



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

June 21, 2011

Mr. Marc Pauley, P.E.  
Granger Electric Company  
16980 Wood Road  
Lansing, Michigan 48906

Dear Mr. Pauley:

This letter is in reference to your Permit to Install application identified as No. 203-10 (State Registration Number N3294) for a new landfill gas fired internal combustion engine and electric generator set located at 15550 68<sup>th</sup> Avenue, Coopersville, Michigan.

The public comment period ended on June 8, 2011. A public hearing was not requested. The Air Quality Division (AQD) received one comment from your consultant, Mr. Khaled Mahmood, during the comment period. This comment was in regards to Special Condition VI.1 of the proposed permit which states "The permittee shall continuously monitor, in a satisfactory manner, the total landfill gas fuel usage of the engine...for EURICENGINE8." This condition cites Title 40 of the Code of Federal Regulations (CFR), Part 63.6625(c) of the federal National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63 Subpart ZZZZ) as one of the applicable regulations. The comment requested that the condition be modified to allow for a calculation of the landfill gas flow by using the methane content of the gas and the heat input to the engine, which will be tracked continuously. It was also stated that the requirement may not apply because the engine is fired exclusively on landfill gas. The regulation clearly states that "If you are operating a new or reconstructed stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, you must monitor and record your fuel usage daily with separate fuel meters to measure the volumetric flow rate of each fuel..." The regulation does not allow for a calculation of the fuel flow rate by measuring other parameters or offer an exemption if you are using only one of listed fuels instead of a mixture. Therefore, no changes were made to the proposed permit conditions.

Pursuant to the delegation of authority from the Director of the Michigan Department of Environmental Quality (MDEQ), I have approved Permit to Install No. 203-10.

This approval is based upon and subject to compliance with all administrative rules of the MDEQ and conditions stipulated in the enclosed supplement. Please review these conditions thoroughly so that you may take the actions necessary to ensure compliance with all of these conditions.

The equipment covered by this permit is also subject to the requirements of the Renewable Operating Permit (ROP) Program. Submittal of the M-001 and C-001 forms may be required prior to commencing operation. A change that is subject to Rule 215 subrules (1), (2), or (3), promulgated pursuant to Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, requires the submittal of the forms to

the appropriate AQD District Office. If a change is made pursuant to Rule 216, please submit the required forms to the AQD Permit Section.

Additional information is included in the M-001 form instructions which are available on the Internet or can be obtained by contacting the Grand Rapids District Office at 616-356-0500. The AQD permit web page is located at <http://www.deq.state.mi.us/aps>.

To help us improve the service we provide our customers, we encourage you to complete a *Permit to Install Customer Service Survey* on the following Web page:  
[http://www.michigan.gov/documents/deq/DEQEval\\_29-pti-customerservice\\_287285\\_7.html](http://www.michigan.gov/documents/deq/DEQEval_29-pti-customerservice_287285_7.html).

Please contact Jeremy Hoeh, AQD, at 517-241-2194 if you have any questions regarding this permit, or you may contact me.

Sincerely,

Mary Ann Dolehanty, Supervisor  
Permit Section  
Air Quality Division  
517-373-2098

Enclosures

cc/enc: Mr. Dave Busman, Polkton Charter Township Manager  
Mr. Daniel C. Krueger, Ottawa County Clerk  
Mr. Khaled Mahmood, Cornerstone Environmental Group  
Ms. Pamela Blakley, U.S. Environmental Protection Agency, Region 5  
Mr. Constantine Blathras, U.S. Environmental Protection Agency, Region 5  
Mr. Brad Wurfel, MDEQ  
Ms. Heidi Hollenbach, MDEQ  
Mr. Jeremy Hoeh, MDEQ