

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

FEBRUARY 3, 2021

**PERMIT TO INSTALL
3-21**

**ISSUED TO
THE ANDERSONS MARATHON HOLDINGS, LLC**

**LOCATED AT
26250 B DRIVE NORTH
SHERIDAN TOWNSHIP, MICHIGAN 49224**

**IN THE COUNTY OF
CALHOUN**

**STATE REGISTRATION NUMBER
B8570**

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: January 22, 2021	
DATE PERMIT TO INSTALL APPROVED: February 3, 2021	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS 3
POLLUTANT / MEASUREMENT ABBREVIATIONS..... 4
GENERAL CONDITIONS 5
FGFACILITY CONDITIONS..... 7
APPENDIX 4. Recordkeeping..... 10

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
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	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 condition 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)**

FGFACILITY CONDITIONS

DESCRIPTION

The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

Baghouses C-20, C-30, C-30A-1, C-30A-2, C-30A-3, C-30A-4, C-70A, P-70, and P-90; Scrubbers C-40, C-40A, and C-120; Flares P-50, P-50A, and P-60; Thermal Oxidizers C-10 and C-10A; and internal floating roofs

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	249 tpy*	12-month rolling time period**	FGFACILITY	SC VI.2	R 336.1205(1)
2. VOC	199 tpy*	12-month rolling time period**	FGFACILITY	SC VI.2	R 336.1205(1)
3. CO	222 tpy*	12-month rolling time period**	FGFACILITY	SC VI.2	R 336.1205(1)
4. Hazardous Air Pollutants (HAPs)	less than 10 tpy of any individual HAP	12-month rolling time period**	FGFACILITY	SC VI.3	R 336.1205(1)
5. HAPs	less than 25 tpy of aggregate of HAPs	12-month rolling time period**	FGFACILITY	SC VI.3	R 336.1205(1)
6. PM	90 tpy*	12-month rolling time period**	FGFACILITY	SC VI.2	R 336.1205(1)
7. PM10	65 tpy*	12-month rolling time period**	FGFACILITY	SC VI.2	R 336.1205(1)
8. PM2.5	60 tpy*	12-month rolling time period**	FGFACILITY	SC VI.2	R 336.1205(1)
9. SO ₂	78 tpy*	12-month rolling time period**	FGFACILITY	SC VI.2	R 336.1205(1)

* Excluding fugitive emissions.

** 12-month rolling time period as determined at the end of each calendar month.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total ethanol and denaturant throughput	161 million gallons per year	12-month rolling time period*	FGFACILITY	SC VI.5	R 336.1205(1), R 336.1225, R 336.1702(a)
2. Denaturant throughput	8.5 million gallons per year	12-month rolling time period*	FGFACILITY	SC VI.5	R 336.1205(1), R 336.1225, R 336.1702(a)

* 12-month rolling time period as determined at the end of each calendar month.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall submit a malfunction abatement plan (MAP) for FGFACILITY to the AQD District Supervisor. The interim MAP and any future revised MAP shall be subject to review and approval, as provided in Rule 911. The permittee shall not operate any equipment in FGFACILITY unless the MAP, revised as necessary according to the procedures of Rule 911, is implemented and maintained. The MAP shall include procedures for maintaining and operating equipment in a satisfactory manner, including procedures for minimizing emissions during malfunction events, and a program for corrective action for such events. If the MAP 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 MAP within 45 days after such an event occurs. **(R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)):**
 - a. The permittee shall submit an interim MAP to the AQD District Supervisor before beginning operation of any equipment in FGFACILITY.
 - b. No later than 270 days after commencing operation of any equipment in FGFACILITY, the permittee shall revise the MAP, based on equipment operating history and the results of the emission testing, and submit the revised MAP to the AQD District Supervisor.
2. The permittee shall submit an odor management plan (OMP) for FGFACILITY to the AQD District Supervisor. The OMP shall include procedures for maintaining and operating equipment in a manner that minimizes the release of odors to the outside air, and a program for corrective action for such events. If the OMP fails to address or inadequately addresses an event that results in an odor release to the outside air at the time the plan is initially developed, the owner or operator shall revise the OMP within 45 days after such an event occurs¹ **(R 336.1901):**
 - a. The permittee shall submit an interim OMP to the AQD District Supervisor before beginning operation of any equipment in FGFACILITY. **(R 336.1901)**
 - b. No later than 270 days after commencing operation of any equipment in FGFACILITY, the permittee shall revise the OMP based on equipment operating history and submit the revised OMP to the AQD District Supervisor. **(R 336.1901)**
3. The permittee shall not operate FGFACILITY unless an emergency response plan, to be followed in the event of an emergency, has been submitted to the local fire department or county emergency response agency and is implemented and maintained. By October 1 each year, the permittee shall review this plan with the local fire department or emergency response agency and make any necessary updates.¹ **(R 336.1901)**
4. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and DD, as they apply to FGFACILITY. **(40 CFR Part 60 Subparts A and DD)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. 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.¹ **(R 336.1901)**
2. The permittee shall install and maintain fencing, warning signs, and/or other measures as necessary to attempt to prevent unauthorized individuals from entering the plant property and buildings.¹ **(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))**

NA

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 by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205(1), 40 CFR 52.21(c) and (d))**
2. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period VOC, CO, PM, PM10, PM2.5, and SO₂ emission calculations to demonstrate compliance with the limits in Special Conditions I.2, I.3, I.6, I.7, I.8, and I.9, respectively. These calculations shall be based upon emission test results, continuous emission monitor data, ethanol production rate records, hours of operation records, and fuel usage records. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1))**
3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period individual HAP and total HAP emission calculations to demonstrate compliance with the limits in Condition I.4 and I.5. These calculations shall be based upon emission test results, continuous emission monitor data, ethanol production rate records, hours of operation records, and fuel usage records. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1))**
4. The permittee shall calculate and keep records of the annual emissions of VOC from FGFACILITY described in Appendix 4, in tons per calendar year. Calculations and record keeping shall begin on December 20, 2012 and shall continue for ten (10) years. **(R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))**
5. The permittee shall keep, in a satisfactory manner, records of the monthly and 12-month rolling time period, as determined at the end of each calendar month, denaturant and combined ethanol and denaturant throughput for FGFACILITY. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1), R 336.1225, R 336.1702(a))**
6. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period NO_x emission calculations to demonstrate compliance with the limit in Special Condition I.1. These calculations shall be based upon emission test results for FGOXID2 and FGCHP; continuous emission monitor data for FGOXID; continuous emission monitor data for FGCHP, if available; continuous parameter monitor data for FGCHP, if available; fuel use records for FGOXID2, FGCHP, EU-CT, EU-DB, and EU-DB in fresh air firing mode; ethanol production records; hours of operation records for EU-DIESELPUMP and EU-DIESELPUMP2; and hours of operation records for FGCHP when operating at temperatures less than 0°F and shall include appropriate data for equipment covered by other permits, grandfathered equipment and exempt equipment. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1))**

VII. REPORTING

1. The permittee shall provide written notification of construction and operation for FGFACILITY to comply with the federal NSPS, 40 CFR 60.7. This notification shall be submitted to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. **(40 CFR 60.7)**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

APPENDIX 4. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in FGFACILITY. Alternative formats must be approved by the AQD District Supervisor.

Recordkeeping Provisions for Source Using Actual to Projected-Actual Applicability Test

All information in this Appendix shall be maintained pursuant to R 336.2818 and 40 CFR 52.21(r)(6)(i) for ten years after issuance of Permit to Install 120-05F (December 20, 2012), and shall be provided to the Department for the first year and thereafter made available to the Department upon request.

A. Project Description:

2012 Production increase.

B. Applicability Test Description:

The actual to projected actual applicability test was used to demonstrate that PSD did not apply to the 2012 production increase.

C. Emission Projections:

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual	Projected Actual/Potential	Excluded	
FGFACILITY	VOC	18.43	53.98	-	NA

NOTE: The Andersons did not consider any emissions to be excludable for this applicability test.