

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO ₂ e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H ₂ S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
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	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

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

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(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 Environmental Quality, 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 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 R 336.1219 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 R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(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 R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with 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 R 336.1370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

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 (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EUTANK37DEGASSING	Tank 37 is an existing 300,000-gallon light oil storage tank equipped with a nitrogen blanket control system. In order to perform internal structural integrity testing, a thermal oxidizer (vapor combustion unit) will be temporarily utilized to control vapor emission from Tank 37. The thermal oxidizer is designed to achieve a minimum destruction efficiency of 98% and is fired by liquid petroleum gas.	TBD	NA
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

The following conditions apply to: EUTANK37DEGASSING

DESCRIPTION: Tank 37 is an existing 300,000 gallon light oil storage tank equipped with a nitrogen blanket control system. In order to perform internal structural integrity testing, a thermal oxidizer (vapor combustion unit) will be temporarily utilized to control vapor emission from Tank 37. The thermal oxidizer is designed to achieve a minimum destruction efficiency of 98 percent and is fired by liquid petroleum gas.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Tank 37 will temporarily utilize a thermal oxidizer (vapor combustion unit) which is designed to achieve a minimum destruction efficiency of 98 percent and is fired by liquid petroleum gas.

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. Degassing of EUTANK37DEGASSING shall not commence until the thermal oxidizer has been installed and is maintaining a minimum combustion chamber temperature of at least 1,400 degrees Fahrenheit. **(R 336.1225, R 336.1702, R 336.1910)**
2. The permittee shall not operate EUTANK37DEGASSING unless a thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes maintaining a minimum VOC destruction efficiency of 98 percent (by weight), a minimum combustion chamber temperature of 1,400 °F and a minimum retention time of 0.5 seconds. **(R 336.1225, R 336.1702, R 336.1910)**
3. The permittee shall monitor all the connections and seals on the thermal oxidizer control system by U.S. EPA Method 21, once per 8-hour shift during the degassing process, and shall visually inspect the seals (including sealing materials) and the ductwork to the control system for evidence of visual defects such as gaps and tears. If an instrument reading indicates an organic chemical concentration of more than 500 ppm above a background concentration, as measured by Method 21, the permittee shall implement corrective action as soon as practicable, but not later than 1 hour after a reading of more than 500 ppm above a background concentration is detected. **(R 336.1225, R 336.1702, R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall only combust liquid petroleum gas (LPG) in the thermal oxidizer installed on EUTANK37DEGASSING. **(R 336.1225, R 336.1702)**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of the thermal oxidizer, on a basis, during operation of EUTANK37DEGASSING. Temperature readings shall be recorded at equally spaced intervals and occur at least once every 15 minutes. Each 15-minute temperature reading shall be at or above 1400 °F. The thermal oxidizer will be equipped with a device capable of monitoring chamber temperature on a nearly continuous basis. The data logger associated with chamber temperature is capable of logging data every 15 minutes. The chamber temperature shall be recorded at least once every 15 minutes. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702, R 336.1702, R 336.1910)**
2. The permittee shall maintain vendor documentation on the thermal oxidizer verifying that the minimum retention time of 0.5 seconds is obtained for the thermal oxidizer. **(R 336.1225, R 336.1702, R 336.1702, R 336.1910)**
3. The permittee shall maintain records of the monitoring performed in Special Condition III.3 including the date and time, the instrument reading, the results of the visual inspection, and corrective actions taken, if applicable. **(R 336.1225, R 336.1702, R 336.1702, R 336.1910)**

VII. REPORTING

1. The permittee shall provide written notification to the Air Quality Division when tank degassing is scheduled to start. Notification shall be provided at least five days in advance of commencement of tank degassing. **(R 336.1201(3))**
2. The permittee shall provide written notification to the Air Quality Division when tank degassing has been completed. Notification shall be provided no later than five days after tank degassing has been completed. **(R 336.1201(3))**

VIII. STACK/VENT RESTRICTIONS

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVTANK37OXIDIZER	30	13	R 336.1225

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR 61, Subpart L, as they apply to EUTANK37DEGASSING. **(40 CFR 61, Subpart L)**
2. This permit shall be terminated and will become void 30 calendar days after initial operation of the Tank #37 degassing operation. **(R 336.1201(3))**