# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

July 27, 2016

PERMIT TO INSTALL 107-16

ISSUED TO Agri-Science Technologies

LOCATED AT 6135 Blue Star Highway Saugatuck, Michigan

IN THE COUNTY OF

Allegan

# STATE REGISTRATION NUMBER P0718

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:

 June 14, 2016

 DATE PERMIT TO INSTALL APPROVED:
 SIGNATURE:

 July 27, 2016
 SIGNATURE:

 DATE PERMIT VOIDED:
 SIGNATURE:

 DATE PERMIT REVOKED:
 SIGNATURE:

# PERMIT TO INSTALL

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## **Common Abbreviations / Acronyms**

|             | Common Acronyms                              | I                 | Pollutant / Measurement Abbreviations                           |
|-------------|--|-------------------|---|
| AQD         | Air Quality Division                         | acfm              | Actual cubic feet per minute                                    |
| BACT        | Best Available Control Technology            | BTU               | British Thermal Unit  |
| CAA         | Clean Air Act                                | °C                | Degrees Celsius   |
| CAM         | Compliance Assurance Monitoring              | со                | Carbon Monoxide   |
| CEM         | Continuous Emission Monitoring               | CO <sub>2</sub> e | Carbon Dioxide Equivalent                                       |
| CFR         | Code of Federal Regulations                  | dscf              | Dry standard cubic foot   |
| СОМ         | Continuous Opacity Monitoring                | dscm              | Dry standard cubic meter  |
| Department/ | Michigan Department of Environmental         | °F                | Degrees Fahrenheit  |
| department  | Quality                                      | gr                | Grains  |
| EU          | Emission Unit                                | HAP               | Hazardous Air Pollutant   |
| FG          | Flexible Group                               | Hg                | Mercury   |
| GACS        | Gallons of Applied Coating Solids            | hr                | Hour  |
| GC          | General Condition                            | HP                | Horsepower  |
| GHGs        | Greenhouse Gases                             | $H_2S$            | Hydrogen Sulfide  |
| HVLP        | High Volume Low Pressure*                    | kW                | Kilowatt  |
| ID          | Identification                               | lb                | Pound   |
| IRSL        | Initial Risk Screening Level                 | m                 | Meter   |
| ITSL        | Initial Threshold Screening Level            | mg                | Milligram   |
| LAER        | Lowest Achievable Emission Rate              | mm                | Millimeter  |
| MACT        | Maximum Achievable Control Technology        | MM                | Million   |
| MAERS       | Michigan Air Emissions Reporting System      | MW                | Megawatts   |
| MAP         | Malfunction Abatement Plan                   | NMOC              | Non-methane Organic Compounds                                   |
| MDEQ        | Michigan Department of Environmental         | NO <sub>x</sub>   | Oxides of Nitrogen  |
| 14050       | Quality                                      | ng                | Nanogram  |
| MSDS<br>NA  | Material Safety Data Sheet<br>Not Applicable | PM                | Particulate Matter  |
| NAAQS       | National Ambient Air Quality Standards       | PM10              | Particulate Matter equal to or less than 10 microns in diameter |
| NESHAP      | National Emission Standard for Hazardous     |                   | Particulate Matter equal to or less than 2.5                    |
|             | Air Pollutants                               | PM2.5             | microns in diameter   |
| 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        | Reasonable Available Control Technology      | scf               | Standard cubic feet   |
| ROP         | Renewable Operating Permit                   | sec               | Seconds   |
| SC          | Special Condition                            | SO <sub>2</sub>   | Sulfur Dioxide  |
| SCR         | Selective Catalytic Reduction                | TAC               | Toxic Air Contaminant   |
| SNCR        | Selective Non-Catalytic Reduction            | Temp              | Temperature   |
| SRN         | State Registration Number                    | THC               | Total Hydrocarbons  |
| TEQ         | Toxicity Equivalence Quotient                | tpy               | Tons per year   |
| USEPA/EPA   | United States Environmental Protection       | μg                | Microgram   |
| VE          | Agency                                       | μm                | Micrometer or Micron  |
| VE          | Visible Emissions                            | VOC               | Volatile Organic Compounds                                      |
|             |  | yr                | Year  |

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

#### GENERAL CONDITIONS

- 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 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.
- 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   | ssion Unit ID Emission Unit Description<br>(Process Equipment & Control Devices)                                    |     |  |  |  |  |  |
|--|---|-----|--|--|--|--|--|
| EU-AMMONIA   | A single aqua ammonia storage tank and any associated handling process. The tank storage capacity is 9,000 gallons. | N/A |  |  |  |  |  |
| 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: EU-AMMONIA

**DESCRIPTION:** A single aqua ammonia storage tank and any associated handling process. The tank storage capacity is 9,000 gallons.

Flexible Group ID: N/A

POLLUTION CONTROL EQUIPMENT: N/A

#### I. EMISSION LIMITS

N/A

#### II. MATERIAL LIMITS

1. The ammonia content of all material stored in EU-AMMONIA shall not exceed 29.45 percent. (R 336.1224, R 336.1225, R 336.1901)

#### III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall not operate EU-AMMONIA unless the inspection and maintenance program specified in Appendix A has been implemented and maintained. (R 336.1901)
- 2. The permittee shall not operate EU-AMMONIA unless an emergency response plan, to be followed in the event of an emergency, has been approved by the local fire department or county emergency response agency and is implemented and maintained. Once each year, the permittee shall review this plan with the local fire department or emergency response agency and make any necessary updates. (R 336.1901)
- 3. The permittee shall not operate EU-AMMONIA unless all transfer operations including transport deliveries are performed by a reliable person properly trained and made responsible for proper compliance with all applicable procedures. (R 336.1901)
- 4. Vapor return lines shall be employed whenever necessary to ensure an accidental release from pressure relief valves will not occur during ammonia transfer operations. (R 336.1901)
- 5. Nitrogen stabilizer shall not be added to EU-AMMONIA. (R 336.1901)

#### IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The EU-AMMONIA storage tank shall be fitted with safety relief valves. Such valves shall be stamped with the date manufactured, and shall be replaced, or re-tested and re-certified, at least every five years or more often if there is evidence of damage or deterioration. (R 336.1225, R 336.1901)
- The permittee shall not operate EU-AMMONIA unless a remotely operated internal or external positive shutoff valve is installed to allow access for emergency shut-off of all flow from the storage tank. (R 336.1225, R 336.1901)
- 3. The permittee shall not operate EU-AMMONIA unless any liquid lines in rail and transport transfer areas are equipped with back pressure check valves and all liquid lines not requiring a back check valve and all vapor lines are equipped with properly sized excess flow valves. These valves shall be installed on the main container side of the predictable break point at the bulkhead. (R 336.1225, R 336.1901)

- 4. Any vapor or liquid line, exclusive of couplings, requiring venting after ammonia transfer shall be vented through a water trap of 55 gallons minimum size. Safety water shall not be used for this purpose. (R 336.1225, R 336.1901)
- 5. A sign shall be present and conspicuously placed at the facility entrance stating the emergency phone numbers for the owner, primary operator, local and state police, local fire department, and ambulance service. (R 336.1901)
- 6. The pressure relief valve shall be set to not more than 60 psig and the relief line shall vent through a water container containing at least 275 gallons of water. (R 336.1224, R 336.1225, 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. The permittee shall keep, in a satisfactory manner, records of the date, duration, and description of any malfunction or spill occurring from EU-AMMONIA, including the estimated amount of ammonia released into the atmosphere. Do not include trace amounts from normal hose coupling bleed downs. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1201(3))**
- 2. The permittee shall keep, in a satisfactory manner, records of the date of annual review and approval of the emergency response plan with the local fire department. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1201(3))

#### VII. <u>REPORTING</u>

 The permittee shall notify the Pollution Emergency Alert System (PEAS) 1-800-292-4706 and/or the AQD District Supervisor immediately of any abnormal release of ammonia from EU-AMMONIA. A normal release includes only hose coupling bleed downs, operation of hydrostatic relief valves, and normal pressure relief from the safety relief valve(s). Relief due to overfilling is not normal. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1201(3), R 336.1901)

## VIII. STACK/VENT RESTRICTIONS

N/A

## IX. OTHER REQUIREMENTS

N/A

#### Footnotes:

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

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# Appendix A Inspection and Maintenance Program Permanent Ammonia Storage Tank

Permittee shall conduct inspections and complete form at least twice per year.

| Tank Identification:  | Satisfactory? |    | tory? |   | Satisfactory |    | tory? |
|---|---------------|----|-------|---|--------------|----|-------|
|   | Yes           | No | Date* |   | Yes          | No | Date* |
| 1. Tank free of leaks   |               |    |       | 14. Unused equipment stored out of the way  |              |    |       |
| <ol> <li>Tank supports in good condition (no cracked or<br/>crumbled concrete, etc.)</li> </ol> |               |    |       | 15. Chemical safety goggles available and in good condition                                 |              |    |       |
| 3. Paint in good condition  |               |    |       | 16. Protective gloves, boots, suits or slickers available and in good condition             |              |    |       |
| 4. Equipment locked when not in use   |               |    |       | 17. Gas masks with ammonia type canisters and refill canisters within date limits available |              |    |       |
| 5. Tank properly labeled  |               |    |       | <ol> <li>Emergency clean water, shower or 75 gallon tank<br/>available nearby</li> </ol>    |              |    |       |
| <ol> <li>Valves and fittings free from leaks and in good<br/>condition</li> </ol>               |               |    |       | 19. Gages, pressure and liquid level, operable  |              |    |       |
| 7. Piping properly supported and guards in place  |               |    |       | 20. Valves properly labeled "liquid" and "vapor"  |              |    |       |
| 8. Pipes free of physical damage and rust and properly painted                                  |               |    |       | 21. Safety relief valves within 5 years of manufacture<br>or recertification and marked     |              |    |       |
| 9. Employees trained in proper filling procedures   |               |    |       | 22. Outlet openings on valves and lines free of dirt and rust with protective caps in place |              |    |       |
| 10. Provisions provided for bleeding of transfer hose from the transport truck                  |               |    |       | 23. Safety relief valves free of debris with rain caps installed                            |              |    |       |
| 11. Wheels properly chocked on the transport truck or rail tank car while unloading             |               |    |       | 24. Safety relief valve manifold operable   |              |    |       |
| 12. Information and warning signs displayed and in good condition                               |               |    |       | 25. Remote shut-off valve in working order  |              |    |       |
| 13. Area free of weeds, trash and other unsafe conditions                                       |               |    |       |   |              |    |       |

Inspector: \_\_\_\_\_

If condition is not applicable, write NA.