

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

August 2, 2023

PERMIT TO INSTALL

93-23

ISSUED TO

Ryan's Hubbell Auto Parts, Inc.

LOCATED AT

9143 Hubbell Street
Detroit, Michigan 48228

IN THE COUNTY OF

Wayne

STATE REGISTRATION NUMBER

P1384

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: June 30, 2023	
DATE PERMIT TO INSTALL APPROVED: August 2, 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. The permittee shall not operate this equipment in a manner that causes or permits the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

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)**

FGFACILITY CONDITIONS

DESCRIPTION

The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGFACILITY unless the fugitive dust control plan specified in Appendix A, or an alternate approvable plan submitted to the AQD District Supervisor, for all plant roadways, the plant yard, all material storage piles, and all material handling operations has been implemented and is maintained. (R 336.1371, R 336.1372, Act 451 324.5524)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

Footnotes:

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

APPENDIX A

MCL 324.5524 Operating Program for Fugitive Dust Control

Ryan's Hubbell Auto Parts, Inc.

9143 Hubbell Street

Detroit, Michigan 48228

1.0 Introduction

This operating program has been developed and implemented for Ryan's Hubbell Auto Parts, Inc. facility located at 9143 Hubbell Street, Detroit, Michigan 48228, herein described as the site. The purpose of this program is to describe the tools and methods used to control fugitive dust emissions in accordance with Section 5524 of the Natural Resources and Environmental Protection Act, being MCL 324.5524, Fugitive Dust Sources or Emissions.

The primary industrial activity at this site is an auto salvage yard, with the addition of the storage and transportation of asphalt millings. Asphalt millings are delivered to the site by truck from nearby road construction jobs. The material is stockpiled in the southwest corner of the site by the use of front-end loaders. Front-end loaders are also used to be placed at the site and to load the asphalt millings into outbound trucks.

Ryan's Hubbell Auto Parts, Inc. operational days will be 7 days a week with hours ranging from 8am to 6pm.

The facility is bordered by Ellis Street and residential buildings to the south, Robson Street and residential buildings and park to the west. Westfield Avenue, residential, and business buildings are to the north, and Hubbell Street and industrial buildings to the east. This site and the adjoining properties to the east are zoned M4 (intensive industrial). The adjoining properties to the north, south, and west are generally zoned R1 (single family residential) with the exception of the northeast adjoining property zoned B4 (general business).

The following sections of this Operating Program are organized in order of the requirements of MCL 324.5524.

1.1 Applicability – MCL 324.5524(1)

The provisions of MCL 324.5524 apply to fugitive dust sources at the facility due to meeting the standard industrial classification (SIC) code and locational requirements that are established within MCL 324.5524. Facility operations are covered under SIC major group 29, *Petroleum Refining and Related Industries*, and group 50, *Wholesale trade-durable goods*. Ryan's Hubbell Auto Parts is an auto salvage yard and specializes in the import and export of asphalt millings. The SIC code used to describe the facility's primary industrial activities is 5039, *Scrap and Waste Material*, and 2951, *Asphalt Paving Mixtures and Blocks*.

1.2 Fugitive Dust Opacity Limits – MCL 324.5524(2)

In accordance with MCL 324.5524(2) the best practices and operational controls are implemented at the facility to limit fugitive dust emissions from asphalt milling storage piles, lots, paved and unpaved roads, and material handling activities to no greater than 5 percent opacity. Emissions from any other source are limited to 20 percent opacity.

2.0 Fugitive Dust Controls – MCL 324.5524(3)

2.1 Stockpile, Conveyor Loading, and Traffic Patterns – MCL 324.5524(3)(a)(i, ii, & iii)

MCL 324.5524(3)(a)(i) through MCL 324.5524(3)(a)(iii) require specific controls to limit fugitive dust emissions from stockpiles, conveyor loading activities, and traffic pattern access areas surrounding stockpiles. This facility does not contain conveyor loading activities. These controls are applicable to facilities where the total uncontrolled emissions of fugitive dust from material storage piles are greater than 50 tons per year, and where potential particulate emissions from all sources, including fugitive dust sources, exceeds 100 tons per year. Ryan's Hubbell Auto Parts potential to emit calculations show fugitive dust emissions do not exceed 50 tons per year, therefore these requirements do not apply.

2.2 Material Handling with Pollution Control Equipment – MCL 324.5524(3)(a)(iv)

Ryan's Hubbell Auto Parts does not utilize pollution control equipment to collect particulate emission form material unloading and transporting operations. Therefore, the requirements do not apply to this site.

2.3 Other Activity Controls – MCL 324.5524(3)(a)(v)

Ryan's Hubbell Auto Parts stockpile the asphalt millings brought onto the site. To minimize fugitive dust emissions from unloading and loading activities, water can be sprayed on the stockpiles on an as needed basis.

2.4 Particulate Collection Equipment – MCL324.5524(3)(b)

MCL324.5524(3)(b) is not applicable to this facility as it does not utilize particulate collection equipment.

2.5 Vehicle Transport of Materials with High Silt Content – MCL 324.5524(3)(c)

Ryan's Hubbell Auto Parts complies with the requirements of MCL 324.5524(3)(iii) by loading trucks in a manner that prevents their contents from dropping, leaking, blowing, otherwise escaping. To achieve this goal, trucks shall not be overloaded and will be loaded in a manner that allows for 6 inches between the load and the top of any sideboard, side panel, or tailgate. If this is not possible, tarps will be used to cover the truck leaving the site to control fugitive dust emissions during transport.

2.6 Vehicle Transport of Materials – MCL 324.5524(3)(d & e)

Customer vehicles used to transport asphalt millings off-site are not owned or operated by Ryan's Hubbell Auto Parts. It is the customers' responsibility to ensure their vehicles are maintained in good operating condition and comply with Michigan law and regulations. If Ryan's Hubbell Auto Parts employees observe a customer vehicle not in a condition to transport materials without spillage or leakage, then the vehicle shall not be loaded.

2.7 Vehicle Transport of Materials – MCL 324.5524(3)(f)

Ryan's Hubbell Auto Parts does not store or handle fly ash, therefore the requirements of MCL 324.5524(3)(f) are not applicable.

2.8 Vehicle Transport of Materials – MCL 324.5524(3)(g)

Ryan's Hubbell Auto Parts does not store or handle iron or steel slag, therefore the requirements of MCL 324.5524(3)(g) are not applicable.

3.0 Requirement to Prepare an Operating Program – MCL 324.5524(4)

This operating program has been prepared in accordance with MCL 324.5524, Fugitive Dust Sources or Emissions, to document the methods and controls implemented at Ryan's Hubbell Auto Parts to control fugitive dust emissions from the site's asphalt millings storage and handling activities. This program has been designed to reduce fugitive dust emissions to the lowest level possible through the application of reasonably available and economically feasible controls.

4.0 Operating Program Contents – MCL 324.5524(5)

4.1 Facility Contact Information – MCL 324.5524(5)(a) & (b)

Facility Name:	Ryan's Hubbell Auto Parts, Inc.
Facility Address:	9143 Hubbell Street, Detroit, Michigan 48228
Facility Manger:	Richard Wagner, Site Manager
Owner/Operator:	R.H. Holdings, LLC. 9143 Hubbell Street, Detroit, Michigan 48228
Environmental Consultant:	Natural Resources Management, LLC 7910 Sylvania Avenue, Sylvania, OH 43560 419-841-3232

The Ryan's Hubbell Auto Parts site manager, Richard Wagner, is responsible for the implementation of the Operating Program with guidance and support from Natural Resources Management, LLC, Environmental Consultant.

4.2 Facility Map and Diagrams – MCL 324.5524(5)(c)

In accordance with MCL 234.5524(5)(c), maps of Ryan's Hubbell Auto Parts site are provided in Figures 1 through 3 of this Operating Program. Figure 1 shows the general site location and its surroundings with a 0.25-mile radius of the site. Figures 2 and 3 depict the general site layout, including the following details:

1. Approximate storage pile locations
2. Loading and unloading operations
3. Traffic patterns within the site property

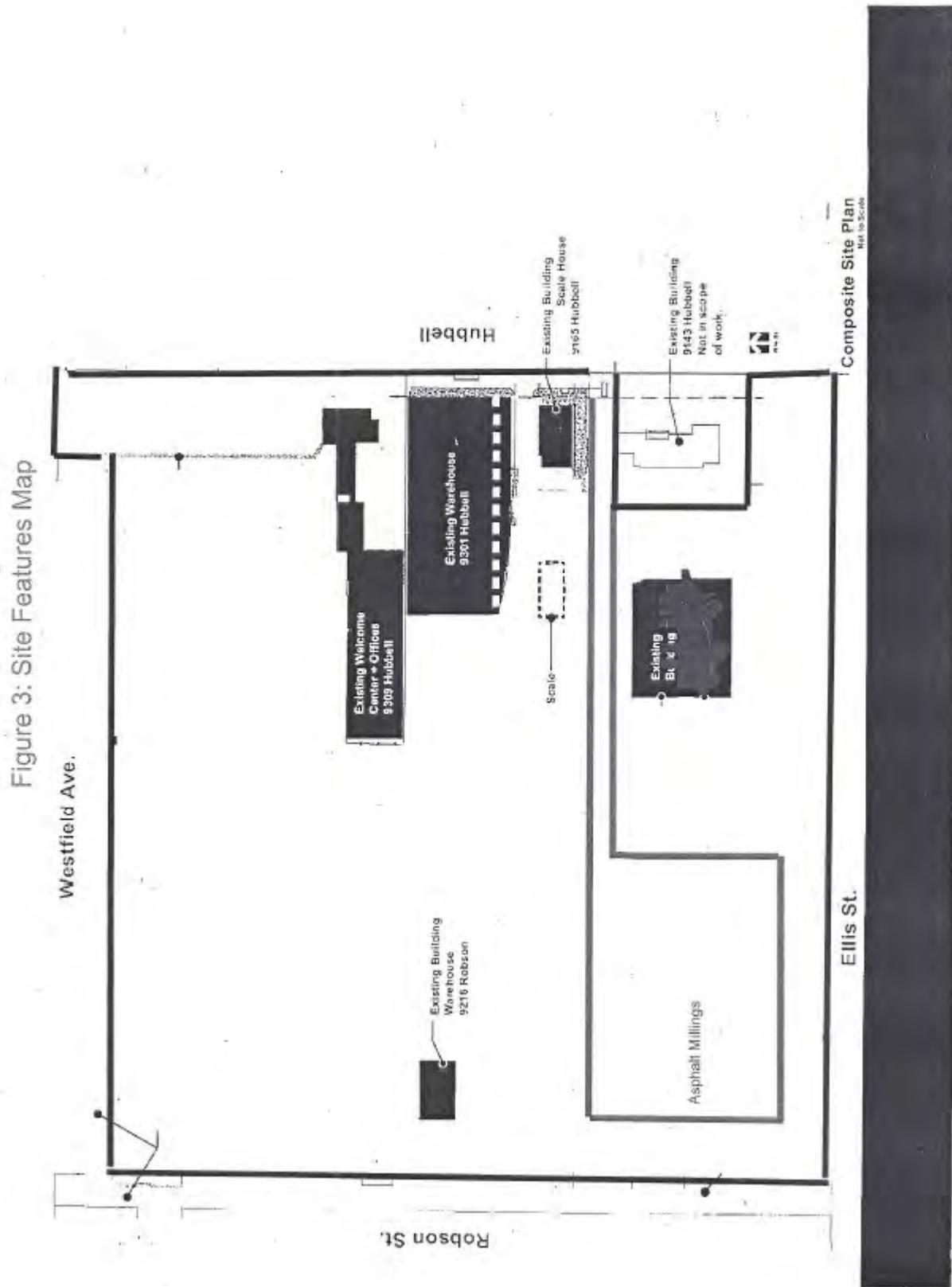
4.2.1 Figure 1

Figure 1: Site Location Map



Source: USGS 7.5-Minute Dearborn, MI Quadrangle, 2019

4.2.3 Figure 3



4.3 Material Handling Pollution Control Equipment Locations – MCL 324.5524(5)(d)

Ryan's Hubbell Auto Parts does not maintain pollution control equipment during asphalt millings loading and transporting operations.

4.4 Fugitive Dust Control Best Management Practices – MCL 324.5524(5)(e)

4.4.1 Material Processing and Conveying

Asphalt millings are delivered to the site by truck. Material is unloaded from the trucks by dumping. Material is further stockpiled by use of a loader on the southwest side of the site (see Figure 3). Fugitive dust is controlled during processing using water sprays as needed (MCL324.5524(a)(v)). Whenever materials are loaded or unloaded, drop heights are also minimized to the maximum extent practicable to control fugitive dust emissions. Water can be used to wet the material to further control fugitive dust when the inherent moisture or precipitation is insufficient to control the fugitive dust.

4.4.2 Traffic Management

Equipment and truck speeds on site are normally restricted to 8 miles per hour.

4.4.3 Dust Suppression

Water, calcium chloride, or another acceptable chemical dust suppressant may be applied to unpaved portions at the site as needed at the owner/operator's discretion to minimize fugitive dust generated from equipment and vehicles travelling on facility property. A loader attachment is onsite equipped with a sweeper bar and water tank with spray bars that can be used to control fugitive dust on unpaved portions of the truck route at the site. Additional information regarding dust suppression use and recordkeeping are discussed in the next two sections of this program.

4.5 Use of Waste or Recycled Oils for Fugitive Dust Control – MCL 324.5524(5)(f)

No waste or recycled oils shall be used for fugitive dust control at Ryan's Hubbell Auto Parts.

4.6 Dust Suppressant Recordkeeping – MCL 324.5524(5)(g)

Water, with no chemical additive is the primary material used for dust suppression on unpaved surfaces and stockpiles at the site. In the event of extremely dry weather conditions, the operator may also select to have unpaved roads treated with a chloride solution by a third-party contractor. A record of all watering/dust suppressant applications shall be kept on file for a period of 5 years. These records may be maintained either electronically or by written logbooks in the Ryan's Hubbell Auto Parts office and can be made available to the AQD upon request.

4.7 Paved Road and Parking Facility Cleaning – MCL 324.5524(5)(h)

On site, paved traffic pattern roads, and Hubbell Street, which is a paved public right-of-way, shall be cleaned by a wet sweeper truck as warranted, weather permitting. Records of paved road cleaning activities shall be kept on file for a period of 5 years. These records may be maintained either electronically or by written logbooks in the Ryan's Hubbell Auto Parts office and can be made available to the AQD upon request.

4.8 Other Information – MCL324.5524(5)(i)

Ryan's Hubbell Auto Parts will provide the AQD with any additional information the department requests to facilitate its review of this operating program.

5.0 Operating Program Amendment – MCL 324.5524(7)

This operating program will be amended and resubmitted to the AQD for approval in the event of operational changes that may result in significant increases of fugitive dust emissions from the site.