

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

July 26, 2024

PERMIT TO INSTALL
90-24

ISSUED TO
ALCO Products, LLC

LOCATED AT
580 Old St. Jean Street
Detroit, Michigan 48214

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
N8308

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:	
DATE PERMIT TO INSTALL APPROVED:	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
PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
PM _{2.5}	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 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)**

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
EUFRONTLINE	A dual-coating process where a top coating is applied in the first coater before a self-adhered bottom coating is applied by the second coater. Black Mag or sand is then applied to the top of the product and a release film is applied to the bottom. The product is then cured through cooling with chilled drums before packaging. Emissions at the asphalt coating section (i.e., start) of the line are discharged via a horizontal duct in the north wall of the building. Emissions from the Black Mag and sand silos and the sand applicator for the coater are controlled by a Torit Dust collector. The conveyor from the silos is not connected to the dust collector because it is self-contained.	FGFRONTLINE
EUBACKLINE	A coating line used to coat scrim (polyester) where a release film is applied and, in some products, a surface facer is applied to the top of products. The products are cooled with chilled drums before packaging.	
EUMIXINGTANK	A 3,500-gallon mixing tank used to mix an asphalt-limestone mixture.	FGTANKS
EUBATCHHOLD	Batch room holding tank used to hold the asphalt-limestone mixture.	FGTANKS
EUFRONTHOLD1	Front line holding tank used to hold the asphalt-limestone mixture which will be used on EUFRONTLINE.	FGTANKS
EUFRONTHOLD2	Front line holding tank used to hold the asphalt-limestone mixture which will be used on EUFRONTLINE.	FGTANKS
EUFRONTHOLD3	Front line holding tank used to hold the asphalt-limestone mixture which will be used on EUFRONTLINE.	FGTANKS
EUBACKHOLD1	Back line holding tank used to hold the asphalt-limestone mixture which will be used on EUBACKLINE.	FGTANKS
EUBACKHOLD2	Back line holding tank used to hold the asphalt-limestone mixture which will be used on EUBACKLINE.	FGTANKS
EUASPHALT1	Asphalt flux storage tank.	FGTANKS
EUASPHALT2	Asphalt flux storage tank.	FGTANKS
EUBLACKMAGSIL O	Silo containing Black Mag for application of granular surface. Emissions are controlled by a Torit Dust Collector.	FGFRONTLINE
EUSANDSILO	Silo containing sand for the application of granular surface. Emissions are controlled by a Torit Dust Collector.	FGFRONTLINE
EUCLEANING	Cleaning of tools and equipment using aromatic hydrocarbon solvent.	

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.

EUBACKLINE EMISSION UNIT CONDITIONS

DESCRIPTION

A coating line used to coat scrim (polyester) where a release film is applied and, in some products, a surface facer is applied to the top of products. The products are cooled with chilled drums before packaging.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.6 tpy	12-month rolling timer period as determined at the end of each calendar month	EUBACKLINE	SC V.1	40 CFR 52.21(c) & (d)
2. PM	0.1 lb per 1,000 lbs of exhaust gas, as determined on a dry gas basis	Instantaneous	EUBACKLINE	SC V.1	R 336.1331
3. Opacity	20%	6-minute average	EUBACKLINE	SC V.2	R 336.1301

II. MATERIAL LIMIT(S)

1. The permittee shall not exceed a throughput of 70,080 tons of asphalt compound in EUBACKLINE per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Upon request from the AQD District Supervisor, the permittee may be required to verify the PM, PM10, and/or PM2.5 emission rates from EUBACKLINE by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10 / PM2.5	40 CFR Part 51, Appendix M

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1331, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**

2. Upon request of the AQD District Supervisor, the permittee shall evaluate visible emissions from EUBACKLINE, in accordance 40 CFR Part 60 Subpart A. Visible emission observation procedures must have prior approval by the AQD Technical Programs Unit and District Office. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 45 days following the last date of the test. **(R 336.1301, R 336.1303)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1331, 40 CFR 52.21(c) & (d))**
2. The permittee shall keep records of the amount of asphalt compounds (in tons) processed in EUBACKLINE on a monthly basis. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1331, 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. SV-BACKLINE (Back Line Coater Stack) ^a	54.3	21	R 336.1225, 40 CFR 52.21(c)&(d)
^a . This stack is equipped with a raincap.			

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EUCLEANING EMISSION UNIT CONDITIONS

DESCRIPTION

Cleaning of tools and equipment using aromatic hydrocarbon solvent.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	0.46 tpy	12-month rolling time period as determined at the end of each calendar month	EUCLEANING	SC V.1, SC VI.3	R 336.1702

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste VOC materials and shall store them in closed containers. The permittee shall dispose of all waste VOC materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1225, R 336.1702(a))**
2. The permittee shall handle all VOC and/or HAP containing materials, in a manner to minimize the generation of fugitive emissions. **(R 336.1225, R 336.1702(a))**

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))**

1. Upon request of the District Supervisor, the permittee shall determine the VOC content, water content and density of any VOC material, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1225, R 336.1702)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each VOC material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702).**
3. The permittee shall keep the following information on a calendar month basis for EUCLEANING:
 - a) Gallons (with water) of each VOC material used and reclaimed.
 - b) VOC content (minus water and with water) of each VOC material as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

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

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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
FGFRONTLINE	A combination of process equipment used with the front line dual-coating process. This includes black mag and sand silos which are used for granular surface. Emissions are controlled by a baghouse. Emissions at the asphalt coating section (i.e., start) of the line are discharged via a horizontal duct in the north wall of the building. Emissions from the Black Mag and sand silos and the sand applicator for the coater are controlled by a Torit Dust collector. The conveyor from the silos is not connected to the dust collector because it is self-contained.	EUFRONTLINE, EUSANDSILO, EUBLACKMAGSILO
FGTANKS	A combination of holding and mixing tanks.	EUMIXINGTANK, EUBATCHHOLD, EUFRONTHOLD1, EUFRONTHOLD2, EUFRONTHOLD3, EUBACKHOLD1, EUBACKHOLD2, EUASPHALT1, EUASPHALT2

FGFRONTLINE FLEXIBLE GROUP CONDITIONS

DESCRIPTION

A combination of process equipment used with the front line dual-coating process. This includes black mag and sand silos which are used for granular surface. Emissions at the asphalt coating section (i.e., start) of the line are discharged via a horizontal duct in the north wall of the building. Emissions from the Black Mag and sand silos and the sand applicator for the coater are controlled by a Torit Dust collector. The conveyor from the silos is not connected to the dust collector because it is self-contained.

Emission Unit: EUFRONTLINE, EUSANDSILO, EUBLACKMAGSILO

POLLUTION CONTROL EQUIPMENT

A baghouse is used to control Black Mag and sand silo emissions.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.53 tpy	12-month rolling time period as determined as the end of each calendar month	EUFRONTLINE	SC V.1	40 CFR 52.21(c) & (d)
2. PM	4.5 tpy	12-month rolling time period as determined as the end of each calendar month	EUSANDSILO and EUBLACKMAGSILO	SC V.1	40 CFR 52.21(c) & (d)
3. PM	0.1 lb per 1,000 lbs of exhaust gas, as determined on a dry gas basis	Instantaneous	The baghouse associated with FGFRONTLINE	SC V.1	R 336.1331
4. PM10	0.05 gr/m ³	Hourly	The baghouse associated with FGFRONTLINE	SC V.1	40 CFR 52.21 (c)&(d)
5. PM2.5	0.05 gr/m ³	Hourly	The baghouse associated with FGFRONTLINE	SC V.1	40 CFR 52.21 (c)&(d)
6. Opacity	20%	6-minute average	FGFRONTLINE	SC V.2, SC VI.3	R 336.1301

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
7. Opacity	1%	6-minute average	EUSANDSILO, EUBLACKMAGSILO	SC V.2, SC VI.3	40 CFR 60.472(d)

II. MATERIAL LIMIT(S)

1. The permittee shall not exceed a throughput of 70,080 tons of asphalt compound in EUFRONTLINE per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1301, R 336.331, 40 CFR 52.21(c) & (d))**
2. The permittee shall not exceed a throughput of 18,000 tons of granular material in EUBLACKMAGSILO and EUSANDSILO per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGFRONTLINE unless a malfunction abatement plan (MAP) as described in Rule 911(2), for each baghouse/filter system, has been submitted within 90 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If 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. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. 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 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any emission unit under FGFRONTLINE unless the respective baghouse/filter system is installed, maintained, and operated in a satisfactory manner per the manufacture's specifications. Satisfactory operation includes but is not limited to maintaining the baghouse as specified by the malfunction abatement plan required by SC III.1. **(R 336.1301, R 336.1331, R 336.1910)**

V. TESTING/SAMPLING

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

1. Upon request from the AQD District Supervisor, the permittee may be required to verify the PM, PM10, and/or PM2.5 emission rates from any combination of emission units in FGFRONTLINE by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10 / PM2.5	40 CFR Part 51, Appendix M

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1331, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**

2. Upon request of the AQD District Supervisor, the permittee shall evaluate visible emissions from the baghouse associated with FGFRONTLINE, in accordance 40 CFR Part 60 Subpart A. Visible emission observation procedures must have prior approval by the AQD Technical Programs Unit and District Office. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 45 days following the last date of the test. **(R 336.1301, R 336.1303)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1331, 40 CFR 52.21(c) & (d))**
2. The permittee shall keep a log of all inspections and maintenance performed on any air emission control system associated with FGFRONTLINE (pursuant to SC III.1). The permittee shall maintain this record on site and make it available to the Department upon request. **(R 336.1331, R 336.1911, 40 CFR 52.21(c) & (d))**
3. The permittee shall conduct and record the results of non-certified visible emission on a daily basis. **(R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))**
4. The permittee shall keep records of the amount of asphalt compounds (in tons) processed in FGFRONTLINE on a monthly basis. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1331, 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. SV-BAGHOUSE (Silo Baghouse Stack)	16 (Rectangular with two slot openings:5x20 inches)	15.9	R 336.1225, 40 CFR 52.21(c)&(d)
2. SV-FRONTLINE (Front Line Coater Stack)*	18	16	R 336.1225, 40 CFR 52.21(c)&(d)

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
*This stack is horizontal.			

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal National Emission Standards for Hazardous Air Pollutants for Area Sources as specified in 40 CFR Part 63 Subparts AAAAAAA and A, as they apply to FGFRONTLINE. **(40 CFR Part 63 Subparts A & AAAAAAA)**
2. The permittee shall comply with all provisions of the federal New Source Performance Standards as specified in 40 CFR Part 60 Subparts UU and A, as they apply to FGFRONTLINE. **(40 CFR Part 60 Subparts A & UU)**

Footnotes:

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

FGTANKS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

A combination of mixing and holding tanks for a variety of material.

Emission Unit: EUMIXINGTANK, EUBATCHHOLD, EUFRONTHOLD1, EUFRONTHOLD2, EUFRONTHOLD3, EUBACKHOLD1, EUBACKHOLD2, EUASPHALT1, EUASPHALT2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	4.75 tpy	12-month rolling time period as determined as the end of each calendar month	FGTANKS	SC V.1	40 CFR 52.21(c) & (d)
2. Opacity	0%	6-minute average	FGTANKS	SC V.2	40 CFR 52.21(c) & (d), R 336.1301, 40 CFR Part 60 Subparts A & UU

II. MATERIAL LIMIT(S)

1. The permittee shall not exceed a throughput of 227,760 tons of asphalt compound in FGTANKS per 12-month rolling time period as determined at the end of each calendar month. **(40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

- Upon request from the AQD District Supervisor, the permittee may be required to verify the PM, PM10, and/or PM2.5 emission rates from any combination of emission units in FGTANKS by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules

PM10 / PM2.5	40 CFR Part 51, Appendix M
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An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1331, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**

2. Upon request of the AQD District Supervisor, the permittee shall evaluate visible emissions from any combination of emission units in FGTANKS, in accordance 40 CFR Part 60 Subpart A. Visible emission observation procedures must have prior approval by the AQD Technical Programs Unit and District Office. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 45 days following the last date of the test. **(R 336.1301, 40 CFR Part 60 Subparts A & UU)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1331, 40 CFR 52.21(c) & (d))**
2. The permittee shall keep records of the amount of asphalt compounds (in tons) processed in FGTANKS on a monthly basis. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1331, 40 CFR 52.21(c) and (d))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal National Emission Standards for Hazardous Air Pollutants for Area Sources as specified in 40 CFR Part 63 Subparts AAAAAAA and A, as they apply to FGTANKS. **(40 CFR Part 63 Subparts A & AAAAAA)**
2. The permittee shall comply with all provisions of the federal New Source Performance Standards as specified in 40 CFR Part 60 Subparts UU and A, as they apply to FGTANKS. **(40 CFR Part 60 Subparts A & UU)**

Footnotes:

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

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)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Beryllium (CAS No. 7440-41-7)	0.22 lbs/yr ¹	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1225(2)
2. Cadmium (CAS No. 7440-4-39)	0.22 lbs/yr ¹	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.4	R 336.1225(2)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(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 complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1225, R 336.1702)

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each beryllium and cadmium containing material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. ¹ **(R 336.1225(2))**.
3. The permittee shall keep the following information on a calendar month basis for FGFACILITY:
 - a) Amount of each beryllium (CAS No. 7440-41-7) containing material used and reclaimed.
 - b) Beryllium (CAS No. 7440-41-7) content of each material used.
 - c) Beryllium (CAS No. 7440-41-7) mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) Beryllium (CAS No. 7440-41-7) mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. ¹ **(R 336.1225(2))**

4. The permittee shall keep the following information on a calendar month basis for FGFACILITY:
 - a) Amount of each cadmium (CAS No. 7440-4-39) containing material used and reclaimed.
 - b) Cadmium (CAS No. 7440-4-39) content of each material used.
 - c) Cadmium (CAS No. 7440-4-39) mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) Cadmium (CAS No. 7440-4-39) mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. ¹ **(R 336.1225(2))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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