

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

February 26, 2014

PERMIT TO INSTALL
185-13

ISSUED TO
Michigan Department of Community Health

LOCATED AT
3350 North Martin Luther King Junior Boulevard
Lansing, Michigan

IN THE COUNTY OF
Ingham

STATE REGISTRATION NUMBER
N0710

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: January 29, 2014	
DATE PERMIT TO INSTALL APPROVED: February 26, 2014	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	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO ₂ e	Carbon Dioxide Equivalent	°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
GHGs	Greenhouse Gases	kW	Kilowatt
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
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	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 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
EUINCINERATOR	MAKE: Consutech Systems, LLC MODEL Number: C-32P-1 Fuel Type: Natural gas Maximum Charge: Automatic Feed Burn (charge) rate: 85 pounds per hour Charge Type: PET REMAINS, MEDICAL/INFECTIOUS WASTE	TBD	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: EUINCINERATOR

DESCRIPTION: MAKE: Consutech Systems, LLC
 MODEL Number: C-32P-1
 Fuel Type: Natural gas
 Maximum Charge: Automatic Feed
 Burn (charge) rate: 85 pounds per hour
 Charge Type: PET REMAINS, MEDICAL/INFECTIOUS WASTE

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Secondary chamber with afterburner

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.20 lb/1,000 lbs of gas ^a	Test Protocol*	EUINCINERATOR	GC 13	R 336.1331
^a Calculated to 50% excess air * Test Protocol shall specify averaging time.					

II. MATERIAL LIMITS

1. The permittee shall not burn any waste in EUINCINERATOR other than the following wastes: **(40 CFR 60.51c)**

Pathological wastes - As defined in the federal Standards of Performance for New Stationary Sources, 40 CFR 60.51c, pathological waste means waste materials consisting of only human or animal remains, anatomical parts, and/or tissue; the bags/containers used to collect and transport the waste material; and animal bedding.

Medical/Infectious waste - As defined in the federal Standards of Performance for New Stationary Sources, 40 CFR 60.51c, infectious waste includes pathological waste known to have been exposed to infectious agents during research, production of biologicals or testing of pharmaceuticals. For co-fired combustors this waste shall not exceed 10 percent, by weight, in aggregate, of the total waste burned in EUINCINERATOR as measured on a calendar quarter basis.

2. The permittee shall not burn any fuel in EUINCINERATOR other than natural gas. **(R 336.1225, R 336.1702)**
3. The permittee shall not charge more than 85 pounds per charge in EUINCINERATOR. **(R 336.1301, R 336.1331)**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not combust waste in EUINCINERATOR unless a minimum temperature of 1600 °F and a minimum retention time of 1.0 seconds in the secondary combustion chamber are maintained. **(R 336.1301, R 336.1331, R 336.1910)**
2. The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EUINCINERATOR. A list of recommended operating and maintenance procedures is specified in Appendix A. **(R 336.1301, R 336.1331, R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature in the secondary combustion chamber of EUINCINERATOR on a continuous basis. **(R 336.1301, R 336.1331)**
2. The permittee shall maintain a scale at the facility for the purpose of verifying the charge weight as required by SC II.3. **(R 336.1301, R 336.1901)**

V. TESTING/SAMPLING

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

N/A

VI. MONITORING/RECORDKEEPING

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

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.
2. The permittee shall monitor and record the temperature in the secondary combustion chamber of EUINCINERATOR on a continuous basis. **(R 336.1301, R 336.1331)**
3. The permittee shall keep, in a satisfactory manner, daily records of the time (duration of burn) and weight of waste combusted in EUINCINERATOR, as required by SC II.3. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1301, R 336.1331)**
4. The permittee shall keep in a satisfactory manner, records on a calendar quarter basis, of the weight of hospital waste and medical/infectious waste combined, and the weight of all other fuels and wastes combusted in EUINCINERATOR. **(40 CFR 60.50c(b))**
5. The permittee shall keep, in a satisfactory manner, secondary combustion chamber temperature records for EUINCINERATOR, as required by SC VI.2. All records shall be kept on file and made available to the Department upon request. **(R 336.1301, R 336.1331)**
6. The permittee shall keep, in a satisfactory manner, a record of all service, maintenance and equipment inspections for EUINCINERATOR. The records shall include the description, reason, date and time of the service, maintenance or inspection. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1910)**

VII. REPORTING

N/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. SVINCINERATOR	18	31	40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENTS

N/A

Footnotes:

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

APPENDIX A
Incinerator Operation and Maintenance Guidelines

1. Designate a trained operator for your unit and make that person responsible for compliance with the air pollution control requirements.
2. Grates should be cleaned before each day's operation (more often if necessary), and the ashes disposed of properly.
3. Preheat the unit with the burners (not with waste) for at least 15 minutes.
4. Do not overload the incinerator. Stay within the given loading rates, and follow the manufacturer's instructions.
5. Schedule charges to minimize opening the charging door as infrequently as possible. Opening the charging door lets cold air in and quenches the fire causing smoke.
6. Burn only the type of wastes that your incinerator has been approved to burn. Follow the manufacturer's instructions to maximize the efficiency of the unit, and to properly burn the waste(s).
7. Keep the combustion air adjusted according to the manufacturer's instructions.
8. Observe the stack frequently and adjust your operation as necessary to eliminate smoke and fly ash.
9. A copy of the manufacturer's manual and this Guideline should be posted near your incinerator.
10. Make semi-annual inspections to check and service all of the equipment. If you do not have a qualified person available for proper inspections, a service contract with a reputable manufacturer is advisable.