

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

September 16, 2015

**PERMIT TO INSTALL
823-91B**

ISSUED TO
Bay City Electric, Light & Power

LOCATED AT
Corner of Henry Street and Fisher Street

IN THE COUNTY OF
Bay

STATE REGISTRATION NUMBER
N3195

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: July 7, 2015	
DATE PERMIT TO INSTALL APPROVED: September 16, 2015	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	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds 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	Reasonable 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
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 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 Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, 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 Environmental Quality. **(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.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EU00001	Dual fuel diesel engine, driving a generator. Dual fuel is approximately 95% natural gas and 5% diesel. 7750 kilowatt.	FG00001 FGFACILITY
EU00002	Dual fuel diesel engine, driving a generator. Dual fuel is approximately 95% natural gas and 5% diesel. 7750 kilowatt.	FG00001 FGFACILITY

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG00001	Two dual fuel diesel engines. Each driving a generator rated at 7750 kilowatts.	EU00001 EU00002
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

The following conditions apply Source-Wide to: FG00001

DESCRIPTION: Two dual fuel diesel engines. Each driving a generator rated at 7750 kilowatts.

Emission Units: EU00001, EU00002

POLLUTION CONTROL EQUIPMENT: catalytic oxidizer

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. SO ₂	0.56 lb/MMBTU heat input ^a	24-hour	FG00001	GC 13	40 CFR 52.21(c) and (d)
^a Equivalent to using diesel fuel with a 0.5% sulfur content and a heat value of 18,000 BTUs per pound.					

II. MATERIAL LIMITS

Fuel	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Natural gas	1,405,900 dscf/day	Monthly average	FG00001	VI.2 VI.4	40 CFR 52.21(c) and (d)
2. Diesel	890 gal/day	Monthly average	FG00001	VI.3 VI.4	40 CFR 52.21(c) and (d)

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the natural gas fuel usage for FG00001 at the frequency indicated:
 - a) Monitor – continuously
 - b) Record – daily

(40 CFR 52.21(c) and (d))
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the diesel fuel usage for FG00001 at the frequency indicated:
 - a) Monitor – continuously
 - b) Record – daily

(40 CFR 52.21(c) and (d))

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(40 CFR 52.21(c) and (d))**
2. The permittee shall monitor and record, in a satisfactory manner, the natural gas fuel usage for FG00001 at the frequency indicated:
 - a) Monitor – continuously
 - b) Record – daily**(40 CFR 52.21(c) and (d))**
3. The permittee shall monitor and record, in a satisfactory manner, the diesel fuel usage for FG00001 at the frequency indicated:
 - a) Monitor – continuously
 - b) Record – daily**(40 CFR 52.21(c) and (d))**
4. The permittee shall keep, in a satisfactory manner, records of the monthly average fuel usage calculation for both natural gas and diesel fuel for FG00001, as required by SC II.1. and II.2. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(40 CFR 52.21(c) and (d))**
5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel used in FG00001 as required by SC I.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(40 CFR 52.21(c) and (d))**

VII. REPORTING

NA

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:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV00001	34	75	40 CFR 52.21(c) and (d)
2. SV00002	34	75	40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines. **(40 CFR, Part 63, Subparts A and ZZZZ)**

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT: catalytic oxidizer

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NOx	99.9 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	VI.4	R 336.1205(a)
2. NOx	2.03 lb/MMBTU when burning dual fuel	Test Protocol*	EU00001 and EU00002 individually	V.1	R 336.1205(a)
3. NOx	5.49 lb/MMBTU when burning diesel	Test Protocol*	EU00001 and EU00002 individually	GC 13	R 336.1205(a)

* Test Protocol shall determine averaging time.

II. MATERIAL LIMITS

Fuel	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Natural gas	74,600,000 dscf/yr	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	VI.2	R 336.1205(a)
2. Diesel	64,500 gal/yr	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	VI.3	R 336.1205(a)

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the natural gas fuel usage for FG00001 at the frequency indicated:
 - a) Monitor – continuously
 - b) Record – monthly

(R 336.1205(a))

2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the diesel fuel usage for FG00001 at the frequency indicated:
 - a) Monitor – continuously
 - b) Record – monthly**(R 336.1205(a))**

V. TESTING/SAMPLING

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

1. Within two years after permit issuance or at the time of the next performance test conducted under 40 CFR Part 63, Subpart ZZZZ following permit issuance, the permittee shall verify the NO_x emission rate in pounds per million BTU from both EU00001 and EU00002 when burning dual fuel by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. 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 Technical Programs Unit and District Office within 60 days following the last date of the test. Testing may be waived upon approval by the AQD District Supervisor. **(R 336.1205(a))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(a))**
2. The permittee shall monitor and record, in a satisfactory manner, the natural gas fuel usage for FG00001 at the frequency indicated:
 - a) Monitor – continuously
 - b) Record – monthlyThe permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period natural gas fuel usage records for FGFACILITY, as required by SC II.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(a))**
3. The permittee shall monitor and record, in a satisfactory manner, the diesel fuel usage for FG00001 at the frequency indicated:
 - a) Monitor – continuously
 - b) Record – monthlyThe permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period diesel fuel usage records for FGFACILITY, as required by SC II.2. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(a))**
4. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period NO_x emission calculation records for FGFACILITY, as required by SC I.1. The permittee shall calculate monthly NO_x emissions for FG00001 using the calculation methodology of multiplying the fuel usage by the emission limits in special condition I.2 and I.3, or the most recent tested values. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA