# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

JUNE 8, 2005

# **NEW SOURCE REVIEW PERMIT TO INSTALL**

NO. 281-04

ISSUED TO DUTTON CORPORATE CENTRE

LOCATED AT 4430 LAPEER ROAD AUBURN HILLS, MICHIGAN 48326

> IN THE COUNTY OF OAKLAND

# STATE REGISTRATION NUMBER N7339

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Part 5505(1) of Article II, Chapter I, Part 55 (Air Pollution Control) of P.A. 451 of 1994. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: 6/7/2005		
DATE PERMIT TO INSTALL APPROVED: 6/8/2005	SIGNATURE:	
DATE PERMIT VOIDED:	SIGNATURE:	
DATE PERMIT REVOKED:	SIGNATURE:	

# PERMIT TO INSTALL

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	Common Abbrevia	auons / A	Pollutant/Measurement Abbreviations
AQD	Air Quality Division	Btu	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	СО	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
EPA	Environmental Protection Agency	gr	Grains
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallon of Applied Coating Solids	$H_2S$	Hydrogen Sulfide
GC	General Condition	hp	Horsepower
HAP	Hazardous Air Pollutant	lb	Pound
HVLP	High Volume Low Pressure *	m	Meter
ID	Identification	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	NOx	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM-10	Particulate Matter less than 10 microns diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	pph	Pound per hour
NSPS	New Source Performance Standards	ppm	Parts per million
NSR	New Source Review	ppmv	Parts per million by volume
PS	Performance Specification	ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge
PTI	Permit to Install	scf	Standard cubic feet
RACT	Reasonable Available Control Technology	sec	Seconds
ROP	Renewable Operating Permit	$SO_2$	Sulfur Dioxide
SC	Special Condition Number	THC	Total Hydrocarbons
SCR	Selective Catalytic Reduction	tpy	Tons per year
SRN	State Registration Number	μg	Microgram
TAC	Toxic Air Contaminant	VOC	Volatile Organic Compounds
VE	Visible Emissions	yr	Year

#### **Common Abbreviations / Acronyms**

\* 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. **[R336.1201(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, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **[R336.1201(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 R336.1210, 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. **[R336.1201(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. [R336.1201(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 R336.1219 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 R336.1219. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **[R336.1219]**
- 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. **[R336.1901]**
- 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 condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **[R336.1912]**
- 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 R336.1301, 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 R336.1303. **[R336.1301]** 
  - 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 R336.1370(2). **[R336.1370]**
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R336.2001 and R336.2003, under any of the conditions listed in R336.2001. **[R336.2001]**

# SPECIAL CONDITIONS

## **Emission Unit Identification**

Emission Unit ID	Emission Unit Description	Stack Identification	
EU-SVE	A permanent Soil Vapor Extraction System (SVE) for collection	SV-SVE	
	of methane and other landfill gases at an industrial park that is		
	built upon a former landfill. The landfill gases shall be collected		
	by SVE and controlled by an Enclosed Flare System with a		
	minimum destruction efficiency of 95% for all VOCs from the		
	Landfill gases.		
Changes to the equipment described in this table are subject to the requirements of R336.1201,			
except as allowed by R336.1278 to R336.1290.			

## The following conditions apply to: EU-SVE

#### **Emission Limits**

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirement
1.1a	VOCs	EU-SVE	2.0 TPY	12 month rolling time period as determined at the end of each calendar month.	Per testing protocol	R336.1702(a)
1.1b	Furan	EU-SVE	9.0 x 10 <sup>-5</sup> pph	Hourly average	Per testing protocol	R336.1225

#### Equipment

- 1.2 The permittee shall not operate EU-SVE unless the Enclosed Flare System is installed, maintained, and operated in a satisfactory manner. **[R336.1225, R336.1702(a), R336.1901, R336.1910]**
- 1.3 The permittee shall equip and maintain the Enclosed Flare System of EU-SVE with the following:
  - (a) Continuous temperature monitor.
  - (b) Continuously burning pilot flame.
  - (c) Pilot flame detection device.

#### [R336.1225, R336.1702(a), R336.1901, R336.1910]

- 1.4 Permittee shall operate a flame detection system in conjunction with the Enclosed Flare System. In the event that the flame is extinguished, shut-in of all lines feeding the flare shall commence automatically. Operation of the flare shall not be restarted unless the non-continuous pilot flame is reignited. Pilot fuel shall be propane or sweet natural gas.
- 1.5 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a gas flow rate measuring device that shall monitor and record the gas flow rate to EU-SVE at least every 15 minutes.
  [R336.1225, R336.1702(a), R336.1901, R336.1910]

## Monitoring

1.6 The permittee shall monitor, in a satisfactory manner, the volumetric flow rate of landfill gas, the total VOC concentration and the furan concentration of the influent vapor stream (landfill gas) to EU-SVE. This shall be done on a weekly basis until four valid samples, which meet all laboratory quality assurance and quality control standards have been obtained. Thereafter, the influent stream to the EU-SVE shall be monitored for these parameters on a monthly basis, then on a quarterly basis after four valid monthly samples have been obtained. Any request for a change in the sampling frequency must be submitted to the AQD District Supervisor for review and approval. **[R336.1225, R336.1702(a), R336.1901, R336.1910]** 

## **Recordkeeping/Reporting/Notification**

- 1.7 All required calculations shall be completed in a format acceptable to the AQD District Supervisor as specified in 1.8 below. **[R336.1225, R336.1702(a), R336.1901]**
- 1.8 The permittee shall record the flow rate, the total VOC concentration, and the furan concentration of the vapor influent stream to EU-SVE. This shall be done on a weekly basis until four valid samples have been obtained. Thereafter, these parameters shall be recorded on a monthly basis, and then on a quarterly basis. All data, including calculation of VOC emission rates, shall be submitted to the AQD District Supervisor using Appendix 1 or an approved equivalent method, within 30 days following collection of the initial data, then for four months, within 30 days following the end of the month in which the data were collected, and thereafter within 30 days following the end of the quarter in which the data were collected. Quarterly reports shall be submitted on or before April 30th, July 30th, October 30th, and January 30th following required quarterly sampling events. Any request for a change in the reporting frequency must be submitted to the AQD District Supervisor for review and approval. [R336.1225, R336.1702(a), R336.1901, R336.1910]
- 1.9 The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period calculations of VOC and average hourly furan emission rates for EU-SVE, as required by SC 1.1a and SC 1.1b. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1225, R336.1702(a), R336.1901]**

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement	
1.10	SV-SVE	N/A	36	R336.1225, R336.1901	
	The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

#### **Stack/Vent Restrictions**

## APPENDIX Soil Remediation Emission Calculation and Recordkeeping

Source Name		<b>Contact Person</b>		
Location		County		
Recordkeeping Period		Permit Number	Pollutant(s)	
Start Date	End Date			

	V	С	$\mathbf{E}_{\mathbf{S}}$	Ps
Date	Air Volume Flow Rate (ft <sup>3</sup> /min)	Inlet Concentration (mg/m <sup>3</sup> ) <sup>1</sup>	Control Efficiency (Percent)	VOC Emissions (lbs/hr) <sup>2</sup>
EXAMPLE	1,000	10,000	95	1.9
1 Dente non 11	· · · · · · · · · · · · · · · · · · ·	me and does not equal million		

<sup>1</sup> Parts per million (ppm) in air is by volume and does not equal milligrams per liter (mg/ $\ell$ ). <sup>2</sup> Identify which pollutant the emissions are being calculated for.

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# EQUATION TO CALCULATE EMISSIONS:

$$P_{s} \frac{lbs}{hr} = V \frac{ft^{3}}{min} \times 0.02832 \frac{m^{3}}{ft^{3}} \times 60 \frac{min}{hr} \times C \frac{mg}{m^{3}} \times 0.001 \frac{g}{mg} \times 0.002205 \frac{lbs}{g} \times \frac{(100 - E_{s})}{100}$$

Signature:
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Date:\_\_\_\_\_

Telephone	Number:	
relephone		