

**MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT  
AIR QUALITY DIVISION**

April 7, 2010

**PERMIT TO INSTALL**

No. 135-09

**ISSUED TO**

Covenant Healthcare

**LOCATED AT**

1447 N. Harrison Avenue  
Saginaw, Michigan 48602

**IN THE COUNTY OF**

Saginaw

**STATE REGISTRATION NUMBER**

M1954

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Natural Resources and Environment. 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: <b>November 20, 2009</b>	
DATE PERMIT TO INSTALL APPROVED: <b>April 7, 2010</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

**PERMIT TO INSTALL**  
**Common Abbreviations / Acronyms**

<b>Common Acronyms</b>		<b>Pollutant/Measurement Abbreviations</b>	
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 <sub>2</sub> 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 <sub>x</sub>	Oxides of Nitrogen
MDNRE	Michigan Department of Natural Resources and Environment (Department)	PM	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM10	PM less than 10 microns diameter
MSDS	Material Safety Data Sheet	PM2.5	PM less than 2.5 microns diameter
NESHA	National Emission Standard for Hazardous Air Pollutants	pph	Pound per hour
P		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 <sub>2</sub>	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. **(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 Natural Resources and Environment, 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. **(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 Natural Resources and Environment. **(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.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Process Equipment &amp; Control Devices)</b>	<b>Flexible Group ID</b>
EU-HarrisonBlr1	Natural gas- and oil-fired Johnston boiler, rated at 500 horsepower (approximately 20,000,000 MMBTU/hr heat input). This boiler is subject to 40 CFR Part 60, Subpart Dc. It shares a stack with EU-HarrisonBlr2.	FG-PTIBoilers
EU-HarrisonBlr2	Natural gas- and oil-fired Johnston boiler, rated at 500 horsepower (approximately 20,000,000 MMBTU/hr heat input). This boiler is subject to 40 CFR Part 60, Subpart Dc. It shares a stack with EU-HarrisonBlr1.	FG-PTIBoilers
EU-CooperBlr3	Natural gas- and oil-fired Johnston boiler, rated at 600 horsepower (approximately 24,000,000 MMBTU/hr heat input). This boiler is subject to 40 CFR Part 60, Subpart Dc.	FG-PTIBoilers
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.		

**FLEXIBLE GROUP SUMMARY TABLE**

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

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FG-PTIBoilers	Three natural gas- and oil-fired boilers serving the healthcare complex. These boilers are all subject to 40 CFR Part 60, Subpart Dc. EU-HarrisonBlr1 and EU-HarrisonBlr2 exhaust through the same stack.	EU-HarrisonBlr1, EU-HarrisonBlr2, EU-CooperBlr3

**The following conditions apply to: FG-PTIBoilers**

**DESCRIPTION:** Three natural gas- and oil-fired boilers serving the healthcare complex. These boilers are all subject to 40 CFR Part 60, Subpart Dc. EU-HarrisonBlr1 and EU-HarrisonBlr2 exhaust through the same stack.

**Emission Units:** EU-HarrisonBlr1, EU-HarrisonBlr2, EU-CooperBlr3

**POLLUTION CONTROL EQUIPMENT:** None

**I. EMISSION LIMITS**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period/ Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
NA	NA	NA	NA	NA	NA

## **II. MATERIAL LIMITS**

1. The permittee shall burn only the following fuels in any boiler in FG-PTIBoilers. **(R 336.1224, R 336.1225, R 336.1702, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), 40 CFR Part 60 Subpart Dc)**
  - a. Pipeline quality natural gas.
  - b. Fuel oil with a maximum sulfur content of 15 ppm, based on certification from the fuel oil supplier. **(40 CFR 60.42c(d), 40 CFR 60.48c(f)(1), 40 CFR 60.42c(h)(1))**
2. The fuel oil usage for FG-PTIBoilers shall not exceed 445 gallons per hour.<sup>1</sup> **(R 336.1225)**
3. The natural gas usage for FG-PTIBoilers shall not exceed 64,600 cubic feet per hour.<sup>1</sup> **(R 336.1225)**

## **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Dc, as they apply to FG-PTIBoilers. **(40 CFR Part 60 Subparts A & Dc)**

## **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the fuel oil usage, on a daily basis, in gallons per day. **(R 336.1205, R 336.2802, 40 CFR 52.21)**

## **V. TESTING/SAMPLING**

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

1. NA

## **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall perform inspections and monitor operating information for each boiler in FG-PTIBoilers in accordance with the federal Standards of Performance for New Stationary sources as specified in 40 CFR Part 60 Subparts A and Dc. The permittee shall keep inspection and operating information records on file at the facility and make them available to the Department upon request. **(40 CFR Part 60 Subparts A & Dc)**
2. The permittee shall monitor and record, in a satisfactory manner, the amount of natural gas and fuel oil delivered to the site for all boilers subject to 40 CFR Part 60, Subpart Dc, on a monthly basis. **(40 CFR 60.48c(g)(3))**

## **VII. REPORTING**

1. The permittee shall submit all monthly fuel usage records for FG-PTIBoilers, as required by SC VI.2, to the AQD District Supervisor in an acceptable format within 30 days following the end of the six-month period in which the records were collected. **(40 CFR 60.48c(e)&(j))**

**VIII. STACK/VENT RESTRICTIONS**

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

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-Harrison	72	125	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c)&(d)
2. SV-Cooper	60	125	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c)&(d)

**IX. OTHER REQUIREMENTS**

1. NA

**Footnotes:**

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