

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

September 29, 2021

**PERMIT TO INSTALL
71-21**

**ISSUED TO
Munson Medical Center**

**LOCATED AT
350 Brook Street
Traverse City, Michigan 49684**

**IN THE COUNTY OF
Grand Traverse**

**STATE REGISTRATION NUMBER
D5884**

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. 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: September 10, 2021 | |
| DATE PERMIT TO INSTALL APPROVED: September 29, 2021 | SIGNATURE: |
| DATE PERMIT VOIDED: | SIGNATURE: |
| DATE PERMIT REVOKED: | SIGNATURE: |

PERMIT TO INSTALL

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COMMON ACRONYMS

| | |
|----------------------------|---|
| AQD | Air Quality Division |
| BACT | Best Available Control Technology |
| CAA | Clean Air Act |
| CAM | Compliance Assurance Monitoring |
| CEMS | Continuous Emission Monitoring System |
| CFR | Code of Federal Regulations |
| COMS | Continuous Opacity Monitoring System |
| Department/department/EGLE | Michigan Department of Environment, Great Lakes, and Energy |
| EU | Emission Unit |
| FG | Flexible Group |
| GACS | Gallons of Applied Coating Solids |
| GC | General Condition |
| GHGs | Greenhouse Gases |
| HVLP | High Volume Low Pressure* |
| ID | Identification |
| IRSL | Initial Risk Screening Level |
| ITSL | Initial Threshold Screening Level |
| LAER | Lowest Achievable Emission Rate |
| MACT | Maximum Achievable Control Technology |
| MAERS | Michigan Air Emissions Reporting System |
| MAP | Malfunction Abatement Plan |
| MSDS | Material Safety Data Sheet |
| NA | Not Applicable |
| NAAQS | National Ambient Air Quality Standards |
| NESHAP | National Emission Standard for Hazardous Air Pollutants |
| NSPS | New Source Performance Standards |
| NSR | New Source Review |
| PS | Performance Specification |
| PSD | Prevention of Significant Deterioration |
| PTE | Permanent Total Enclosure |
| PTI | Permit to Install |
| RACT | Reasonable Available Control Technology |
| ROP | Renewable Operating Permit |
| SC | Special Condition |
| SCR | Selective Catalytic Reduction |
| SNCR | Selective Non-Catalytic Reduction |
| SRN | State Registration Number |
| TBD | To Be Determined |
| TEQ | Toxicity Equivalence Quotient |
| USEPA/EPA | United States Environmental Protection Agency |
| VE | Visible Emissions |

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

| | |
|-------------------|--|
| acfm | Actual cubic feet per minute |
| BTU | British Thermal Unit |
| °C | Degrees Celsius |
| CO | Carbon Monoxide |
| CO ₂ e | Carbon Dioxide Equivalent |
| dscf | Dry standard cubic foot |
| dscm | Dry standard cubic meter |
| °F | Degrees Fahrenheit |
| gr | Grains |
| HAP | Hazardous Air Pollutant |
| Hg | Mercury |
| hr | Hour |
| HP | Horsepower |
| H ₂ S | Hydrogen Sulfide |
| kW | Kilowatt |
| lb | Pound |
| m | Meter |
| mg | Milligram |
| mm | Millimeter |
| MM | Million |
| MW | Megawatts |
| NMOC | Non-Methane Organic Compounds |
| NO _x | Oxides of Nitrogen |
| ng | Nanogram |
| PM | Particulate Matter |
| PM10 | Particulate Matter equal to or less than 10 microns in diameter |
| PM2.5 | Particulate Matter equal to or less than 2.5 microns in diameter |
| pph | Pounds per hour |
| ppm | Parts per million |
| ppmv | Parts per million by volume |
| ppmw | Parts per million by weight |
| psia | Pounds per square inch absolute |
| psig | Pounds per square inch gauge |
| scf | Standard cubic feet |
| sec | Seconds |
| SO ₂ | Sulfur Dioxide |
| TAC | Toxic Air Contaminant |
| Temp | Temperature |
| THC | Total Hydrocarbons |
| tpy | Tons per year |
| µg | Microgram |
| µm | Micrometer or Micron |
| VOC | Volatile Organic Compounds |
| yr | Year |

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 Environment, Great Lakes, and Energy, 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 Rule 210 (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 Rule 219 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 Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(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 condition 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 Rule 301, 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 Rule 303 (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 Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT 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 (Including Process Equipment & Control Device(s)) | Flexible Group ID |
|-------------------------|---|--------------------------|
| EUGENERATOR#3 | A 2,937 HP (2,190 kilowatts (kW)) diesel-fueled compression ignition emergency engine with a model year of 2011 or later, and a displacement of less than 30 liters/cylinder. | 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 336.1291.

**EUGENERATOR#3
 EMISSION UNIT CONDITIONS**

DESCRIPTION

A 2,937 HP (2,190 kilowatts (kW)) diesel-fueled compression ignition emergency engine with a model year of 2011 or later, and a displacement of less than 30 liters/cylinder.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period / Operating Scenario | Equipment | Monitoring / Testing Method | Underlying Applicable Requirements |
|------------------|-----------------|---|------------------|------------------------------------|--|
| 1. NMHC + NOx | 6.4 g/kW-hr | Hourly ^A | EUGENERATOR#3 | SC V.1 SC VI.2 | 40 CFR 60.4202(b)(2), Appendix I of 40 CFR Part 1039 |
| 2. CO | 3.5 g/kW-hr | Hourly ^A | EUGENERATOR#3 | SC V.1 SC VI.2 | 40 CFR 60.4202(b)(2), Appendix I of 40 CFR Part 1039 |
| 3. PM | 0.20 g/kW-hr | Hourly ^A | EUGENERATOR#3 | SC V.1 SC VI.2 | 40 CFR 60.4202(b)(2), Appendix I of 40 CFR Part 1039 |

^A These emission limits are for certified engines; if testing becomes required to demonstrate compliance, then the tested values must be compared to the Not to Exceed (NTE) requirements determined through 40 CFR 60.4212(c).

II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in EUGENERATOR#3 with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. **(R 336.1205(1)(a) and (3), 40 CFR 60.4207, 40 CFR 1090.305)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUGENERATOR#3 for more than 500 hours per year based on a 12-month rolling time period as determined at the end of each calendar month. The 500 hours includes the hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.2. **(R 336.1205(1)(a) and (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**

2. The permittee may operate EUGENERATOR#3 for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. **(40 CFR 60.4211(f)(2))**
3. The permittee may operate EUGENERATOR#3 up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing as provided in 40 CFR 60.4211(f)(2). Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity. **(40 CFR 60.4211(f)(3))**
4. If the permittee purchased a certified engine, according to procedures specified in 40 CFR Part 60, Subpart IIII, for the same model year, the permittee shall meet the following requirements for EUGENERATOR#3:
 - a. Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions,
 - b. Change only those emission-related settings that are permitted by the manufacturer, and
 - c. Meet the requirements as specified in 40 CFR 89, 94 and/or 1068, as they apply to the engine.If you do not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine. **(40 CFR 60.4211(a) & (c))**
5. If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan for EUGENERATOR#3 and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 60.4211(g)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUGENERATOR#3 with non-resettable hours meters to track the operating hours. **(R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 60.4209)**
2. The maximum rated power output of EUGENERATOR#3 shall not exceed 2,937 HP (2190 kW), as certified by the equipment manufacturer. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 60.4202, 40 CFR 60.4205, 40 CFR 89.112(a))**

V. TESTING/SAMPLING

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

1. If the EUGENERATOR#3 is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:
 - a. Conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer

- b. If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212.
- c. Conduct subsequent performance testing every 8,760 hours of engine operation or every 3 years thereafter, whichever comes first, to demonstrate compliance with the applicable emission standards.

No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The permittee must submit 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. **(40 CFR 60.4211(g)(3), 40 CFR 60.4212)**

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 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(1)(a)&(3), R 336.1225, 40 CFR 52.21 (c) & (d), 40 CFR Part 60, Subpart IIII)**

2. The permittee shall keep, in a satisfactory manner, the following records for EUGENERATOR#3:

- a. For a certified engine: The permittee shall keep records of the manufacturer certification documentation.
- b. For an uncertified engine: The permittee shall keep records of testing required in SC V.1.

The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 60.4211)**

3. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for EUGENERATOR#3:

- a. For a certified engine: The permittee shall keep records of the manufacturer's emission-related written instructions, and records demonstrating that the engine has been maintained according to those instructions, as specified in SC III.4.
- b. For an uncertified engine: The permittee shall keep records of a maintenance plan, as required by SC III.5, and maintenance activities.

The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 60.4211)**

4. The permittee shall monitor and record, the total hours of operation for EUGENERATOR#3 on a monthly and 12-month rolling time period basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for EUGENERATOR#3, on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation of EUGENERATOR#3, including what classified the operation as emergency and how many hours are spent for non-emergency operation. **(R 336.1205(1)(a) & (3), 40 CFR 60.4211, 40 CFR 60.4214)**

5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EUGENERATOR#3, demonstrating that the fuel meets the requirement of 40 CFR 1090.305. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. **(R 336.1205(1)(a) & (3), 40 CFR 60.4207(b), 40 CFR 1090.305)**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUGENERATOR#3. **(R 336.1201(7)(a))**

2. The permittee shall submit a notification specifying whether EUGENERATOR#3 will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation. **(40 CFR Part 60, Subpart III)**
3. The permittee shall submit the following notifications if EUGENERATOR#3 is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 60.4211(f)(3)(i) the permittee must submit an annual report including the following:
 - a) Company name and address where the engine is located.
 - b) Date of the report and beginning and ending dates of the reporting period.
 - c) Engine site rating and model year.
 - d) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
 - e) Hours operated for the purposes specified in 40 CFR 60.4211(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 60.4211(f)(2)(ii) and (iii).
 - f) Number of hours the engine is contractually obligated to be available for the purposes specified in 40 CFR 60.4211(f)(2)(ii) and (iii).
 - g) Hours spent for operation for the purposes specified in 40 CFR 60.4211(f)(3)(i), including the date, end time for engine operation for the purposes specified in 40 CFR 60.4211(f)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

The first annual report must cover the calendar year 2021 and must be submitted no later than March 31, 2022. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in 40 CFR 60.4. **(40 CFR 60.4211)**

VIII. STACK/VENT RESTRICTION(S)

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. SVGENERATOR#3 | 18 | 28 | R 336.1225, 40 CFR 52.21 (c) & (d) |

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and III, as they apply to EUGENERATOR#3. **(40 CFR Part 60, Subparts A & III, 40 CFR 63.6590(c))**
2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and ZZZZ, as they apply to EUGENERATOR#3. **(40 CFR Part 63, Subparts A & ZZZZ, 40 CFR 63.6585)**

Footnotes:

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