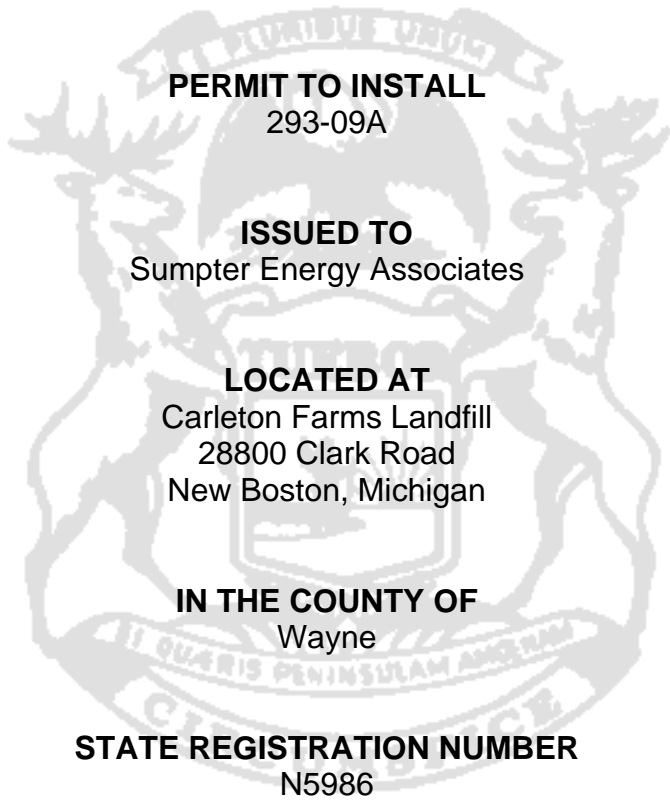


**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

June 29, 2011



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: May 2, 2011	
DATE PERMIT TO INSTALL APPROVED: June 29, 2011	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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 10 microns diameter
MSDS	Material Safety Data Sheet	PM2.5	PM less than 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
EUICENGINE_15	Spark ignition, lean burn, reciprocating internal combustion engine (Caterpillar G3520C, 2,233 bhp at 100% load) for combusting treated landfill gas to produce electricity (1.6 megawatt gross electrical output). The engine will drive an associated generator set to produce the electricity.	TBD	FGICENGINES15-16
EUICENGINE_16	Spark ignition, lean burn, reciprocating internal combustion engine (Caterpillar G3520C, 2,233 bhp at 100% load) for combusting treated landfill gas to produce electricity (1.6 megawatt gross electrical output). The engine will drive an associated generator set to produce the electricity.	TBD	FGICENGINES15-16

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
FGICENGINES15-16	Two internal combustion, lean burn engines for combusting treated landfill gas to produce electricity	EUICENGINE_15, EUICENGINE_16

The following conditions apply to: FGICENGINES15-16

DESCRIPTION: Two internal combustion, lean burn engines for combusting treated landfill gas to produce electricity

Emission Units: EUCENGINE_15, EUCENGINE_16

POLLUTION CONTROL EQUIPMENT:

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. CO	3.3 g/bhp-hr	Test Protocol	Each engine in FGICENGINES15-16	SC V.1, V.2	R 336.2804, R 336.2810, 40 CFR 52.21(d) & (j), 40 CFR Part 60 Subpart JJJJ
2. CO	16.25 pph	Test Protocol	Each engine in FGICENGINES15-16	SC V.1	R 336.2804, 40 CFR 52.21(d) & (j)
3. NO _x	0.6 g/bhp-hr*	Test Protocol	Each engine in FGICENGINES15-16	SC V.1, SC V.2	R 336.2810, 40 CFR 52.21 (c), (d) & (j), 40 CFR Part 60 Subpart JJJJ
4. NO _x	2.95 pph	Test Protocol	Each engine in FGICENGINES15-16	SC V.1	R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
5. SO ₂	1.25 pph	Test Protocol	Each engine in FGICENGINES15-16	SC V.1, SC V.3	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d) & (j)
6. VOC	0.2 g/bhp-hr*	Test Protocol	Each engine in FGICENGINES15-16	SC V.2	R 336.1702(a), 40 CFR Part 60 Subpart JJJJ
7. PM-10	0.23 g/bhp-hr	Test Protocol	Each engine in FGICENGINES15-16	SC V.1	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d) & (j)
8. PM-10	1.13 pph	Test Protocol	Each engine in FGICENGINES15-16	SC V.1	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d) & (j)
9. CO ₂ e	8278 tpy	12-month rolling time period as determined at the end of each calendar month	Each engine in FGICENGINES15-16	SC VI.7	R 336.2810, 40 CFR 52.21(j)

*Except during periods of start-up, shut down or malfunction, as defined in 40 CFR §60.2

II. MATERIAL LIMITS

1. The heat input for FGICENGINES15-16 shall not exceed 260,880 million Btu per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205, R 336.1225, R 336.1702, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall only burn landfill gas in FGICENGINES15-16 that has been treated in a system which complies with 40 CFR 60.752(b)(2)(iii)(C). **(R 336.1225, R 336.1331, R 336.1702, 40 CFR 63.6625(c))**
2. No later than 60 days after issuance of this permit, the permittee shall submit to the AQD District Supervisor, for review and approval, a malfunction abatement/operation and preventative maintenance plan for FGICENGINES15-16. After approval of the malfunction abatement/operation and preventative maintenance plan by the AQD District Supervisor, the permittee shall not operate FGICENGINES15-16 unless the malfunction abatement/operation and preventative maintenance plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum the plan shall include:
 - a. Identification of the equipment and, if applicable, air-cleaning device, and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair.
 - b. Description of the items or conditions to be inspected and frequency of the inspections or repairs.
 - c. Identification of the equipment and, if applicable, air-cleaning device, operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of these parameters and a description of the method of monitoring or surveillance procedures.
 - d. Identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - e. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.
 - f. Operation and maintenance procedures for maintaining the most efficient combustion of the landfill gas to achieve compliance with the green house gas emission limit.

If the plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the plan within 45 days after such an event occurs and submit the revised plan for approval to the AQD District Supervisor. Should the AQD determine the malfunction abatement/operation and preventative maintenance plan to be inadequate, the AQD District Supervisor may request modification of the plan to address those inadequacies. **(R 336.1702, R 336.1910, R 336.1911, R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), & (j))**

3. The permittee shall operate each of the stationary reciprocating internal combustion engines (RICE) in a manner which reasonably minimizes HAP emissions. **(40 CFR 63.6625(c))**
4. Based on each engine's kilowatt output, the permittee shall adjust the engine's air/fuel ratio, as needed, to ensure that the engine operates at its maximum design output based on the fuel available to burn. **(R 336.1702, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate any engine in FGICENGINES15-16 unless that engine's air/fuel ratio controller is installed, maintained and operated in a satisfactory manner. **(R 336.1702, R 336.1910)**

2. The permittee shall equip each engine in FGICENGINES15-16 with a device to monitor and record the hours of operation for each engine. **(40 CFR Part 60 Subpart JJJJ)**
3. The permittee shall equip FGICENGINES15-16 with a device to monitor and record the total daily fuel usage of the engines. **(R 336.1201(3), R 336.1225, 40 CFR 63.6625(c))**

V. TESTING/SAMPLING

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

1. Within 180 days after commencement of initial start up, the permittee shall verify NO_x, SO₂, CO, and PM-10 emission rates from one or more engine(s) in FGICENGINES15-16, by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R 336.2001, R 336.2803, R 336.2804, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**
2. Except as provided in 40 CFR 60.4243(b), the permittee shall conduct an initial performance test for each engine in FGICENGINES15-16 within one year after startup of the engine and every 8760 hours of operation (as determined through the use of a non-resettable hour meter) or three years, whichever occurs first, to demonstrate compliance with the emission limits in 40 CFR 60.4233(e), unless the engines have been certified by the manufacturer as required by 40 CFR Part 60 Subpart JJJJ and the permittee maintains the engine as required by 40 CFR 60.4243(a)(1). If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4244. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. **(40 CFR 60.4243, 40 CFR 60.4244, 40 CFR Part 60 Subpart JJJJ)**
3. The permittee shall verify the hydrogen sulfide or total reduced sulfur (TRS) content of the treated landfill gas burned in FGICENGINES15-16 on a quarterly basis by gas sampling. If, after a year, the average of the previous four (4) quarterly concentrations of the hydrogen sulfide or TRS concentration of the landfill gas is below 230 ppm (TRS equivalent), the permittee may petition the District Supervisor, Air Quality Division to reduce the frequency of gas sampling and recording the hydrogen sulfide/TRS concentration of the landfill gas to once each calendar year. If at any time the average of the previous four concentration readings exceeds 230 ppm (TRS equivalent), the permittee shall resume sampling and recording on a quarterly basis and shall review all operating and maintenance activities for the landfill gas collection and treatment system along with keeping records of corrective actions taken. Once the average of the previous four concentrations determined from the quarterly readings is maintained below 230 ppm of hydrogen sulfide/TRS concentration in the landfill gas for one year after an exceedence, the permittee may resume annual monitoring and recordkeeping. The permittee may combine/share the hydrogen sulfide/TRS testing of the landfill gas with co-located companies at the same facility. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.2001(3), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c) and (d))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall continuously monitor, in a satisfactory manner, the total landfill gas fuel usage of the engines and the hours of operation for each engine in FGICENGINES15-16. **(R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), 40 CFR 63.6625(c), 40 CFR Part 60 Subpart JJJJ)**
2. The permittee shall maintain a log of all maintenance activities conducted according to the malfunction abatement/operation and preventative maintenance plan (pursuant to SC III.2). The permittee shall keep this log on file at the facility for a period of at least five years and make it available to the Department upon request. **(R 336.1702, R 336.1911, R 336.1912, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

3. The permittee shall keep, in a satisfactory manner, records of the total landfill gas usage of the engines and the hours of operation for each engine in FGICENGINES15-16 on a daily basis, as required by SC VI.1. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1702, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d), 40 CFR 63.6655(c), 40 CFR Part 60 Subpart JJJJ)**
4. The permittee shall monitor emissions and operating information, including monitoring and recording the hours of operation of each engine in FGICENGINES15-16, in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and JJJJ. The permittee shall keep records of all source emissions data and operating information for each engine in FGICENGINES15-16 on file at the facility and make the records available upon request. **(40 CFR Subparts A & JJJJ (40 CFR 60.4245))**
5. The permittee shall continuously monitor and record, in a satisfactory manner, the kilowatt output from each engine in FGICENGINES15-16. **(R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**
6. The permittee shall monitor and record, on a monthly basis, the average Btu content of the landfill gas burned in FGICENGINES15-16. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1702, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**
7. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling CO₂e emission calculation records for each engine in FGICENGINES15-16. The CO₂e emission calculations shall be based on the monthly landfill gas usage of the engines and the monthly Btu content of the landfill gas records. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.2803, R 336.2804, 40 CFR 52.21(c) &(d))**

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 FGICENGINES15-16. **(R 336.1201(7)(a))**
2. The permittee shall submit an annual report in accordance with Table 7 of 40 CFR Part 63, Subpart ZZZZ to the appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(40 CFR 63.6650(g), 40 CFR 63.6650(b)(5))** The following information shall be included in this annual report:
 - a. The permittee shall report the fuel flow rate and the heating value that was used in the permittee's calculations. **(40 CFR 63.6650(g)(1))**
 - b. The permittee shall report the operating limits provided in the permittee's federally enforceable permit, and any deviations from these limits. **(40 CFR 63.6650(g)(2))**
 - c. The permittee shall report any problems or errors suspected from the fuel flow rate meters. **(40 CFR 63.6650(g)(3))**

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. SVICENGINE_15	16	74	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
2. SVICENGINE_16	16	74	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable provisions of the New Source Performance Standards as specified in 40 CFR Part 60, Subpart A and Subpart JJJJ, as they apply to FGICENGINES15-16. **(40 CFR Part 60 Subpart A and JJJJ)**
2. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to FGICENGINES15-16. **(40 CFR, Part 63, Subparts A and ZZZZ)**

Footnotes:

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