

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

October 4, 2024

PERMIT TO INSTALL
176-18A

ISSUED TO
Energy Developments Michigan, LLC Brent Run Landfill

LOCATED AT
8335 West Vienna Road
Montrose, Michigan 48457

IN THE COUNTY OF
Genesee

STATE REGISTRATION NUMBER
N5987

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. 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: September 16, 2024	
DATE PERMIT TO INSTALL APPROVED: October 4, 2024	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS2

POLLUTANT / MEASUREMENT ABBREVIATIONS.....3

GENERAL CONDITIONS4

EMISSION UNIT SPECIAL CONDITIONS.....6

 EMISSION UNIT SUMMARY TABLE6

FLEXIBLE GROUP SPECIAL CONDITIONS.....7

 FLEXIBLE GROUP SUMMARY TABLE7

 FGICEENGINES8

APPENDIX 7-2: Emission Calculations..... 14

COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

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 Environment, Great Lakes, and Energy, 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 Rule 210 (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 Rule 219 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 Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(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 Rule 301, 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 Rule 303 (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 Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT 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 (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUENGINE3	This emission unit, and any replacement of this unit as applicable under R 336.1285(a)(vi), is for a Caterpillar G3520C lean burn RICE rated at 2,242 bhp fueled with treated landfill gas to produce electricity.	November 2012	FGICEENGINES, FGRICENSPS, FGRICEMACT
EUENGINE4	This emission unit, and any replacement of this unit as applicable under R 336.1285(a)(vi), is for a Caterpillar G3520C lean burn RICE rated at 2,242 bhp fueled with treated landfill gas to produce electricity.	November 2012	FGICEENGINES, FGRICENSPS, FGRICEMACT
EUENGINE5	This emission unit, and any replacement of this unit as applicable under R 336.1285(a)(vi), is for a Caterpillar G3512 lean burn RICE rated at 861 bhp fueled with treated landfill gas to produce electricity	November 2010	FGICEENGINES, FGRICENSPS, FGRICEMACT
EUENGINE6	This emission unit, and any replacement of this unit as applicable under R 336.1285(a)(vi), is for a Caterpillar G3520C lean burn RICE rated at 2,242 bhp fueled with treated landfill gas to produce electricity	August 2016	FGICEENGINES, FGRICENSPS, FGRICEMACT
EUENGINE7	This emission unit, and any replacement of this unit as applicable under R 336.1285(a)(vi), is for a Caterpillar G3520C lean burn reciprocating internal combustion engine (RICE) rated at 2,242 bhp fueled with treated landfill gas to produce electricity	April 2019	FGICEENGINES, FGRICENSPS, FGRICEMACT

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 336.1291.

FLEXIBLE GROUP SPECIAL CONDITIONS

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
FGICEENGINES	Lean burn reciprocating internal combustion engine(s) fueled with treated landfill gas and used to produce electricity. This flexible group includes the emission units below and any subsequent replacements for those units as applicable under R 336.1285(a)(vi).	EUENGINE3, EUENGINE4, EUENGINE5, EUENGINE6, EUENGINE7

FGICEENGINES FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Lean burn reciprocating internal combustion engine(s) fueled with treated landfill gas and used to produce electricity. This flexible group includes the emission units below and any subsequent replacements for those units as applicable under R 336.1285(a)(vi).

Emission Unit: EUENGINE3, EUENGINE4, EUENGINE5, EUENGINE6, EUENGINE7

POLLUTION CONTROL EQUIPMENT

Air-to-fuel ratio controller on each engine.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NO _x	4.94 pph (Limit applies to each engine)	Hourly	EUENGINE3, EUENGINE4, EUENGINE6, EUENGINE7	SC V.1, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3), R 336.2803, R 336.2804
2. NO _x	5.10 pph	Hourly	EUENGINE5	SC V.1, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3), R 336.2803, R 336.2804
3. NO _x	108.7 tpy	12-month rolling time period as determined at the end of each month	FGICEENGINE S	SC VI.4, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3)
4. CO	16.30 pph (Limit applies to each engine)	Hourly	EUENGINE3, EUENGINE4, EUENGINE6, EUENGINE7	SC V.1, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3), R 336.2804
5. CO	7.84 pph	Hourly	EUENGINE5	SC V.1, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3), R 336.2804
6. SO ₂	3.56 pph (Limit applies to each engine)	Hourly	EUENGINE3, EUENGINE4, EUENGINE6, EUENGINE7	SC V.1, SC V.4, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3), R 336.2803, R 336.2804
7. SO ₂	1.96 pph	Hourly	EUENGINE5	SC V.1, SC V.4, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3), R 336.2803, R 336.2804

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
8. SO ₂	71.0 tpy	12-month rolling time period as determined at the end of each month	FGICEENGINE S	SC VI.3, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3)
9. PM ₁₀	0.73 pph (Limit applies to each engine)	Hourly	EUENGINE3, EUENGINE4, EUENGINE6, EUENGINE7	SC V.2, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3), R 336.2803, R 336.2804
10. PM ₁₀	0.40 pph	Hourly	EUENGINE5	SC V.2, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3), R 336.2803, R 336.2804
11. PM _{2.5}	0.73 pph (Limit applies to each engine)	Hourly	EUENGINE3, EUENGINE4, EUENGINE6, EUENGINE7	SC V.2, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3) R 336.2803, R 336.2804
12. PM _{2.5}	0.40 pph	Hourly	EUENGINE5	SC V.2, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3) R 336.2803, R 336.2804
13. PM _{2.5}	14.5 tpy	12-month rolling time period as determined at the end of each month	FGICEENGINE S	SC VI.4, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3)
14. VOC (formaldehyde is included in this limit)	4.94 pph (Limit applies to each engine)	Hourly	EUENGINE3, EUENGINE4, EUENGINE6, EUENGINE7	SC V.1, SC VI.4, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3)
15. VOC (formaldehyde is included in this limit)	1.04 pph	Hourly	EUENGINE5	SC V.1, SC VI.4, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3)
16. VOC (formaldehyde is included in this limit)	91.1 tpy	12-month rolling time period as determined at the end of each month	FGICEENGINE S	SC VI.4, SC VI.5, SC VI.6	R 336.1205(1)(a) & (3)
17. Formaldehyde	2.10 pph ¹ (Limit applies to each engine)	Hourly	EUENGINE3, EUENGINE4, EUENGINE6, EUENGINE7	SC V.3, SC VI.5, SC VI.6	R 336.1225(2)
18. Formaldehyde	0.75 pph ¹	Hourly	EUENGINE5	SC V.3, SC VI.5, SC VI.6	R 336.1225(2)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Treated Landfill Gas	1,546.26 MMscf per year	12-month rolling time period as determined at the end of each calendar month	FGICEENGINES	SC VI.2	R 336.1205(1)(a) & (3)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only burn landfill gas in FGICEENGINES. The landfill gas must be treated in a system which complies with 40 CFR 63.1959(b)(2)(iii)(C). **(R 336.1225, R 336.1331, R 336.1702, 40 CFR 63.1959(b)(2)(iii)(C))**
2. The permittee shall not operate FGICEENGINES unless the malfunction abatement/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.

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/preventative maintenance plan to be inadequate, the AQD District Supervisor may request modification of the plan to address those inadequacies. **(R 336.1702(a), R 336.1910, R 336.1911, R 336.1912, R 336.2803, R 336.2804)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate each engine of FGICEENGINES unless an air-to-fuel ratio controller is installed, maintained and operated in a satisfactory manner. **(R 336.1702, R 336.1910)**
2. The design capacity of EUENGINE3, EUENGINE4, EUENGINE6, and EUENGINE7 shall not exceed 2,242 hp each, as specified by the equipment manufacturer. **(R 336.1205(1)(a), R 336.1225, R 336.1702, R 336.2803, R 336.2804)**
3. The permittee shall equip and maintain FGICEENGINES with a device to monitor and record the daily fuel usage. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a))**

V. TESTING/SAMPLING

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

1. The permittee shall verify emission rates for each engine in FGICEENGINES for NO_x, CO, VOC, and SO₂ at a minimum, every 5 years from the date of completion of the most recent stack test, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in the table below:

Pollutant	Test Method Reference
NO _x	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOC (Includes formaldehyde)	40 CFR Part 60, Appendix A; or Method 320 of Appendix A of 40 CFR Part 63
SO ₂	40 CFR Part 60, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. If a recent (less than 1 year) NO_x and/or CO stack test from any engine has been verified by the AQD, the permittee may use it for compliance with this initial test only. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804)**

- Upon request of the District Supervisor, the permittee shall verify PM₁₀ and PM_{2.5} emission rates for one or more engines in FGICEENGINES by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using the approved EPA Method listed in 40 CFR Part 51, Appendix M: An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804)**
- The permittee shall verify formaldehyde emission rates from the three engines EUENGINE3 or EUENGINE4, EUENGINE5, and EUENGINE7 of FGICEENGINES, at a minimum, every 5 years from the date of completion of the most recent stack test, by testing at owner's expense, in accordance with Department requirements. The permittee may petition the AQD District Office to test a representative engine(s) for FGICEENGINES. Testing shall be performed using an approved EPA Method listed in the table below:

Pollutant	Test Method Reference
Formaldehyde	40 CFR Part 60, Appendix A; or Method 320 of Appendix A of 40 CFR Part 63

An alternate method or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1225, R 336.2001, R 336.2003, R 336.2004)**

4. The permittee shall verify the hydrogen sulfide (H₂S) or total reduced sulfur (TRS) content of the landfill gas burned in FGICEENGINES monthly by gas sampling (e.g. Draeger Tubes, Tedlar Sampling Bags, etc.) and semi-annually by gas sampling using an EPA approved method and laboratory analysis, at the owner's expense, in accordance with Department requirements. If at any time, the H₂S (TRS equivalent) concentration of the landfill gas sample exceeds 640 ppmv, the permittee shall sample and record the H₂S (TRS equivalent) concentration of the landfill gas weekly 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 H₂S (TRS equivalent) concentration of the landfill gas (determined from 4 consecutive weekly samples) is maintained below 640 ppmv for one month after an exceedance, the permittee may resume monthly monitoring and recordkeeping. If after one year, each of the monthly concentrations of the H₂S (TRS equivalent) of the landfill gas are below 640 ppm, the permittee may petition the AQD District Supervisor to reduce the frequency of gas sampling. The AQD must approve the frequency of sampling before it is initiated. No less than 30 days prior to the initial test for each type of gas sampling, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to the first test for each type of gas sampling. Thereafter, the permittee shall submit a test plan upon the request of the AQD District Supervisor or if any changes are made to the approved testing protocol. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.2001, R 336.2003, R 336.2004)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1225, R 336.1702, R 336.2803, R 336.2804)**
2. The permittee shall continuously monitor and record, in a satisfactory manner, the landfill gas usage for FGICEENGINES. **(R 336.1205, R 336.2803, R 336.2804)**
3. The permittee shall calculate and record the SO₂ emission rates from FGICEENGINES on a monthly and 12-month rolling basis, using the equation in Appendix 7-2. The calculations shall utilize, at a minimum, weekly and/or monthly gas sampling data collected (SC V.3), the monthly gas usage for each engine, monthly hours of operation for each engine, and the ratio of total sulfur to sulfur as H₂S from the most recent laboratory test. All records shall be kept on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.2803, R 336.2804)**
4. The permittee shall calculate and record the NO_x, PM_{2.5}, and VOC (including formaldehyde) emission rate from FGICEENGINES on a monthly and 12-month rolling basis, using Appendix 7-2. **(R 336.1205(3), R 336.1702(a))**
5. The permittee shall maintain the following record for each engine in FGICEENGINES. The following information shall be recorded and kept on file at the facility:
 - a) Engine manufacturer;
 - b) Date engine was manufactured;
 - c) Engine model number;
 - d) Engine horsepower;
 - e) Engine serial number;
 - f) Engine specification sheet;
 - g) Date of initial startup of the engine; and
 - h) Date engine was removed from service at this stationary source.All of the above information shall be stored in a format acceptable to the AQD District Supervisor. **(R 336.1205, R 336.1225, R 336.1301, R 336.1331, R 336.1702, R 336.1910, R 336.1911, R 336.1912, R 336.2803, R 336.2804)**
6. The permittee shall maintain records of all information necessary for all notifications and reports for each engine in FGICEENGINES, as specified in these special conditions as well as that information necessary to

demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:

- a) Compliance tests and any testing required under the special conditions of this permit;
- b) Monitoring data for the hours of operation, volumetric flow rate and landfill gas usage;
- c) Calculated amount of landfill gas combusted in each engine on a monthly and 12-month rolling basis;
- d) Hours of operation on a monthly and 12-month rolling basis;
- e) Monthly average Btu content of the landfill gas burned;
- f) Manufacturer's data, specifications, and operating and maintenance procedures;
- g) Maintenance activities conducted according to the PM/MAP;
- h) All calculations necessary to show compliance with the limits contained in this permit.

All of the above information shall be stored in a format acceptable to the AQD District Supervisor.

(R 336.1205, R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, R 336.1912, R 336.2802, R 336.2803, R 336.2804)

See Appendix 7-2

VII. REPORTING

1. The permittee shall notify the AQD district office within one week of when the frequency of the gas sampling changes for any reason. **(R 336.1205, R 336.1225, R 336.2001, R 336.2003, R 336.2004)**
2. In accordance with R 336.1285(2)(a)(vi) and R 336.1278, engine replacements can only be done under a normal maintenance program. If any engine in FGICEENGINES is replaced with an equivalent-emitting or lower-emitting engine, the permittee shall notify the AQD District Supervisor of such change-out and submit a description of the engine and acceptable emissions data to show that the alternate engine is equivalent-emitting or lower-emitting. The data shall be submitted within 30-days of the engine change out. **(R 336.1205, R 336.1702(a), R 336.1911, R 336.2803, R 336.2804)**

VIII. STACK/VENT RESTRICTION(S)

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. SVICEENG3	14 ²	75 ²	R 336.1225, R 336.2803, R 336.2804
2. SVICEENG4	14 ²	75 ²	R 336.1225, R 336.2803, R 336.2804
3. SVICEENG5	12 ²	30 ²	R 336.1225, R 336.2803, R 336.2804
4. SVICEENG6	14 ²	70 ²	R 336.1225, R 336.2803, R 336.2804
5. SVICEENG7	14 ²	70 ²	R 336.1225, R 336.2803, R 336.2804

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

APPENDIX 7-2: Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FGICEENGINES.

Procedures for Calculating Emissions

The permittee shall demonstrate compliance with the emission limits in this permit by using the following methods.

Vendor Data or Stack Testing:

The permittee shall use emission factors from source specific testing (if stack test data is available, use most recent stack test data) or vendor data, as available for each emission unit included in FGICEENGINES. The permittee may use emission factors contained in the most recent AP-42 (Compilation of Air Pollutant Emission Factors) or the most recent FIRE (Factor Information Retrieval) database if vendor or stack testing data is not available. If emission factors from other sources are used, the permittee shall obtain the approval of the AQD District Supervisor before using the emission factors to calculate emissions. The permittee shall document the source of each emission factor used in the calculations.

Calculation for Monthly SO₂ Emissions using gas sampling:

The following calculation for SO₂ emissions shall utilize the monthly average of the weekly (or daily, if required) H₂S concentration measurements from gas sample data collected, the monthly gas usage, monthly hours of operation, and the ratio of total sulfur to sulfur as H₂S from the most recent laboratory test. **Note:** The TRS to H₂S ratio must be used in the calculation when a Draeger Tube or other sampling method does not measure the total sulfur in the gas.

SO₂ Emissions (tons per month)

$$= \frac{(X \text{ scf } H_2S)}{MMcf \text{ LFG}} \times \frac{1.1733 \text{ mols } S}{1 \text{ ft}^3 \text{ H}_2S} \times \frac{34.08 \text{ grams } H_2S}{1 \text{ mol } S} \times \frac{1 \text{ lb}}{453.59 \text{ grams}} \times \frac{1 \text{ ton}}{2,000 \text{ lbs}} \times \frac{1.88 \text{ SO}_2}{H_2S} \frac{MW}{\text{H}_2S} \\ \times \text{LFG} \times \text{Ratio} \frac{TRS}{H_2S}$$

Where:

X = ppm sulfur content, as H₂S

S = Sulfur

MW = Molecular Weight of SO₂ to H₂S

LFG = Actual Landfill Gas Usage per month (ft³/month)

Ratio TRS to H₂S = Determined from most recent laboratory test