MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

October 14, 2016

PERMIT TO INSTALL 172-16

ISSUED TO Lowell Energy AD, LLC

LOCATED AT 625 Chatham Street Lowell, Michigan

IN THE COUNTY OF Kent

PENINSULA

STATE REGISTRATION NUMBER P0375

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: October 10, 2016				
October 14, 2016	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	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 ₂ 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 ₂ S	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 _x	Oxides of Nitrogen	
	Quality	ng	Nanogram	
MSDS NA	Material Safety Data Sheet 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 ₂	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	
\/E	Agency	μm	Micrometer or Micron	
VE	Visible Emissions	VOC	Volatile Organic Compounds Year	
*F 10/15	licators the pressure measured at the gun air ca	yr		

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

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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.

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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	
	An odor control unit which utilizes carbon filtration to remove hydrogen sulfide and other odorous compounds generated from the waste treatment system feeding an anaerobic digester.	NA	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.

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The following conditions apply to: EUODORCONTROLSYS

DESCRIPTION: An odor control unit which utilizes carbon filtration to remove hydrogen sulfide and other

odorous compounds generated from the waste treatment system feeding an anaerobic

digester

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Carbon adsorption

I. <u>EMISSION LIMITS</u>

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. Within 30 calendar days of the date of permit approval, the permittee shall submit to the AQD District Supervisor, an approvable operation and maintenance plan for EUODORCONTROLSYS. The plan shall include sufficient monitoring to ensure the odor control equipment is operating in a satisfactory manner, including carbon breakthrough test schedule or carbon replacement schedule, and sufficient recordkeeping to demonstrate the equipment is operating in a satisfactory manner. (R 336.1901, R 336.1910, R 336.1911)
- 2. The permittee shall maintain and operate EUODORCONTROLSYS according to the procedures outlined in the operation and maintenance plan required by SC III.1. (R 336.1901, R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record all operation and maintenance activities performed in accordance with the operation and maintenance plan required in SC III.1, including any carbon change outs for EUODORCONTROLSYS. The permittee shall keep all operation, maintenance, and carbon change out information records, on file at the facility and make them available to the Department upon request. (R 336.1901, R 336.1910, R 336.1911)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA