# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

EFFECTIVE DATE: JANUARY 29, 2016

**ISSUED TO** 

**EDW. C. LEVY CO. PLANT 6** 

State Registration Number (SRN): B4243

LOCATED AT

13800 Mellon Street, Detroit, Michigan 48209

### RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B4243-2016

Expiration Date: January 29, 2021

Administratively Complete ROP Renewal Application Due Between 7-29-2019 and 7-29-2020

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

# SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B4243-2016

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

Michigan Department of Environmental Quality

Wilhemina McLemore, Detroit District Supervisor

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# **AUTHORITY AND ENFORCEABILITY**

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

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

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

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

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

This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Consent Order Number 18-1993 entered on September 9, 1994 between the Air Quality Division of the Department of Natural Resources and the permittee.

# A. GENERAL CONDITIONS

# **Permit Enforceability**

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted.
   (R 336.1213(5))
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (R 336.1213(5)(a), R 336.1214a(5))
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. (R 336.1213(5)(b), R 336.1214a(3))

#### **General Provisions**

- 1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. (R 336.1213(1)(a))
- 2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. (R 336.1213(1)(b))
- 3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (R 336.1213(1)(c))
- 4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities (R 336.1213(1)(d)):
  - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
  - c. Inspect, at reasonable times, any of the following:
    - i. Any stationary source.
    - ii. Any emission unit.
    - iii. Any equipment, including monitoring and air pollution control equipment.
    - iv. Any work practices or operations regulated or required under the ROP.
  - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
- 5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. (R 336.1213(1)(e))

- 6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (R 336.1213(1)(f))
- 7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R 336.1213(1)(g))
- 8. This ROP does not convey any property rights or any exclusive privilege. (R 336.1213(1)(h))

# **Equipment & Design**

- 9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). (R 336.1370)
- 10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. (R 336.1910)

#### **Emission Limits**

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

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

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

### Testing/Sampling

- 13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). (R 336.2001)
- 14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. (R 336.2001(2), R 336.2001(3), R 336.2003(1))
- 15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. (R 336.2001(5))

# Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate (R 336.1213(3)(b)):

- a. The date, location, time, and method of sampling or measurements.
- b. The dates the analyses of the samples were performed.
- c. The company or entity that performed the analyses of the samples.
- d. The analytical techniques or methods used.
- e. The results of the analyses.
- f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
- 17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. (R 336.1213(1)(e), R 336.1213(3)(b)(ii))

# **Certification & Reporting**

- 18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R 336.1213(3)(c))
- 19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. (R 336.1213(4)(c))
- 20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (R 336.1213(4)(c))
- 21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. (R 336.1213(3)(c))
  - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
  - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
  - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

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22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following (R 336.1213(3)(c)):

- a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
- 23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. (R 336.1213(3)(c)(i))
- 24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. (R 336.1212(6))
- 25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA. (R 336.1912)

#### **Permit Shield**

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

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

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

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. (R 336.1213(6)(b)(iv))
- 28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
  - a. Operational flexibility changes made pursuant to Rule 215. (R 336.1215(5))
  - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). (R 336.1216(1)(b)(iii))
  - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. (R 336.1216(1)(c)(iii))
  - d. Minor Permit Modifications made pursuant to Rule 216(2). (R 336.1216(2)(f))
  - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. (R 336.1216(4)(e))
- 29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. (R 336.1217(1)(c), R 336.1217(1)(a))

#### **Revisions**

- 30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. (R 336.1215, R 336.1216)
- 31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). (R 336.1219(2))
- 32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. (R 336.1210(9))
- 33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. (R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))

# Reopenings

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

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# Renewals

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

### **Stratospheric Ozone Protection**

- 36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
- 37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

#### **Risk Management Plan**

- 38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
- 39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR Part 68.10(a):
  - a. June 21, 1999.
  - b. Three years after the date on which a regulated substance is first listed under 40 CFR Part 68.130, or
  - c. The date on which a regulated substance is first present above a threshold quantity in a process.
- 40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
- 41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). (40 CFR Part 68)

### **Emission Trading**

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

# **Permit To Install (PTI)**

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

- 44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.<sup>2</sup> (R 336.1201(8), Section 5510 of Act 451)
- 45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.<sup>2</sup> (R 336.1219)
- 46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<sup>2</sup> (R 336.1201(4))

#### Footnotes:

<sup>&</sup>lt;sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>&</sup>lt;sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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# **B. SOURCE-WIDE CONDITIONS**

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

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

### **POLLUTION CONTROL EQUIPMENT:** Water sprays, side shields

# I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fugitive Dust	5% opacity <sup>2</sup>	3-minute average <sup>a,b</sup>	Fugitive dust from any road, lot, storage pile, or material handling activity at a storage pile		Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)
2. Fugitive Dust	20% opacity <sup>2</sup>	3-minute average <sup>a</sup>	Fugitive dust from any other source	SC VI.1&2	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)

a in accordance with Test Method 9D at Act 451, Section 5525, Paragraph (j)

# II. MATERIAL LIMIT(S)

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

### III. PROCESS/OPERATIONAL RESTRICTION(S)

#### A. PROCESS CONTROL MEASURES.

1. Control on Process Equipment shall be as follows:

Grizzly / Feeder (601 A) Material watered before feeding Conveyor #1 (604) Uncovered, Material still wet

Crusher / Screen Tower (611/606) Water sprays Conveyor 609 Uncovered Conveyor 610 #2 Uncovered Conveyor 610 A #3 Uncovered Conveyor 612 #9 Uncovered

<sup>&</sup>lt;sup>b</sup> The provisions of this subsection shall not apply to storage pile material handling activities when wind speeds are in excess of 25 miles per hour (40.2 kilometers per hour).

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FE Conveyor 614 #10 Uncovered
FE Screen Uncovered
Bridge conveyor (BC) Side shields

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.A)

2. To minimize the fugitive emissions from the loading of trucks and the transporting of material off-site, the following operating practices shall be adhered to:

- a. All trucks transporting finished product shall be tarped before leaving the property.
- b. Drop heights of the front end loader bucket will be no more than two (2) feet above sideboard of the trucks.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.A)

3. Control of emissions due to vehicle movement about the stockpiles shall be accomplished by applying lignosulfonate or an equivalent or more effective material to the traveled areas among the piles. When lignosulfonate is used, the application rate of 5 gal/100 sq. ft. shall be used. The diluted ratio shall be 3:1, and the application frequency shall be once per month. The actual square footage to be controlled shall be dependent upon the amount of material in storage. If a dust suppressant other than lignosulfonate is used, facility shall submit the demonstration required in IX.1.B.1.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.A)

4. Spilled material under conveyors shall be attended to on an ongoing basis. Spillage on roadways shall be removed daily. A truck operator who has spilled material onto the road shall be notified so that appropriate action can be taken to prevent future incidences.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.A)

#### B. STOCKPILE AREAS and ACTIVITIES.

1. Raw slag shall be watered prior to transfer by front end loader to the grizzly/feeder at the beginning of the process plant. Water is added to the material at a rate of 4.0 gallons per ton of slag processed.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.B)

2. Load-out emissions shall be controlled by limiting drop height of the bucket to a maximum of two (2) feet above the sideboard of the truck.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.B)

#### C. ROADWAYS AND PARKING LOTS

- 1. Paved Roads
  - a. Paved roads shall be cleaned daily during operating hours, weather permitting, with a power flush or wet/vacuum truck.
  - b. Track-out shall be cleaned up daily when it occurs.
  - c. Speed limit on paved roads is 15 MPH.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.C)

- 2. Unpaved Roads
  - a. Unpaved roads shall be treated with a lignosulfonate (or equivalent) dust suppressant. If lignosulfate is used, the application rate shall be no less than 0.45 gallons of solution per square yard with dilution ratio of 3:1. If a dust suppressant other than lignosulfonate is used, facility shall submit the demonstration required in IX.1.B.1.
  - b. Speed limit on unpaved roads is 5 MPH.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.C)

- D. PROCESS EMISSIONS (Crushing, Screening, Conveying, and Transfer)
  - 1. Crushing / Screening operations shall be equipped with water sprays for fugitive dust control. Materials shall be wetted with water sprays prior to entering the crushing/screening operations.

Edw.C. Levy Co. Plant 6

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2. Conveying and transferring for those conveyors and transfer points covered under III.A.1 shall be equipped with covered conveyors, water sprays, side shields, or scope for fugitive dust control as described under III.A.1.

3. Load-out emission shall be controlled by limited drop height to a maximum of two (2) feet above the sideboard of the truck. All trucks shall be tarped.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.D)

# IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

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

NA

#### See Appendix 5

#### VI. MONITORING/RECORDKEEPING

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

 The permittee shall record the data and information specified in Appendix 4, Section 4.1- Required Records for Fugitive Dust Sources and shall keep the records for a period of at least two years. Records shall be made available to AQD upon written or verbal request. The permittee may use alternate formats with the approval by the AQD District Supervisor for recording equivalent information without the need to modify or amend this permit.

(Consent Order SIP 18-1993, (Revised 9/9/94), Exhibit A, Addendum), R336.1213(3))

2. The permittee shall perform a non-certified visible emission observation of the fugitive dust sources in III.A,B,C,&D at least 5 days per week during representative operations, excluding non-operating days, during March through October. The permittee shall initiate corrective action upon observation of visible emissions and shall keep a written or electronic record of each required observation and corrective action taken. (R336.1213(3))

#### See Appendix 4

#### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for reporting period July 1 to December 31 and November 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. A quarterly report shall be submitted by the permittee to AQD identifying each day in which an emission limit, operational requirement, or recording requirement, as specified in SIP No. 18-1993 (Revised 9/9/94) Exhibit A (Fugitive Dust Control Plan, Edward C. Levy Co. Plant #6), was not met. This report shall, for each instance, explain the reason that the emission limit, operational requirement, or recordkeeping requirement was not met, the duration of the event, the remedial action taken, and a description of the steps which were taken to prevent a recurrence. These reports shall be submitted within 30 days following the end of the calendar quarter in which the data was collected. (Consent Order SIP 18-1993 (Revised 9/9/94), Paragraph 11)

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# See Appendix 8

#### VIII. STACK/VENT RESTRICTION(S)

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

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

# IX. OTHER REQUIREMENT(S)

1. The permittee may change its processes, modify the fugitive dust control program summarized in Section III, Process/Operational Restrictions and contained in SIP No. 18-1993, or modify the particulate emission control program in accordance with the following:

### A. Process Change

- 1. The Permittee may change its operations or process, which are sources of particulate and fugitive dust provided all of the following conditions are met:
  - a. The provisions of the Control Programs continue to apply to the subject operation or process;
  - b. The change does not result in an increase in the level of fugitive dust or particulate emissions;
  - c. The change is approved.
- 2. The permittee shall submit to MDEQ a written description of the proposed change and how it meets the requirements of A(1).
- 3. The MDEQ shall approve or disapprove the proposed change, in writing, within 45 days after receiving the submitted proposed change, which meets the requirements of (A)(1).
- 4. Should the MDEQ disapprove the proposed change, the disapproval must describe the specific reasons for the decision and must be forwarded to the Permittee.

### B. Control Program Revision

- 1. The Permittee may revise the Control Programs provided both of the following conditions are met:
  - a. The permittee demonstrates, in writing, that the proposed revision does not result in an increase in the level of fugitive dust or particulate emissions and submits the demonstration to the MDEQ for approval.
  - b. The revision is approved.
- 2. The MDEQ shall approve or disapprove the proposed revision, in writing, within 45 days after receiving the submitted proposed revision using an applicable U.S. EPA approved method to demonstrate the proposed revision meets the requirements of B(1).
- 3. Should the MDEQ disapprove the proposed revision, the disapproval must describe the specific reasons for the decision and must be forwarded to the permittee.

(Consent Order SIP 18-1993, (Revised 9/9/94), Paragraph 13(A)(1), (2), and (B))

2. The conditions contained in this ROP for which a Consent Order is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the Consent Order. The

effective date of termination is defined for the purposes of the conditions as the date upon which the Termination Order is signed by the Chief of the AQD. (R336.1213(3))

Footnotes:

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

<sup>&</sup>lt;sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# C. EMISSION UNIT CONDITIONS

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

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

#### **EMISSION UNIT SUMMARY TABLE**

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

	Emission Unit Description (Including Process Equipment & Control	Installation Date/	Flexible Group ID
Emission Unit ID	Device(s))	Modification Date	
EULEVYPLANT6	Processing equipment associated with Levy Plant 6, including a grizzly feeder, seven conveyors, two screens and a crusher. Equipped with water spray system for air pollution control. It does not include equipment associated with EUCONVEYORSYSTEM and EUDEISTERSCREEN.	01/01/1971 9/19/2006	NA
EUCONVEYORSYSTEM	Five conveyors, located downstream of the Deister Screen (EUDEISTERSCREEN), designed to transfer slag and related materials to finished product stockpiles. Equipped with water spray system for air pollution control. Additional conveyors located downstream of the Deister Screen are not part of this emission unit.	05/09/1997 9/19/2006	NA
EUDEISTERSCREEN	A 350 ton per hour Deister Screen designed to separate slag and related materials into various finished product sizes. This emission unit includes nine conveyors and four knuckle conveyors. All but two conveyors are located downstream of the screen. Equipped with water spray system and adjustable stacker height mechanism for air pollution control.	04/17/1995	NA
EUBOFSLAGPIT	Basic Oxygen Furnace (BOF) slag pits equipped with water spray system for air pollution control. Also includes a partial enclosure of the pot knocking station for emission control.	04/17/1995	NA
EUCOLDCLEANERS	Cold cleaners that meet the applicable requirements of R336.1281(h)	After 7/1/1979	FGCOLDCLEANERS
EUDROPBALLCRANE	This process consists of dropping a large steel ball from a crane onto scrap steel to break it into small pieces to be reused by adjacent steel mill, AK Steel, Dearborn Works.	04/17/1995	FGRULE290

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUPROCESS#2	1-100 tons per hour hopper and 2-100 tons per hour conveyor used for recycling slag materials back into the screening portion of the existing slag processing plant.	5/11/2004	FGRULE290
EUMATRANSCONVEY	1-200 tons per hour hopper and one conveyor (Pot Slagger)	1985	FGRULE290

# EULEVYPLANT6 EMISSION UNIT CONDITIONS

# **DESCRIPTION**

Processing equipment associated with Levy Plant 6, including a grizzly feeder, seven conveyors including the bridge conveyor, two screens and a crusher. It does not include equipment associated with EUCONVEYORSYSTEM and EUDEISTERSCREEN.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT:** Water spray system

# I. <u>EMISSION LIMIT(S)</u>

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM10	1.06 pounds per hour <sup>2</sup>	Calendar day average	EULEVYPLANT6	SC VI.1,2&4	R336.1201(3)
2. PM10	0.93 tons per year <sup>2</sup>	Based on a 12 month rolling time period as determined at the end of each calendar month	EULEVYPLANT6	SC VI.3&5	R336.1201(3)
Particulate     Matter	8.44 pounds per hour <sup>2</sup>	Calendar day average	EULEVYPLANT6	SC VI.1,2&4	R336.1201(3)
4. Particulate Matter	7.43 tons per year <sup>2</sup>	Based on a 12 month rolling time period as determined at the end of each calendar month	EULEVYPLANT6	SC VI.3&5	R336.1201(3)
5. Visible Emissions	10% opacity <sup>2</sup>	6-Minute Average	Slag screening operations, conveyors or transfer points on conveyors	SC VI.7,9&10	R336.1301(1)(c)
6. Fugitive dust	5% opacity <sup>2</sup>	3-Minute Average	Roadways, parking lots, or storage piles, including any material handling activity at a storage pile	SC VI.8,9&10	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)

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# II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Slag     processing plant     raw material     throughput	400 tons per hour <sup>2</sup>	Calendar day average	EULEVYPLANT6	SC VI.1&2	R336.1201(3)
Slag     processing plant     raw material     throughput	704,000 tons per year <sup>2</sup>	Based on a 12 month rolling time period as determined at the end of each calendar month	EULEVYPLANT6	SC VI.3	R336.1201(3)

# III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall maintain a minimum moisture content of 1.5 percent by weight in the raw materials and crushed stone<sup>2</sup>. (R 336.1201(3))
- 2. The permittee shall not operate the slag processing plant unless the adjustable stacker height mechanisms and water spray systems are installed and maintained to minimize fugitive dust emissions on crushers, screens, conveyors, and at all exit points<sup>2</sup>. (R 336.1201(3))
- 3. The permittee shall not crush and screen asbestos tailings or asbestos containing materials, as defined by the National Emission Standards for Hazardous Air Pollutants (40 CFR, 61.143) regulations, in the crushing plant<sup>2</sup>. (R 336.1201(3))
- 4. The permittee shall not operate the slag processing plant unless the program for continuous fugitive dust emissions control for the plant has been implemented and maintained<sup>2</sup>. (R 336.1201(3), R 336.1372, R336.1901)

# IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

# V. TESTING/SAMPLING

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

NA

# See Appendix 5

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall monitor and record the daily tonnage of material throughput<sup>2</sup>. (R 336.1201(3))
- 2. The permittee shall monitor and record the daily hours of operation of the slag processing plant<sup>1</sup>. (R 336.1901)
- 3. The permittee shall monitor and record the total material throughput of the slag processing plant on a monthly and 12-month rolling time period as determined at the end of each calendar month. (R336.1213(3))
- 4. The permittee shall calculate and maintain records of the PM and PM10 hourly emissions based on the daily operating hours and daily throughput and appropriate AP42 emission factors or other factors agreed upon by the appropriate AQD Detroit Supervisor. (R 336.1213(3))

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 The permittee shall keep, in a satisfactory manner, calculations determining the monthly and 12-month rolling time period mass emissions of PM and PM<sub>10</sub> as determined at the end of each calendar month. (R 336.1213(3))

- 6. The permittee shall keep records as specified in the fugitive dust control program and as required under Consent Order SIP 18-1993, (Revised 9/9/94), Exhibit A, Addendum and Appendix 4 of this permit<sup>2</sup>. (R 336.1201(3))
- 7. The permittee shall perform a Method 9 certified visible emission observation of the grizzly feeder, screens, crusher, or of the conveyor system at least once every two calendar weeks for a minimum of 15 minutes during representative operations. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1213(3))
- 8. The permittee shall perform a Method 9D certified visible emission observation of loading activities from a finished product storage pile into a truck at least once every two calendar weeks for a minimum of 15 minutes when the loading process is operating. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1213(3))
- 9. The permittee shall conduct periodic inspections for the purpose of determining the operational condition of the adjustable stacker height mechanisms and water spray systems on crushers, screens, conveyors, including bridge conveyor side shields (from both sides of the river), and all exit points, and if necessary, the reasons for malfunction or failure. These inspections shall be conducted immediately after observing visible emissions in excess of the visible emission limit, but not less frequently than at least once a month and the permittee shall keep a written or electronic record of each inspection and corrective action taken if any. (R 336.1213(3))
- 10. Permittee shall sample each finished product storage pile to determine the minimum moisture content by weight on a weekly basis. Records of minimum moisture content sampling shall be maintained. After six weekly samples, the permittee may petition to the Department to reduce the sampling frequency to monthly. This petition must be submitted in writing and approved by the appropriate AQD District Supervisor. (R336.1213(3))

# See Appendix 4

# VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for reporting period July 1 to December 31 and November 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for the previous calendar year.

(R 336.1213(4)(c))

# See Appendix 8

# VIII. STACK/VENT RESTRICTION(S)

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

Edw.C. Levy Co. Plant 6

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

# IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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# EUCONVEYORSYSTEM EMISSION UNIT CONDITIONS

# **DESCRIPTION**

Five conveyors, located downstream of the Deister Screen (EUDEISTERSCREEN), designed to transfer slag and related materials to finished product stockpiles. Additional conveyors located downstream of the Deister Screen are not part of this emission unit.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT:** Water sprays

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Visible emissions	10% opacity <sup>2</sup>	6-Minute Average	EUCONVEYORSYSTEM	SC VI.4&6	R336.1301(1)(c)

# II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Material	250 tons per hour <sup>2</sup>	Calendar day	EUCONVEYORSYSTEM	SC VI.1&2	R336.1201(3)
conveyed		average			
2. Material	492,800	Calendar year	EUCONVEYORSYSTEM	SC VI.3	R336.1201(3)
conveyed	tons per year <sup>2</sup>				

### III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate the conveyor system unless the water spray systems are installed, maintained, and operated to minimize fugitive dust emissions on conveyors<sup>2</sup>. (R 336.1301, R 336.1901)
- 2. The permittee shall not operate the conveyor system unless the program for continuous fugitive dust emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations has been implemented and is maintained<sup>2</sup>. (R 336.1372, R 336.1901)
- 3. The permittee shall not process any asbestos tailing or waste materials containing asbestos in the conveyor system pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61, Subpart M<sup>1</sup>. (R 336.1224, R 336.1225, R 336.1901)

# IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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#### V. TESTING/SAMPLING

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

NA

# See Appendix 5

# VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall monitor and record the daily tonnage of material conveyed<sup>2</sup>. (R 336.1201(3))
- 2. The permittee shall monitor and record the daily hours of operation of the conveyor system<sup>1</sup>. (R 336.1901)
- 3. The permittee shall monitor and record the total material throughput of the conveyor system on a monthly and 12-month rolling time period as determined at the end of each calendar month. (R 336.1213(3))
- 4. The permittee shall perform a Method 9 certified visible emission observation of a representative operating conveyor, including the transfer/drop points of the conveyor system at least once every two calendar weeks for a minimum of 15 minutes during conveying operations. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1213(3))
- 5. The permittee shall keep records as specified in the fugitive dust control program and as required under Consent Order SIP 18-1993, (Revised 9/9/94), Exhibit A, Addendum and Appendix 4 of this permit<sup>2</sup>. (R 336.1213(3))
- 6. The permittee shall conduct periodic inspections for the purpose of determining the operational condition of the water spray systems on conveyors, and if necessary, the reasons for malfunction or failure. These inspections shall be conducted immediately after observing visible emissions in excess of the visible emission limit, but not less frequently than at least once a month and the permittee shall keep a written or electronic record of each inspection and corrective action taken if any. (R 336.1213(3))

### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for reporting period July 1 to December 31 and November 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for the previous calendar year. (R 336.1213(4)(c))

#### See Appendix 8

### VIII. STACK/VENT RESTRICTION(S)

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

Edw.C. Levy Co. Plant 6

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

# IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

<sup>&</sup>lt;sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# EUDEISTERSCREEN EMISSION UNIT CONDITIONS

# **DESCRIPTION**

A 350 Ton Per Hour Deister Screen designed to separate slag and related materials into various finished product sizes. This emission unit includes nine conveyors and four knuckle conveyors. All but two conveyors are located downstream of the screen.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT:** Water sprays

# I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Visible emissions	10% opacity <sup>2</sup>	6-Minute Average	EUDEISTERSCREEN	SC VI.4&5	R336.1301(1)(c)

# II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Material throughput	350 tons per hour <sup>2</sup>	Hourly	EUDEISTERSCREEN	SC VI.1&2	R336.1201(3)
2. Material throughput	616,000 tons per year <sup>2</sup>	Based on a 12 month rolling time period at the end of each calendar month	EUDEISTERSCREEN	SC VI.3	R336.1201(3)

# III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall set and maintain the opacity sensor at a visible emission rate of five percent opacity<sup>2</sup>. (R 336.1201(3))

### IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

# V. TESTING/SAMPLING

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

NA

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# VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall monitor and record the hourly tonnage of material throughput. (R 336.1213(3))
- 2. The permittee shall monitor and record the daily hours of operation of the Deister screen system. (R 336.1213(3))
- 3. The permittee shall monitor and record the total material throughput of the Deister screen system on a monthly and 12-month rolling time period as determined at the end of each calendar month. (R 336.1213(3))
- 4. The permittee shall perform a Method 9 certified visible emission observation of a representative operating conveyor of the Deister screen system at least once every two calendar weeks for a minimum of 15 minutes during screening operation. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1213(3))
- 5. If the sensor reads above 5% opacity, the water sprays shall be actuated. Permittee shall keep a record of corrective actions taken, if other than water sprays. (R 336.1213(3))

# VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for reporting period July 1 to December 31 and November 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for the previous calendar year.

  (R 336.1213(4)(c))

### See Appendix 8

#### VIII. STACK/VENT RESTRICTION(S)

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

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

### IX. OTHER REQUIREMENT(S)

NA

#### Footnotes:

<sup>&</sup>lt;sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>&</sup>lt;sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# EUBOFSLAGPIT EMISSION UNIT CONDITIONS

# **DESCRIPTION**

Basic Oxygen Furnace (BOF) slag pit with water spray system for fugitive dust emission control. Also includes a partial enclosure of the pot knocking station for emission control.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT:** Water sprays

# I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fugitive Dust	5% opacity <sup>2</sup>	3-minute average <sup>a,b</sup>	Fugitive dust from any road, lot, storage pile, or material handling activity at a storage pile	SC VI.1,2&3	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)
2. Fugitive Dust	20% opacity <sup>2</sup>	3-minute average <sup>a</sup>	Fugitive dust from any other source	SC VI.1,2&3	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)

in accordance with Test Method 9D at Act 451, Section 5525, Paragraph (j)

### II. MATERIAL LIMIT(S)

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

# III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall quench the dumped slag with water sprays before digging. (Consent Order SIP 18-1993, (Revised 9/9/94), Exhibit A, Section 3.A)
- 2. The permittee shall operate and maintain a partial enclosure with water misting at the pot knocking station<sup>1</sup>.(R336.1901)

<sup>&</sup>lt;sup>b</sup> The provisions of this subsection shall not apply to storage pile material handling activities when wind speeds are in excess of 25 miles per hour (40.2 kilometers per hour).

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# IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

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

NA

### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall perform a Method 9D certified visible emission observation of slag dumping or digging operation at least once every calendar week for a minimum of 15 minutes during representative dumping or digging operations. Both operations shall be observed within a month. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1213(3))
- 2. The permittee shall perform a Method 9D certified visible emission observation of the pot knocking station during representative pot knocking operations at least once every calendar week for a minimum of 15 minutes. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1213(3))
- 3. The permittee shall conduct periodic inspections for the purpose of determining the operational condition of the water spray systems on the slag pit dumping areas and the pot knocking station, and if necessary record the reasons for malfunction or failure noted from the inspection. These inspections shall be conducted during scheduled outages or downtimes, and immediately after observing visible emissions, but not less frequently than at least once every calendar week and permittee shall keep a written or electronic record of each inspection and corrective action taken if any. (R 336.1213(3))

#### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for reporting period July 1 to December 31 and November 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for the previous calendar year.

(R 336.1213(4)(c))

#### See Appendix 8

# VIII. STACK/VENT RESTRICTION(S)

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

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

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# IX. OTHER REQUIREMENT(S)

NA

# Footnotes:

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b). <sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# D. FLEXIBLE GROUP CONDITIONS

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

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

#### FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs	
FGCOLDCLEANERS	Cold cleaners that meet the applicable requirements of R336.1281(h).	EUCOLDCLEANERS	
FGRULE290	New and existing emission units that meet R336.1290 exemption criteria.	EUDROPBALLCRANE, EUPROCESS#2, EUMATRANSCONVEY	

# FG-COLD CLEANERS FLEXIBLE GROUP CONDITIONS

# **DESCRIPTION**

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

**Emission Unit: EUCOLDCLEANERS** 

POLLUTION CONTROL EQUIPMENT: NA

#### I. EMISSION LIMIT(S)

NA

# II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (R 336.1213(2))

# III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (R 336.1611(2)(b), R 336.1707(3)(b))
- 2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (R 336.1213(3))

#### IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

- 1. The cold cleaner must meet one of the following design requirements:
  - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(h))
  - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285(r)(iv))
- 2. The cold cleaner shall be equipped with a device for draining cleaned parts.

(R 336.1611(2)(b), R 336.1707(3)(b))

- 3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))
- 4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))
- 5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:

a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is

- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

#### V. TESTING/SAMPLING

NA

# VI. MONITORING/RECORDKEEPING

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

equal to or greater than 0.7. (R 336.1707(2)(a))

- 1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))
- 2. The permittee shall maintain the following information on file for each cold cleaner: (R 336.1213(3))
  - a. A serial number, model number, or other unique identifier for each cold cleaner.
  - b. The date the unit was installed, manufactured or that it commenced operation.
  - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
  - d. The applicable Rule 201 exemption.
  - e. The Reid vapor pressure of each solvent used.
  - f. If applicable, the option chosen to comply with Rule 707(2).
- 3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))
- 4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

#### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

### See Appendix 8

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# VIII. STACK/VENT RESTRICTION(S)

NA

# IX. OTHER REQUIREMENT(S)

NA

FG-RULE 290

# **DESCRIPTION**

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.

**FLEXIBLE GROUP CONDITIONS** 

Emission Units: EUDROPBALLCRANE, EUPROCESS#2, EUMATRANSCONVEY

# **POLLUTION CONTROL EQUIPMENT: NA**

# I. <u>EMISSION LIMIT(S)</u>

- 1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. (R 336.1290(a)(i))
- 2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: (R 336.1290(a)(ii))
  - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. (R 336.1290(a)(ii)(A))
  - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(a)(ii)(B))
  - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(a)(ii)(C))
  - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. (R 336.1290(a)(ii)(D))
- 3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: (R 336.1290(a)(iii))
  - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than

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or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. (R 336.1290(a)(iii)(A))

- b. The visible emissions from the emission unit are not more than five percent opacity in accordance with the methods contained in Rule 303. (R 336.1290(a)(iii)(B))
- c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. (R 336.1290(a)(iii)(C))

#### II. MATERIAL LIMIT(S)

NA

# III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. (R 336.1290)

# IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

NA

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. (R 336.1213(3))
  - Records identifying each air contaminant that is emitted. (R 336.1213(3))
  - b. Records identifying if each air contaminant is controlled or uncontrolled. (R 336.1213(3))
  - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. (R 336.1213(3))
  - Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). (R 336.1213(3))
  - e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. (R 336.1213(3), R 336.1290(c))
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. (R 336.1213(3))
  - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. (R 336.1290(b), R 336.1213(3))
  - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. (R 336.1213(3))

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

### See Appendix 4

# VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

# E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

# **APPENDICES**

# Appendix 1. Abbreviations and Acronyms

Common Acronyms			Pollutant / Measurement Abbreviations
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM CFR	Continuous Emission Monitoring Code of Federal Regulations	CO <sub>2</sub> e dscf	Carbon Dioxide Equivalent Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic root  Dry standard cubic meter
	Michigan Department of Environmental	°F	Degrees Fahrenheit
Department/ department	Quality	gr	Grains
EÚ	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H <sub>2</sub> S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kŴ	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MDEQ	Michigan Department of Environmental	NO <sub>x</sub>	Oxides of Nitrogen
MCDC	Quality	ng PM	Nanogram
MSDS NA	Material Safety Data Sheet	PM10	Particulate Matter agual to or loss than 10
NAAQS	Not Applicable National Ambient Air Quality Standards	PIVITO	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous	PM2.5	Particulate Matter equal to or less than 2.5
112011/11	Air Pollutants	1 1012.0	microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO <sub>2</sub>	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection	μg	Microgram
	Agency	μm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
	icators, the pressure measured at the gun air can	yr	Year

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

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# Appendix 2. Schedule of Compliance

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

# **Appendix 3. Monitoring Requirements**

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

# Appendix 4. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in Part B / Source-Wide Conditions. Alternative formats must be approved by the AQD District Supervisor.

#### 4.1 Required Records for Fugitive Dust Sources

- A. Unpaved Roads / Lots
  - 1. Date of Treatment
  - 2. Control Measure Used
  - 3. Responsible Person's Initial
  - 4. Name of Product Applied
  - 5. Amount of Solution / Water Applied
  - 6. Dilution Ratio
  - 7. Road Segment / Lot Identification
- B. Paved Roads / Lots
  - 1. Date of Treatment
  - 2. Control Measure Used
  - 3. Responsible Person's Initial
  - 4. Road Segment / Lot Identification
- C. Storage Piles / Material Handling
  - 1. Date of Treatment
  - 2. Control Measure Used
  - 3. Responsible Person's Initial
  - 4. Dilution Ratio
  - 5. Amount of Dust Suppressant / Water Applied
  - 6. Identification of Pile / Material Handling Operation Treated
  - 7. Equipment Used
- D. Optional Records
  - 1. Precipitation
  - 2. Temperature
  - 3. Wind Direction and Velocity

## **Appendix 5. Testing Procedures**

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

# Appendix 6. Permits to Install

Source-Wide PTI No MI-PTI-B4243-2009 is being reissued as Source-Wide PTI No. MI-PTI-B4243-2016

# **Appendix 7. Emission Calculations**

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

# Appendix 8. Reporting

#### A. Annual, Semiannual, and Deviation Certification Reporting

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

### **B.** Other Reporting

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