MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT AIR QUALITY DIVISION

November 29, 2010

PERMIT TO INSTALL 206-10

ISSUED TO

Aleda E. Lutz VA Medical Center, Government Agency

LOCATED AT

1500 Weiss Street Saginaw, Michigan

IN THE COUNTY OF

Saginaw

STATE REGISTRATION NUMBER K2899

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: November 24, 2010			
November 29, 2010	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	
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 ₂ S	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	ng	Nanogram	
MDNRE	Michigan Department of Natural Resources and Environment (Department)	NO _x	Oxides of Nitrogen	
MSDS	Material Safety Data Sheet	PM	Particulate Matter	
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	PM less than 10 microns diameter	
NSPS	New Source Performance Standards	PM2.5	PM less than 2.5 microns diameter	
NSR	New Source Review	pph	Pound per hour	
PS	Performance Specification	ppm	Parts per million	
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume	
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight	
PTI	Permit to Install	psia	Pounds per square inch absolute	
RACT	Reasonably Available Control Technology	psig	Pounds per square inch gauge	
ROP	Renewable Operating Permit	scf	Standard cubic feet	
SC	Special Condition	sec	Seconds	
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide	
SRN	State Registration Number	THC	Total Hydrocarbons	
TAC	Toxic Air Contaminant	tpy	Tons per year	
TEQ	Toxicity Equivalence Quotient	μg	Microgram	
VE	Visible Emissions	VOC	Volatile Organic Compounds	
		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 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.
- 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)	Flexible Group ID	
EU-ENGINE BLDG21 A 500-kw diesel-fueled emergency backup generator, model year 2010. Emissions from EU-ENGINE BLDG21 exhaust via stack SV-ENGINE BLDG21		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: EU-ENGINE BLDG21

DESCRIPTION: A 500-kw diesel-fueled emergency backup generator

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: None

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NO _x	2.0 tpy	12-month rolling time period as determined at the end of each calendar month	EU-ENGINE BLDG21	SC VI.3	R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

The NO_x limit is based on an emission factor of 7.92 lbs NO_x per hour and a maximum of 500 hours of operation a year.

II. MATERIAL LIMITS

1. The diesel fuel used in EU-ENGINE BLDG21 shall meet the requirements of 40 CFR 80.510 (b) with the maximum sulfur content of the fuel oil not to exceed 15 ppm (0.0015 per cent) by weight. (R 336.1205, 40 CFR 60.4207 (b), 40 CFR 80.510(b))

III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall install and operate EU-ENGINE BLDG21 in accordance with the manufacture's specifications. (40 CFR Part 60 Subpart IIII)
- 2. 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 IIII, as they apply to EU-ENGINE BLDG21. (40 CFR Part 60 Subparts A & IIII)
- 3. The permittee shall not operate EU-ENGINE BLDG21 for more than 500 hours per 12-month rolling time period as determined at the end of each calendar month. Of these 500 hours, the permittee shall not exceed 100 hours for maintenance checks and readiness testing. (R 336.1205, R 336.1225, R 336.1702(a), 40 CFR 52.21 (c) & (d), Subpart IIII, § 60.4211 (e))

IV. <u>DESIGN/EQUIPMENT PARAMETERS</u>

1. The permittee shall equip and maintain EU-ENGINE BLDG21 with non-resettable hours meter to track its operating hours. (R 336.1205, R 336.1224, R 336.1225, 40 CFR 60.4209(a))

V. TESTING/SAMPLING

N/A

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years, unless otherwise indicated. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))
- 2. The permittee shall monitor and record in a satisfactory manner the diesel fuel usage rate for the generator on a monthly and 12-month rolling time period basis. The permittee shall also monitor and record in a satisfactory manner the diesel fuel usage rate for EU-ENGINE BLDG21 on a monthly and 12-month rolling time period basis. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))
- 3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period NO_x emission calculation records for EU-ENGINE BLDG21. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))
- 4. The permittee shall keep separate records of the sulfur content calculations for EU-ENGINE BLDG21, in percent by weight, on an annual average. Alternately, the permittee shall keep, for EACH fuel shipment delivery, a statement from the fuel supplier indicating that the diesel fuel sulfur content is 15 ppm or less, by weight. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205, 40 CFR Part 72.7, 40 CFR 80.510(a), 40 CFR 80.510(b))
- 5. The permittee shall keep, for the life of the engine, the manufacture certification documentation indicating that EU-ENGINE BLDG21 meets the applicable emission limitations contained in the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subpart IIII. The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.4211(b) (3))
- 6. The permittee shall monitor the hours of operation of EU-ENGINE BLDG21 and the reason it was in operation during that time on a monthly basis in a manner that is acceptable to the District Supervisor, Air Quality Division. (R 336.1205(1)(a) and (3), 40 CFR Part 60, Subpart IIII, § 60.4214)

VII. REPORTING

N/A

VIII. STACK/VENT RESTRICTIONS

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

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-ENGINE BLDG21	12.0	21.0	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)