SUPPLEMENT TO PERMIT NO. 134-97

Pontiac Osteopathic Hospital
Pontiac, Michigan

April 28, 1997

GENERAL CONDITIONS

1. Rule 201(1) - The process or process equipment covered by this permit shall not be reconstructed, relocated, altered, 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.

2. Rule 201(4) - If the installation, reconstruction, relocation, or alteration 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 person to whom this permit was issued, 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, if it is decided not to pursue the installation, reconstruction, relocation, or alteration of the equipment allowed by this Permit to Install.

3. Rule 201(6)(a) - If this Permit to Install is issued for a process or process equipment located at a stationary source which is subject to a Renewable Operating Permit pursuant to Rule 210, trial operation is allowed if the equipment performs in accordance with the terms and conditions of this Permit to Install and until the appropriate terms and conditions of this Permit to Install have been incorporated into the Renewable Operating Permit as a modification pursuant to Rule 216 or upon renewal pursuant to Rule 217. Upon incorporation of the appropriate terms and conditions into the Renewable Operating Permit, this Permit to Install shall become void.

4. Rules 201(6)(b)(i) or 216(1)(a)(v)(A) - Except as provided in General Condition No. 3, operation of the process or process equipment is allowed if, not more than 30 days after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this Permit to Install was issued, or the authorized agent pursuant to Rule 204, notifies the District Supervisor, Air Quality Division, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, alteration, or modification is considered to occur not later than commencement of trial operation of the process or process equipment.

5. Rule 201(6)(b)(ii) - Except as provided in General Condition No. 3, not more than 18 months after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this permit was issued, or the authorized agent pursuant to Rule 204, shall notify the District Supervisor, Air Quality Division, in writing, of the status of compliance of the process or process equipment with the terms and conditions of the Permit to Install. The notification shall include all of the following:

   A. The results of all testing, monitoring, and recordkeeping performed to determine the actual emissions from the process or process equipment and to demonstrate compliance with the terms and conditions of the Permit to Install.

B. A schedule of compliance for the process or process equipment as described in Rule 119(a).

C. A statement, signed by the person owning or operating the process or process equipment, that, based on information and belief formed after reasonable inquiry, the statements and information in the notification are true, accurate, and complete.

6. Rule 201(7) and Section 5510 of Act 451, P.A. 1994 - 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.

7. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required in Rule 219(1)(a), (b) and (c). The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality.

8. Rule 901 - 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.

9. Rule 912 - The owner or operator of a source, process, or process equipment shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant in excess of standards for more than one hour, or of any air contaminant in excess of standards for more than two hours, as required in this rule, to the District Supervisor, Air Quality Division. 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 District Supervisor within 10 days, with the information required in this rule.

10. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future regulations which may be promulgated under Part 55 of Act 451, P.A. 1994.

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

12. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, P.A. 1994, and the rules promulgated thereunder.

SPECIAL CONDITIONS

13. The ethylene oxide (EtO) emission rate from the AMSCO Model 3017 EtO sterilizer/aerator controlled by an EO Disposer System, hereinafter "sterilizer/aerator" and "catalytic abatement system", shall not exceed 0.10 grams (0.0035 oz.) per hour nor 73 grams (2.6 oz.) per year based upon a 12-month rolling time period as determined at the end of each calendar month.

14. Applicant shall not use more than 100 grams (3.52 oz.) of EtO per load nor 73,000 grams (161 lb.) of EtO per year based on a 12-month rolling average as determined at the end of each calendar month.

15. Rules 1001, 1003 and 1004 - Verification of EtO and the capture efficiency of the catalytic abatement system emission rates from the sterilizer/aerator by testing, at owner's expense, in accordance with Department requirements, may be required for operating approval. Verification of emission rates includes the submittal of a complete report of the test results. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the District Supervisor, Air Quality Division, and results shall be submitted within 120 days of the written requirement for such verification.

16. Applicant shall maintain records of the following:

    A. Monthly sterilant usage data.
    B. Date, duration and description of any malfunction of the control equipment, as well as any maintenance performed.
    C. Date of replacement of catalyst of control equipment media.
    D. Any testing results.

    These records shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.

17. Applicant shall calculate the EtO usage and emission rates from the sterilizer/aerator for each calendar monthly, using the method detailed in Appendix A or an alternate method approved by the District Supervisor. This information shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.

18. Applicant shall not operate the sterilizer/aerator unless the catalytic abatement system is installed and operating properly. The catalytic abatement system shall be installed, maintained and operated according to manufacturer's specifications. Proper operation requires a minimum control efficiency of 99.9% (by weight). A copy the manufacturer's specifications for the control device shall be maintained on file.

19. Applicant shall monitor the oxidation temperature at the outlet to the catalyst bed on a continuous basis per manufacturer's specifications. Applicant shall maintain equipment printouts indicating inadequate flow or temperature for a period of at least two years and make them available to the Air Quality Division upon request.

20. Applicant shall not operate the sterilizer/aerator unless a closed loop recirculating fluid vacuum pump which prevents the discharge of any EtO to a wastewater stream is installed and operation properly.

21. The exhaust gases from the sterilizer/aerator shall be discharged unobstructed vertically upwards to the ambient air from a stack with an exit point not less than 176 feet above ground level.

APPENDIX A

MONTH / YEAR:_____

		A	**B**	**C** = A x B	**D** = sum of C for day	**E**	**F** = A x E	**G** = sum of F for day
DATE	Sterilizer ID	Number of Cycles	Pounds EtO used/cycle	Pounds EtO used/sterilizer	Pounds EtO used/day	Pounds HCFC used/cycle	Pounds HCFC used/sterilizer	Pound HCFC used/day

TOTAL POUNDS ETO USED/MONTH, **H** = SUM OF D -->

POUNDS USED/12 MONTH ROLLING TIME PERIOD, **I** -->
(**I** = Total of Previous Eleven Months + H)

TOTAL POUNDS ETO EMITTED/MONTH, **J** = H x (1-0.999) -->

POUNDS EMITTED/12 MONTH ROLLING TIME PERIOD, **K** -->
(**K** = Total of Previous Eleven Months + J)

TOTAL POUNDS HCFC EMITTED/MONTH, **L** = SUM OF G -->

TONS HCFC EMITTED/MONTH, **M** = L/2000 -->

TONS HCFC EMITTED/12 MONTH ROLLING TIME PERIOD, **N** -->
(**N** = Total of Previous Eleven Months + M)

PPH EtO emitted = sum of B for any 1 hour x (1-0.999)
PPH HCFC emitted = sum of E for any 1 hour