to achieve compliance with an emission limitation or standard and for which the emission unit has potential pre-control emissions more than 100% of the major source threshold amount for the applicable pollutant (i.e., at a level considered to be *major* under the ROP Program).

As presented in Table 3, no emission units at AMP are subject to CAM requirements.

3.5 Plans Required to be Submitted

AMP's existing ROP and PTIs reference a MAP for the plating lines. The most recent MAP can be found in AI-Plans.

3.6 Federal Regulation – Non Applicable Requirements

AMP has identified the following non-Applicable requirements:

- 40 CFR Part 63 Subpart N – *NESHAP: Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*
  - Reason: CHROMATE LINES 1 & 2 does not use electrodes or current control to deposit metals; therefore, is not subject per 40 CFR 63.340(c).
- 40 CFR Part 63 Subpart ZZZZ (4Z) – *NESHAP: Stationary Reciprocating Internal Combustion Engines*
  - Reason: EUCOGEN is an existing emergency stationary RICE per 40 CFR 63.6590(a)(1)(i) (commenced construction or reconstruction before December 19, 2002); additionally the unit is more than 500 brake HP and is located at a major source of HAP emissions; therefore, it is not subject per 40 CFR 63.6590(b)(3)(iii).
- 40 CFR Part 63 Subpart WWWWWW (6W) – *NESHAP: Area Source Standards for Plating and Polishing Operations*
  - Reason: AMP is a major source of HAPs, including FGPLATINGLINES and CHROMATE LINES 1 & 2.
- 40 CFR Part 63 Subpart CCC (3C) – *NESHAP: Steel Pickling—HCl Process Facilities and Hydrochloric Acid Regeneration Plants*
  - Reason: 3C applies to 63.1155(1): *All new and existing steel pickling facilities that pickle carbon steel using hydrochloric acid solution that contains 6 percent or more by weight HCl and is at a temperature of 100°F or higher*.
    The definition of steel pickling is: *Steel pickling means the chemical removal of iron oxide mill scale that is formed on steel surfaces during hot rolling or hot forming of semi-finished steel products through contact with an aqueous solution of acid where such contact occurs prior to shaping or coating of the finished steel product. This definition does not include removal of light rust or scale from finished steel products or activation of the metal surface prior to plating or coating*.

Form AI-NonApp provides the non-applicable requirements in the existing ROP.

4.0 Exempt Emission Unit Information (Parts D and G)

Michigan Rule 212(4) identifies exempt emission units that are required to be reported in an administratively complete application for an ROP. Table 2 identifies all exempt emission units that are required to be reported.

4.1 Emergency Engines

AMP has a 500 kW natural gas-fired steam/electric internal combustion engine (EUCOGEN). Maximum heat input capacity of 2.5 MMBtu/hr. It is currently exempt pursuant to rule 282(2)(g). The engine is greater than 500 HP and located at a major source; therefore, it is exempt 40CFR Part 63 Subpart ZZZZ.

EUCOGEN is scheduled for removal in July of 2020.

4.2 Natural Gas-Fired Equipment

AMP has natural gas-fired space heaters, hot water heaters, process heaters, and boilers. The natural gas-fired equipment, which are listed in Table 2, are exempt pursuant to rule 282(2)(b)(i), which states:

> *(b) Fuel-burning equipment which is used for space heating, service water heating, electric power, generation, oil and gas production or processing, or indirect heating and which burns only the following fuels:*
> *(i) Sweet natural gas, synthetic gas, liquefied petroleum gas, or a combination thereof and the equipment has a rated heat input capacity of not more than 50,000,000 Btu per hour.*

The facility is a major source of HAPs, therefore, some of the natural gas-fired heaters and boilers are subject to 40 CFR Part 63 Subpart DDDDD (5D). Table 2 identifies boilers and heaters subject to 5D, or the applicable exemption from the rule. The requirements and conditions for FGBOILERMACT have been incorporated into the existing ROP.

4.3 Aboveground Storage Tanks

AMP has a 6,500-gallon HCl tank onsite that qualifies for exemption under Rules 290 and 291.

4.4 Rules 290

The existing ROP contains applicable requirements for the facility's existing Rule 290 sources, FGRULE290. The conditions have been updated to reflect the new EGLE template.

5.0 ROP Information and Requested Changes (Parts E and H)

A summary of all changes requested to the existing ROP is provided as AI-Markup.

5.1 Administrative Changes to Existing Terms and Conditions

AMP is not requesting to modify the names and descriptions of emission units that appear in the existing ROP.

5.2 Federal Regulations

AMP is subject to the following NESHAPs:

- 40 CFR Part 63 Subpart A – General Provisions
- 40 CFR Part 63 Subpart 5D – NESHAP for Major Sources: *Industrial, Commercial, and Institutional Boilers and Process Heaters*
- 40 CFR Part 63 Subpart MMMM (4M) – NESHAP: *Surface Coating of Miscellaneous Metal Parts and Products*

The requirements for these NESHAPs have been incorporated into the existing ROP.

5.3 Applicable Stacks

Stacks with applicable requirements that are identified in the existing ROP, but which have not been reported in MAERS are identified in Table 4.

5.4 Dismantled Emission Units

No emission units have been dismantled and/or removed from the AMP site; however, EUCOGEN is currently scheduled to be dismantled in July 2020.

6.0 Permits to Install

No PTIs have been issued for AMP which have not already been rolled into the existing ROP.

6.1 PTI Applicable Stacks

No PTIs containing applicable stacks have been issued for AMP since the last ROP revision.

6.2 PTI Compliance Assurance Monitoring

No PTIs requiring CAM have been issued for AMP. See Table 3 for CAM evaluations.

7.0 Conclusion

The ROP for the AMP facility expires on November 12, 2020. An administratively complete application for renewal must be received by the EGLE, Air Quality Division not more than 18 months before (May 12, 2019) and not less than 6 months before (May 12, 2020) the expiration date of the current ROP to maintain the permit application shield. The application shield ensures that the facility will be able to continue to operate under its current permit should the processing of its renewal application by EGLE extend beyond the permit expiration date.

In addition to the hard copy submittal of the ROP Renewal Application, if a source submits an electronic copy of the application and supporting documents to EGLE, the EGLE application administrative completeness review is reduced to 15 days. Documentation that the application was delivered to EGLE timely, including a copy of the email submittal and electronic return receipt will be maintained by AMP.

Following administrative review of the Application by EGLE, the facility will receive a letter from the EGLE indicating the facility has obtained an application shield pursuant to Rule 217(1)(a) and the existing ROP will not expire until the renewal permit has been issued. Once the application shield letter has been received, it will also be maintained until the renewal permit has been issued.

Tables

Table 1 – Summary of Emission Units Included in ROP and PTIs
ROP Renewal Application
Ajax Metal Processing - Detroit, Michigan

Emission Unit ID	Emission Unit Description	Installation Date/ Modification Date	Flexible Group ID	H.3 Remove/Add (yes/no)	New PTI Not Previously Incorporated into ROP	H.2 Administrative Changes to EU Name, Description, or CE	C.1 Emissions Reported to MAERS	Applicable Stacks	E.2 Stacks Reported to MAERS	C.7 Plans Required to be Submitted
EUDIPSPIN	Dip/Spin coating process with a 3.0 MMBtu capacity natural gas-fired curing oven. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT	no	no	no	yes	see Flexible Group	no	no
EUDIPSPIN2	Dip/Spin coating process with a 1.5 MMBtu capacity natural gas-fired curing oven. Purge and clean-up operations associated with the line.	11-30-2016 03-30-2017	FGLOCKSEAL FGMACT FGFACILITY	no	no	no	yes	see Flexible Group	no	no
EUL&SOVENS	Three natural gas-fired paint curing ovens serving the locking and sealing area.	01/01/1996	FGLOCKSEAL FGMACT	no	no	no	yes	see Flexible Group	no	no
EULOCTITE1	Locking and sealing area flow coat process line #5. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT	no	no	no	yes	see Flexible Group	no	no
EULOCTITE2	Locking and sealing area flow coat process line #6. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT	no	no	no	yes	see Flexible Group	no	no
EULOCTITE3	Locking and sealing area flow coat process line #7. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT	no	no	no	yes	see Flexible Group	no	no
EUWHEEL1	Locking and sealing area flow coat process line #1. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT	no	no	no	yes	see Flexible Group	no	no
EUWHEEL2	Locking and sealing area flow coat process line #2. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT	no	no	no	yes	see Flexible Group	no	no
EUWHEEL3	Locking and sealing area flow coat process line #3. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT	no	no	no	yes	see Flexible Group	no	no
EUWHEEL4	Locking and sealing area flow coat process line #4. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT	no	no	no	yes	see Flexible Group	no	no
EUPHOS1	Zinc Phosphating line: HCL Acid Pickling Tank & Packed Bed Scrubber	6/23/1975	FGRULE290	no	no	no	yes	see Flexible Group	NA	no
EUPHOS2	Zinc Phosphating line: HCL Acid Pickling Tank & Packed Bed Scrubber	1/13/1992	FGRULE290	no	no	no	yes	see Flexible Group	NA	no
EUPLATINGLINE4	Plating line #4, previously known as EUZINCALLOY1.	8/21/1980	FGPLATINGLINES	no	no	no	yes	see Flexible Group	no	yes - MAP
EUPLATINGLINE3	Plating line #3, previously known as EUZINCALLOY2.	6/23/1975	FGPLATINGLINES	no	no	no	yes	see Flexible Group	no	yes - MAP
EUPLATINGLINE1	Plating line #1, previously known as EUZINCALLOY3	4/25/1990	FGPLATINGLINES	no	no	no	yes	see Flexible Group	no	yes - MAP
EUPLATINGLINE11	Plating line #11, previously known as EUZINC4	7/8/1991	FGPLATINGLINES	no	no	no	yes	see Flexible Group	no	yes - MAP
EUPLATINGLINE12	Plating line #12, previously known as EUZINC5	03/02/1992	FGPLATINGLINES	no	no	no	yes	see Flexible Group	no	yes - MAP
EUPLATINGLINE6	Plating line #6	2011	FGPLATINGLINES	no	no	no	yes	see Flexible Group	no	yes - MAP
EUWAX	Zinc Electroplating Wax Usage	7/1/1987	FGRULE290	no	no	no	yes	see Flexible Group	NA	no
EUBOILER60HP	60 HP Natural Gas-fired Boiler	1987	FGBOILERMACT	no	no	no	yes	see Flexible Group	NA	no
EUBOILER150HP	150HP Natural Gas-fired Boiler	1987	FGBOILERMACT	no	no	no	yes	see Flexible Group	NA	no
EUHARDENING1	11 MMBtu/hr Hardening Furnace 1 (40 Burners at 275,000 BTUs each. Five heating zones each with 8 burners)	1976	FGBOILERMACT	no	no	no	yes - EUL&SOVENS	see Flexible Group	NA	no
EUHARDENING2	11 MMBtu/hr Hardening Furnace 2 (40 Burners at 275,000 BTUs each. Five heating zones each with 8 burners)	1976	FGBOILERMACT	no	no	no	yes - EUL&SOVENS	see Flexible Group	na	no
EUENDO	1 MMBtu/hr Endothermic Generator		FGBOILERMACT	no	no	no	yes - EUL&SOVENS	see Flexible Group	NA	no

Table 1 – Summary of Emission Units Included in ROP and PTIs
ROP Renewal Application
Ajax Metal Processing - Detroit, Michigan

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs	Remove/Add (yes/no)	New PTI Not Previously Incorporated into ROP	H.2 Administrative Changes to EU Name, Description, or CE	C.1 Emissions Reported to MAERS	Applicable Stacks	E.2 Stacks Reported to MAERS	C.7 Plans Required to be Submitted
FGLOCKSEAL FGMACT	Seven flow coat process lines and two Dip Spin coating lines comprising the locking and sealing area along with three natural gas-fired paint curing ovens serving the locking and sealing area. Purge and clean-up operations associated with the line. This includes, any new or additional coating line that is installed pursuant to an MDEQ general permit to install for a coating line emitting up to 10 tons per year of volatile organic compounds.	EUL&SOVENS, EULOCTITE1, EULOCTITE2, EULOCTITE3, EUWHEEL1, EUWHEEL2, EUWHEEL3, EUWHEEL4 EUDIPSPIN EUDIPSPIN2	no	no	no	yes	SVDIPSPIN2-01 SVDIPSPIN2-02 SVLOCTITE1-01 SVLOCTITE1-02 SVLOCTITE2-01 SVLOCTITE2-02 SVLOCTITE3-01 SVWHEEL1-01 SVWHEEL1-02 SVWHEEL1-03 SVWHEEL3-01 SVWHEEL3-02 SVWHEEL3-03 SVWHEEL4 SVDIPSPIN-01 SVDIPSPIN-02	no	no
FGPLATINGLINES	6 plating lines that consist of alkaline cleaning baths, hydrochloric acid pickling baths and zinc electroplating tanks.	EUPLATINGLINE1, EUPLATINGLINE3, EUPLATINGLINE4, EUPLATINGLINE6, EUPLATINGLINE11, EUPLATINGLINE12	no	no	no	yes	SVSCRUB6 SVSCRUB1 SVSCRUB3 SVSCRUB4 SVSCRUB11 SVSCRUB12 SVPLT1 SVPLT3 SVPLT4 SVPLT11 SVPLT12	no	yes - MAP
FGBOILERMACT	This Flexible Group only includes those applicable requirements that would apply to existing affected boilers as described in 40 CFR Part 63, Subpart DDDDD beginning on January 31, 2016, as they would apply to Ajax Metal Processing Inc. located in Detroit, MI.	EUBOILER60HP, EUBOILER150HP, EUHARDENING1, EUHARDENING2, EUENDO	no	no	no	yes	na	no	no
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.	EUPHOS1, EUPHOS2, EUWAX	no	no	no	yes	na	no	no

Table 2 – Summary of Exempt Emission Units
ROP Renewal Application
Ajax Metal Processing - Detroit, Michigan

Emission Unit	Description	Rule for Listing in ROP	Exemption	Required to be listed	Application Part	Reported to MAERS	Applicable Requirements	NOTES
EUCOGEN	500 kW natural gas-fired steam/electric IC engine. Maximum heat input capacity of 2.5 MMBtu/hr.	336.1212(4)(e)	R336.1285(g)	Yes	Part D	Yes	No	Not subject to RICE MACT - Greater than 500 HP at a major source of HAPs Removal planned for July of 2020
EUHCLTANK	6500 Gallon HCl tank, vented to scrubber	R336.1212(4)(i)	R336.1291	Yes	Part D	No	Rule 291 records	No Criteria Pollutant emissions
EUAIRMAKEUP	Four natural gas-fired air make up units each with a maximum heat input of 5.3 MMBtu/hr.	336.1212(4)(c)	R336.1282(2)(b)(i)	Yes	Part D	Yes	No	Not subject to boiler MACT - Comfort and Space Heat Units are specifically excluded from the definition of process heater in 63.7579
EUHEATTREAT1	Direct Fired Temporing Furnace on Line 1	336.1212(4)(c)	R336.1282(2)(a)(i)	Yes	Part D	Yes	No	Not subject to boiler MACT - Direct Fired Units do not meet the definition of process heater in 63.7577
EUHEATTREAT2	Direct Fired Temporing Furnace on Line 2	336.1212(4)(c)	R336.1282(2)(a)(i)	Yes	Part D	Yes	No	Not subject to boiler MACT - Direct Fired Units do not meet the definition of process heater in 63.7578
Plating Line #1 Dryer	Plating Line #1 Dryer	336.1212(4)(c)	R336.1282(2)(b)(i)	Yes	Part D	Yes	No	Not subject to boiler MACT - Direct Fired Units do not meet the definition of process heater in 63.7579
Plating Line #4 Dryer	Plating Line #4 Dryer	336.1212(4)(c)	R336.1282(2)(b)(i)	Yes	Part D	Yes	No	Not subject to boiler MACT - Direct Fired Units do not meet the definition of process heater in 63.7580
Plating Line #6 Dryer	Plating Line #6 Dryer	336.1212(4)(c)	R336.1282(2)(b)(i)	Yes	Part D	Yes	No	Not subject to boiler MACT - Direct Fired Units do not meet the definition of process heater in 63.7581
Plating Line 11 Bake Oven	Plating Line 11 Bake Oven	336.1212(4)(c)	R336.1282(2)(b)(i)	Yes	Part D	Yes	No	Not subject to boiler MACT - Direct Fired Units do not meet the definition of process heater in 63.7582
Phos #2 Dryer	Phos #2 Dryer	336.1212(4)(c)	R336.1282(2)(b)(i)	Yes	Part D	Yes	No	Not subject to boiler MACT - Direct Fired Units do not meet the definition of process heater in 63.7583
EUHARDENING1	11 MMBtu/hr Hardening Furnace 1 (40 Burners at 275,000 BTUs each. Five heating zones each with 8 burners)	336.1212(4)(c)	R336.1282(a) - **1980 MAPCC General Rules allowed oil quench**	Yes – already included in existing ROP	Part H	Yes	Yes - FGBOILERMACT	Already included in existing ROP; Heat Treat Furnaces installed before 1980
EUHARDENING2	11 MMBtu/hr Hardening Furnace 2 (40 Burners at 275,000 BTUs each. Five heating zones each with 8 burners)	336.1212(4)(c)	R336.1282(a) - **1980 MAPCC General Rules allowed oil quench**	Yes – already included in existing ROP	Part H	Yes	Yes - FGBOILERMACT	Already included in existing ROP; Heat Treat Furnaces installed before 1980
EUBOILER150HP	150 HP Natural Gas-fired Boiler	336.1212(4)(c)	R336.1282(2)(b)(i)	Yes – already included in existing ROP	Part H	Yes	Yes - FGBOILERMACT	
EUBOILER60HP	60 HP Natural Gas-fired Boiler	336.1212(4)(c)	R336.1282(2)(b)(i)	Yes – already included in existing ROP	Part H	Yes	Yes - FGBOILERMACT	
EUENDO	Endothermic Generator	NA	R336.1285(l)(iv)	Yes – already included in existing ROP	Part H	Yes	Yes - FGBOILERMACT	all combustion emissions from the plant reported to MAERS, however EUEndo is not specifically listed

Table 2 – Summary of Exempt Emission Units
ROP Renewal Application
Ajax Metal Processing - Detroit, Michigan

Emission Unit	Description	Rule for Listing in ROP	Exemption	Required to be listed	Application Part	Reported to MAERS	Applicable Requirements	NOTES
EUPHOS1	Zinc Phosphating Line: HCL Acid Pickling Tank & Packed Bed Scrubber	R336.1212(4)(h)	R336.1290	Yes – already included in existing ROP	Part G	Yes	Yes - FGRULE290	Add emission unit to ROP all ready added to FGRULE290
EUPHOS2	Zinc Phosphating Line: HCL Acid Pickling Tank & Packed Bed Scrubber	R336.1212(4)(h)	R336.1290	Yes – already included in existing ROP	Part G	Yes	Yes - FGRULE290	Included in current ROP
EUWAX	Zinc Electroplating - Wax Usage	R336.1212(4)(h)	R336.1290	Yes – already included in existing ROP	Part G	Yes	Yes - FGRULE290	Added emission unit and added to FGRULE290

Table 3 – Summary of Compliance Assurance Monitoring

ROP Renewal Application

Ajax Metal Processing - Detroit, Michigan

Emission Unit ID or Flexible Group ID	CAM Requirement Rolled into ROP	Control Equipment	Pollutants Controlled	Applicable Emission Limits	NSPS or NESHAP Requirements	CEMS	Precontrolled Emissions above Major Source Threshold	Subject to CAM	Reason
FGLOCKSEAL	no	No control equipment	NA	2000 pounds VOC/month 10.0 tpy VOC	Part 63 Subpart DDDD	no	NA	no	No applicable control equipment
FGPLATINGLINES	no	Packed bed scrubber	HCl	no	no	no	no	no	No emission limits

CAM Applicability

The emission unit uses a control device to achieve compliance with an emission limitation or standard for the applicable pollutant ;

The emission unit has potential pre-control emissions which are over 100 percent of the major source threshold amount (at a level considered to be major under the ROP Program) for the

Not otherwise exempt

Table 4 – List of Stacks
ROP Renewal Application
Ajax Metal Processing - Detroit, Michigan

Emission Unit ID or Flexible Group ID	CAM Requirement Rolled into ROP	4. Stack & Vent ID	5. Remove from MAERS	Applicable Emission Limits	NSPS or NESHAP Requirements	8. Height Above Ground (feet)	Verified Height	Permitted Height Above Ground (feet)
FGLOCKSEAL	no	SVDIPSPIN2-01	na	na	Dip Spin 2 Application	30	unknown	30
FGLOCKSEAL	no	SVDIPSPIN2-02	na	na	Dip Spin 2 Oven	30	unknown	30
FGLOCKSEAL	no	SVLOCTITE1-01	na	na	Application	28	unknown	28
FGLOCKSEAL	no	SVLOCTITE1-02	na	na	Oven	28	unknown	28
FGLOCKSEAL	no	SVLOCTITE2-01	na	na	Application	28	unknown	28
FGLOCKSEAL	no	SVLOCTITE2-02	na	na	Oven	28	unknown	28
FGLOCKSEAL	no	SVLOCTITE3-01	na	na	Oven	28	unknown	28
FGLOCKSEAL	no	SVWHEEL1-01	na	na	Application	28	unknown	28
FGLOCKSEAL	no	SVWHEEL3-01	na	na	Application	28	unknown	28
FGLOCKSEAL	no	SVWHEEL3-02	na	na	Oven end	28	unknown	28
FGLOCKSEAL	no	SVWHEEL3-03	na	na	Oven middle	28	unknown	28
FGLOCKSEAL	no	SVWHEEL4	na	na	Oven	28	unknown	28
FGLOCKSEAL	no	SVDIPSPIN1-01	na	na	Oven	28	unknown	28
FGLOCKSEAL	no	SVDIPSPIN1-02	na	na	Oven	28	unknown	28
FGPLATINGLINES	no	SVSCRUB6	na	na	na	38	unknown	38
FGPLATINGLINES	no	SVSCRUB1	na	na	na	39	unknown	39
FGPLATINGLINES	no	SVSCRUB3	na	na	na	39	unknown	39
FGPLATINGLINES	no	SVSCRUB4	na	na	na	39	unknown	39
FGPLATINGLINES	no	SVSCRUB11	na	na	na	38	unknown	38
FGPLATINGLINES	no	SVSCRUB12	na	na	na	39	unknown	39
FGPLATINGLINES	no	SVPLT1	na	na	na	31	unknown	31
FGPLATINGLINES	no	SVPLT3	na	na	na	30	unknown	30
FGPLATINGLINES	no	SVPLT4	na	na	na	31	unknown	31
FGPLATINGLINES	no	SVPLT11	na	na	na	30	unknown	30
FGPLATINGLINES	no	SVPLT12	na	na	na	29	unknown	29

Table 4 – List of Stacks
ROP Renewal Application
Ajax Metal Processing - Detroit, Michigan

Emission Unit/ Flexible Group	Stacks Reported to MAERS	4. Stack & Vent ID	9. Inside Stack Diameter (inches)	Verified Diameter	Permitted Stack Diameter (inches)	10. Exit Gas Temperature (°F)	Verified Discharge Temp	11. Actual Exit Gas Flow Rate (CFM)
FGLOCKSEAL	no	SVDIPSPIN2-01	12		12	unknown	unknown	unknown
FGLOCKSEAL	no	SVDIPSPIN2-02	24		24		unknown	unknown
FGLOCKSEAL	no	SVLOCTITE1-01	14		14		unknown	unknown
FGLOCKSEAL	no	SVLOCTITE1-02	10		10		unknown	unknown
FGLOCKSEAL	no	SVLOCTITE2-01	14		14		unknown	unknown
FGLOCKSEAL	no	SVLOCTITE2-02	10		10		unknown	unknown
FGLOCKSEAL	no	SVLOCTITE3-01	14		14		unknown	unknown
FGLOCKSEAL	no	SVWHEEL1-01	12		12		unknown	unknown
FGLOCKSEAL	no	SVWHEEL1-02	14		14		unknown	unknown
FGLOCKSEAL	no	SVWHEEL1-03	10		10		unknown	unknown
FGLOCKSEAL	no	SVWHEEL3-01	14		14		unknown	unknown
FGLOCKSEAL	no	SVWHEEL3-02	10		10		unknown	unknown
FGLOCKSEAL	no	SVWHEEL3-03	14		14		unknown	unknown
FGLOCKSEAL	no	SVWHEEL4	14		14		unknown	unknown
FGLOCKSEAL	no	SVDIPSPIN1-01	12		12		unknown	unknown
FGLOCKSEAL	no	SVDIPSPIN1-02	16		16		unknown	unknown
FGPLATINGLINES	no	SVSCRUB6	21		21		unknown	unknown
FGPLATINGLINES	no	SVSCRUB1	20		20		unknown	unknown
FGPLATINGLINES	no	SVSCRUB3	20		20		unknown	unknown
FGPLATINGLINES	no	SVSCRUB4	20		20		unknown	unknown
FGPLATINGLINES	no	SVSCRUB11	38		38		unknown	unknown
FGPLATINGLINES	no	SVSCRUB12	42		42		unknown	unknown
FGPLATINGLINES	no	SVPLT1	46		46		unknown	unknown
FGPLATINGLINES	no	SVPLT3	42		42		unknown	unknown
FGPLATINGLINES	no	SVPLT4	42		42		unknown	unknown

Table 4 – List of Stacks
ROP Renewal Application
Ajax Metal Processing - Detroit, Michigan

Emission Unit/ Flexible Group	Stacks Reported to MAERS	4. Stack & Vent ID	12. Stack Orientation	Verified Orientation	Verified Rain Protection	13. Latitude	14. Longitude	15. Horizontal Collection Method
FGLOCKSEAL	no	SVDIPSPIN2-01	Vertical	no	yes	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVDIPSPIN2-02	Vertical	no	yes	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVLOCTITE1-01	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVLOCTITE1-02	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVLOCTITE2-01	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVLOCTITE2-02	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVLOCTITE3-01	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVWHEEL1-01	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVWHEEL1-02	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVWHEEL1-03	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVWHEEL3-01	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVWHEEL3-02	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVWHEEL3-03	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVWHEEL4	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVDIPSPIN1-01	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGLOCKSEAL	no	SVDIPSPIN1-02	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.

Table 4 – List of Stacks
ROP Renewal Application
Ajax Metal Processing - Detroit, Michigan

Emission Unit/ Flexible Group	Stacks Reported to MAERS	4. Stack & Vent ID	12. Stack Orientation	Verified Orientation	Verified Rain Protection	13. Latitude	14. Longitude	15. Horizontal Collection Method
FGPLATINGLINES	no	SVSCRUB6	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGPLATINGLINES	no	SVSCRUB1	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGPLATINGLINES	no	SVSCRUB3	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGPLATINGLINES	no	SVSCRUB4	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGPLATINGLINES	no	SVSCRUB11	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGPLATINGLINES	no	SVSCRUB12	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGPLATINGLINES	no	SVPLT1	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGPLATINGLINES	no	SVPLT3	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGPLATINGLINES	no	SVPLT4	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGPLATINGLINES	no	SVPLT11	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.
FGPLATINGLINES	no	SVPLT12	Vertical	no	no	42.369027	-83.022234	001 The geographic coordinate determination method based on address matching-house number.

Table 4 – List of Stacks
ROP Renewal Application
Ajax Metal Processing - Detroit, Michigan

Emission Unit/ Flexible Group	Stacks Reported to MAERS	4. Stack & Vent ID	16. Source Map Scale Number (only required if 15 = 018)	17. Horizontal Accuracy Measure (Meters)	18. Horizontal Reference Datum Code	19. Reference Point Code	20. Bypass Stack Only (yes/no)	21. If yes, Operator ID of Main Stack
FGLOCKSEAL	no	SVDIPSPIN2-01	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVDIPSPIN2-02	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVLOCTITE1-01	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVLOCTITE1-02	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVLOCTITE2-01	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVLOCTITE2-02	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVLOCTITE3-01	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVWHEEL1-01	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVWHEEL1-02	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVWHEEL1-03	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVWHEEL3-01	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVWHEEL3-02	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVWHEEL3-03	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVWHEEL4	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVDIPSPIN1-01	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGLOCKSEAL	no	SVDIPSPIN1-02	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na

Table 4 – List of Stacks
ROP Renewal Application
Ajax Metal Processing - Detroit, Michigan

Emission Unit/ Flexible Group	Stacks Reported to MAERS	4. Stack & Vent ID	16. Source Map Scale Number (only required if 15 = 018)	17. Horizontal Accuracy Measure (Meters)	18. Horizontal Reference Datum Code	19. Reference Point Code	20. Bypass Stack Only (yes/no)	21. If yes, Operator ID of Main Stack
FGPLATINGLINES	no	SVSCRUB6	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGPLATINGLINES	no	SVSCRUB1	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGPLATINGLINES	no	SVSCRUB3	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGPLATINGLINES	no	SVSCRUB4	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGPLATINGLINES	no	SVSCRUB11	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGPLATINGLINES	no	SVSCRUB12	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGPLATINGLINES	no	SVPLT1	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGPLATINGLINES	no	SVPLT3	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGPLATINGLINES	no	SVPLT4	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGPLATINGLINES	no	SVPLT11	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na
FGPLATINGLINES	no	SVPLT12	na	5	001 North American Datum of 1927	102 Center of a facility or station.	no	na

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RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: B5830	Section Number (if applicable):

1. Additional Information ID
AI-NonApp

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUCOGEN	40 CFR Part 63 Subpart ZZZZ (EUCOGEN is exempt from permitting per R 336.1282(b)(i) & R336.1285(g))	EUCOGEN is an existing emergency stationary RICE per 40 CFR 63.6590(a)(1)(i) (commenced construction or reconstruction before 12/19/2002) and, therefore, they are not subject per 40 CFR 63.6590(b)(3)(iii) as the unit is more than 500 brake HP and located at a major source of HAP emissions.
FGPLATINGLINES & CHROMATE LINES 1 & 2	40 CFR Part 63 Subpart WWWWWW (CHROMATE LINES 1 & 2 are exempt from permitting per R 336.1285(r)(vi)	FGPLATINGLINES & CHROMATE LINES 1 & 2 are located at a major source of HAPs and therefore, not subject per 40 CFR 63.11504(a).
CHROMATE LINES 1 & 2	40 CFR Part 63 Subpart N (CHROMATE LINES 1 & 2 are exempt from permitting per R 336.1285(r)(vi)	CHROMATE LINES 1 & 2 does not use electrodes or current control to deposit metals and, therefore, they are not subject per 40 CFR 63.340(c)
HCl Pickling Tanks	40 CFR Part 63 Subpart CCC	The definition of steel pickling does not include removal of light rust or scale from finished steel products or activation of the metal surface prior to plating or coating per 40 CFR 63.1156.

No changes identified.

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RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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	SRN: B5830	Section Number (if applicable):

1. Additional Information ID
AI-Plans

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Copy of Malfunction Abatement Plan (MAP) revised in 2013. No changes have been made to emission units identified in the Plan.

Malfunction Abatement Plan
MI-ROP-B5830-2009a

Rev: March 2013

Preventative Maintenance Plan
Flexible Group ID
"FG Plate Lines"

i. Background

i. Emission Unit

Facility: **Ajax Metal Processing, Inc.**
4651 Bellevue Avenue
Detroit, MI 48207
SRN: **B5830, Wayne County**

- Description: **EUPlating Line 1** – Zinc alloy plating line #3 (Zinc Nickel)
  Dimension 62"x64" (3,968 Sq In / 27.55 Sq Ft)
  Internal CFM Reading 4,300 – 4,700 Identification: SV003
- Description: **EUPlating Line 3** – Zinc alloy plating line #2 (Zinc Iron)
  Dimension 62"x66" (4,092 Sq In / 28.41 Sq Ft)
  Internal CFM Reading 4,300 – 4,700 Identification: SV002
- Description: **EUPlating Line 4** – Zinc alloy plating line #1 (Tin Zinc)
  Dimension 62"x64" (3,968 Sq In / 27.55 Sq Ft)
  Internal CFM Reading 3,600 – 4,000 Identification: SV001
- Description: **EUPlating Line 6**– Zinc Phosphating line (Zinc)
  Dimension 69"x74" (5,106 Sq In / 35.5 Sq Ft)
  Internal CFM Reading 3,700 – 4,100 Identification: N/A
- Description: **EUPlating Line 11** – Zinc plating line No. 4 (Zinc Nickel)
  Dimension 72"x74" (72x74 Sq In / 37 Sq Ft)
  Internal CFM Reading 3,500 – 3,900 Identification: SV004
- Description: **EUPlating Line 12** – Zinc electroplating line #5 (Zinc)
  Dimension 76"x74" (5,624 Sq In / 39 Sq Ft)
  Internal CFM Reading 4,200 – 4,600 Identification: SV005

*All lines contain a HCL pickling tank and a packed bed scrubber with water as the control device.

ii. Applicable Regulation, Emission Limit and Monitoring Requirements
Permit No: **ROP No: MI-ROP-B5830-2009a**
(See Table I)

Table I
Permit Limitations

MAXIMUM CONCENTRATION OF HYDROCHLORIC ACID	MAXIMUM SURFACE AREA OF THE TANK	MAXIMUM TEMPERATURE FO THE SOLUTION
17% by weight Hydrochloric Acid (this is equivalent to 50% by volume of 20° Baume HCI)	39.1 Square Feet	120°F

i. Items inspected and Frequency of Inspection

Equipment at Ajax is monitored as part of normal operations to insure proper functioning of the equipment. If plant personnel working in the plating area notice an equipment malfunction or variation in the normal operating variables, they are instructed to inform the plant supervisor. Variations in the normal operating variables can signify problems with the equipment, systems, or controls that may lead to an environmental excursion. The following table describes the items to be inspected and frequencies if applicable:
(See Table II)

ii. Identification of Supervisory and Maintenance Personnel

Primary responsibilities for the operation, maintenance and repair of the facility rests with the Maintenance Supervisor. In the event that the Maintenance Supervisor is absent, the Plant Operations Manager is responsible for inspection and repair. Maintenance and lab technicians will perform the necessary repair and maintenance. Should the need arise, outside contractors may be brought in to complete repairs. An updated list of current maintenance and lab technicians shall be kept at the plant. A description of the responsibilities of these individuals for operation of the plant malfunctions as well as inspections, maintenance and repairs is stated on the updated list.

iii. Description of Inspected Items

A scrubber uses the natural process of recirculating water decontaminating air essentially the same process that occurs during a rainstorm, but made more efficient by technology and engineering. Contaminated air is passed through the scrubber using either negative or positive pressure, created from a fan on either upstream or downstream from the scrubber unit. The gas stream enters the scrubber unit near the bottom and travels up through the packed bed section (where the contaminants are actually separated from the gas). The gas stream is vigorously exposed to the scrubber solution, through a demister assembly to remove the liquid droplets from the exiting gas. The clean gas stream is then discharged either to the atmosphere or routed back through the original process.
(See Figure 1)

Ajax maintains an internal software program (Mainsaver) that is used for all scrubber PM's. This work order gets generated once a month for all acid scrubbers and it lists the work that needs to be performed. The work will be performed by the maintenance department and the work order is closed upon completion.
(See Exhibit I)

Replacement Parts
The following replacement parts will be maintained in inventory for quick replacement:

Band Belt Size	**Bearings**
(1) 3VX500 Banded	(2) RSA 1 7/16
(1) 3VX560	(2) RSA 1 /11/16
(1) B-67	(2) FAF 2 3/16
(1) B-53	
(1) B-53	
(1) B-60	
(1) B-58	
(1) B-58	

Common Items:

- Motor – (1) 7 ½ HP, 1750 RPM, FR 213T
- Pump – (1) Serfilco – EH 1 ½ - 35C – D3.0

iv. Corrective Procedures or Operational Changes in the Event of a Malfunction

Each plating line has a warning light on it which flashes red when tripped to indicate to the operator that a problem has occurred.
Reasons for a warning light condition:
- Low feed water flow
- Low recirculation flow
- Recirculation tank meter reads less than 20 GPM

In the event of an alarm, the operator will call the maintenance department to initiate corrective action, beginning with an evaluation of the occurrence to determine the action required to correct the situation. During any warning condition production will be suspended until corrective actions are implemented. (This procedure includes the removal of product from pickling tank.) Corrective action includes, but is not limited to: lubricating bearings; replacing or fixing the malfunctioning part; remote diagnostics via the master control cabinet; physical diagnostics by a trained technician; system bypass and system shutdown.

Ajax has deemed it necessary to clean the media in the scrubber approximately every two (2) years.

v. Preventative Maintenance Records

The following records will be maintained.

1. Monthly visual inspections of the scrubbers. Inspection records will include the date, findings and corrective actions taken or repairs made.
2. All significant unscheduled maintenance activities performed on the scrubbers. Records will include the date, findings and corrective actions taken or repairs made.
3. Annual routine maintenance of the scrubbers. Maintenance records will include the date, findings and corrective actions taken or repairs made.

vi. Reporting Malfunctions to the MDEQ

1. First notice as soon as reasonably possible, but not later than 2 business days after the start-up or showdown, or after discovery of the abnormal conditions or malfunction. Notice shall be any reasonable means, including electronic, telephone or oral communication.
2. A written report submitted within 10 days after the problem occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the following information:
    a. The time and date of the probable causes or reasons for, and the duration of, the problem.
    b. An identification of the source, process or process equipment which experienced abnormal conditions, was started up or shut down, or which malfunctioned and all other affected process or process equipment that have emissions in excess of an applicable requirement, including a description of the type and, where known or where it is reasonably possible to estimate, the quantity or magnitude of emissions in excess of applicable requirements.
    c. Information describing the measures taken and air pollution control practices followed to minimize emissions.
    d. For abnormal conditions and malfunctions, the report shall also include a summary of the actions taken to correct and to prevent a reoccurrence of the abnormal conditions or malfunction and the time taken to correct the malfunction.

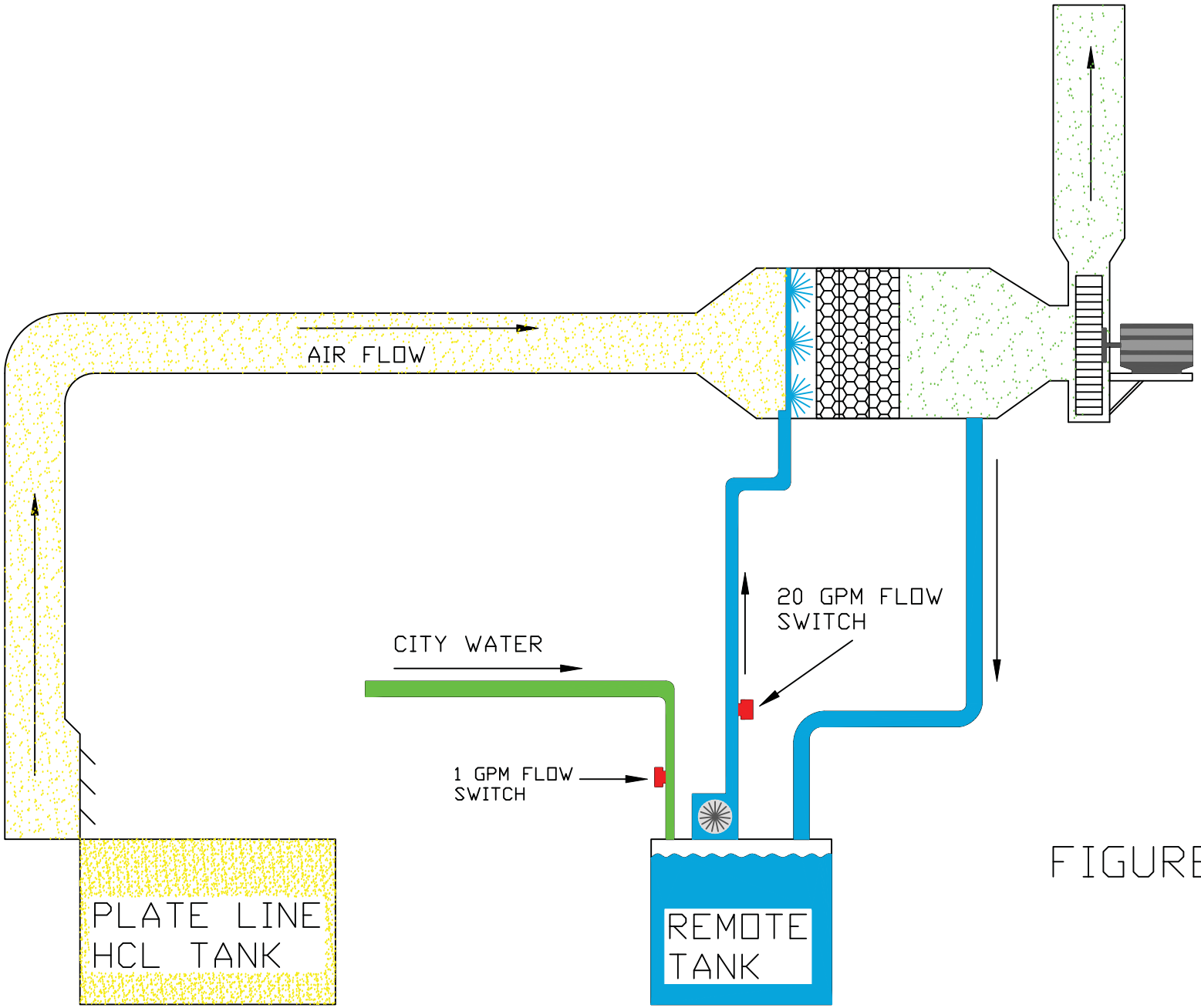
AIR FLOW
20 GPM FLOW SWITCH
CITY WATER
1 GPM FLOW SWITCH
PLATE LINE HCL TANK
REMOTE TANK

FIGURE 1

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RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: B5830	Section Number (if applicable):

1. Additional Information ID
AI-PTE

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

See PTI 47-16 and PTI 47-16A for PTE calculations for the addition of a new dip spin coating line and modification of the Plating Line 11 plating tank. Below is a summary of emissions for these additions/modifications since the last ROP renewal.

Type	Coating	ID	Total Usage (gal/hr)	Total Usage (gal/yr)	Density (lb/gal)	VOC Content (wt %)	HAP Content (wt %)	VOC Emissions (lb/hr)	VOC Emissions (tpy)	HAP Emissions (lb/hr)	HAP Emissions (tpy)
Single Component Coatings	MS-6106A Torque Tension Fluid	MS-6106A	9.0	75,000	9.08	-	-	-	-	-	-
	Torqu'N'Tension 12	TNT12			8.68	0.03	0.03	2.34	9.76	2.34	9.76
	Black Torqu'N'Tension 15	TNT15			8.66	0.03	0.03	2.34	9.74	2.34	9.74
	Torqu'N'Tension F103	TNTF103			8.64	-	-	-	-	-	-
	Torqu'N'Tension UV	TNTUV			8.43	-	-	-	-	-	-
							MAX	2.34	9.76	2.34	9.76

*Note Dip Spin line is limited to 2000 lb/month and 10 tpy of VOC emissions. Facility side lmit from remains 30 tpy VOC from coating lines.

			EE_m	e_m	C_m	D_m	EF_m	Q_{acfm}	T_1	Q_{dscfm}	W	H			E_{yr}
Tank ID	Bath	Metal/Particulate Emission	= Electrochemical Equivalent for metal (A-hr/mil-ft2)	= cathode efficiency for metal (%)	= bath concentration for metal (oz/gal)	= Current Density for metal (A/ft2)	Emission Factor (gr/dscf)	Exhaust Gas Flow Rate (acfm)	Temperature (°F)	Exhaust Gas Flow Rate (dscfm)	Uncontrolled Emissions (lb/hr)	Hours/yr	Actual Operation (Amp-hrs/yr)	Emission Factor (lb/Amp-hrs)	Emission Rate (lb/yr)
			A-hr/mil-ft^2	%	oz/gal	A/ft^2	(gr/dscf)	(acfm)		(scfm)	(lb/hr)				
Plating Line 11	Alkaline	Zinc	14.3	70	2.8	10	1.89E-06	50,800	95	50,800	8.22E-04	8,760	39,974,800	1.80E-07	7.2
	Zinc/Nickel	Nickel	19	70	0.6	10	5.37E-07	50,800	95	50,800	2.34E-04	8,760	39,974,800	5.13E-08	2.0
												Annual Totals	79,949,600	1.16E-07	9.2

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RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

	SRN: B5830	Section Number (if applicable):

1. Additional Information ID
AI-Markup

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Attached is the marked-up copy of the existing ROP for:

Ajax Metal Processing, Inc.
Ajax Metal Processing (SRN: B5830)
Detroit, Michigan

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

EFFECTIVE DATE: November 12, 2015
REVISION DATES: October 14, 2016, December 11, 2017

ISSUED TO

AJAX METAL PROCESSING

State Registration Number (SRN): B5830

LOCATED AT

4651 Bellevue Street, Detroit, Michigan MI 48207

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B5830-2015b

Expiration Date: November 12, 2020

Administratively Complete ROP Renewal Application Due
Between May 12, 2019 and May 12, 2020

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B5830-2015b

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

_____
Wilhemina McLemore, Detroit District Supervisor

TABLE OF CONTENTS

AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**

- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**

- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**

2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**

3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**

4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
   a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
   c. Inspect, at reasonable times, any of the following:
      i. Any stationary source.
      ii. Any emission unit.
      iii. Any equipment, including monitoring and air pollution control equipment.
      iv. Any work practices or operations regulated or required under the ROP.
   d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.

5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**

7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**

8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any 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)**

10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following: **(R 336.1301(1))**
    a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
    b. A limit specified by an applicable federal new source performance standard.

    The grading of visible emissions shall be determined in accordance with Rule 303.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
    a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.[1] **(R 336.1901(a))**
    b. Unreasonable interference with the comfortable enjoyment of life and property.[1] **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**

14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**

15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
    a. The date, location, time, and method of sampling or measurements.
    b. The dates the analyses of the samples were performed.
    c. The company or entity that performed the analyses of the samples.
    d. The analytical techniques or methods used.
    e. The results of the analyses.
    f. The related process operating conditions or parameters that existed at the time of sampling or measurement.

17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**

19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**

20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
    a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
    b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
    c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
    a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
    b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**

24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**

25. 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 appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor 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 conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
    a. The applicable requirements are included and are specifically identified in the ROP.
    b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

    Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
    a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
    b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
    c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
    a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
    b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
    c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
    d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
    e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**

31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**

32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
    a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
    b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
    c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
    d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(7))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.

37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
    c. The date on which a regulated substance is first present above a threshold quantity in a process.

40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.

41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan’s State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. [2] **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. [2] **(R 336.1201(8), Section 5510 of Act 451)**

45. The terms and conditions of a PTI 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 the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI 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. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ. [2] **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. [2] **(R 336.1201(4))**

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

SOURCE-WIDE CONDITIONS

DESCRIPTION:

All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	Less than 30.0 tpy[2]	12-month rolling time period as determined at the end of each calendar month	All metal parts coating lines operating per the requirements of R 336.1621(10)(b) at the Stationary Source	SC V.1, SC VI.2	**R 336.1702(d)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

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 336.1213(3)(b)(ii))**

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.[2] **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.702(d))**

2. The permittee shall keep the following information on a calendar month basis for all metal parts coating lines operating per the requirements of R 336.1621(10)(b) at the Stationary Source:
   a. Gallons or pounds of each VOC containing coating used and reclaimed.
   b. VOC content, in pounds per gallon or pounds per pound, of each VOC containing coating used.
   c. VOC emission calculations determining the monthly emission rate in tons per calendar month.
   d. VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month from the coating of metal parts.

   The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1702(d))**

See Appendix 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

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
EUDIPSPIN	Dip/Spin coating process with a 3.0 MMBtu capacity natural gas-fired curing oven. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT
EUDIPSPIN2	Dip/Spin coating process with a 1.5 MMBtu per hour capacity natural gas-fired curing oven. Purge and clean-up operations associated with the line.	11-30-2016 03-30-2017	FGLOCKSEAL, FGMACT, FGFACILITY
EUL&SOVENS	Three natural gas-fired paint curing ovens serving the locking and sealing area.	01/01/1996	FGLOCKSEAL FGMACT
EULOCTITE1	Locking and sealing area flow coat process line #5. Purge and clean-up operations associated with the line.	03/01/1996	FGLOCKSEAL FGMACT
EULOCTITE2	Locking and sealing area flow coat process line #6. Purge and clean-up operations associated with the line.	03/01/1996	FGLOCKSEAL FGMACT
EULOCTITE3	Locking and sealing area flow coat process line #7. Purge and clean-up operations associated with the line.	03/01/1996	FGLOCKSEAL FGMACT
EUWHEEL1	Locking and sealing area flow coat process line #1. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT
EUWHEEL2	Locking and sealing area flow coat process line #2. Purge and clean-up operations associated with the line.	03/01/1996	FGLOCKSEAL FGMACT
EUWHEEL3	Locking and sealing area flow coat process line #3 Purge and clean-up operations associated with the line.	02/01/1996	FGLOCKSEAL FGMACT
EUWHEEL4	Locking and sealing area flow coat process line #4. Purge and clean-up operations associated with the line.	02/01/1996	FGLOCKSEAL FGMACT
EUPHOS1	Zinc Phosphating line: HCL Acid Pickling Tank & Packed Bed Scrubber	6/23/1975	FGRULE290
EUPHOS2	Zinc Phosphating line: HCL Acid Pickling Tank & Packed Bed Scrubber	1/13/1992	FGRULE290

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUPLATINGLINE4	Plating line #4, previously known as EUZINCALLOY1.	8/21/1980	FGPLATINGLINES
EUPLATINGLINE3	Plating line #3, previously known as EUZINCALLOY2	6/23/1975	FGPLATINGLINES
EUPLATINGLINE1	Plating line #1, previously known as EUZINCALLOY3	4/25/1990	FGPLATINGLINES
EUPLATINGLINE11	Plating line #11, previously known as EUZINC4	7/8/1991	FGPLATINGLINES
EUPLATINGLINE12	Plating line #12, previously known as EUZINC5	03/02/1992	FGPLATINGLINES
EUPLATINGLINE6	Plating line #6	2011	FGPLATINGLINES
EUWAX	Zinc Electroplating Wax Usage	7/1/1987	FGRULE290
EUBOILER60HP	60 HP Natural Gas-fired Boiler	1987	FGBOILERMACT
EUBOILER150HP	150HP Natural Gas-fired Boiler	1987	FGBOILERMACT
EUHARDENING1	11 MMBtu/hr Hardening Furnace 1 (40 Burners at 275,000 BTUs each. Five heating zones each with 8 burners)	1976	FGBOILERMACT
EUHARDENING2	11 MMBtu/hr Hardening Furnace 2 (40 Burners at 275,000 BTUs each. Five heating zones each with 8 burners)	1976	FGBOILERMACT
EUENDO	1 MMBtu/hr Endothermic Generator		FGBOILERMACT

D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

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
FGLOCKSEAL, FGMACT	Seven flow coat process lines and two Dip Spin coating lines comprising the locking and sealing area along with three natural gas-fired paint curing ovens serving the locking and sealing area. Purge and clean-up operations associated with the line. This includes, any new or additional coating line that is installed pursuant to an MDEQ general permit to install for a coating line emitting up to 10 tons per year of volatile organic compounds.	EUL&SOVENS, EULOCTITE1, EULOCTITE2, EULOCTITE3, EUWHEEL1, EUWHEEL2, EUWHEEL3, EUWHEEL4 EUDIPSPIN EUDIPSPIN2
FGPLATINGLINES	6 plating lines that consist of alkaline cleaning baths, hydrochloric acid pickling baths and zinc electroplating tanks.	EUPLATINGLINE1, EUPLATINGLINE3, EUPLATINGLINE4, EUPLATINGLINE6, EUPLATINGLINE11, EUPLATINGLINE12
FGBOILERMACT	This Flexible Group only includes those applicable requirements that would apply to existing affected boilers as described in 40 CFR Part 63, Subpart DDDDD beginning on January 31, 2016, as they would apply to Ajax Metal Processing Inc. located in Detroit, MI.	EUBOILER60HP, EUBOILER150HP, EUHARDENING1, EUHARDENING2, EUENDO
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.	EUPHOS1, EUPHOS2, EUWAX

FGLOCKSEAL
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Seven flow coat process lines and two Dip Spin coating lines comprising the locking and sealing area along with three natural gas-fired paint curing ovens serving the locking and sealing area. Purge and clean-up operations associated with the lines. This includes any new or additional coating line that is installed pursuant to an MDEQ general permit to install for a coating line emitting up to 10 tons per year of volatile organic compounds.

Emission Units: EUDIPSPIN, EUDIPSPIN2, EUL&SOVENS, EULOCTITE1, EULOCTITE2, EULOCTITE3, EUWHEEL1, EUWHEEL2, EUWHEEL3, EUWHEEL4

POLLUTION CONTROL EQUIPMENT

For spray applications: Dry filters or a water curtain for particulate control. A properly operated thermal oxidizer or catalytic oxidizer may be used to meet the requirements of this flexible group. Proper operation of a thermal or catalytic oxidizer requires an overall minimum of 76% reduction of VOC emissions to the atmosphere.[2] **(R 336.1224, R 336.1910, R 336.1331, R 336.1702(d)**

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	2000 pounds/month[2]	Calendar month	Each individual coating line and the purge and clean-up operations associated with the line.	SC. V.1 SC. VI.3	**R 336.1225, R 336.1702(d)**
2. VOC	10.0 tpy[2]	12 month rolling time period as determined at the end of each calendar month	Each individual coating line and the purge and clean-up operations associated with the line.	SC. V.1 SC. VI.3	**R 336.1225, R 336.1702(d)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall recover and reclaim, recycle, or dispose of coatings, paints, purge and cleanup solvents, etc. (materials) used in FGLOCKSEAL, in accordance with all applicable regulations.[2] **(R 336.1224, R 336.1702(a))**

2. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.[2] **(R 336.1224, R 336.1702(a))**

3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.[2] **(R 336.1224, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each application portion of FGLOCKSEAL with HVLP applicator or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.[2] **(R 336.1702(d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.[2] **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1224, R 336.1225, R 336.1702)**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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.[2] **(R 336.1224, R 336.1225, R 336.1702)**

3. The permittee shall keep the following information on a calendar month basis for FGLOCKSEAL:
   a. Gallons (with water) of each coating, paint, purge and clean up solvent, etc. (material) used and reclaimed.
   b. VOC content (with water) of each material as applied.
   c. VOC mass emission calculations determining the monthly emission rate in pounds per calendar month.
   d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

   The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1702)**

See Appendix 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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. SVDIPSPIN2-01* (Dip Spin 2 Application)	12^2	30^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
2. SVDIPSPIN2-02* (Dip Spin 2 Oven)	24^2	30^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
3. SVLOCTITE1-01 (Application)	14^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
4. SVLOCTITE1-02 (Oven)	10^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
5. SVLOCTITE2-01 (Application)	14^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
6. SVLOCTITE2-02 (Oven)	10^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
7. SVLOCTITE3-01 (Oven)	14^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
8. SVWHEEL1-01 (Application)	12^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
9. SVWHEEL1-02 (Oven end)	14^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
10. SVWHEEL1-03 (Oven middle)	10^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
11. SVWHEEL3-01 (Application)	14^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
12. SVWHEEL3-02 (Oven end)	10^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
13. SVWHEEL3-03 (Oven middle)	14^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
14. SVWHEEL4 (Oven)	14^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
15. SVDIPSPIN-01 (Oven)	12^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**
16. SVDIPSPIN-02 (Oven)	16^2	28^2	**R 336.1225, 40 CFR 52.21(c) & (d)**

* Equipped with rain cap

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products.[2] **(40 CFR Part 63, Subparts A and MMMM)**

2. The permittee may change or replace any coating used on EUL&SOVENS, EULOCTITE1, EULOCTITE2, EULOCTITE3, EUWHEEL1, EUWHEEL2, EUWHEEL3, EUWHEEL4, and/or EUDIPSPIN (excluding EUDIPSPIN2) without applying for a new general permit to install application, provided all of the general permit to install applicability criteria will continue to be met after the coating change.[2] **(R 336.1201a(1))**

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGMACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

EUDIPSPIN, EUDIPSPIN2, EULOCTITE1, EULOCTITE2, EULOCTITE3, EUWHEEL1, EUWHEEL2, EUWHEEL3, EUWHEEL4 (8 coating lines and 3 natural gas-fired paint curing ovens serving the locking and sealing area). Any new or additional coating line that is installed pursuant to an MDEQ general permit to install for a coating line emitting up to 10 tons per year of volatile organic compounds.

Each new, reconstructed, and existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR, Part 63, Subpart MMMM, 63.3881(a)(2) through (6), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating. 40 CFR, Part 63, Subpart MMMM does not apply to surface coating or a coating operation that meets any of the criteria of 40 CFR 63.3881(c)(1) through (17).

Emission Unit: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Organic HAP	2.6 lbs. per gal of coating solids	12-month rolling time period	Existing – General Use Coating	SC. VI.1 through SC. VI.10	**40 CFR 63.3890(b)(1)**
* As determined at the end of each calendar month.					

1. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.3890 using at least one of the following three options, which are listed in 40 CFR 63.3891(a) through (c):
   a) Compliant material option,
   b) Emission rate without add-on controls option, or
   c) Emission rate with add-on controls option.

   The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials used when determining the emission rate. **(40 CFR 63.3891)**

2. Any coating operation(s) using the compliant material option or the emission rate without add-on controls option, shall be in compliance with the applicable emission limits in 40 CFR 63.3890 at all times. **(40 CFR 63.3900(a)(1))**

3. If the surface coating operation(s) meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.3890(a) or (b), the permittee may comply separately with each subcategory emission limit, or comply using one of the alternatives in 40 CFR 63.3890(c)(1) or (2). **(40 CFR 63.3890(c))**

II. MATERIAL LIMIT(S)

For the compliant materials option, the permittee shall meet the material limits specified in the following table.

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Each Thinner and/or Additive	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC. VI.1, SC. VI.2, SC. VI.3, SC. VI.5	**40 CFR 63.3891(a)**
Each Cleaning Material	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC. VI.1, SC. VI.2, SC. VI.3, SC. VI.5	**40 CFR 63.3891(a)**
* Determined according to 40 CFR 63.3941(a).					

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 336.1213(3)(b)(ii), 40 CFR 63.3931)**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.3931)**

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.3941, 40 CFR 63.3951, or 40 CFR 63.3961. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months. **(40 CFR 63.3940, 40 CFR 63.3950, 40 CFR 63.3960)**

2. The permittee shall keep all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931. **(40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(j))**

3. The permittee shall maintain, at a minimum, the following records for each compliance period:

   a) A copy of each notification and report that is submitted to comply with Subpart MMMM, and the documentation supporting each notification and report. **(40 CFR 63.3930(a))**

   b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. **(40 CFR 63.3930(b))**

   c) A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. **(40 CFR 63.3930(c)(1))**

d) For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941. **(40 CFR 63.3930(c)(2))**

e) For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951. **(40 CFR 63.3930(c)(3))**

f) The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the volume used. **(40 CFR 63.3930(d))**

g) The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight. **(40 CFR 63.3930(e))**

h) The volume fraction of coating solids for each coating used during each compliance period. **40 CFR 63.3930(f))**

i) For either the emission rate without add-on controls option, or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period. **(40 CFR 63.3930(g))**

j) The information specified in 40 CFR 63.3930(h)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4). **(40 CFR 63.3930(h))**

k) The date, time, and duration of each deviation. **(40 CFR 63.3930(j))**

4. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the emission limit in 40 CFR 63.3890, for each compliance period, using Equation 2 of 40 CFR 63.3941. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.3941(a). **(40 CFR 63.3942)**

5. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to 40 CFR 63.3951(a) through (g). **(40 CFR 63.3952)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. For the compliant material option, if any coating used for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890; or any thinner or cleaning material used contains any organic HAP, the permittee shall report this as a deviation as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(5). **(40 CFR 63.3942(b))**

5. For the emission rate without add-on controls, if the organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890, the permittee shall report this as a deviation as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(6). [2] **(40 CFR 63.3952(b))**

6. The Permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.3910. **(40 CFR Part 63, Subparts A and MMMM)**

7. The permittee shall submit all semiannual compliance reports specified in 40 CFR 63.3920(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.3890, include a statement that the coating operations were in compliance. **(40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c), 40 CFR 63.3963(f))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products. **(40 CFR Part 63, Subparts A and MMMM)**

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGPLATINGLINES
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

6 plating lines that consist of alkaline cleaning baths, hydrochloric acid pickling baths and zinc electroplating tanks.

Emission Units: EUPLATINGLINE1, EUPLATINGLINE3, EUPLATINGLINE4, EUPLATINGLINE6, EUPLATINGLINE11 and EUPLATINGLINE12

POLLUTION CONTROL EQUIPMENT:

Each line has an associated scrubber system

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any plating line in FGPLATINGLINES unless the associated packed bed scrubber for that plating line is installed, maintained and operated properly. Proper operation includes but is not limited to performing the manufacturer's recommended maintenance on the control device and operating in conjunction with the malfunction abatement plan (MAP) specified in SC III.2.[2] **(R 336.1224, R 336.1225, R 336.1910)**

2. The permittee shall submit to the AQD District Supervisor, for review and approval, a MAP that has been updated to include the new identification for each emission unit in FGPLATINGLINES. After approval of the updated MAP by the AQD District Supervisor, the permittee shall not operate any plating line in FGPLATINGLINES unless the MAP, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum the plan shall include:

    a. Identification of the equipment and, if applicable, air-cleaning device and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair

    b. Description of the items or conditions to be inspected and frequency of the inspections or repairs

    c. Identification of the equipment and, if applicable, air-cleaning device, operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of these parameters and a description of the method of monitoring or surveillance procedures

    d. Identification of the major replacement parts that shall be maintained in inventory for quick replacement

    e. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits

    If the plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the plan within 45 days after such an event occurs and submit the revised plan for approval to the AQD District Supervisor. Should the AQD determine the MAP to be inadequate, the AQD District Supervisor may request modification of the plan to address those inadequacies.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, R 336.1912)**

3. The parameters of the acid pickling tanks in FGPLATINGLINES shall not exceed that listed in the following table[1]: **(R 336.1224, R336.1225)**

MAXIMUM CONCENTRATION OF HYDROCHLORIC ACID	MAXIMUM SURFACE AREA OF THE TANK	MAXIMUM TEMPERATURE OF THE SOLUTION
17% by weight hydrochloric acid (this is equivalent to 50% by volume of 20° Baume HCl)	39.1 square feet	120°F

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1224, R 336.1225, R 336.1910)**

2. The permittee shall keep, in a satisfactory manner, the following monthly records for FGPLATINGLINES.
   a. Written or electronic log of maximum monthly concentration of acid in the tank. Concentration may be expressed as percent by volume of degree baume HCl
   b. Area of the acid tank in square feet
   c. Temperature of the acid solution in the tank
   d. Written or electronic log of the hours of operation
   e. Corrective action taken upon failure of all of the following:
      i. the fans drawing vacuum on the acid tank
      ii. the pumps circulating the scrubber water through the scrubber

   The permittee shall keep the records using method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1224, R 336.1225, R 336.1910)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSCRUB6	21[2]	38[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
2. SVSCRUB1	20[2]	39[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
3. SVSCRUB3	20[2]	39[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
4. SVSCRUB4	20[2]	39[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
5. SVSCRUB11	20[2]	38[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
6. SVSCRUB12	20[2]	39[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
7. SVPLT1	38[2]	31[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
8. SVPLT3	42[2]	30[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
9. SVPLT4	46[2]	31[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
10. SVPLT11	42[2]	30[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
11. SVPLT12	42[2]	29[2]	**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).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGBOILERMACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This Flexible Group only includes those applicable requirements that would apply to new and existing affected boilers or process heaters as described in 40 CFR Part 63, Subpart DDDDD beginning on January 31, 2016, as they would apply to Ajax Metal Processing Inc. located in Detroit, MI. A new unit commenced construction or reconstruction after June 4, 2010. A boiler or process heater is existing if it is not new or reconstructed.

Compliance Date: January 31, 2016 for existing units
Startup for new units

Emission Units: Any new, reconstructed, and existing industrial, commercial and institutional boiler and process heaters, which meet the definition of "units designed to burn gas 1 subcategory", as defined in 63.7575, located at a major source of HAPs. Existing affected units include: EUBOILER150HP, EUBOILER60HP, EUHARDENING1, EUHARDENING2, EUENDO.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall only combust gas 1 fuels. Gas 1 subcategory includes any boiler or process heater that burns only natural gas, refinery gas, or other gas 1 fuels as defined in 63.7575, with the exception of liquid fuels burned during gas curtailment and supply emergencies or for periodic testing (not to exceed 48 hours in a calendar year). **(40 CFR 63.7575)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall perform a one-time energy assessment for each existing affected boiler in accordance with Table 3 of 40 CFR 63 Subpart DDDDD no later than January 31, 2016. **(40 CFR 63.7510(e))**

2. The permittee shall perform an initial tune up of each affected boiler that was installed before June 4, 2010 in accordance with 40 CFR 63 Subpart DDDDD no later than January 31, 2016. **(40 CFR 63.7510(f))**

3. New or reconstructed boilers installed on or after January 31, 2013 must perform an initial tune up accordance with 40 CFR 63 Subpart DDDDD within the applicable annual, biennial, or 5-year schedule as specified in §63.7540(a) following startup of the unit. Thereafter, the permittee must complete the applicable annual, biennial, or 5-year tune-up as specified in Table 3 of 40 CFR 63 Subpart DDDDD. **(40 CFR 63.7510(f), 63.7540(a))**

4. New and existing boilers or process heaters with continuous oxygen trim system or heat input capacity less than 5 million Btu per hour must conduct a 5-year tune up of the boiler or process heater. Each 5-year tune up must be conducted no more than 61 months after the previous tune up. **(40 CFR 63.7500(e), 63.7515(d), 63.7540)**

5. New and existing boilers or process heaters without continuous oxygen trim system and with a heat input capacity greater than 5 million Btu per hour and less than 10 million Btu per hour must conduct a biennial tune up of the boiler or process heater. Each biennial tune up must be conducted no more than 25 months after the previous tune up. **(40 CFR 63.7500(e), 63.7515(d), 63.7540)**

6. New and existing boilers or process heaters, including metal process furnaces, without continuous oxygen trim system and with heat input capacity greater than 10 million Btu per hour must conduct an annual tune up of the boiler or process heater. Each annual tune up must be conducted no more than 13 months after the previous tune up. **(40 CFR 63.7500, 63.7515(d), 63.7540)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep records of each notification and report submitted, and all supporting documentation, to comply with 40 CFR 63, Subparts A & DDDDD. **(40 CFR 63.7555(a)(1))**

2. The permittee shall keep records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in §63.10(b)(2)(viii).
(40 CFR 63.7555(a)(2))

3. For boilers and process heaters required to conduct an annual tune-up, the permittee shall maintain an annual report on-site and submit, if requested the following information: **(40 CFR 63.7540(a)(10))**

   a) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;

   b) A description of any corrective actions taken as a part of the tune-up; and

   c) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

See Appendix 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler(s) and/ or process heater(s) and its energy use systems was completed. within 60 days following completion of the tests. **(40 CFR 63.7530(d))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. On and after January 31, 2016, the permittee shall comply with all applicable provisions of the federal National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and DDDDD. **(40 CFR Part 63, Subparts A and DDDDD)**

2. Gas 1 subcategory includes any boiler or process heater that burns only natural gas, refinery gas, or other gas 1 fuels with the exception of liquid fuels burned during gas curtailment and supply emergencies or for periodic testing (not to exceed 48 hours in a calendar year). **(40 CFR 63.7575)**

3. Metal process furnaces are a subcategory of process heaters, as defined in 40 CFR Part 63, Subpart DDDDD, which include natural gas-fired annealing furnaces, preheat furnaces, reheat furnaces, aging furnaces, heat treat furnaces, and homogenizing furnaces. **(40 CFR 63.7575)**

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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FGRULE290
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.~~Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.~~

Emission Units installed on or after December 20, 2016: NA

Emission Units installed prior to December 20, 2016~~Emission Units~~: EUPHOS1, EUPHOS2, EUWAX

POLLUTION CONTROL EQUIPMENT
NA

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(i))**

2. Any emission unit for which CO2 equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: (R 336.1290(2)(a)(ii))~~Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(a)(ii))**~~

   ~~a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**~~

   ~~b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(B))**~~

   ~~c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(C))**~~

   ~~d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(a)(ii)(D))**~~

a. For toxic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 micrograms per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively.

(R 336.1290(2)(a)(ii)(A))

b. For toxic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(2)(a)(ii)(B))**

c. The emission unit shall not emit any toxic air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(2)(a)(ii)(C))**

d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(D))**

e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(E))**

~~3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: **(R 336.1290(a)(iii))**~~

~~a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**~~

~~b. The visible emissions from the emission unit are not more than 5 percent opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**~~

~~c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(a)(iii)(C))**~~

3. Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: **(R 336.1290(2)(a)(iii))**

a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(2)(a)(iii)(A))**

b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(2)(a)(iii)(B))**

c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(2)(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**
2. The following requirements apply to emission units installed on or after December 20, 2016, utilizing control equipment:

   a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following: **(R 336.1290(2)(b)(i), R 336.1910)**

      i. Oxidizers and condensers equipped with a continuously displayed temperature indication device.

      ii. Wet scrubbers equipped with a liquid flow rate monitor.

      iii. Dual stage carbon absorption where the first canister is monitored for breakthrough and replaced if breakthrough is detected.

   b. An air cleaning device for particulate matter shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate.

   ~~1.~~ **(R 336.1290(2)(b)(ii), R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

~~1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**~~

~~a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**~~

~~b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**~~

~~c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**~~

~~d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**~~

~~e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**~~

~~2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**~~

~~a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**~~

~~b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**~~

~~3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**~~

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**

   a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**

   b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**

   c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**

   d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). **(R 336.1213(3))**

   e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed on or after December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. **(R 336.1213(3), R 336.1290(2)(d))**

   f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. **(R 336.1213(3), R 336.1290(2)(e))**

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**

   a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(2)(c), R 336.1213(3))**

   b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**

3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

~~Stack & Vent ID~~	~~Maximum Exhaust Dimensions (inches)~~	~~Minimum Height Above Ground (feet)~~	~~Underlying Applicable Requirements~~
~~NA~~	~~NA~~	~~NA~~	~~NA~~

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUCOGEN	40 CFR Part 63 Subpart ZZZZ (EUCOGEN is exempt from permitting per R 336.1282(b)(i) & R336.1285(g))	EUCOGEN is an existing emergency stationary RICE per 40 CFR 63.6590(a)(1)(i) (commenced construction or reconstruction before 12/19/2002) and, therefore, they are not subject per 40 CFR 63.6590(b)(3)(iii) as the unit is more than 500 brake HP and located at a major source of HAP emissions.
FGPLATINGLINES & CHROMATE LINES 1 & 2	40 CFR Part 63 Subpart WWWWWW (CHROMATE LINES 1 & 2 are exempt from permitting per R 336.1285(r)(vi)	FGPLATINGLINES & CHROMATE LINES 1 & 2 are located at a major source of HAPs and therefore, not subject per 40 CFR 63.11504(a).
CHROMATE LINES 1 & 2	40 CFR Part 63 Subpart N (CHROMATE LINES 1 & 2 are exempt from permitting per R 336.1285(r)(vi)	CHROMATE LINES 1 & 2 does not use electrodes or current control to deposit metals and, therefore, they are not subject per 40 CFR 63.340(c)
HCl Pickling Tanks	40 CFR Part 63 Subpart CCC	The definition of steel pickling does not include removal of light rust or scale from finished steel products or activation of the metal surface prior to plating or coating per 40 CFR 63.1156.

APPENDICES

Commented [FDS2]: Acronym table updated to reflect MDEQ/EGLE name change

Appendix 1. Abbreviations and Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO_2e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
		gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MDEQ	Michigan Department of Environmental Quality	NO_x	Oxides of Nitrogen
		ng	Nanogram
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10 microns in diameter
NAAQS	National Ambient Air Quality Standards		
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO_2	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection Agency	µg	Microgram
		µm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year
Common Acronyms		Pollutant / Measurement Abbreviations	

AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO_2e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
EGLE	Michigan Department of Environment, Great Lakes, and Energy	°F	Degrees Fahrenheit
		gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO_x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards		
NSR	New Source Review	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
PS	Performance Specification	pph	Pounds per hour
PSD	Prevention of Significant Deterioration	ppm	Parts per million
PTE	Permanent Total Enclosure	ppmv	Parts per million by volume
PTI	Permit to Install	ppmw	Parts per million by weight
RACT	Reasonable Available Control Technology	psia	Pounds per square inch absolute
ROP	Renewable Operating Permit	psig	Pounds per square inch gauge
SC	Special Condition	scf	Standard cubic feet
SCR	Selective Catalytic Reduction	sec	Seconds
SNCR	Selective Non-Catalytic Reduction	SO_2	Sulfur Dioxide
SRN	State Registration Number	TAC	Toxic Air Contaminant
TEQ	Toxicity Equivalence Quotient	Temp	Temperature
USEPA/EPA	United States Environmental Protection Agency	THC	Total Hydrocarbons
VE	Visible Emissions	tpy	Tons per year
		µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. **(R 336.1213(4)(a), R 336.1119(a)(ii))**

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any Permit to Install issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B5830-2009. Those ROP applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No. MI-PTI B5830-2009a is being reissued as Source-Wide PTI No. MI-PTI-B5830-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
131-11	201100128	Incorporate Permit to Install (PTI) No. 131-11. PTI No. 131-11 streamlines plating line conditions into FGPLATINGLINES. Equipment EUZINCALLOY1, EUZINCALLOY2, EUZINCALLOY3, EUZINC4 and EUZINC5 was renamed respectively as EUPLATINGLINE4, EUPLATINGLINE3, EUPLATINGLINE1, EUPLATINGLINE11 and EUPLATINGLINE12. EUPLATINGLINE6 was added.	FGPLATELINES

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B5830-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
47-16	201600128 / October 14, 2016	Incorporate PTI 47-16, which is for installing a new dip spin line (EUDIPSPIN2) and to modify the size of the plating tank on EUPLATINGLINE11. Additionally, The facility will be a synthetic minor source for VOC which is the main concern criteria pollutant.	Source-wide Conditions EUDIPSPIN2 FGLOCKSEAL FGPLATINGLINES
47-16A	201700119 / December 11, 2017	Incorporate PTI 47-16, which is for changing EUDIPSPIN2 stacks with the rain cap devices. Ajax met Rule 225 requirement via Rule 227(1)(a) analysis. All other applicable requirements in FGLOCKSEAL remain unchanged. Additionally, a Condition to complete all required caluculations for FGPLATINGLINES was added to the Monitoring and Recordkeeping Condtions in the FGPLATINGLINES Table.	EUDIPSPIN2 FGLOCKSEAL FGPLATINGLINES

Appendix 7. Emission Calculations

The permittee shall use the following calculations, or other DEQ-AQD approved calculations, in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FGLOCKSEAL.

VOC Emission Calculations for 10 TPY Coating Line

COMPANY _____ PERMIT NUMBER _____

MONTH / YEAR _____

	A	B	C = A x B
MATERIAL IDENTIFICATION (Coating, Reducer, Catalyst, or Purge/Clean-up Solvent)	**MATERIAL USED (Gallons)***	**VOC CONTENT (Pounds VOC / Gallon)**	**VOC EMISSIONS (Pounds)**

Total pounds VOCs uncontrolled, **D** = Sum of C **D** _____

Total tons VOCs uncontrolled, **E** = D/2000 **E** _____

Control Factor F: For a coating line using a properly operated thermal or catalytic oxidizer to meet the requirements of the general permit, F = 1-(76/100) = 0.24. If uncontrolled, F = 1 F _____

Total tons VOCs emitted this month, **G** = E x F **G** _____

Total tons VOCs emitted 11 previous months, **H** = Sum of G for 11 previous months **H** _____

Total tons VOCs emitted over 12-month period, **J** = G + H **J** _____

J cannot exceed 10 tons per year from each coating line, nor 30 tons per year from all coating lines at a stationary source. These limits include emissions from associated purge and clean-up operations.

***** For purge/clean-up solvents, subtract amount reclaimed

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

EFFECTIVE DATE: November 12, 2015
REVISION DATES: October 14, 2016, December 11, 2017

ISSUED TO

AJAX METAL PROCESSING

State Registration Number (SRN): B5830

LOCATED AT

4651 Bellevue Street, Detroit, Michigan MI 48207

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B5830-2015b

Expiration Date: November 12, 2020

Administratively Complete ROP Renewal Application Due
Between May 12, 2019 and May 12, 2020

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B5830-2015b

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

_____
Wilhemina McLemore, Detroit District Supervisor

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**

- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**

- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**

2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**

3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**

4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
   a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
   c. Inspect, at reasonable times, any of the following:
      i. Any stationary source.
      ii. Any emission unit.
      iii. Any equipment, including monitoring and air pollution control equipment.
      iv. Any work practices or operations regulated or required under the ROP.
   d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.

5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**

7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**

8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any 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)**

10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following: **(R 336.1301(1))**
    a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
    b. A limit specified by an applicable federal new source performance standard.

    The grading of visible emissions shall be determined in accordance with Rule 303.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
    a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.[1] **(R 336.1901(a))**
    b. Unreasonable interference with the comfortable enjoyment of life and property.[1] **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**

14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**

15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
    a. The date, location, time, and method of sampling or measurements.
    b. The dates the analyses of the samples were performed.
    c. The company or entity that performed the analyses of the samples.
    d. The analytical techniques or methods used.
    e. The results of the analyses.
    f. The related process operating conditions or parameters that existed at the time of sampling or measurement.

17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**

19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**

20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
    a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
    b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
    c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
    a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
    b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**

24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**

25. 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 appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor 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 conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
    a. The applicable requirements are included and are specifically identified in the ROP.
    b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

    Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
    a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
    b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
    c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
    a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
    b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
    c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
    d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
    e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**

31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**

32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
    a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
    b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
    c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
    d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(7))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.

37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
    c. The date on which a regulated substance is first present above a threshold quantity in a process.

40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.

41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. [2] **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. [2] **(R 336.1201(8), Section 5510 of Act 451)**

45. The terms and conditions of a PTI 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 the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI 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. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ. [2] **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. [2] **(R 336.1201(4))**

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

SOURCE-WIDE CONDITIONS

DESCRIPTION:

All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	Less than 30.0 tpy[2]	12-month rolling time period as determined at the end of each calendar month	All metal parts coating lines operating per the requirements of R 336.1621(10)(b) at the Stationary Source	SC V.1, SC VI.2	**R 336.1702(d)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

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 336.1213(3)(b)(ii))**

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.[2] **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.702(d))**

2. The permittee shall keep the following information on a calendar month basis for all metal parts coating lines operating per the requirements of R 336.1621(10)(b) at the Stationary Source:
   a. Gallons or pounds of each VOC containing coating used and reclaimed.
   b. VOC content, in pounds per gallon or pounds per pound, of each VOC containing coating used.
   c. VOC emission calculations determining the monthly emission rate in tons per calendar month.
   d. VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month from the coating of metal parts.

   The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1702(d))**

See Appendix 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

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
EUDIPSPIN	Dip/Spin coating process with a 3.0 MMBtu capacity natural gas-fired curing oven. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT
EUDIPSPIN2	Dip/Spin coating process with a 1.5 MMBtu per hour capacity natural gas-fired curing oven. Purge and clean-up operations associated with the line.	11-30-2016 03-30-2017	FGLOCKSEAL, FGMACT, FGFACILITY
EUL&SOVENS	Three natural gas-fired paint curing ovens serving the locking and sealing area.	01/01/1996	FGLOCKSEAL FGMACT
EULOCTITE1	Locking and sealing area flow coat process line #5. Purge and clean-up operations associated with the line.	03/01/1996	FGLOCKSEAL FGMACT
EULOCTITE2	Locking and sealing area flow coat process line #6. Purge and clean-up operations associated with the line.	03/01/1996	FGLOCKSEAL FGMACT
EULOCTITE3	Locking and sealing area flow coat process line #7. Purge and clean-up operations associated with the line.	03/01/1996	FGLOCKSEAL FGMACT
EUWHEEL1	Locking and sealing area flow coat process line #1. Purge and clean-up operations associated with the line.	01/01/1996	FGLOCKSEAL FGMACT
EUWHEEL2	Locking and sealing area flow coat process line #2. Purge and clean-up operations associated with the line.	03/01/1996	FGLOCKSEAL FGMACT
EUWHEEL3	Locking and sealing area flow coat process line #3 Purge and clean-up operations associated with the line.	02/01/1996	FGLOCKSEAL FGMACT
EUWHEEL4	Locking and sealing area flow coat process line #4. Purge and clean-up operations associated with the line.	02/01/1996	FGLOCKSEAL FGMACT
EUPHOS1	Zinc Phosphating line: HCL Acid Pickling Tank & Packed Bed Scrubber	6/23/1975	FGRULE290
EUPHOS2	Zinc Phosphating line: HCL Acid Pickling Tank & Packed Bed Scrubber	1/13/1992	FGRULE290

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUPLATINGLINE4	Plating line #4, previously known as EUZINCALLOY1.	8/21/1980	FGPLATINGLINES
EUPLATINGLINE3	Plating line #3, previously known as EUZINCALLOY2	6/23/1975	FGPLATINGLINES
EUPLATINGLINE1	Plating line #1, previously known as EUZINCALLOY3	4/25/1990	FGPLATINGLINES
EUPLATINGLINE11	Plating line #11, previously known as EUZINC4	7/8/1991	FGPLATINGLINES
EUPLATINGLINE12	Plating line #12, previously known as EUZINC5	03/02/1992	FGPLATINGLINES
EUPLATINGLINE6	Plating line #6	2011	FGPLATINGLINES
EUWAX	Zinc Electroplating Wax Usage	7/1/1987	FGRULE290
EUBOILER60HP	60 HP Natural Gas-fired Boiler	1987	FGBOILERMACT
EUBOILER150HP	150HP Natural Gas-fired Boiler	1987	FGBOILERMACT
EUHARDENING1	11 MMBtu/hr Hardening Furnace 1 (40 Burners at 275,000 BTUs each. Five heating zones each with 8 burners)	1976	FGBOILERMACT
EUHARDENING2	11 MMBtu/hr Hardening Furnace 2 (40 Burners at 275,000 BTUs each. Five heating zones each with 8 burners)	1976	FGBOILERMACT
EUENDO	1 MMBtu/hr Endothermic Generator		FGBOILERMACT

D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

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
FGLOCKSEAL, FGMACT	Seven flow coat process lines and two Dip Spin coating lines comprising the locking and sealing area along with three natural gas-fired paint curing ovens serving the locking and sealing area. Purge and clean-up operations associated with the line. This includes, any new or additional coating line that is installed pursuant to an MDEQ general permit to install for a coating line emitting up to 10 tons per year of volatile organic compounds.	EUL&SOVENS, EULOCTITE1, EULOCTITE2, EULOCTITE3, EUWHEEL1, EUWHEEL2, EUWHEEL3, EUWHEEL4 EUDIPSPIN EUDIPSPIN2
FGPLATINGLINES	6 plating lines that consist of alkaline cleaning baths, hydrochloric acid pickling baths and zinc electroplating tanks.	EUPLATINGLINE1, EUPLATINGLINE3, EUPLATINGLINE4, EUPLATINGLINE6, EUPLATINGLINE11, EUPLATINGLINE12
FGBOILERMACT	This Flexible Group only includes those applicable requirements that would apply to existing affected boilers as described in 40 CFR Part 63, Subpart DDDDD beginning on January 31, 2016, as they would apply to Ajax Metal Processing Inc. located in Detroit, MI.	EUBOILER60HP, EUBOILER150HP, EUHARDENING1, EUHARDENING2, EUENDO
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.	EUPHOS1, EUPHOS2, EUWAX

FGLOCKSEAL
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Seven flow coat process lines and two Dip Spin coating lines comprising the locking and sealing area along with three natural gas-fired paint curing ovens serving the locking and sealing area. Purge and clean-up operations associated with the lines. This includes any new or additional coating line that is installed pursuant to an MDEQ general permit to install for a coating line emitting up to 10 tons per year of volatile organic compounds.

Emission Units: EUDIPSPIN, EUDIPSPIN2, EUL&SOVENS, EULOCTITE1, EULOCTITE2, EULOCTITE3, EUWHEEL1, EUWHEEL2, EUWHEEL3, EUWHEEL4

POLLUTION CONTROL EQUIPMENT

For spray applications: Dry filters or a water curtain for particulate control. A properly operated thermal oxidizer or catalytic oxidizer may be used to meet the requirements of this flexible group. Proper operation of a thermal or catalytic oxidizer requires an overall minimum of 76% reduction of VOC emissions to the atmosphere.[2] **(R 336.1224, R 336.1910, R 336.1331, R 336.1702(d)**

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	2000 pounds/month[2]	Calendar month	Each individual coating line and the purge and clean-up operations associated with the line.	SC. V.1 SC. VI.3	**R 336.1225, R 336.1702(d)**
2. VOC	10.0 tpy[2]	12 month rolling time period as determined at the end of each calendar month	Each individual coating line and the purge and clean-up operations associated with the line.	SC. V.1 SC. VI.3	**R 336.1225, R 336.1702(d)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall recover and reclaim, recycle, or dispose of coatings, paints, purge and cleanup solvents, etc. (materials) used in FGLOCKSEAL, in accordance with all applicable regulations.[2] **(R 336.1224, R 336.1702(a))**

2. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.[2] **(R 336.1224, R 336.1702(a))**

3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.[2] **(R 336.1224, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each application portion of FGLOCKSEAL with HVLP applicator or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.[2] **(R 336.1702(d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.[2] **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1224, R 336.1225, R 336.1702)**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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.[2] **(R 336.1224, R 336.1225, R 336.1702)**

3. The permittee shall keep the following information on a calendar month basis for FGLOCKSEAL:
   a. Gallons (with water) of each coating, paint, purge and clean up solvent, etc. (material) used and reclaimed.
   b. VOC content (with water) of each material as applied.
   c. VOC mass emission calculations determining the monthly emission rate in pounds per calendar month.
   d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

   The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1702)**

See Appendix 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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. SVDIPSPIN2-01* (Dip Spin 2 Application)	12[2]	30[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
2. SVDIPSPIN2-02* (Dip Spin 2 Oven)	24[2]	30[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
3. SVLOCTITE1-01 (Application)	14[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
4. SVLOCTITE1-02 (Oven)	10[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
5. SVLOCTITE2-01 (Application)	14[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
6. SVLOCTITE2-02 (Oven)	10[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
7. SVLOCTITE3-01 (Oven)	14[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
8. SVWHEEL1-01 (Application)	12[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
9. SVWHEEL1-02 (Oven end)	14[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
10. SVWHEEL1-03 (Oven middle)	10[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
11. SVWHEEL3-01 (Application)	14[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
12. SVWHEEL3-02 (Oven end)	10[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
13. SVWHEEL3-03 (Oven middle)	14[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
14. SVWHEEL4 (Oven)	14[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
15. SVDIPSPIN-01 (Oven)	12[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
16. SVDIPSPIN-02 (Oven)	16[2]	28[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**

* Equipped with rain cap

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products.[2] **(40 CFR Part 63, Subparts A and MMMM)**

2. The permittee may change or replace any coating used on EUL&SOVENS, EULOCTITE1, EULOCTITE2, EULOCTITE3, EUWHEEL1, EUWHEEL2, EUWHEEL3, EUWHEEL4, and/or EUDIPSPIN (excluding EUDIPSPIN2) without applying for a new general permit to install application, provided all of the general permit to install applicability criteria will continue to be met after the coating change.[2] **(R 336.1201a(1))**

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGMACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

EUDIPSPIN, EUDIPSPIN2, EULOCTITE1, EULOCTITE2, EULOCTITE3, EUWHEEL1, EUWHEEL2, EUWHEEL3, EUWHEEL4 (8 coating lines and 3 natural gas-fired paint curing ovens serving the locking and sealing area). Any new or additional coating line that is installed pursuant to an MDEQ general permit to install for a coating line emitting up to 10 tons per year of volatile organic compounds.

Each new, reconstructed, and existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR, Part 63, Subpart MMMM, 63.3881(a)(2) through (6), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating. 40 CFR, Part 63, Subpart MMMM does not apply to surface coating or a coating operation that meets any of the criteria of 40 CFR 63.3881(c)(1) through (17).

Emission Unit: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Organic HAP	2.6 lbs. per gal of coating solids	12-month rolling time period	Existing – General Use Coating	SC. VI.1 through SC. VI.10	**40 CFR 63.3890(b)(1)**
* As determined at the end of each calendar month.					

1. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.3890 using at least one of the following three options, which are listed in 40 CFR 63.3891(a) through (c):
   a) Compliant material option,
   b) Emission rate without add-on controls option, or
   c) Emission rate with add-on controls option.

   The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials used when determining the emission rate. **(40 CFR 63.3891)**

2. Any coating operation(s) using the compliant material option or the emission rate without add-on controls option, shall be in compliance with the applicable emission limits in 40 CFR 63.3890 at all times. **(40 CFR 63.3900(a)(1))**

3. If the surface coating operation(s) meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.3890(a) or (b), the permittee may comply separately with each subcategory emission limit, or comply using one of the alternatives in 40 CFR 63.3890(c)(1) or (2). **(40 CFR 63.3890(c))**

II. MATERIAL LIMIT(S)

For the compliant materials option, the permittee shall meet the material limits specified in the following table.

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Each Thinner and/or Additive	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC. VI.1, SC. VI.2, SC. VI.3, SC. VI.5	**40 CFR 63.3891(a)**
Each Cleaning Material	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC. VI.1, SC. VI.2, SC. VI.3, SC. VI.5	**40 CFR 63.3891(a)**
* Determined according to 40 CFR 63.3941(a).					

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 336.1213(3)(b)(ii), 40 CFR 63.3931)**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.3931)**

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.3941, 40 CFR 63.3951, or 40 CFR 63.3961. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months. **(40 CFR 63.3940, 40 CFR 63.3950, 40 CFR 63.3960)**

2. The permittee shall keep all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931. **(40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(j))**

3. The permittee shall maintain, at a minimum, the following records for each compliance period:

   a) A copy of each notification and report that is submitted to comply with Subpart MMMM, and the documentation supporting each notification and report. **(40 CFR 63.3930(a))**

   b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. **(40 CFR 63.3930(b))**

   c) A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. **(40 CFR 63.3930(c)(1))**

d) For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941. **(40 CFR 63.3930(c)(2))**

e) For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951. **(40 CFR 63.3930(c)(3))**

f) The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the volume used. **(40 CFR 63.3930(d))**

g) The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight. **(40 CFR 63.3930(e))**

h) The volume fraction of coating solids for each coating used during each compliance period. **40 CFR 63.3930(f))**

i) For either the emission rate without add-on controls option, or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period. **(40 CFR 63.3930(g))**

j) The information specified in 40 CFR 63.3930(h)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4). **(40 CFR 63.3930(h))**

k) The date, time, and duration of each deviation. **(40 CFR 63.3930(j))**

4. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the emission limit in 40 CFR 63.3890, for each compliance period, using Equation 2 of 40 CFR 63.3941. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.3941(a). **(40 CFR 63.3942)**

5. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to 40 CFR 63.3951(a) through (g). **(40 CFR 63.3952)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. For the compliant material option, if any coating used for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890; or any thinner or cleaning material used contains any organic HAP, the permittee shall report this as a deviation as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(5). **(40 CFR 63.3942(b))**

5. For the emission rate without add-on controls, if the organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890, the permittee shall report this as a deviation as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(6). [2] **(40 CFR 63.3952(b))**

6. The Permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.3910. **(40 CFR Part 63, Subparts A and MMMM)**

7. The permittee shall submit all semiannual compliance reports specified in 40 CFR 63.3920(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.3890, include a statement that the coating operations were in compliance. **(40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c), 40 CFR 63.3963(f))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products. **(40 CFR Part 63, Subparts A and MMMM)**

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGPLATINGLINES
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

6 plating lines that consist of alkaline cleaning baths, hydrochloric acid pickling baths and zinc electroplating tanks.

Emission Units: EUPLATINGLINE1, EUPLATINGLINE3, EUPLATINGLINE4, EUPLATINGLINE6, EUPLATINGLINE11 and EUPLATINGLINE12

POLLUTION CONTROL EQUIPMENT:

Each line has an associated scrubber system

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any plating line in FGPLATINGLINES unless the associated packed bed scrubber for that plating line is installed, maintained and operated properly. Proper operation includes but is not limited to performing the manufacturer's recommended maintenance on the control device and operating in conjunction with the malfunction abatement plan (MAP) specified in SC III.2.[2] **(R 336.1224, R 336.1225, R 336.1910)**

2. The permittee shall submit to the AQD District Supervisor, for review and approval, a MAP that has been updated to include the new identification for each emission unit in FGPLATINGLINES. After approval of the updated MAP by the AQD District Supervisor, the permittee shall not operate any plating line in FGPLATINGLINES unless the MAP, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum the plan shall include:

    a. Identification of the equipment and, if applicable, air-cleaning device and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair

    b. Description of the items or conditions to be inspected and frequency of the inspections or repairs

    c. Identification of the equipment and, if applicable, air-cleaning device, operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of these parameters and a description of the method of monitoring or surveillance procedures

    d. Identification of the major replacement parts that shall be maintained in inventory for quick replacement

    e. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits

    If the plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the plan within 45 days after such an event occurs and submit the revised plan for approval to the AQD District Supervisor. Should the AQD determine the MAP to be inadequate, the AQD District Supervisor may request modification of the plan to address those inadequacies.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, R 336.1912)**

3. The parameters of the acid pickling tanks in FGPLATINGLINES shall not exceed that listed in the following table[1]: **(R 336.1224, R336.1225)**

MAXIMUM CONCENTRATION OF HYDROCHLORIC ACID	MAXIMUM SURFACE AREA OF THE TANK	MAXIMUM TEMPERATURE OF THE SOLUTION
17% by weight hydrochloric acid (this is equivalent to 50% by volume of 20° Baume HCl)	39.1 square feet	120°F

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1224, R 336.1225, R 336.1910)**

2. The permittee shall keep, in a satisfactory manner, the following monthly records for FGPLATINGLINES.
   a. Written or electronic log of maximum monthly concentration of acid in the tank. Concentration may be expressed as percent by volume of degree baume HCl
   b. Area of the acid tank in square feet
   c. Temperature of the acid solution in the tank
   d. Written or electronic log of the hours of operation
   e. Corrective action taken upon failure of all of the following:
      i. the fans drawing vacuum on the acid tank
      ii. the pumps circulating the scrubber water through the scrubber

   The permittee shall keep the records using method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1224, R 336.1225, R 336.1910)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSCRUB6	21[2]	38[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
2. SVSCRUB1	20[2]	39[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
3. SVSCRUB3	20[2]	39[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
4. SVSCRUB4	20[2]	39[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
5. SVSCRUB11	20[2]	38[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
6. SVSCRUB12	20[2]	39[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
7. SVPLT1	38[2]	31[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
8. SVPLT3	42[2]	30[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
9. SVPLT4	46[2]	31[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
10. SVPLT11	42[2]	30[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
11. SVPLT12	42[2]	29[2]	**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).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGBOILERMACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This Flexible Group only includes those applicable requirements that would apply to new and existing affected boilers or process heaters as described in 40 CFR Part 63, Subpart DDDDD beginning on January 31, 2016, as they would apply to Ajax Metal Processing Inc. located in Detroit, MI. A new unit commenced construction or reconstruction after June 4, 2010. A boiler or process heater is existing if it is not new or reconstructed.

Compliance Date: January 31, 2016 for existing units
Startup for new units

Emission Units: Any new, reconstructed, and existing industrial, commercial and institutional boiler and process heaters, which meet the definition of "units designed to burn gas 1 subcategory", as defined in 63.7575, located at a major source of HAPs. Existing affected units include: EUBOILER150HP, EUBOILER60HP, EUHARDENING1, EUHARDENING2, EUENDO.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall only combust gas 1 fuels. Gas 1 subcategory includes any boiler or process heater that burns only natural gas, refinery gas, or other gas 1 fuels as defined in 63.7575, with the exception of liquid fuels burned during gas curtailment and supply emergencies or for periodic testing (not to exceed 48 hours in a calendar year). **(40 CFR 63.7575)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall perform a one-time energy assessment for each existing affected boiler in accordance with Table 3 of 40 CFR 63 Subpart DDDDD no later than January 31, 2016. **(40 CFR 63.7510(e))**

2. The permittee shall perform an initial tune up of each affected boiler that was installed before June 4, 2010 in accordance with 40 CFR 63 Subpart DDDDD no later than January 31, 2016. **(40 CFR 63.7510(f))**

3. New or reconstructed boilers installed on or after January 31, 2013 must perform an initial tune up accordance with 40 CFR 63 Subpart DDDDD within the applicable annual, biennial, or 5-year schedule as specified in §63.7540(a) following startup of the unit. Thereafter, the permittee must complete the applicable annual, biennial, or 5-year tune-up as specified in Table 3 of 40 CFR 63 Subpart DDDDD. **(40 CFR 63.7510(f), 63.7540(a))**

4. New and existing boilers or process heaters with continuous oxygen trim system or heat input capacity less than 5 million Btu per hour must conduct a 5-year tune up of the boiler or process heater. Each 5-year tune up must be conducted no more than 61 months after the previous tune up. **(40 CFR 63.7500(e), 63.7515(d), 63.7540)**

5. New and existing boilers or process heaters without continuous oxygen trim system and with a heat input capacity greater than 5 million Btu per hour and less than 10 million Btu per hour must conduct a biennial tune up of the boiler or process heater. Each biennial tune up must be conducted no more than 25 months after the previous tune up. **(40 CFR 63.7500(e), 63.7515(d), 63.7540)**

6. New and existing boilers or process heaters, including metal process furnaces, without continuous oxygen trim system and with heat input capacity greater than 10 million Btu per hour must conduct an annual tune up of the boiler or process heater. Each annual tune up must be conducted no more than 13 months after the previous tune up. **(40 CFR 63.7500, 63.7515(d), 63.7540)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep records of each notification and report submitted, and all supporting documentation, to comply with 40 CFR 63, Subparts A & DDDDD. **(40 CFR 63.7555(a)(1))**

2. The permittee shall keep records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in §63.10(b)(2)(viii).
(40 CFR 63.7555(a)(2))

3. For boilers and process heaters required to conduct an annual tune-up, the permittee shall maintain an annual report on-site and submit, if requested the following information: **(40 CFR 63.7540(a)(10))**

   a) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;

   b) A description of any corrective actions taken as a part of the tune-up; and

   c) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

See Appendix 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler(s) and/ or process heater(s) and its energy use systems was completed. within 60 days following completion of the tests. **(40 CFR 63.7530(d))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. On and after January 31, 2016, the permittee shall comply with all applicable provisions of the federal National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and DDDDD. **(40 CFR Part 63, Subparts A and DDDDD)**

2. Gas 1 subcategory includes any boiler or process heater that burns only natural gas, refinery gas, or other gas 1 fuels with the exception of liquid fuels burned during gas curtailment and supply emergencies or for periodic testing (not to exceed 48 hours in a calendar year). **(40 CFR 63.7575)**

3. Metal process furnaces are a subcategory of process heaters, as defined in 40 CFR Part 63, Subpart DDDDD, which include natural gas-fired annealing furnaces, preheat furnaces, reheat furnaces, aging furnaces, heat treat furnaces, and homogenizing furnaces. **(40 CFR 63.7575)**

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGRULE290
FLEXIBLE GROUP CONDITIONS

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DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification. ~~Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.~~

Emission Units installed on or after December 20, 2016: NA

Emission Units installed prior to December 20, 2016 ~~**Emission Units**~~**:** EUPHOS1, EUPHOS2, EUWAX

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(i))**

2. Any emission unit for which CO2 equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: (R 336.1290(2)(a)(ii)) ~~Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(a)(ii))**~~

   ~~a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**~~

   ~~b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(B))**~~

   ~~c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(C))**~~

   ~~d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(a)(ii)(D))**~~

a. For toxic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 micrograms per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively.

(R 336.1290(2)(a)(ii)(A))

b. For toxic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(2)(a)(ii)(B))**

c. The emission unit shall not emit any toxic air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(2)(a)(ii)(C))**

d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(D))**

e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(E))**

~~3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: **(R 336.1290(a)(iii))**~~

~~a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**~~

~~b. The visible emissions from the emission unit are not more than 5 percent opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**~~

~~c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(a)(iii)(C))**~~

3. Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: **(R 336.1290(2)(a)(iii))**

a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(2)(a)(iii)(A))**

b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(2)(a)(iii)(B))**

c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(2)(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**
2. The following requirements apply to emission units installed on or after December 20, 2016, utilizing control equipment:
   a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following: **(R 336.1290(2)(b)(i), R 336.1910)**
      i. Oxidizers and condensers equipped with a continuously displayed temperature indication device.
      ii. Wet scrubbers equipped with a liquid flow rate monitor.
      iii. Dual stage carbon absorption where the first canister is monitored for breakthrough and replaced if breakthrough is detected.
   b. An air cleaning device for particulate matter shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate.

~~1.~~ **(R 336.1290(2)(b)(ii), R 336.1910)**

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IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

~~1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**~~

~~a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**~~

~~b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**~~

~~c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**~~

~~d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**~~

~~e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**~~

~~2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**~~

~~a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**~~

~~b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**~~

~~3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**~~

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**

   a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**

   b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**

   c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**

   d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). **(R 336.1213(3))**

   d. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed on or after December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. **(R 336.1213(3), R 336.1290(2)(d))**

   e. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. **(R 336.1213(3), R 336.1290(2)(e))**

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**

   a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(2)(c), R 336.1213(3))**

   b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**

3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

~~Stack & Vent ID~~	~~Maximum Exhaust Dimensions (inches)~~	~~Minimum Height Above Ground (feet)~~	~~Underlying Applicable Requirements~~
~~NA~~	~~NA~~	~~NA~~	~~NA~~

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUCOGEN	40 CFR Part 63 Subpart ZZZZ (EUCOGEN is exempt from permitting per R 336.1282(b)(i) & R336.1285(g))	EUCOGEN is an existing emergency stationary RICE per 40 CFR 63.6590(a)(1)(i) (commenced construction or reconstruction before 12/19/2002) and, therefore, they are not subject per 40 CFR 63.6590(b)(3)(iii) as the unit is more than 500 brake HP and located at a major source of HAP emissions.
FGPLATINGLINES & CHROMATE LINES 1 & 2	40 CFR Part 63 Subpart WWWWWW (CHROMATE LINES 1 & 2 are exempt from permitting per R 336.1285(r)(vi)	FGPLATINGLINES & CHROMATE LINES 1 & 2 are located at a major source of HAPs and therefore, not subject per 40 CFR 63.11504(a).
CHROMATE LINES 1 & 2	40 CFR Part 63 Subpart N (CHROMATE LINES 1 & 2 are exempt from permitting per R 336.1285(r)(vi)	CHROMATE LINES 1 & 2 does not use electrodes or current control to deposit metals and, therefore, they are not subject per 40 CFR 63.340(c)
HCl Pickling Tanks	40 CFR Part 63 Subpart CCC	The definition of steel pickling does not include removal of light rust or scale from finished steel products or activation of the metal surface prior to plating or coating per 40 CFR 63.1156.

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APPENDICES

Appendix 1. Abbreviations and Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO_2e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
		gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MDEQ	Michigan Department of Environmental Quality	NO_x	Oxides of Nitrogen
		ng	Nanogram
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10 microns in diameter
NAAQS	National Ambient Air Quality Standards		
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO_2	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection Agency	µg	Microgram
		µm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year
Common Acronyms		Pollutant / Measurement Abbreviations	

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AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO_2e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
EGLE	Michigan Department of Environment, Great Lakes, and Energy	°F	Degrees Fahrenheit
		gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO_x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards		
NSR	New Source Review	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
PS	Performance Specification	pph	Pounds per hour
PSD	Prevention of Significant Deterioration	ppm	Parts per million
PTE	Permanent Total Enclosure	ppmv	Parts per million by volume
PTI	Permit to Install	ppmw	Parts per million by weight
RACT	Reasonable Available Control Technology	psia	Pounds per square inch absolute
ROP	Renewable Operating Permit	psig	Pounds per square inch gauge
SC	Special Condition	scf	Standard cubic feet
SCR	Selective Catalytic Reduction	sec	Seconds
SNCR	Selective Non-Catalytic Reduction	SO_2	Sulfur Dioxide
SRN	State Registration Number	TAC	Toxic Air Contaminant
TEQ	Toxicity Equivalence Quotient	Temp	Temperature
USEPA/EPA	United States Environmental Protection Agency	THC	Total Hydrocarbons
VE	Visible Emissions	tpy	Tons per year
		µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. **(R 336.1213(4)(a), R 336.1119(a)(ii))**

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any Permit to Install issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B5830-2009. Those ROP applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No. MI-PTI B5830-2009a is being reissued as Source-Wide PTI No. MI-PTI-B5830-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
131-11	201100128	Incorporate Permit to Install (PTI) No. 131-11. PTI No. 131-11 streamlines plating line conditions into FGPLATINGLINES. Equipment EUZINCALLOY1, EUZINCALLOY2, EUZINCALLOY3, EUZINC4 and EUZINC5 was renamed respectively as EUPLATINGLINE4, EUPLATINGLINE3, EUPLATINGLINE1, EUPLATINGLINE11 and EUPLATINGLINE12. EUPLATINGLINE6 was added.	FGPLATELINES

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B5830-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
47-16	201600128 / October 14, 2016	Incorporate PTI 47-16, which is for installing a new dip spin line (EUDIPSPIN2) and to modify the size of the plating tank on EUPLATINGLINE11. Additionally, The facility will be a synthetic minor source for VOC which is the main concern criteria pollutant.	Source-wide Conditions EUDIPSPIN2 FGLOCKSEAL FGPLATINGLINES
47-16A	201700119 / December 11, 2017	Incorporate PTI 47-16, which is for changing EUDIPSPIN2 stacks with the rain cap devices. Ajax met Rule 225 requirement via Rule 227(1)(a) analysis. All other applicable requirements in FGLOCKSEAL remain unchanged. Additionally, a Condition to complete all required caluculations for FGPLATINGLINES was added to the Monitoring and Recordkeeping Condtions in the FGPLATINGLINES Table.	EUDIPSPIN2 FGLOCKSEAL FGPLATINGLINES

Appendix 7. Emission Calculations

The permittee shall use the following calculations, or other DEQ-AQD approved calculations, in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FGLOCKSEAL.

VOC Emission Calculations for 10 TPY Coating Line

COMPANY _____ PERMIT NUMBER _____

MONTH / YEAR _____

	A	B	C = A x B
MATERIAL IDENTIFICATION (Coating, Reducer, Catalyst, or Purge/Clean-up Solvent)	**MATERIAL USED (Gallons)***	**VOC CONTENT (Pounds VOC / Gallon)**	**VOC EMISSIONS (Pounds)**

Total pounds VOCs uncontrolled, **D** = Sum of C **D**

Total tons VOCs uncontrolled, **E** = D/2000 **E**

Control Factor F: For a coating line using a properly operated thermal or catalytic oxidizer to meet the requirements of the general permit, F = 1-(76/100) = 0.24. If uncontrolled, F = 1 F

Total tons VOCs emitted this month, **G** = E x F **G**

Total tons VOCs emitted 11 previous months, **H** = Sum of G for 11 previous months **H**

Total tons VOCs emitted over 12-month period, **J** = G + H **J**

J cannot exceed 10 tons per year from each coating line, nor 30 tons per year from all coating lines at a stationary source. These limits include emissions from associated purge and clean-up operations.

* For purge/clean-up solvents, subtract amount reclaimed

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.