

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

September 17, 2018

**PERMIT TO INSTALL
124-18**

**ISSUED TO
Sklarczyk Seed Farm LLC**

**LOCATED AT
8710 M-32 East
Johannesburg, Michigan**

**IN THE COUNTY OF
Otsego**

**STATE REGISTRATION NUMBER
N7536**

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:

August 9, 2018

DATE PERMIT TO INSTALL APPROVED:

September 17, 2018

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

PERMIT TO INSTALL

Table of Contents

Section	Page
Alphabetical Listing of Common Abbreviations / Acronyms	2
General Conditions	3
Special Conditions	5
Emission Unit Summary Table.....	5
Special Conditions for EUHEATER1	5
Appendix A.....	7

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	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO _{2e}	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 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)	Flexible Group ID
EUHEATER1	Alternate Heating Systems Inc. Model B1000 990,000 btu/hr used oil fired boiler/heater	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.		

The following conditions apply to: EUHEATER1

DESCRIPTION: Alternate Heating Systems Inc. Model B1000 990,000 btu/hr used oil fired boiler/heater

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

1. The permittee shall not burn any fuel in EUHEATER1 other than those listed below.
 - a. No. 1 virgin fuel oil
 - b. No. 2 virgin fuel oil
 - c. Used oil (including crankcase, hydraulic, and transmission oils) with properties that do not exceed the standards specified in Appendix A. "Used oil" is any oil that has been refined from crude oil, or any synthetic oil, that has been used and as result of such use is contaminated by physical or chemical impurities as defined in 40 CFR 279.1. This includes used oil generated by the permittee, household "do-it-yourselfer", and from used oil collection centers.
(R 336.1224, R336.1225, 40 CFR 279.11)
2. The permittee shall not burn in EUHEATER1 more than 60 gallons per day of the fuels listed in SC II.1.1
(R 336.1224, R336.1225)

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall remove deposited material from the ash pan of EUHEATER1 as needed to prevent re-entrainment of such materials in the exhaust. **(R 336.1224, R 336.1331)**
2. The permittee shall not operate EUHEATER1 unless the Compliance Monitoring Plan (CMP) for Used Oil specified in Appendix A, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. **(R 336.1201, R 336.1225, R 336.1911, Act 451 324.5521, 40 CFR 279)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not burn used oil fuel in EUHEATER1 unless such fuel oil or used oil is pretreated (e.g. sedimentation, filtration, etc.) to reduce water and sediment. **(R 336.1224, R 336.1331)**

V. TESTING/SAMPLING

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

1. Within 60 days after written notification from the AQD District Supervisor, the permittee shall submit a used oil fuel analysis. **(R 336.1224, R336.1225, 40 CFR 279.21(b), 40 CFR 279.11)**
2. All used oil must be acceptable for use as a fuel under federal and state used oil regulations. The allowable levels of properties and constituents of used oil are listed in Table 1 of Appendix A. **(R 336.1224, R 336.1225, R 336.1702, 40 CFR 279.11)**

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, in a satisfactory manner, the source, type, and gallons of all fuels combusted in EUHEATER1 on a daily basis as specified in SC II.2. The permittee shall keep all records on file at the facility for at least five years and make them available to the Department upon request. **(R 336.1201, R 336.1224, R 336.1225, 40 CFR 279.11)**
2. The permittee shall keep, in a satisfactory manner, all records required in Appendix A for each calendar month EUHEATER1 is operated. The permittee shall keep all records on file at the facility for at least five years and make them available to the Department upon request. **(R 336.1201, R 336.1224, R 336.1225, 40 CFR 279.11)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stack listed in the table below shall be discharged 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. SVHEATER1	10 ¹	20 ¹	R 336.1225

IX. OTHER REQUIREMENTS

1. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart JJJJJJ, as they apply to EUHEATER1. **(40 CFR Part 63 Subpart JJJJJJ)**

Footnotes:

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

APPENDIX A

Compliance Monitoring Plan (CMP) for Used Oil

- A. All used oil must be acceptable for use as a fuel under federal and state used oil regulations. An analysis must be available for each new batch and must be kept on file.**

Each shipment from a used oil supplier must be accompanied by documentation demonstrating that the used oil meets specification levels in 40 CFR 279.11 (Standards for the Management of Used Oil) and R 299.9809, promulgated pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. The documentation shall include supplier certification and analytical data, both of which are for oil generated within the most recent 12-month period. The analysis must be representative of the used oil accepted for use as a fuel by the permittee. Separate truckloads may have identical documentation from the supplier if they are generated by the same process from a single supplier. The analysis shall be reviewed by the permittee to ensure that the used oil properties and constituents do not exceed any of the used oil specifications contained in Table 1 prior to burning in EUHEATER1.

Table 1 – Allowable Used Oil Specifications

Property/Constituent	Allowable Level
Higher Heating Value	17,000 Btu per pound (minimum)
Arsenic	5.0 ppmw (maximum)
Cadmium	2.0 ppmw (maximum)
Chromium	10.0 ppmw (maximum)
Lead	100.0 ppmw (maximum)
Sulfur	1.0 percent (maximum)
Polychlorinated Biphenyls (PCBs)	1.0 ppmw (maximum)
Total Halogens	1,000 ppmw (maximum)

Verification: Analysis records for each shipment shall be maintained a minimum of 5 years.