STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE DIRECTOR

In the matter of administrative proceedings against **H INDUSTRIES**, a corporation organized under the laws of the State of Michigan and doing business at 19455 Glendale Street, in the City of Detroit, County of Wayne, State of Michigan	AQD No. 7-2008 SRN:N0246

STIPULATION FOR ENTRY OF FINAL ORDER
BY CONSENT

This proceeding resulted from allegations by the Michigan Department of Environmental Quality ("MDEQ") Air Quality Division ("AQD") against H Industries, ("Company"), a Michigan corporation located at 19455 Glendale Street in the City of Detroit, County of Wayne, State of Michigan, with State Registration Number ("SRN") N0246. The MDEQ alleges that the Company is in violation of the Michigan Administrative Code ("MAC"), 2003 AACS, R336.1201 ("Rule 201"), 2000 AACS R336.1301 ("Rule 301"), R336.1310 ("Rule 310"), 2002 AACS R336.1901 ("Rule 901") and R336.1910 ("Rule 910"). Specifically, the MDEQ alleges that the Company has: Installed a furnace without first obtaining the proper air use permit, emitted smoke from the facility in excess of the maximum allowed 20% opacity, caused the open burning of refuse or other waste material at the facility, caused odorous emissions of sufficient intensity and duration so as to constitute unreasonable interference with the comfortable enjoyment of life and property, and has failed to maintain the required control device in a satisfactory manner, as cited herein and in the Letters of Violation ("LOVs") dated July 5, 2006, July 19, 2006, August 11, 2006, September 13, 2006, and October 23, 2006. The Company and MDEQ stipulate to the termination of this proceeding by entry of a Stipulation for Entry of a Final Order by Consent ("Consent Order").

The Company and MDEQ stipulate as follows:

1. The Natural Resources and Environmental Protection Act, 1994 PA 451, ("Act 451"), MCL 324.101 et seq. is an act that controls pollution to protect the environment and natural resources in the State.

2. Article II, Pollution Control, Part 55 of Act 451 ("Part 55"), MCL 324.5501 et seq. provides for air pollution control regulations in this State.

3. The Michigan Department of Natural Resources ("MDNR") is authorized pursuant to Section 5503 of Part 55 to administer and enforce all provisions of Part 55. Section 301 of Part 3 provides the authority to the Director of the MDNR to delegate powers and duties.

4. The MDEQ was created as a principal department within the Executive Branch of the State of Michigan pursuant to Executive Order 1995-18. All statutory authority, powers, duties, functions and responsibilities of the MDNR AQD were transferred to the Director of the MDEQ ("Director").

5. The Director has delegated authority to the Chief of the AQD ("AQD Chief") to enter into this Consent Order.

6. The termination of this matter by a Consent Order pursuant to Section 5528 of Part 55 is proper and acceptable.

7. The Company and the MDEQ agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by the Company that the law has been violated.

8. This Consent Order becomes effective on the date of execution ("effective date of this Consent Order") by the AQD Chief.

9. The Company shall achieve compliance with the aforementioned regulations in accordance with the requirements contained in this Consent Order.

COMPLIANCE PROGRAM AND IMPLEMENTATION SCHEDULE

10. A. Permit

1. On August 22, 2006, the Company submitted to the AQD, pursuant to the administrative rules of Part 55, acceptable plans and specifications, and a complete application for an installation permit (Permit to Install No. 242-06) describing the air pollution control device[s] and/or other equipment to be used to control the emissions from the aluminum dross melting furnace to obtain compliance with Part 55 and the administrative rules promulgated thereunder.

2. On September 12, 2006, the AQD issued Permit to Install No. 242-06 to H Industries for the existing aluminum dross melting furnace and lime injection baghouse.

3. On and after the effective date of this Consent Order, H Industries shall fully comply with the terms and conditions of Permit to Install No. 242-06 which is attached as Exhibit A, incorporated by reference and made an enforceable part of this Consent Order. Any future modification

to, or revision of, Permit to Install No. 242-06 shall replace Permit to Install No. 242-06 as Exhibit "A", be incorporated by reference, and be made an enforceable part of this Consent Order.

B. Operating Conditions

1. On and after the effective date of this Consent Order, the Company shall unload raw material dross within an enclosure, or in some other equivalent manner, such that no visible fugitive emissions are observed during unloading activities.

2. On and after the effective date of this Consent Order, the Company shall store raw material dross inside of the facility immediately after unloading the raw material dross from the delivery vehicle.

3. On and after the effective date of this Consent Order, all waste material generated during the smelting process shall be deposited into the waste material holding bins immediately after being moved outside for disposal.

4. Waste material holding bins shall be completely covered at all times when containing waste except when loading waste material into the bins.

5. On and after the effective date of this Consent Order, the Company shall ensure any dross crushing performed at the site shall be performed in an enclosed area and performed in a manner such that no visible emissions from the dross crushing operation are observed.

6. On and after the effective date of this Consent Order, the Company shall maintain the vertical discharge point from the baghouse exhaust stack at a point already agreed to by the AQD District Supervisor, so as to eliminate plume downwash and associated ground level opacity and odor impacts.

7. On and after the effective date of this Consent Order the minimum stack height approved by the AQD District Supervisor shall be incorporated into the Company's existing Permit to Install No. 242-06 or any subsequent revision to that permit.

8. On and after the effective date of this Consent Order, the Company shall not operate the aluminum smelting process unless the Company implements and complies fully with the AQD approved Startup, Shutdown, and Malfunction Abatement Plan (MAP) for the aluminum dross melting furnace and lime injection baghouse system. The MAP shall be attached as Exhibit B, incorporated by reference, and made an enforceable part of this Consent Order. Any requested changes or updates to the required MAP shall be promptly submitted to the AQD Southeast Michigan District Supervisor for approval. Upon approval and notification to the Company the revised MAP shall be

attached to and become an enforceable part of this Consent Order. Prior to termination of this Consent Order, Exhibit B shall be attached and incorporated by reference as an enforceable part of the Company's then current Permit to Install.

C. Limitations

1. On and after the effective date of this Consent Order, the Company shall not cause the emission of any air contaminant or water vapor from the facility in violation of R336.1901 ("Rule 901").

TESTING

11. The Company shall conduct stack testing for Particulate Matter (PM) in accordance with EPA Reference Test Method 5B or 5C, or an alternative method approved by the AQD, to demonstrate compliance with the emission limitations specified in R336.1331 ("Rule 331") and Permit to Install No. 242-06 or any subsequent modifications thereof. Testing shall be conducted within one hundred and twenty (120) days of the effective date of this Consent Order and in accordance with the following schedule:

A. No less than sixty (60) days prior to testing, the Company shall submit a test plan which meets the requirements specified in Exhibit C of this Consent Order to the AQD Southeast Michigan District Supervisor and the Technical Programs Unit Supervisor for approval.

B. Within thirty (30) days after the approval of the test plan, the Company shall have completed the testing in accordance with the approved test plan.

C. Not less than seven (7) days prior to testing, the Company or his authorized agent, shall notify the AQD Southeast Michigan District Supervisor and the Technical Programs Unit Supervisor, in writing, of the time and place of the tests and who shall conduct them. A representative of the AQD shall have the opportunity to witness the tests.

D. Within sixty (60) days following the last date of the test, the Company shall submit to the AQD Southeast Michigan District Supervisor and Technical Programs Unit Supervisor a test report, which includes the test data and results, in accordance with the requirements specified in Exhibit C of this Consent Order.

E. Upon written request of AQD, the Company shall conduct stack testing for hydrogen chloride (HCl) emissions in accordance with EPA Reference Test Method 26, or an alternative method approved by AQD. Testing shall be conducted within one hundred and twenty (120) days of AQD

written request and in accordance with the schedule contained in subparagraphs A through D of paragraph 10 of this Consent Order. The Company may choose to satisfy this condition by conducting HCl testing concurrent with the PM testing required in Paragraph 10 of this Consent Order.

GENERAL PROVISIONS

12. On and after the effective date of this Consent Order, except as otherwise provided by the administrative rules of Part 55, the Company shall not install, construct, reconstruct, relocate, alter, or modify any process or process equipment including control equipment pertaining thereto, which may emit an air contaminant, unless a permit to install which authorizes such action is issued by the MDEQ pursuant to Rule 201, the Company is issued a waiver pursuant to Rule 202, or the change is exempt from the requirements of Rule 201.

13. This Consent Order in no way affects the Company's responsibility to comply with any other applicable state and federal, or local laws or regulations, including without limitation, any amendments to the federal Clean Air Act, 42 USC 7401 et seq., Act 451, Part 55 or their rules and regulations, or to the State Implementation Plan.

14. This Consent Order constitutes a civil settlement and satisfaction as to the resolution of the violations specifically addressed herein; however, it does not resolve any criminal action that may result from these same violations.

15. The Company shall pay to the General Fund of the State of Michigan, in the form of a checks made payable to the "State of Michigan" and delivered to the Michigan Department of Environmental Quality, Financial and Business Services Division, Revenue Control, P.O. Box 30657, Lansing, Michigan 48909-8157, a total settlement amount of $12,000.00, which includes AQD costs for investigation and enforcement. The sum of $12,000.00 shall be paid in four (4) equal payments as follows: The sum of $3,000.00 shall be paid by March 28, 2007. The sum of $3,000.00 shall be paid by June 28, 2008. The sum of $3,000.00 shall be paid by September 28, 2008. The sum of $3,000.00 shall be paid by December 28, 2008. To ensure proper credit, all payments made pursuant to this Consent Order shall include the Agreement Identification No. AQD 3297 on the face of the check. This settlement amount is in addition to any fees, taxes, or other fines that may be imposed on the Company by law.

16. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 12 of this Consent Order, the Company is subject to a stipulated fine of up to $10,000.00

per violation. On and after the effective date of this Consent Order, if the Company fails to comply with paragraphs 10.B.1., 10.B.2., 10.B.3., 10.B.4 or 10.B.5 of this Consent Order, the Company is subject to stipulated fines of up to $5,000.00 per violation per day. On and after the effective date of this Consent Order, if the Company fails to comply with paragraphs 10.A.3, 10.B.6, 10.B.7, 10.B.8, 10.C, 11.A., 11.B., 11.C., 11.D or 11.E. of this Consent Order, the Company is subject to stipulated fines of up to $3,000.00 per violation per day. On and after the effective date of this Consent Order, if the Company fails to comply with any other provision of this Consent Order, the Company is subject to a stipulated fine of up to $500.00 per violation. The amount of the stipulated fines imposed pursuant to this paragraph shall be within the discretion of the MDEQ. Stipulated fines submitted under this Consent Order shall be by check, payable to the State of Michigan within thirty (30) days of written demand and shall be delivered to the Michigan Department of Environmental Quality, Financial and Business Services Division, Revenue Control, P.O. Box 30657, Lansing, Michigan 48909-8157. To ensure proper credit, all payments shall include the Agreement Identification No. AQD 3297S on the face of the check. Payment of stipulated fines shall not alter or modify in any way the Company's obligation to comply with the terms and conditions of this Consent Order.

17. The AQD, at its discretion, may seek stipulated fines or statutory fines for any violation of this Consent Order which is also a violation of any provision of applicable federal and state law, rule, regulation, permit, or MDEQ administrative order. However, the AQD is precluded from seeking both a stipulated fine under this Consent Order and a statutory fine for the same violation.

18. To ensure timely payment of the settlement amount assessed in paragraph 15 and any stipulated fines assessed pursuant to paragraph 16 of this Consent Order, the Company shall pay an interest penalty to the State of Michigan each time it fails to make a complete or timely payment under this Consent Order. The interest penalty shall be determined at a rate of twelve percent (12%) per year compounded annually, using the full increment of amount due as principal, calculated from the due date specified in this Consent Order until the date that delinquent payment is finally paid in full. Payment of an interest penalty by the Company shall be made to the State of Michigan in accordance with paragraph 16 of this Consent Order. Interest payments shall be applied first towards the most overdue amount or outstanding interest penalty owed by the Company before any remaining balance is applied to subsequent payment amount or interest penalty.

19. The Company agrees not to contest the legal basis for the settlement amount assessed pursuant to paragraph 15. The Company also agrees not to contest the legal basis for any stipulated fines

assessed pursuant to paragraph 16 of this Consent Order, but reserves the right to dispute in a court of competent jurisdiction the factual basis upon which a demand by MDEQ of stipulated fines is made. In addition, the Company agrees that said fines have not been assessed by the MDEQ pursuant to Section 5529 of Part 55 and therefore are not reviewable under Section 5529 of Part 55.

20. This compliance program is not a variance subject to the 12 month limitation specified in Section 5538 of Part 55.

21. This Consent Order shall remain in full force and effect for a period of at least five (5) years. Thereafter, the Consent Order shall terminate only upon written notice of termination issued by the AQD Chief. Prior to issuance of a written notice of termination, the Company shall submit a request, to the AQD Chief at the Michigan Department of Environmental Quality, Air Quality Division, P.O. Box 30260, Lansing, Michigan 48909-7760, consisting of a written certification that the Company has fully complied with all the requirements of this Consent Order and has made all payments including all stipulated fines required by this Consent Order. Specifically, this certification shall include: (i) the date of compliance with each provision of the compliance program and the date any payments or stipulated fines were paid; (ii) a statement that all required information has been reported to the AQD Southeast Michigan District Supervisor; (iii) confirmation that all records required to be maintained pursuant to this Consent Order are being maintained at the facility; and, (iv) such information as may be requested by the AQD Chief.

22. In the event H Industries sells or transfers the facility, with SRN N0246, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within thirty (30) calendar days, the Company shall also notify the AQD Southeast Michigan District Supervisor, in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser and/or transferee. The purchaser and/or transferee must agree, in writing, to assume all of the obligations of this Consent Order. A copy of that agreement shall be forwarded to the AQD Southeast Michigan District Supervisor within thirty (30) days of assuming the obligations of this Consent Order.

23. Prior to the effective date of this Consent Order and pursuant to the requirements of Sections 5511 and 5528(3) of Part 55, the public was notified of a 30-day public comment period and was provided the opportunity for a public hearing.

24. Section 5530 of Part 55 may serve as a source of authority but not a limitation under which the Consent Order may be enforced. Further, Part 17 of Act 451 and all other applicable laws and any other legal basis or applicable statute may be used to enforce this Consent Order.

25. The Company hereby stipulates that entry of this Consent Order is a result of an action by MDEQ to resolve alleged violations of its facility located at 19455 Glendale Street, in Detroit, Michigan. The Company further stipulates that it will take all lawful actions necessary to fully comply with this Consent Order, even if the Company files for bankruptcy in the future. The Company will not seek discharge of the settlement amount and any stipulated fines imposed hereunder in any future bankruptcy proceedings, and the Company will take necessary steps to ensure that the settlement amount and any future stipulated fines are not discharged, including requesting an order from the pertinent U.S. Bankruptcy Court designating the settlement amount and any future stipulated fines as exceptions to discharge pursuant to 11 U.S. Code Section 523(a)(7). The Company, during and after any future

bankruptcy proceedings, will ensure that the settlement amount and any future stipulated fines remain an obligation to be paid in full by the Company to the extent allowed by applicable bankruptcy law.

The undersigned certifies that he/she is fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

H INDUSTRIES

HENRY KIJANKA PRES.
Print Name and Title

Signature Date: 3/6/08

The above signatory subscribed and sworn to before me this 6 day of March, 2008.

CARMELA R. GIANNINI
Notary Public, Macomb County, MI
My Commission Expires Nov. 25, 2008

Carmela R. Giannini
Notary Public

Approved as to Content:

ACTING
G. Vinson Hellwig, Chief
AIR QUALITY DIVISION
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Dated: 3/24/08

Approved as to Form:

Alan F. Hoffman, Section Head
ENVIRONMENTAL REGULATION SECTION
ENVIRONMENT, NATURAL RESOURCES,
AND AGRICULTURE DIVISION
DEPARTMENT OF ATTORNEY GENERAL

Dated: 3/20/08

FINAL ORDER

The Chief of the Air Quality Division having had opportunity to review the Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Environmental Quality pursuant to the provisions of Part 55 of Act 451 and otherwise being fully advised on the premises,

HAS HEREBY ORDERED that the Consent Order is approved and shall be entered in the record of the MDEQ as a Final Order.

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

Lynn Judd ACTING

G. Vinson Hellwig, Chief
Air Quality Division

Dated: 3/24/08

EXHIBIT A

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

September 12, 2006

PERMIT TO INSTALL
242-06

ISSUED TO
H-Industries, Inc.

LOCATED AT
19455 Glendale
Detroit, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
N0246

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: **September 12, 2006**	
DATE PERMIT TO INSTALL APPROVED: **October 17, 2006**	SIGNATURE: Lynn Fiddler
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant/Measurement Abbreviations	
AQD	Air Quality Division	Btu	British Thermal Unit
ANSI	American National Standards Institute	°C	Degrees Celsius
BACT	Best Available Control Technology	CO	Carbon Monoxide
CAA	Clean Air Act	dscf	Dry standard cubic foot
CEM	Continuous Emission Monitoring	dscm	Dry standard cubic meter
CFR	Code of Federal Regulations	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H_2S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NOx	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality	PM	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM-10	Particulate Matter less than 10 microns diameter
MSDS	Material Safety Data Sheet	pph	Pound per hour
NESHAP	National Emission Standard for Hazardous Air Pollutants	ppm	Parts per million
NSPS	New Source Performance Standards	ppmv	Parts per million by volume
NSR	New Source Review	ppmw	Parts per million by weight
PS	Performance Specification	psia	Pounds per square inch absolute
PSD	Prevention of Significant Deterioration	psig	Pounds per square inch gauge
PTE	Permanent Total Enclosure	scf	Standard cubic feet
PTI	Permit to Install	sec	Seconds
RACT	Reasonably Available Control Technology	SO_2	Sulfur Dioxide
ROP	Renewable Operating Permit	THC	Total Hydrocarbons
SC	Special Condition	tpy	Tons per year
SCR	Selective Catalytic Reduction	µg	Microgram
SRN	State Registration Number	VOC	Volatile Organic Compounds
TAC	Toxic Air Contaminant	yr	Year
TEQ	Toxicity Equivalence Quotient		
VE	Visible Emissions		

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

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **[R336.1201(1)]**

2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **[R336.1201(4)]**

3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **[R336.1201(6)(b)]**

4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **[R336.1201(8), Section 5510 of Act 451, PA 1994]**

5. The AQD District Supervisor shall be notified, in writing, of a change in ownership or operational control of the stationary source or emission unit(s) authorized by this Permit to Install pursuant to R336.1219. The notification shall include all of the information required by R336.1219(1)(a) and (b). In addition, a new owner or operator must submit a written statement pursuant to R336.1219(1)(c), agreeing to and accepting the terms and conditions of this Permit to Install, and shall notify the AQD District Supervisor of any change in the contact person for this Pemit to Install. **[R336.1219]**

6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **[R336.1901]**

7. The permittee shall provide notice of an abnormal condition, start-up; shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **[R336.1912]**

8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law nor does it affect any liability for past violations under the Natural Resources and Environmental Protection Act, 1994 PA 451.

10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R336.1303. **[R336.1301]**

    a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.

    b) A visible emission limit specified by an applicable federal new source performance standard.

    c) A visible emission limit specified as a condition of this Permit to Install.

12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R336.1370(2). **[R336.1370]**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R336.2001 and R336.2003, under any of the conditions listed in R336.2001. **[R336.2001]**

SPECIAL CONDITIONS

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification
EUDROSSFURNACE	A natural gas-fired rotary furnace with a burner of 5 mmBtu/hr heat input. The furnace is used to recover aluminum from dross.	SVDROSSFURNACE
Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed by R336.1278 to R336.1290.		

Flexible Group Identification

Flexible Group ID	Emission Units Included in Flexible Group	Stack Identification
FGFACILITY	All process equipment at the facility including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

The following conditions apply to: EUDROSSFURNACE

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirement
1.1a	PM	EUDROSSFURNACE	0.1 lb/1000 lb of gas	Test Protocol	GC 13	R336.1331

Process/Operational Limits

1.2 The permittee shall not charge in EUDROSSFURNACE material other than dross and salt flux. **[R336.1201(3), R336.1205, R336.1224, R336.1225, R336.1702, R336.1901]**

Equipment

1.3 The permittee shall equip and maintain EUDROSSFURNACE with a lime injected baghouse. **[R336.1205, R336.1220, R336.1224]**

1.4 The permittee shall not operate EUDROSSFURNACE unless the lime injected baghouse is properly installed, maintained, and operated in accordance with the manufacturer' specifications. Proper installation includes that all emissions from EUDROSSFURNACE shall be exhausted through the baghouse. **[R336.1205, R336.1220, R336.1224]**

Recordkeeping/Reporting/Notification

1.5 The permittee shall keep, in a satisfactory manner, monthly dross throughput and monthly salt flux usage rate for EUDROSSFURNACE. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **[R336.1205, R336.1220]**

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
1.6	SVDROSSFURNACE	42	40	40 CFR 52.21 (c) & (d)
	The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.			

The following conditions apply to: FGFACILITY

Process/Operational Limits

2.1 The permittee shall not operate EUDROSSFURNACE unless the program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained. **[R336.1371, R336.1372, Act 451 324.5524]**

APPENDIX A

Fugitive Dust Control Plan

I. Site Roadways / Plant Yard

A. The dust on the site roadways/plant yard shall be controlled by applications of water, calcium chloride or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet the 20 percent opacity limit. A record of all watering/dust suppressant applications shall be kept on file and be made available to the AQD upon request.

B. All paved roadways/plant yards shall be swept as needed between applications.

C. Any material spillage on roads shall be cleaned up promptly.

II. Plant

A. The drop distance at each transfer point shall be reduced to the minimum the equipment can achieve.

B. All material transfer conveyors, if any, and transfer points will be kept covered.

III. Storage Piles

A. Stockpiling of all materials shall be performed to minimize drop distance and control potential dust problems.

B. Material storage piles must be protected by a cover, enclosed, or sprayed with water or a surfactant solution, or treated by an equivalent method on an as needed basis in order to meet the opacity limit of 20 percent. Also, equipment to apply water or dust suppressant shall be available at the site, or on call for use at the site, within a given operating day. A record of all watering/dust suppressant applications shall be kept on file and be made available to the AQD upon request.

IV. Truck Traffic

A. On-site: Material transport vehicles shall be loaded with telescopic chutes into enclosed railcars or tank trucks.

V. AQD/MDEQ Inspection

A. The provisions and procedures of this plan are subject to adjustment if following an inspection and written notification the AQD finds the fugitive dust requirements and/or permitted emission limits are not being met.

N0246 KRK BMA

EXHIBIT B

H Industries, Inc.
19455 Glendale
Detroit, MI 48223
February 20, 2007

Katie Koster
Environmental Engineer
AQD – MDEQ

SUBJECT: SRN: N0246, Detroit, Wayne County
Malfunction Abatement Plan

Dear Katie Koster:

Per your request of February 7, 2007, I am providing you with the Preventative Maintenance/Malfunction Abatement Plan for the Baghouse Filtration System in place at H Industries, Inc. The brochures previously submitted are manufactures literature specific to the components used onsite at H Industries.

Sincerely,

Henry Kijanka

H INDUSTRIES

Preventative Maintenance/Malfunction Abatement Plan

2. PROCESS OPERATING REQUIRMENTS

The following are normal operating ranges of the process operation variables at H Industries that shall be monitored to detect a malfunction or failure.

PROCESS/ CONTROL DEVICE	PRESSURE DROP RANGE	FABRIC FILTER INLET TEMP RANGE	INITIATION OF CLEANING CYCLE (IN WG)	LIME ADDITION RATE
Lime Injection Baghouse (Module 1,2, & 3)	1-5	150 – 180	5.0	80# Daily

In WG = inches water gauge

Note: Any variations from these conditions are to be brought to the attention of the Plant Manager.

3. MONITORING/RECORDKEEPING

Monitoring and recordkeeping for each process operation variable will be conducted based upon the schedule in the table below.

VARIABLE MONITORED	MONITORING FREQUENCY	ALARM	ALARM SET POINT	RECORDING FREQUENCY
Pressure Drop (Modules 1-3)	Continuous	Y	< 1 WG	Once per day or if outside operating Range
Triboelectric (Broken Bag Detection)	Continuous	Y	Upon Detection	Once per day or upon detection
Baghouse Gas Inlet Temperature	Continuous	Y	200	Once per day or if outside operating Range
Lime Addition Rate	Per Addition	N	N/A	Per Addition
Leak Detection / Opacity Monitoring	Routine Basis	N	N/A	Once per day or if outside operating Range

Records, including the date, time, operator, and process variable reading, shall be maintained on the attached recordkeeping forms for a period of at least 5 years. Example recordkeeping forms are included in the Appendix.

Preventative Maintenance / Malfunction Abatement Plan

The following operation, maintenance, and recordkeeping procedures have been implemented at H Industries to ensure the all process, control, and monitoring devices are functioning within permit and manufacturers specifications.

1. DESCRIPTION

The aluminum recovery process, at H Industries, consists of one rotary furnace which is utilized to recover secondary aluminum from aluminum dross. This is the only type of material used in this furnace. Aluminum dross is loaded into the furnace; it is then melted at high a temperature to recover the secondary aluminum from the dross. The liquefied aluminum is then poured off into sows. During this process the furnace exhausts gas into the baghouse filtration system as documented in this abatement plan.

Lime is added to baghouse filtration system during the startup process. This initial pre-coating of the filtration bag occurs after the system is preheated with dry, clean air and brought up to a temperature above the dew point. The filtration bags are coated with an initial coating of lime equal to approx 80 Lbs. Addition lime may later be added to the system if needed, as document further in the document.

The baghouse system is monitor by several devices, including visual observation. Differential pressure is monitored in the unit by a Magnehelic gauge mounted on the intake side of the baghouse. This unit is used in part to monitor items such as proper lime coating of filtration bags, broken filtration bags, air flow into unit. A temperature gauge is mounted on the intake side of the filtration system; this unit is used to monitor the intake side gas temperature. This gauge help in insure that gas temperature do not rise above an operating range that could potentially damage the filtration bags. A Triboelectric device is mounted on the outflow side of the filtration system. This device is designed to monitor for any particulate matter that passes through the filtration bag. This device is used in identifying potential problem between the intake and outflow sides on the filtration system such as the presents of broken, torn, dislodged filtration bags. This device is used in connection with routine observation of the stack by the furnace operator. Visual observations are also used on a routine basis to identify any issue that could occur in the baghouse filtration system.

4. MALFUNCTION/CORRECTIVE ACTION PLAN

The following is a summary of potential malfunctions and corresponding corrective actions to be taken at H Industries.

POTENTIAL MALFUNCTION	POSSIBLE CAUSE	CORRECTIVE PROCEDURE / OPERATIONAL CHANGE
Visible emissions from baghouse stack	Filtration bag broken, torn, or damaged	Isolate compartment of baghouse where problem is originating. Isolate potential filtration bag and close off tubesheet as needed. Inspect opacity of stack.
Baghouse pressure raising above normal operating range	Cleaning system not functioning	Verify cleaning system is online. Verify air pressure is online. Verify Initiation point set correctly. Repair as needed.
Baghouse pressure dropping below normal operating range	Filtration bag broken, torn, or damaged	Isolate compartment of baghouse where problem is originating. Isolate potential filtration bag and close off tubesheet as needed. Inspect opacity of stack.

Note: These are just a few examples of possible problems that may occur with the baghouse system. An expanded troubleshooting guide can be found included in the Appendix.

All malfunctions and corrective action taken must be documented. Documentation will include a description of the malfunction, cause, and corrective action taken, the date and time of the malfunction, and the date and time period of the corrective action taken. Records shall be maintained for a period of al least 5 years. Example recordkeeping forms are included in the Appendix.

5. PREVENTATIVE MAINTENANCE AND REPAIR REQUIREMENTS

A. Schedule of preventative maintenance that will be conducted on a daily, monthly, quarterly, and yearly basis:

Daily Maintenance:

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1. Check pressure drop
2. Verify triboelectric device is in green
3. Monitor gas flow rate
4. Observe stack outlet visually
5. Monitor cleaning cycle, lights and meters on control panel
6. Check compressed air on pulse-jet injectors
7. Monitor discharge system; make sure dust is removed as needed
8. Verify if additional lime needs to be added to system
9. Walk through baghouse inspection to check for abnormal visual conditions and potential problems.
10. Document any issues

Weekly Maintenance:

1. Check all moving parts on discharge systems
2. Check damper operation
3. Spot check bag tensioning on reverse air and shaker bag
4. Check compressed air lines, including filters
5. Check operation of Magnehelic gauge
6. Check accuracy of temperature gauges
7. Check cleaning sequence to see that all valves are seating properly
8. Check drive components on fan

Monthly Maintenance:

1. Spot check bag connection conditions
2. Check all moving parts on baghouse
3. Check fan for corrosion and blade wear
4. Check all hoses and clamps
5. Leak test check for bag leaks and holes
6. Inspect baghouse structure for corrosion

Quarterly Maintenance:

1. Thoroughly inspect bags
2. Check ducts for dust buildup
3. Observe damper valves for proper seating
4. Check gaskets on all doors
5. Inspect paint on baghouse
6. Inspect baffle plate for wear

Annual Maintenance:

1. Check all welds and blots
2. Check hopper for wear
3. Replace high wear parts on cleaning system

B. Inventory of spare parts that will be kept onsite:

Filtration bags
Gaskets
Valves
Seals
Gauges

C. Routine Maintenance

The two indicators of the performance of a bag house are Collection Efficiency and Pressure Drop. If the pressure drop is satisfactory, the proper amount of air is moving through the baghouse. If the stack is clean, the baghouse is doing the job it was intended to do. Pressure drop is monitored by using a Magnehelic gauge. Additionally a Triboelectric gauge is used to monitor particulate emissions that would indicate a bag failure. These items can be useful in determining maintenance and charting baghouse performance over time. Opacity, the visual density of stack emissions, can be monitored by observation. Stack opacity can also be continuously monitored by way of Triboflow device.

D. See Appendix for additional maintenance information

Records of maintenance and repair activities, including date, time, operator performing maintenance and repair, and description of activity, shall be maintained for a period of at least 5 years. Example recordkeeping forms are included in Appendix.

6. STARTUP/SHUTDOWN PROCEDURES

The specific startup and shutdown procedure shall be used. Improper start-up or shutdown can damage the equipment and therefore must be follow each time. If hot, moist gases are to be filtered; the baghouse MUST be preheated to raise the interior temperature in the baghouse to above the dew point in order to prevent condensation and potential problems. This is done by starting up the furnace and burning clean fuel (natural gas) while the furnace is empty and before any gases are filtered. The baghouse must be brought online slowly to avoid potential problems with filtration media. The filtration media must also be coated with a protective layer of lime to avoid possible permeability problem that could arise. This is indicated by a pressure differential of 1" to 2". The gas flow can then be slowly increased to the design rate. The following is the general startup/shutdown guideline:

A. STARTUP:

All physical inspection shall be done of the baghouse unit to spot and potential problems.

Make sure all collector components are working and in proper mode. Baghouse can then be brought online.

Do not allow higher then design filtration velocities or airflow.

Avoid passing below the dew point when dirty gases are present. The system shall be preheated for 20-30 minutes with clean hot air before the introduction of particulate laden (blue) gas. During normal operation, maintain the temperature above the dew point level.

Lime will need to be injected into system

Check all monitoring devices for proper operation, and then document status.

B. SHUTDOWN:

Purge the collector with clean (hot when necessary) dry air before allowing temperature to descend below dew point.

Cleaning system will be used to eject collected dust and lime that has adhered to filtration system. No lime may be allowed to stay on filtration bags.

Dust must be removed from hopper. The presence of any moisture can set it like cement, which could require hours of work to remove.

Allow Bags to clean down after dust settles

Check to see that all components are in the proper shutdown mode.

Check system for any potential problems.

7. APPENDIX

A. Bag Maintenance

Bag failures occur at varying times depending on the operation of the collector. Typical bag life is from two to five years. Bag failure can be spotted through daily monitoring and inspection. Including monitoring Triboelectric alarm. Stack opacity is also a good indication of bag condition. If the plume is dirty, then some problem exists, either in a single compartment or throughout the baghouse. If this case exists, follow-up trouble shooting is needed. In the compartmentalized baghouse, it is possible to monitor the stack opacity while isolating the compartments. Stack emissions will be reduced when the compartment with broken bags is brought offline.

Four ways to look for broken bags are:

1. Visual inspection for holes, tears, or leaks
2. Look for the accumulation of dust which can be related to nearby holes
3. Dust accumulation on the top tubesheet or in the blowpipe above the failed bag will be readily noticeable
4. Use of florescent powder and backlight

It is the practice in some plants to change-out bags as they fail. However, this may not be a wise decision. A new bag placed in the vicinity of old ones, is forced to take on more then its share of dust due to the tendency of air to flow to the path of least resistance. As a result, the bag is blinded and bag life is reduced and premature failure may occur.
It has become an accepted practice to simple block off the affected bag. In a pulse-jet baghouse with top access, a plug is placed over the tubesheet hole of the failed bag. Once this is done the affected compartment can be brought back online with no increase in opacity.

B. Record Keeping

The logging of actual inspections, observation, and preventative maintenance will help in determining the overall quality of baghouse operations. Once the visual inspection of the physical components on the baghouse is completed, the operational data, both current and historical that may have a bearing on baghouse performance shall be evaluated. The purpose of this evaluation process is to:

- Monitor the system
- Identify those items that indicate problems prior to shutdown
- Uncover the underlying causes so problems do not occur
- Identify area that require maintenance and/or repair

Areas that require monitoring and careful documentation include, but are not limited to, alterations in the operation of the baghouse or process changes.

Many factor can be have a substantial impact on baghouse performance, as such these items must be documented. Items such as pressure drops and cleaning cycle adjustment shall also be documented for further analysis.

C. Example Recordkeeping Forms (attached).

Baghouse Variable Conditions Monitoring Worksheet

Date & Time	Opacity	Tribo Condition	Inlet Temp.	Pressure Drop	Lime Added	Operator

Note: Worksheet needs to be filled out at minimum once per day, or upon variable change requiring corrective action.

Baghouse Maintenance/Repair Worksheet

Date & Time	Routine Maint. (Y/N)	Maintenance /Repair Item	Description	Operator

Note: Worksheet needs to be filled out upon any maintenance or repair activity.

Baghouse Malfunction Worksheet

Date & Time	Malfunction	Cause	Corrective Action	Operator

Note: Worksheet needs to be filled out each time a malfunction in baghouse system occurs.

EXHIBIT C

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FORMAT FOR SUBMITTAL OF SOURCE EMISSION TEST PLANS AND REPORTS

April 2004

INTRODUCTION

The source emission test is often the ultimate determination of compliance. The results of a test are of great significance to both the regulatory agency and the source. Since the results often determine the course of future enforcement discussions between the agency and the source, it is important that the test be performed in a valid and representative manner. The complex nature of the various sampling methods places great responsibility on both agency and testing personnel to assure each test is an accurate representation of a source's actual emissions.

The objective of this document is to describe the Air Quality Division's (AQD's) technical submittal requirements for a source test. The format described applies to the requirements of Michigan Department of Environmental Quality Rule 1001 (4), and to any other emission test submitted for reasons such as a permit requirement, for a consent order or consent judgment, or at the request of the AQD.

TEST PLAN SUBMITTAL

In order to establish uniform requirements and help ensure proper test methods and procedures are employed, **the information specified below should be submitted to the appropriate district office and the Technical Programs Unit in Lansing,** at least 30 days prior to the scheduled test date. A complete submittal will minimize the possibility of a test rejection as a result of improper sampling or data collection methods.

Testing shall be performed in strict accordance with procedures specified in the Code of Federal Regulations, Title 40, Part 60 (Standards of Performance for New Stationary Sources, Appendix A, as amended), Part 61 (National Emission Standards for Hazardous Air Pollutants, Appendix B), and Part 51 (Requirements for Preparation, Adoption, and Submittal of Implementation Plans, Appendix M); and the Michigan Department of Environmental Quality Rules, Part 10, Intermittent Testing and Sampling. Any variations in the sampling or analytical procedures must be described in the test plan and receive approval from the division prior to testing. If state or federal test methods are not available for the pollutants of concern or the nature of the test site makes it impractical to use them, other methods may be proposed as necessary.

While the specific items in the test plan will vary depending on the source and pollutants of interest, the following format should be utilized:

1. Identification and a brief description of the source to be tested. The description should include:
   a. names, addresses and telephone numbers of the contacts for information regarding the source and the test plan,
   b. type of industrial process or combustion facility,
   c. type and quantity of raw and finished materials used in the process,
   d. description of any cyclical or batch operations which would tend to produce variable emissions with time,
   e. basic operating parameters used to regulate the process, and
   f. rated capacity of the process. Process capacity can be demonstrated by calculating an average and maximum production reate using facility records. Based on these figures the facility shall include a production rate to be maintained during emission testing.

2. A brief description of any air pollution control equipment associated with the process:
   a. type of control device,
   b. operating parameters, and
   c. rated capacity and efficiency,
   d. any maintenance activity on the air pollution control equipment within the last three months.
3. Applicable permit number and emission limits for the process to be tested.

4. Identify all pollutants to be measured.

5. A description of the sampling train(s) to be used, including schematic diagrams if appropriate.

6. Detailed sampling and analysis procedures, including the applicable standard methods reference. This should include concentration of calibration gases where appropriate and expected emission concentrations. Method of calibration (through the system or to back of the monitor) should be indicated. Justify any proposed sampling or analytical modifications.

7. The number and length of sampling runs which will constitute a complete test.

8. Dimensioned sketch showing all sampling ports in relation to breeching and to upstream and downstream disturbances or obstructions of gas flow.

9. Estimated flue gas conditions such as temperature, moisture and velocity.
10. Projected process operating conditions during which the tests will be run (e.g., production rate). ***These conditions should match the operating conditions stated in***

the facility's permit or facility operations shall be at the maximum routine operating conditions during the test.

11. A description of any process or control equipment data to be collected during the test period. This should include any permit required information used to demonstrate the acceptable operations of emissions control processes and production rates.

12. A description of any monitoring data to be collected during the test period and subsequently reported (e.g., stationary continuous emission monitor data).

13. Chain of custody procedures.

14. Field quality assurance/quality control procedures (e.g., field blanks, sample storage and transport methods).

15. Laboratory quality assurance/quality control procedures utilized as part of the testing (e.g., manner and frequency of blanks, spikes and standards). This should include analysis of audit samples where required as a component of the approved test method.

16. Names and titles of personnel who will be performing the tests.

The facility information in items 1, 2, 3, 8, 10, 11 and 12 above can be submitted by completeing the attached Facility Test Information form or with a letter signed by the responsible official, as defined in Michigan Air Pollution Control Rule 336.1118(j). This letter shall certify that the testing will be conducted in accordance with the attached test plan and that the facility will be operated in compliance with permit conditions or at the maximum routine operating conditions for the facility. If the source operates under a Renewable Operating Permit, certification by a responsible official, using the Renewable Operating Permit Certification form (EQP 5736) must be included with the test plan and cover letter.

EMISSION TEST REPORTING

The emission test report should contain all pertinent data concerning the test program. In addition to reporting the results, it should include descriptions of the source, the sampling and analytical methodologies, the process operating conditions, and all raw field data, lab analytical data, and calculation methods. Since the report will serve as evidence to both the agency and the source as a demonstration of the compliance status of the facility, it is important it be complete in content and adequate in quality. Its contents should be presented in an understandable and organized manner. **The information listed below shall be submitted to the appropriate district office and the Technical Programs Unit** by the date specified in an applicable air use permit, consent order, consent judgment, or state or federal regulation. Otherwise, pursuant to Michigan Department of Environmental Quality Rule 1001(4), a complete test report shall be submitted to the AQD within 60 days following the last date of testing. In the event that the test report is not complete, additional information will be requested for submittal. If the information

is not received following two written requests to the facility, the test results may be rejected by the AQD.

While the exact format of the report and the applicable information necessary will vary depending on the source and the pollutants of interest, the following format should be utilized.

1. Introduction
   a. identification, location and dates of tests,
   b. purpose of testing,
   c. brief description of source,
   d. names, addresses and telephone numbers of the contacts for information regarding the test and the test report, and
   e. names and affiliation of all personnel involved in conducting the testing.

2. Summary of Results
   a. operating data (e.g., production rate, fuel type or composition),
   b. applicable permit/license number or designation for the source,
   c. results expressed in units consistent with the emission limitation applicable to the source, and
   d. comparison with emission regulations.

3. Source Description
   a. description of process, including operation of emission control equipment,
   b. process flow sheet or diagram (if applicable),
   c. type and quantity of raw and finished materials processed during the tests,
   d. maximum and normal rated capacity of the process, and
   e. description of process instrumentation monitored during the test.

4. Sampling and Analytical Procedures
   a. description of sampling train(s) and field procedures,
   b. description of recovery and analytical procedures,
   c. dimensioned sketch showing all sampling ports in relation to breeching and to upstream and downstream disturbances or obstructions of gas flow,
   d. sketch of cross-sectional view of stack indicating traverse point locations and exact stack dimensions.

5. Test Results and Discussion
   a. detailed tabulation of results including process operating conditions and flue gas conditions,
   b. discussion of significance of results relative to operating parameters and emission regulations,
   c. discussion of any variations from normal sampling procedures or operating conditions which could have affected the results,
   d. documentation of any process or control equipment upset condition which occurred during the testing,
   e. description of any major maintenance performed on the air pollution control device(s) during the 3 month period prior to testing,

f. in the event of a re-test, a description of any changes made to the process or air pollution control device(s) since the last test,
g. results of any quality assurance audit sample analyses required by the reference method,

h. calibration sheets for the dry gas meter, orifice meter, pitot tube, and any other equipment or analytical procedures which require calibration,
i. sample calculations of all the formulas used to calculate the results,
j. copies of all field data sheets, and
k. copies of all laboratory data including quality assurance/quality control (e.g. blanks, spikes, standards).

The facility information in items 1, 2 and 3 above can be submitted by completing the attached Facility Test Results form or in a letter signed by the responsible official, as defined in Michigan Air Pollution Control Rule 336.1118(j). This letter shall certify that the testing was conducted in accordance with the approved test plan and that the facility operating conditions were in compliance with permit requirements or were at the maximum routine operating conditions for the facility. If the source operates under a Renewable Operating Permit, certification by a responsible official using form, using the Renewable Operating Permit Certification form (EQP 5736), must be included with the emission test results and cover letter.

REFERENCES

1. Michigan Department of Environmental Quality Rules, Part 10, Intermittent Testing and Sampling.

2. United States Environmental Protection Agency, Plant Inspection Workshop-Techniques for Evaluating Performance of Air Pollution Control Equipment: Observing Compliance Tests, February, 1981.

Mailing Address for the Technical Programs Unit

Michigan Department of Environmental Quality
Air Quality Division
Technical Programs Unit
P.O. Box 30260
Lansing, MI 48909

Street Address for Technical Programs Unit (needed for Federal Express, UPS, etc.)

Michigan Department of Environmental Quality
Air Quality Division – Technical Programs Unit
Constitution Hall, 3rd Floor North
525 West Allegan Street
Lansing, MI 48909

AIR QUALITY DIVISION

Pre-Test Facility Information Form

Facility Name:
Facility Address: **County:**

Contact Person:
Telephone Number: **Fax Number:**

Permit Number: **SRN:**

Description of facility production (rates) or process (continuous or batch) operations:
Historical aveage production rate:
Historical maximum production rate:
Production rate to be maintained during emissions monitoring:

Air pollution control equipment and operation:

Maintenance activity on air pollution control equipment within last three months:

Production or process operations required during emissions testing:

Production or process control information to be recorded during emissions testing:

Air pollution equipment control equipment operating information to be recorded during emissions testing:

Representative from the facility must sign below certifying that the information provided on this form and any attached information is accurate and complete.

Signature: **Date:**
Name:
Title:
Facility:

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

Post Test Facility Information Form

Facility Name:
Facility Address: **County:**

Contact Person:
Telephone Number: **Fax Number:**

Permit Number: **SRN:**

Description of facility production rates or process operations during emissions sampling:

Are these items as described in test plan? If not provide an explanation for differences.

Air pollution control equipment and operations during emissions sampling:

Are these items as described in test plan? If not provide an explanation for differences.

Production or process control information recorded during emissions testing:

Air pollution equipment control equipment operating information recorded during emissions testing:

Based on the emission momitoring results is your facility in compliance with the applicable permit limitations?

Representative from the facility must sign below certifying that the information provided on this form and any attached information is accurate and complete.

Signature: **Date:**
Name:
Title:
Facility: