

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

October 19, 2022

**PERMIT TO INSTALL**  
135-22

**ISSUED TO**  
Kinder Morgan RNG Holdco, LLC

**LOCATED AT**  
21545 Cannonsville Road  
Pierson, Michigan 49339

**IN THE COUNTY OF**  
Montcalm

**STATE REGISTRATION NUMBER**  
N2804

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: <b>July 15, 2022</b>	
DATE PERMIT TO INSTALL APPROVED: <b>October 19, 2022</b>	SIGNATURE: <i>MaryAnn Dolcharty</i>
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

## PERMIT TO INSTALL

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## 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 <sub>2</sub> 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 <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	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 <sub>2</sub>	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)**

## 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
EUENGINE1	This emission unit, and any replacement of this unit as applicable under R 336.1285(2)(a)(vi), is for a CAT G3520C reciprocating internal combustion engine rated at 2,242 brake-horsepower (bhp) fueled with treated landfill/digester gas to produce electricity.	07-01-2018	FGRICEENG FGRICEMACT
EUENGINE2a	This emission unit, and any replacement of this unit as applicable under R 336.1285(2)(a)(vi), is for a CAT G3520C reciprocating internal combustion engine rated at 2,242 bhp fueled with treated landfill/digester gas to produce electricity.	TBD	FGRICEENG FGRICEMACT FGRICENSPS
EUENGINE3	This emission unit, and any replacement of this unit as applicable under R 336.1285(2)(a)(vi), is for a CAT G3520C reciprocating internal combustion engine rated at 2,242 brake-horsepower (bhp) fueled with treated landfill/digester gas to produce electricity.	10-07-2019	FGRICEENG FGRICEMACT FGRICENSPS

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.

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGRICEENG	Reciprocating internal combustion engines fueled with treated landfill gas and used to produce electricity.	EUENGINE1 EUENGINE2a EUENGINE3
FGRICENSPS	Non-emergency engine(s) greater than 500 hp, fueled with landfill/digester gas. Engine(s) ordered after June 12, 2006 and manufactured on or after July 1, 2007.	EUENGINE3 EUENGINE2a
FGRICEMACT	New and reconstructed engines located at a major source of HAP emissions, greater than 500hp, non-emergency fueled with landfill gas. Commenced construction or reconstruction on or after December 19, 2002.	EUENGINE1 EUENGINE2a EUENGINE3

**FGRICEENG**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Reciprocating internal combustion engines 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 Rule 285(2)(a)(vi).

**Emission Units:** EUENGINE1, EUENGINE2a, EUENGINE3

**POLLUTION CONTROL EQUIPMENT**

Fuel treatment system and air-to-fuel ratio controller.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	4.94 pph  (limit applies to each emission unit)	Hourly	EUENGINE1 EUENGINE2a EUENGINE3	SC V.1 SCVI.5	R 336.1205(1)(a) & (b), 40 CFR 52.21 (c) and (d)
2. CO	15.7 pph  (limit applies to each emission unit)	Hourly	EUENGINE1 EUENGINE2a EUENGINE3	SC V.1 SCVI.5	R 336.1205(1)(a) & (b), 40 CFR 52.21 (c) and (d)
3. CO	206.7 tpy (limit applies to the flexible group)	12-month rolling time period as determined at the end of each calendar month	FGRICEENG	SC V.1, SC VI.3, SC VI.5	R 336.1205(1)(a) & (b), 40 CFR 52.21 (d)
4. SO <sub>2</sub>	5.78 pph (limit applies to each emission unit)	Hourly	EUENGINE1 EUENGINE2a EUENGINE3	SC V.1 SCVI.5	R 336.1205(1)(a) & (b), 40 CFR 52.21 (c) and (d)
5. SO <sub>2</sub>	76.0 tpy (limit applies to the flexible group)	12-month rolling time period as determined at the end of each calendar month	FGRICEENG	SC V.4, SC VI.3, SC VI.5	R 336.1205(1)(a) & (b)
6. VOC*	4.94 pph (limit applies to each emission unit)	Hourly	EUENGINE1 EUENGINE2a EUENGINE3	SC V.3 SC VI.5	R 336.1702(a)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
7. Formaldehyde	2.08 pph <sup>1</sup> (limit applies to each emission unit)	Hourly	EUENGINE1 EUENGINE2a EUENGINE3	SC V.2, SC VI.5	R 336.1225(1)(a)

\*VOC limit includes formaldehyde.

**II. MATERIAL LIMITS**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.Treated Landfill Gas	913.58 million cubic feet per year*	12-month rolling time period as determined at the end of each calendar month	FGRICEENG	SC VI.2	R 336.1205(1)(a) & (b)

\*Based on a lower hearing value of 455 BTU/standard cubic feet.

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall only burn treated landfill gas in FGRICEENG. **(R 336.1225, R 336.1331, R 336.1702)**
2. No later than 30 days after start-up of EUENGINE2a, the permittee shall submit to the AQD District Supervisor, for review and approval, a malfunction abatement/preventative maintenance plan for FGRICEENG. After approval of the malfunction abatement/preventative maintenance plan by the AQD District Supervisor, the permittee shall not operate FGRICEENG 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, pollution control equipment, 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, pollution control equipment, 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, 40 CFR 52.21(c) & (d))**

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate any engine in FGRICEENG unless the engines air/fuel ratio controller is installed, maintained and operated in a satisfactory manner. **(R 336.1702(a), R 336.1910)**

2. The design capacity of EUENGINE1, EUENGINE2a, and EUENGINE3 shall each not exceed 2,242 bhp, as specified by the equipment manufacturer. **(R 336.1205(1)(a) & (b), R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))**
3. The permittee shall equip and maintain FGRICEENG with a device to continuously monitor and record the fuel usage. **(R 336.1205(1)(a) & (b), R 336.1225, R 336.1702)**
4. The permittee shall equip and maintain FGRICEENG with non-resettable hours meters to track the operating hours. **(R 336.1205(1)(a) & (b))**

**V. TESTING/SAMPLING**

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

1. Within 180 days after initial startup of each engine in FGRICEENG and within every 5 years from the date of completion of the most recent stack test for that engine, the permittee shall verify NOx, CO, and SO<sub>2</sub> emission rates from each engine in FGRICEENG, 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:

<b>Pollutant</b>	<b>Test Method Reference</b>
NOx	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
SO <sub>2</sub>	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. 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. **(R 336.1205(1)(a) & (b), R 336.1225, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**

2. Within 180 days after initial startup of each engine in FGRICEENG and within every 5 years from the date of completion of the most recent stack test of each engine, the permittee shall verify formaldehyde emission rates from each engine in FGICENGINES, 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:

<b>Pollutant</b>	<b>Test Method Reference</b>
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. 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. **(R 336.1225, R 336.2001, R 336.2003, R 336.2004)**

3. Within 180 days after initial startup of EUENGINE2a and within every 5 years from the date of completion of the most recent stack test for each engine in FGRICEENG, the permittee shall verify total VOC emission rates from each engine, 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:

<b>Pollutant</b>	<b>Test Method Reference</b>
VOC	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. 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. **(R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**

4. The permittee shall verify the hydrogen sulfide (H<sub>2</sub>S) or total reduced sulfur (TRS) content of the landfill gas burned in FGRICEENG weekly by gas sampling (e.g., Draeger Tubes, Tedlar Sampling Bags, etc.) and bi-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 H<sub>2</sub>S (TRS equivalent) concentration of the landfill gas sample exceeds 1000 ppmv, the permittee shall sample and record the H<sub>2</sub>S (TRS equivalent) concentration of the landfill gas daily 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 H<sub>2</sub>S (TRS equivalent) concentration of the landfill gas determined from at least five (5) daily consecutive samples are maintained below 1000 ppmv, for one week after an exceedance, the permittee may resume weekly monitoring and recordkeeping. 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(1)(a) & (b), R 336.1225, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21 (c) & (d))**

#### **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(1)(a) & (b), R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))**
2. The permittee shall continuously monitor and record, in a satisfactory manner, the landfill gas usage for each engine in FGRICEENG and hours of operation for each engine in FGRICEENG. **(R 336.1205(1)(a) & (b), R 336.1225, R 336.1702)**
3. The permittee shall calculate and record the SO<sub>2</sub> emission rates and mass emissions from each engine in FGRICEENG using the equation in Appendix 7-2 or other acceptable method, as determined by the AQD District Supervisor. The calculations shall utilize, at a minimum, weekly gas sampling data collected (SC V.1), the monthly gas usage, monthly hours of operation, and the ratio of total sulfur to sulfur as H<sub>2</sub>S 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(1)(a) & (b), 40 CFR 52.21(c) & (d))**
4. The permittee shall maintain the following record for each engine in FGRICEENG. 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.
  - 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(1)(a) & (b), R 336.1225, R 336.1301, R 336.1331, R 336.1702, R 336.1910, R 336.1911, R 336.1912, 40 CFR 52.21(c) & (d))**

- 5 The permittee shall maintain records of all information necessary for all notifications and reports for each engine in FGRICEENG, as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of the 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(1)(a) & (b), R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, R 336.1912, 40 CFR 52.21(c) & (d))**

See Appendix 7-2

**VII. REPORTING**

1. The permittee shall submit an initial notification as required by 40 CFR 60.7(a)(1) for each engine in FGRICEENG, if the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines become applicable to any engine installed. The notification shall include the information below, as specified in 40 CFR 60.4245 (c)(1) through (5):
  - a) Name and address of the owner or operator. **(40 CFR 60.4245(c)(1))**
  - b) The address of the affected source. **(40 CFR 60.4245(c)(2))**
  - c) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement. **(40 CFR 60.4245(c)(3))**
  - d) Emission control equipment. **(40 CFR 60.4245(c)(4))**
  - e) Fuel used. **(40 CFR 60.4245(c)(5))**
2. The permittee shall submit the initial notification to the AQD District Supervisor in an acceptable format within 30 days of commencing construction of any engine in FGRICEENG. **(40 CFR Part 60, Subpart JJJJ)**

**VIII. STACK/VENT RESTRICTIONS**

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 Requirement
1. SVENGINE1	18	46	R 336.1225, 40 CFR 52.21 (c) & (d)
2. SVENGINE2	18	46	R 336.1225, 40 CFR 52.21 (c) & (d)
3. SVENGINE3	18	46	R 336.1225, 40 CFR 52.21 (c) & (d)

**IX. OTHER REQUIREMENTS**

NA

**Footnotes:**

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

**FGRICENSPS  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Non-emergency engine(s) greater than or equal to 500 hp, fueled with landfill gas. Engine(s) ordered after June 12, 2006 and manufactured on or after July 1, 2007.

**Emission Unit:** EUENGINE3, EUENGINE2a

**POLLUTION CONTROL EQUIPMENT**

Fuel treatment system and air-to-fuel ratio controller.

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. NOx	2.0 g/bhp-hr or 150 ppmvd at 15% O <sub>2</sub>	Hourly	Each engine manufactured after 7/01/2010	SC V.1 SC VI.1	40 CFR 60.4233(e) and Table 1
2. CO	5.0 g/bhp-hr or 610 ppmvd at 15% O <sub>2</sub>	Hourly	Each engine manufactured after 7/01/2010	SC V.1 SC VI.1	40 CFR 60.4233(e) and Table 1
3. VOC	1.0 g/bhp-hr* or 80 ppmvd at 15% O <sub>2</sub> *	Hourly	Each engine manufactured after 7/01/2010	SC V.1 SC VI.1	40 CFR 60.4233(e) and Table 1

\*As stated in 40 CFR 60.4241(h) and Table 1 of Subpart JJJJ: For purposes of this subpart, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall operate and maintain each engine in FGRICENSPS such that it meets the emission limits established, over the entire life of the engine. **(40 CFR 60.4234, 40 CFR 60.4243(b))**
2. If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan for each engine in FGRICENSPS and shall, to the extent practicable, maintain and operate each engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 60.4243(b))**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall equip and maintain FGRICENSPS with non-resettable hours meters to track the operating hours. **(40 CFR 60.4243)**

#### **V. TESTING/SAMPLING**

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

1. Except as provided in 40 CFR 60.4243(b), the permittee shall conduct an initial performance test for each engine in FGRICENSPS within one year after startup of the engine and every 8760 hours of operation (as determined through the use of a non-resettable hour meter) or three years, whichever occurs first, to demonstrate compliance with the emission limits in 40 CFR 60.4233(e), unless the engine(s) have been certified by the manufacturer in accordance with 40 CFR Part 60, Subpart JJJJ and the permittee maintains the engine as required by 40 CFR 60.4243(a)(1). If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4244. No less than 30 days prior to any 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. 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. **(40 CFR 60.8, 40 CFR 60.4243, 40 CFR 60.4244, 40 CFR 60.4245, 40 CFR Part 60, Subpart JJJJ)**

#### **VI. MONITORING/RECORDKEEPING**

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

1. If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan and records of conducted maintenance for each engine in FGRICENSPS and shall, to the extent practicable, maintain and operate each engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 60.4243(b))**

#### **VII. REPORTING**

1. The permittee shall submit an initial notification as required by 40 CFR 60.7(a)(1) for each engine in FGRICENSPS if the engine(s) installed is/are not certified by an engine manufacturer to meet the emission standards in 40 CFR 60.4231. The notification shall include the information below, as specified in 40 CFR 60.4245 (c)(1) through (5):
  - a) Name and address of the owner or operator. **(40 CFR 60.4245(c)(1))**
  - b) The address of the affected source. **(40 CFR 60.4245(c)(2))**
  - c) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement. **(40 CFR 60.4245(c)(3))**
  - d) Emission control equipment. **(40 CFR 60.4245(c)(4))**
  - e) Fuel used. **(40 CFR 60.4245(c)(5))**

The permittee shall submit the initial notification to the AQD District Supervisor in an acceptable format within 30 days of commencing construction of any engine in FGRICENSPS. **(40 CFR Part 60, Subpart JJJJ)**

#### **VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the New Source Performance Standards, as specified in 40 CFR Part 60, Subpart A and Subpart JJJJ, as they apply to each engine in FGRICENSPS. **(40 CFR Part 60, Subparts A and JJJJ)**

**Footnotes:**

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

<b>FGRICEMACT FLEXIBLE GROUP CONDITIONS</b>
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**DESCRIPTION**

New and reconstructed non-emergency engines greater than 500 hp fueled with landfill/digester gas, located at a major source of HAPs. Construction or reconstruction commenced on or after December 19, 2002.

**Emission Units:** EUENGINE1, EUENGINE2a, EUENGINE3

**POLLUTION CONTROL EQUIPMENT**

Fuel treatment system and air-to-fuel ratio controller.

**I. EMISSION LIMITS**

NA

**II. MATERIAL LIMITS**

NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. Each engine in FGRICEMACT shall operate in a manner which reasonably minimizes HAP emissions. **(40 CFR 63.6625(c))**
2. Each engine in FGRICEMACT shall operate in a manner which minimizes time spent at idle during startup and minimizes the startup time to a period needed for appropriate and safe loading of each engine, not to exceed 30 minutes. **(40 CFR 63.6625(h))**

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The engines in FGRICEMACT shall equip and maintain separate fuel meters to monitor and record the daily fuel usage and volumetric flow rate of each fuel used. **(40 CFR 63.6625(c))**

**V. TESTING/SAMPLING**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3), 40 CFR 63.6660)**

1. The engines in FGRICEMACT, which fire landfill gas or digester gas equivalent to 10% or more of the gross heat input on an annual basis, must monitor and record the daily fuel usage with separate fuel meters to measure the volumetric flow rate of each fuel. **(40 CFR 63.6625(c))**

**VII. REPORTING**

NA

**VIII. STACK/VENT RESTRICTIONS**

NA

**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 A and Subpart ZZZZ, as they apply to each engine in FGRICEMACT. **(40 CFR Part 63, Subparts A and ZZZZ)**

**Footnotes:**

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

## 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

Fuel treatment system and air-to-fuel ratio controller for the engines.

#### I. EMISSION LIMIT(S)

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. CO	225.2 tpy <sup>a, b</sup>	12-month rolling time period as determined at the end of each calendar month	SOURCEWIDE	SC VI.1 SC VI.2	R 336.1205(1)(a) & (b)
2. SO <sub>2</sub>	93 tpy <sup>a, b</sup>	12-month rolling time period as determined at the end of each calendar month	SOURCEWIDE	SC VI.1 SC VI.2	R 336.1205(1)(a) & (b)

<sup>a</sup> The Source-Wide limits are based on a lower heating value (LHV) of 455 BTU per cubic foot

<sup>b</sup> The potential emissions are restricted by the material limit in FGRICEENG, projected maximum LFG production of 1109 MMscf/yr, and exempt equipment capacity

#### II. MATERIAL LIMIT(S)

NA

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

#### IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 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(1)(a) & (b), 40 CFR 52.21(c) & (d))

2. The permittee shall keep in a satisfactory manner, monthly and 12-month rolling time period emission calculation records of CO and SO<sub>2</sub> for all equipment Source-Wide. If stack test results for any emission unit exist, the permittee may use those stack test results as the basis for the emission factor used subject to the approval of the AQD. If stack test results do not exist for a specific pollutant, the permittee shall use the applicable emission factor listed in Appendix 7-2 to estimate the emissions. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(1)(a) & (b), 40 CFR 52.21(d))**

**See Appendix 7-2**

**VII. REPORTING**

NA

**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

## APPENDIX 7-2 Emission Calculations

The permittee shall demonstrate compliance with the emission limits in this permit by vendor data, stack testing, and/or gas testing.

Vendor Data or Stack Testing:

The permittee shall use emission factors from vendor data or from source specific testing (if stack test data is available, use most recent stack test data), as available for each emission unit included Source-Wide. The permittee shall 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 CO Emissions:

The following calculation for a CO emission factor in lb/MMcf of Landfill Gas shall utilize the lb/MMBTU emission factor multiplied by the monthly average BTU content of landfill gas. The lb CO/MMcf of Landfill Gas shall be multiplied by the amount of landfill gas used to get monthly and 12-month rolling mass emissions.

$$CO \text{ Emission Factor} \left( \frac{lb \text{ CO}}{MMcf \text{ LFG}} \right) = \frac{(lb \text{ CO})}{MMBTU} \times \frac{BTU}{scf}$$

Emission Factors from Vendor Data:

RICE 3520 = 1.32 lb/MMBTU

Open Flare = 0.37 lb/MMBTU

Calculation for Monthly SO<sub>2</sub> Emissions:

The following calculation for SO<sub>2</sub> emissions shall utilize the monthly average of the weekly (or daily, if required) H<sub>2</sub>S concentration measurements from test data collected, the monthly gas usage, monthly hours of operation, and the ratio of total sulfur to sulfur as H<sub>2</sub>S from the most recent laboratory test. The lbs SO<sub>2</sub>/MMcf of Landfill Gas shall be multiplied by the amount of landfill gas used to get monthly and 12-month rolling mass emissions.

$$SO_2 \text{ Emission Factor} \left( \frac{lbs \text{ SO}_2}{MMcf \text{ LFG}} \right) = \frac{\left( \frac{X \text{ scf } H_2S}{MMcf \text{ LFG}} \right) \times \frac{1 \text{ scf } SO_2}{\text{scf } H_2S} \times \frac{64.06 \text{ lb } SO_2}{\text{mol}}}{\frac{385 \text{ cf}}{\text{mol}}}$$

Where X = ppm sulfur content, as H<sub>2</sub>S