

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

March 18, 2011

**PERMIT TO INSTALL**  
236-10

**ISSUED TO**  
Drug & Laboratory Disposal, Inc.

**LOCATED AT**  
331 Broad Street  
Plainwell, Michigan

**IN THE COUNTY OF**  
Allegan

**STATE REGISTRATION NUMBER**  
N0656

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:

**February 4, 2011**

DATE PERMIT TO INSTALL APPROVED:

**March 18, 2011**

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

**PERMIT TO INSTALL**

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**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
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM10	PM less than or equal to 10 microns diameter
MSDS	Material Safety Data Sheet	PM2.5	PM less than or equal 2.5 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	Reasonably Available Control Technology	sec	Seconds
ROP	Renewable Operating Permit	SO <sub>2</sub>	Sulfur Dioxide
SC	Special Condition	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
TEQ	Toxicity Equivalence Quotient	yr	Year
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 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. **(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.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Process Equipment &amp; Control Devices)</b>
EU-DLS-2-MILL	Hammermill used to break or crush glass containers contaminated with a variety of organic and inorganic waste. The hammermill is controlled by a particulate filter followed by a two stage activated carbon system.
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-DLS-2-MILL**

**DESCRIPTION:** Hammermill used to break or crush glass containers contaminated with a variety of organic and inorganic waste.

**Flexible Group ID:**

**POLLUTION CONTROL EQUIPMENT:** Particulate filter followed by a two stage activated carbon system.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC, acetone, methylene chloride, and tetrachloroethylene	500 pounds per year	12-month rolling time period*	EU-DLS-2-MILL	GC 13, SC VI.7	R 336.1224, R 336.1225, R 336.1702(a)
* 12-month rolling time period as determined at the end of each calendar month					

**II. MATERIAL LIMITS**

1. NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EU-DLS-2-MILL unless an operation and maintenance plan (OMP) for EU-DLS-2-MILL has been submitted within 60 days of permit issuance, and is implemented and maintained. The OMP shall include provisions for maintaining the activated carbon system, conducting the carbon breakthrough tests required by SC V.1, maintaining the particulate control system, and minimizing fugitive emissions from EU-DLS-2-MILL. If at any time the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the OMP within 45 days after such an event occurs. The permittee shall also amend the OMP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the OMP and any amendments to the OMP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the OMP or amended OMP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate EU-DLS-2-MILL unless the two stage activated carbon system is installed, maintained, and operated in a satisfactory manner. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
2. The permittee shall not operate EU-DLS-2-MILL unless the particulate control filter is installed, maintained, and operated in a satisfactory manner. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**

**V. TESTING/SAMPLING**

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

1. The permittee shall test, in a satisfactory manner, the dual-stage activated carbon system for breakthrough of the first carbon tray at least once every sixteen hours of operation. The permittee shall conduct the

breakthrough testing while the EU-DLS-2-MILL exhaust fan is operating and the exhaust from EU-DLS-2-MILL contains organic compounds. The permittee shall evaluate breakthrough by testing for acetone, chloroform, benzene, chlorobenzene, isopropyl alcohol, methyl ethyl ketone, methylene chloride, ethyl benzene, toluene, trichloroethene, vinyl chloride, and xylenes by collecting a sample followed by laboratory analysis, as described in the OMP. Breakthrough is considered a reading at the point between the first and second trays that is 20 percent or more of the influent concentration into the first tray. If breakthrough is detected, the permittee shall not operate EU-DLS-2-MILL until the carbon in the first tray has been replaced and the operating order of the trays has been reversed. The permittee shall determine the influent concentration to the first tray each time a carbon tray is replaced and shall use the resulting influent concentration to establish breakthrough. Upon written approval of the AQD District Supervisor, the permittee may change the testing frequency and/or the list of compounds to be included in the breakthrough testing. Upon written request by the AQD District Supervisor, the permittee shall change the list of compounds to be included in the breakthrough testing. **(R 336.1224, R 336.1225, R 336.1702, R 336.1910)**

## **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall keep, in a satisfactory manner, records of all inspections and maintenance conducted in accordance with the OMP required by SC III.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
2. The permittee shall keep, in a satisfactory manner, a log of the weekly hours of operation of EU-DLS-2-MILL. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**
3. The permittee shall keep, in a satisfactory manner, records of the carbon breakthrough checks and carbon replacements, required by SC V.1, on file at the facility and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
4. The permittee shall keep, in a satisfactory manner, records of the particulate control filter replacements on file at the facility and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
5. The permittee shall keep, in a satisfactory manner, records of the waste category and amount of each waste category processed in EU-DLS-2-MILL each calendar month on file at the facility and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
6. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1224, R 336.1225, R 336.1702(a))**
7. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period emission calculations to demonstrate compliance with the limit in SC I.1. The permittee may, unless an AQD approved VOC emission test has been conducted, calculate the VOC emission rate using the data obtained from the activated carbon breakthrough testing, assuming VOC to be the sum of the VOCs included in the breakthrough testing. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**

## **VII. REPORTING**

1. 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:

<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-DLS-2-MILL*	4	16	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
* This stack is not required to be discharged unobstructed vertically upwards to the ambient air.			

**IX. OTHER REQUIREMENTS**

1. NA

**Footnotes:**

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