

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

December 7, 2006

PERMIT TO INSTALL

No. 291-06

ISSUED TO

Detroit Water & Sewerage Department

LOCATED AT

12082 Pleasant Avenue
Detroit, Michigan 48217

IN THE COUNTY OF

Wayne

STATE REGISTRATION NUMBER

N7704

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 Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: 10/24/2006	
DATE PERMIT TO INSTALL APPROVED: 12/7/2006	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant/Measurement Abbreviations	
AQD	Air Quality Division	Btu	British Thermal Unit
ANSI	American National Standards Institute	°C	Degrees Celsius
BACT	Best Available Control Technology	CO	Carbon Monoxide
CAA	Clean Air Act	dscf	Dry standard cubic foot
CEM	Continuous Emission Monitoring	dscm	Dry standard cubic meter
CFR	Code of Federal Regulations	°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
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	PM	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM-10	Particulate Matter less than 10 microns diameter
MSDS	Material Safety Data Sheet	pph	Pound per hour
NESHAP	National Emission Standard for Hazardous Air Pollutants	ppm	Parts per million
NSPS	New Source Performance Standards	ppmv	Parts per million by volume
NSR	New Source Review	ppmw	Parts per million by weight
PS	Performance Specification	psia	Pounds per square inch absolute
PSD	Prevention of Significant Deterioration	psig	Pounds per square inch gauge
PTE	Permanent Total Enclosure	scf	Standard cubic feet
PTI	Permit to Install	sec	Seconds
RACT	Reasonably Available Control Technology	SO ₂	Sulfur Dioxide
ROP	Renewable Operating Permit	THC	Total Hydrocarbons
SC	Special Condition	tpy	Tons per year
SCR	Selective Catalytic Reduction	µg	Microgram
SRN	State Registration Number	VOC	Volatile Organic Compounds
TAC	Toxic Air Contaminant	yr	Year
TEQ	Toxicity Equivalence Quotient		
VE	Visible Emissions		

* 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 AQD District Supervisor shall be notified, in writing, of a change in ownership or operational control of the stationary source or emission unit(s) authorized by this Permit to Install pursuant to R336.1219. The notification shall include all of the information required by R336.1219(1)(a) and (b). In addition, a new owner or operator must submit a written statement pursuant to R336.1219(1)(c), agreeing to and accepting the terms and conditions of this Permit to Install, and shall notify the AQD District Supervisor of any change in the contact person for this Permit to Install. **[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 no 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). **[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 nor does it affect any liability for past violations under the Natural Resources and Environmental Protection Act, 1994 PA 451.
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-OCS-PUMP	An odor control system for the combined storm and sanitary wet wells and the sanitary pump station room. The odor control system uses activated carbon.	SV-PUMP
EU-OCS-SCR/CSO1	An odor control system for a screen facility and two combined sewer overflow (CSO) basins. The odor control system uses activated carbon.	SV-CSO1
EU-OCS-SCR/CSO2	An odor control system for a screen facility and two combined sewer overflow (CSO) basins. The odor control system uses activated carbon.	SV-CSO2
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.		

Flexible Group Identification

Flexible Group ID	Emission Units Included in Flexible Group	Stack Identification
FG-OCS-SCR/CSO	EU-OCS-SCR/CSO1, EU-OCS-SCR/CSO2	SV-CSO1, SV-CSO2

The following conditions apply to: EU-OCS-PUMP

Description: An odor control system for the combined storm and sanitary wet wells and the sanitary pump station room. The odor control system uses activated carbon.

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirement
1.1a	Hydrogen Sulfide	EU-OCS-PUMP	0.0043 pph	Hourly	GC 13, SC 1.4, 1.5, 1.6	R336.1225, R336.1901

Process/Operational Limits

- 1.2 The permittee shall operate the odor control system when the pump station is operating, except in the event of an odor control system malfunction (which shall be expeditiously corrected) or scheduled maintenance. The operation and maintenance plan required in special condition No. 1.3 shall include provisions to repair the odor control system, and bring it back into operation, as expeditiously as possible. [R336.1224, R336.1225, R 336.1901, R336.1910]
- 1.3 Within 30 calendar days of the date of permit approval or equipment start-up, the permittee shall submit to the AQD District Supervisor, an approvable operation and maintenance plan for EU-OCS-PUMP. [R336.1224, R336.1225, R336.1901, R336.1910]

Testing

- 1.4 Upon request by the AQD District Supervisor, the permittee shall verify the hydrogen sulfide emission rate from EUOCS, by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. [R336.2001, R336.2003, R336.2004]
- 1.5 The permittee shall test, in a satisfactory manner, the activated carbon bed for breakthrough at least once each calendar quarter. The permittee shall evaluate breakthrough by sampling the exhaust air using Tedlar bag sampling followed by laboratory analysis; by use of a hand-held instrument capable of detecting concentrations at the levels expected; or by sampling the carbon to determine the remaining bed life, in accordance the operation and maintenance plan required in special condition No. 1.3. The permittee shall submit any request for a change in the testing frequency to the AQD District Supervisor for review and approval. [R336.1224, R336.1225, R 336.1901, R336.1910]

Recordkeeping/Reporting/Notification

- 1.6 The permittee shall keep, in a satisfactory manner, records of each activated carbon bed breakthrough test. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1224, R336.1225, R336.1901, R3136.1910]

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
1.7	SV-PUMP	54	42	R336.1225, R336.1901
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

The following conditions apply to: FG-OCS-SCR/CSO

Description: Two odor control systems for a screening facility and two combined sewer overflow (CSO) basins. The odor control systems use activated carbon.

Emission Unit IDs: EU-OCS-SCR/CSO1, EU-OCS-SCR/CSO2

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirement
2.1a	Hydrogen Sulfide	Each odor control system	0.0031 pph	Hourly	GC 13, SC 2.4, 2.5, 2.6	R336.1225, R336.1901

Process/Operational Limits

- 2.2 The permittee shall operate both odor control systems when the CSO facility has the potential to generate odors, except in the event of an odor control system malfunction (which shall be expeditiously corrected) or scheduled maintenance. The operation and maintenance plan required in special condition No. 2.3 shall include provisions to repair the odor control system, and bring it back into operation, as expeditiously as possible. [R336.1224, R336.1225, R 336.1901, R336.1910]

- 2.3 Within 30 calendar days of the date of permit approval or equipment start-up, the permittee shall submit to the AQD District Supervisor, an approvable operation and maintenance plan for FG-OCS-SCR/CSO. [R336.1224, R336.1225, R336.1910]

Testing

- 2.4 Upon request by the AQD District Supervisor, the permittee shall verify the hydrogen sulfide emission rate from EU-OCS-SCR/CSO1 and/or EU-OCS-SCR/CSO2, by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. [R336.2001, R336.2003, R336.2004]
- 2.5 The permittee shall test, in a satisfactory manner, each activated carbon bed for breakthrough at least once each calendar quarter. The permittee shall evaluate breakthrough by sampling the exhaust air using Tedlar bag sampling followed by laboratory analysis; by use of a hand-held instrument capable of detecting concentrations at the levels expected; or by sampling the carbon to determine the remaining bed life, in accordance the operation and maintenance plan required in special condition No. 2.3. The permittee shall submit any request for a change in the testing frequency to the AQD District Supervisor for review and approval. [R336.1224, R336.1225, R 336.1901, R336.1910]

Recordkeeping/Reporting/Notification

- 2.6 The permittee shall keep, in a satisfactory manner, records of each activated carbon bed breakthrough test. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1224, R336.1225, R336.1901, R3136.1910]

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
2.7a	SV-CSO1	46	21	R336.1225, R336.1901
2.7b	SV-SCO2	46	21	R336.1225, R336.1901
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				