

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

December 1, 2011

PERMIT TO INSTALL

109-11

ISSUED TO

Wayne County Airport Authority

LOCATED AT

Detroit Metropolitan Wayne County Airport
WCAA North Powerhouse
Romulus, Michigan

IN THE COUNTY OF

Wayne

STATE REGISTRATION NUMBER

M4174

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 1, 2011

DATE PERMIT TO INSTALL APPROVED:

December 1, 2011

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 (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 ₂	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 48909-7760, 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)	Installation Date / Modification Date	Flexible Group ID
EU-NEWBOILER1	Fire tube boiler utilizing natural gas and fuel oil. The boiler has a steam production capacity of 17,200 lbs. per hour of steam and has a maximum rated heat input of 20.8 MMBtu per hour when burning natural gas and a maximum rated heat input of 20.4 MMBtu per hour when burning fuel oil.	December 1, 2011	FG-NEWBOILERS
EU-NEWBOILER2	Fire tube boiler utilizing natural gas and fuel oil. The boiler has a steam production capacity of 17,200 lbs. per hour of steam and has a maximum rated heat input of 20.8 MMBtu per hour when burning natural gas and a maximum rated heat input of 20.4 MMBtu per hour when burning fuel oil.	December 1, 2011	FG-NEWBOILERS
EU-NEWBOILER3	Fire tube boiler utilizing natural gas and fuel oil. The boiler has a steam production capacity of 17,200 lbs. per hour of steam and has a maximum rated heat input of 20.8 MMBtu per hour when burning natural gas and a maximum rated heat input of 20.4 MMBtu per hour when burning fuel oil.	December 1, 2011	FG-NEWBOILERS
EU-NEWBOILER4	Fire tube boiler utilizing natural gas and fuel oil. The boiler has a steam production capacity of 17,200 lbs. per hour of steam and has a maximum rated heat input of 20.8 MMBtu per hour when burning natural gas and a maximum rated heat input of 20.4 MMBtu per hour when burning fuel oil.	December 1, 2011	FG-NEWBOILERS

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.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-NEWBOILERS	Four fire tube boilers utilizing natural gas and fuel oil. Each boiler has a steam production capacity of 17,200 lbs. per hour of steam and has a maximum rated heat input of 20.8 MMBtu per hour when burning natural gas and a maximum rated heat input of 20.4 MMBtu per hour when burning fuel oil.	EU-NEWBOILER1 EU-NEWBOILER2 EU-NEWBOILER3 EU-NEWBOILER4

The following conditions apply to: FG-NEWBOILERS

DESCRIPTION:

Four fire tube boilers utilizing natural gas and fuel oil. Each boiler has a steam production capacity of 17,200 lbs. per hour of steam and has a maximum rated heat input of 20.8 MMBtu per hour when burning natural gas and a maximum rated heat input of 20.4 MMBtu per hour when burning fuel oil.

POLLUTION CONTROL EQUIPMENT:

NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NO _x	0.018 lb/MMBtu (when firing natural gas)	Test protocol*	Each boiler in FG-NEWBOILERS	GC 13	(R 336.1205(3))
2. NO _x	0.113 lb/MMBtu ppm (when firing distillate oil)	Test protocol*	Each boiler in FG-NEWBOILERS	GC 13	(R 336.1205(3))

* Test protocol will specify averaging time period

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Fuel oil	0.0015% by weight	Instantaneous	FG-NEWBOILERS	VI.1	40 CFR 60.42c(d) R 336.1402
2. Fuel oil	28,000 gallons per year	12 month rolling time period as determined at the end of the calendar month	FG-NEWBOILERS	VI.2	R 336.1205(3)

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall only combust natural gas and/or fuel oil in FG-NEWBOILERS. (R 336.1225)
2. The permittee shall install, maintain, and operate each boiler in FG-NEWBOILERS according to the manufacturer written instructions, or procedures developed by the owner/operator and approved by the boiler manufacturer, over the entire life of each boiler. (R 336.1225, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETERS

1. The maximum design heat input rate of each boiler in FG-NEWBOILERS shall not exceed 20.8 million British thermal units per hour (MMBtu/hr) on a fuel heat input basis. (R 336.1201(3))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain records of the fuel oil supplier certification for all oil combusted in FG-NEWBOILERS. This certification shall include:

- a. The name of the oil supplier
- b. A statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60.41c.
- c. The sulfur content or maximum sulfur content of the oil.

(40 CFR 60.48c(f))

2. The permittee shall maintain the following records:

- a. The amount of natural gas combusted in FG-NEW BOILERS in million cubic feet, on a monthly basis.
- b. The amount of distillate oil combusted in FG-NEWBOILERS in thousands of gallons, on a monthly basis.

(40 CFR 60.48c(g)(3), R 336.1201(7)(a), 40 CFR 60.7)

VII. REPORTING

1. The permittee shall submit notification of the date of construction of the new boilers, as well as the actual startup date of the boilers. This notification shall also include:

- The design heat input capacity of the affected facility and the identification of the fuels to be combusted.
- If applicable, a copy of any federally enforceable requirements that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c or 40 CFR 60.43c.
- The annual capacity factor at which the permittee anticipates operating the boilers, based on all fuels fired and based on each individual fuel fired.

(40 CFR 60.48c(a))

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. SV-NEWBOILER1	24.0	42.5	R336.1225
2. SV-NEWBOILER2	24.0	42.5	R336.1225
3. SV-NEWBOILER3	24.0	42.5	R336.1225
4. SV-NEWBOILER4	24.0	42.5	R336.1225

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable requirements of their Renewable Operating Permit (Permit Number MI-ROP-M4174-2010). **(R 336.1205(3))**