

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

January 31, 2023

**PERMIT TO INSTALL
20-23**

ISSUED TO
TriTech Titanium Parts LLC

LOCATED AT
6401 East Seven Mile Road
Detroit, Michigan 48234

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
P1299

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

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: December 22, 2022	
DATE PERMIT TO INSTALL APPROVED: January 31, 2023	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Flexible Group ID
EUWAX	Wax patterns are made with molds or with a 3D printer. Patterns are then cleaned and etched.	FGMOLD
EUSANDERS	Ceramic molds are made by dipping the wax patterns in a series of three water-based ceramic slurry mixtures and tumbling them in sanders in between each slurry dip. Sanders are controlled by an AGET cyclone dust collector.	FGMOLD
EUAUTOCLAVE	Autoclave steam chamber to melt wax out of the cast, heated by natural gas with a maximum rated heat input of 398,000 Btu/hr.	FGMOLD
EUKILN	Kiln to bake ceramic molds. VOCs (wax fumes) with a maximum rated heat input of 1.1 MMBtu/hr. controlled by an afterburner with a maximum rated heat input of 550,000 Btu/hr.	FGMOLD
EUVACWELDFURN1	Electric vacuum-weld melting furnace used to make titanium investment castings and billets. Equipped with a 10-micron particulate filter and oil demister.	FGVACWELDFURNS
EUVACWELDFURN2	Electric vacuum-weld melting furnace used to make titanium investment castings and billets. Equipped with a 10-micron particulate filter and oil demister.	FGVACWELDFURNS
EUMIM	Metal injection molding (MIM) process. Organic binder/wax and titanium powder are mixed and injected into a mold. Wax/binder is removed from green MIM parts in a debinding solution. Parts then move to an electric sintering oven with a natural gas fired afterburner.	NA

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

**EUMIM
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Metal injection molding (MIM) process. Organic binder/wax and titanium powder are mixed and injected into a mold. Wax/binder is removed from green MIM parts in aqueous debinding solution. Parts then move to an electric sintering oven with a natural gas fired afterburner.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

The electric sintering oven is controlled by a natural gas-fired afterburner.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Solvent used to remove wax from parts	1,320 gallons per year	12-month rolling time period as determined at the end of each calendar month	EUMIM	SC VI.2	R 336.1225, R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUMIM unless a malfunction abatement plan (MAP) as described in Rule 911(2) for the natural gas-fired afterburner for the sintering oven has been submitted within 90 days of permit issuance and is implemented and maintained. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))**
2. 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. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the sintering oven of EUMIM unless an afterburner is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the afterburner includes maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each solvent and binder used in EUMIM, 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. (R 336.1225, R 336.1702)
2. The permittee shall monitor and record, in a satisfactory manner, the volume, in gallons, of solvent used in EUMIM to remove wax from parts, and solvent reclaimed, on a monthly and 12-month rolling time period basis. The permittee shall complete all calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month. (R 336.1225, R 336.1702(a))
3. The permittee shall monitor and record, in a satisfactory manner, the afterburner temperature at least once per shift, when the sintering oven is in operation. (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSINTER	7	24	R 336.1225, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

NA

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGMOLD	Ceramic mold production for investment castings, including the production of wax patterns, ceramic molds, wax removal, and kilning.	EUWAX, EUSANDERS, EUAUTOCLAVE, EUKILN
FGVACWELDFURNS	Two (2) electric vacuum-weld melting furnaces used to make titanium investment castings and billets. The furnaces are equipped with a 10-micron particulate filter and oil demister.	EUVACWELDFURN1, EUVACWELDFURN2

FGMOLD FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Ceramic mold production for investment castings, including the production of wax patterns, ceramic molds, wax removal, and kilning.

Emission Unit: EUWAX, EUSANDERS, EUAUTOCLAVE, EUKILN.

POLLUTION CONTROL EQUIPMENT

EUWAX is uncontrolled and emits in-plant.
EUSANDERS is controlled by an AGET cyclone dust collector.
EUAUTOCLAVE is uncontrolled.
EUKILN is controlled by a natural gas-fired afterburner.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUSANDERS or EUKILN unless a malfunction abatement plan (MAP) as described in Rule 911(2) for the associated control device (AGET cyclone dust collector for EUSANDERS and natural gas-fired afterburner for EUKILN) has been submitted within 90 days of permit issuance and is implemented and maintained. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

2. The permittee shall not operate EUKILN unless an afterburner is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the afterburner includes maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
3. The permittee shall not operate EUSANDERS unless the associated cyclone dust collector is installed, maintained, and operated in a satisfactory manner. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record, in a satisfactory manner, the EUKILN afterburner temperature at least once per shift, when EUKILN is in operation. (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))
2. The permittee shall keep a record of all inspections and maintenance performed on the cyclone dust collector for EUSANDERS and the natural gas-fired afterburner for EUKILN. The permittee shall maintain this record on site and make it available to the Department upon request. (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1910, 40 CFR 52.21)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSANDERS	Unrestricted	Unrestricted	NA
2. SVAUTOCLAVE	Unrestricted	Unrestricted	NA
3. SVKILN	14 x 16 ¹	24 ¹	R 336.1224, R 336.1225

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

**FGVACWELDFURNS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Two (2) electric vacuum-weld melting furnaces used to make titanium investment castings and billets. The furnaces are equipped with a 10-micron particulate filter and oil demister.

Emission Unit: EUVACWELDFURN1, EUVACWELDFURN2.

POLLUTION CONTROL EQUIPMENT

A 10-micron particulate filter and oil demister are shared by both furnaces.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Titanium electrode (metal charged to furnace)	100.0 lbs/heat	Per operating cycle	Each furnace in FGVACWELDFURNS	SC VI.1	R 336.1205, R 336.1225, 40 CFR 52.21(c) and (d)
2. Titanium charged to the furnace	600 tpy	12-month rolling time period as determined at the end of each calendar month	FGVACWELDFURNS	SC VI.2	R 336.1205, R 336.1225, 40 CFR 52.21(c) and (d)

3. The permittee shall melt less than 600 tons of metal(s) in FGVACWELDFURNS per calendar year. This condition is necessary to avoid requirements of the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries. **(40 CFR Part 63, Subpart ZZZZZZ)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only charge titanium to FGVACWELDFURNS that is free of oil, rubber, paint, or other contamination. **(R 336.1225, R 336.1702)**
2. The permittee shall not melt in both furnaces of FGVACWELDFURNS simultaneously. **(R 336.1225, 40 CFR 52.21(c) and (d))**
3. The permittee shall not operate the furnaces in FGVACWELDFURNS unless a malfunction abatement plan (MAP) as described in Rule 911(2) for the associated particulate filter and oil demister has been submitted within 90 days of permit issuance and is implemented and maintained. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or

operational changes to achieve compliance with all applicable emission limits. (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the furnaces in FGVACWELDFURNS unless the associated particulate filter and oil demister is installed, maintained, and operated in a satisfactory manner. (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))
2. The permittee shall install and maintain a scale to measure the metal before it is charged to furnaces of FGVACWELDFURNS. (R 336.1205, R 336.1225, 40 CFR 52.21(c) & (d))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record, in a satisfactory manner, the weight of metal charged to each furnace in FGVACWELDFURNS for each operating cycle (heat). (R 336.1205, R 336.1224, R 336.1225, 40 CFR 52.21(c) and (d))
2. The permittee shall monitor and record, in a satisfactory manner, the annual melt production of FGVACWELDFURNS on a monthly and 12-month rolling time period basis. The permittee shall complete all calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month. (R 336.1205, R 336.1224, R 336.1225, 40 CFR 52.21(c) and (d))
3. The permittee shall keep a record of all inspections and maintenance performed on the particulate filters and oil demisters associated with FGVACWELDFURNS. The permittee shall maintain this record on site and make it available to the Department upon request. (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, 40 CFR 52.21)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVVACWELDFURNS	3	24	R 336.1225, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

NA