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

February 15, 2023

PERMIT TO INSTALL 212-08C

ISSUED TO Energy Developments Byron Center, LLC

> LOCATED AT 10300 South Kent Drive SW Byron Center, Michigan 49315

> > IN THE COUNTY OF

Kent

# STATE REGISTRATION NUMBER N1324

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:

# December 8, 2022

DATE PERMIT TO INSTALL APPROVED: February 15, 2023	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

# PERMIT TO INSTALL

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## **COMMON ACRONYMS**

# POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm BTU $^{\circ}$ C CO CO <sub>2</sub> e dscf dscm $^{\circ}$ F gr HAP Hg hr HP H <sub>2</sub> S kW Ib m mg mm MM MW NMOC NO <sub>x</sub> ng PM PM10 PM2.5 pph PM10 PM2.5 pph ppmv ppmv ppmv ppmv ppmv ppmv ppmv	Actual cubic feet per minute British Thermal Unit Degrees Celsius Carbon Monoxide Carbon Dioxide Equivalent Dry standard cubic foot Dry standard cubic meter Degrees Fahrenheit Grains Hazardous Air Pollutant Mercury Hour Horsepower Hydrogen Sulfide Kilowatt Pound Meter Milligram Millimeter Million Megawatts Non-Methane Organic Compounds Oxides of Nitrogen Nanogram Particulate Matter Particulate Matter equal to or less than 10 microns in diameter Particulate Matter equal to or less than 2.5 microns in diameter Pounds per hour Parts per million Parts per million by volume Parts per
•	
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.

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- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of 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
EUICEENGINE1	This emission unit, and any replacement of this unit as applicable under R 336.1285(2)(a)(vi), is for a Caterpillar G3520C reciprocating internal combustion engine rated at 2,233 bhp fueled with treated landfill/digester gas to produce electricity.	March 23, 2009 July 12, 2019, May 30, 2020	FGICEENGINES, FGRICENSPS, FGRICEMACT
EUICEENGINE2	This emission unit, and any replacement of this unit as applicable under R 336.1285(2)(a)(vi), is for a Caterpillar G3520C reciprocating internal combustion engine rated at 2,233 bhp fueled with treated landfill/digester gas to produce electricity.	March 23, 2009 July 12, 2019, May 30, 2020	FGICEENGINES, FGRICENSPS, FGRICEMACT
EUICEENGINE3	This emission unit, and any replacement of this unit as applicable under R 336.1285(2)(a)(vi), is for a Caterpillar G3520C reciprocating internal combustion engine rated at 2,242 bhp fueled with treated landfill/digester gas to produce electricity.	TBD	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	Reciprocating internal combustion engine(s) fueled with treated landfill/digester gas and used to produce electricity.	EUICEENGINE1, EUICEENGINE2, EUICEENGINE3
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.	EUICEENGINE1, EUICEENGINE2, EUICEENGINE3
FGRICEMACT	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.	EUICEENGINE1, EUICEENGINE2, EUICEENGINE3

# FGICEENGINES FLEXIBLE GROUP CONDITIONS

### DESCRIPTION

Three reciprocating internal combustion engine(s) fueled with treated landfill/digester 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: EUICEENGINE1, EUICEENGINE2, EUICENGINE3

## POLLUTION CONTROL EQUIPMENT

NA

### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. CO	16.23 pph per engine	Hourly	EUICEENGINE1 EUICEENGINE2	SC V.1, SC VI.2, SC VI.5	40 CFR 52.21(d)
2. CO	16.30 pph	Hourly	EUICEENGINE3	SC V.1, SC VI.2, SC VI.5	40 CFR 52.21(d)
3. NOx	4.92 pph per engine	Hourly	EUICEENGINE1 EUICEENGINE2	SC V.1, SC VI.2, SC VI.5	40 CFR 52.21(c) & (d)
4. NOx	4.94 pph	Hourly	EUICEENGINE3	SC V.1, SC VI.2, SC VI.5	40 CFR 52.21(c) & (d)
5. SO <sub>2</sub>	5.55 pph (Limit applies to each engine)	Hourly	Each Engine in FGICEENGINES	SC V.1, SC VI.2, SC VI.5	40 CFR 52.21(c) & (d)
6. SO <sub>2</sub>	72.95 tpy	12-month rolling time period as determined and the end of each month	FGICEENGINES	SC V.3, SC VI.1, SC VI.3, SC VI.5	R 336.1205(3)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
7. Formaldehyde	2.10 pph <sup>1</sup> per engine	Hourly	EUICEENGINE1 EUICEENGINE2	SC V.2, SC VI.5	R 336.1225(2)
8. Formaldehyde	2.42 pph <sup>1</sup>	Hourly	EUICEENGINE3	SC V.2, SC VI.5	R 336.1225(2)

## II. MATERIAL LIMIT(S)

			Time Period /		Monitoring / Testing	Underlying Applicable
	Material	Limit	<b>Operating Scenario</b>	Equipment	Method	Requirements
1.	Treated Landfill Gas	853.05 MMscf per year	12-month rolling time period as determined at the end of each calendar month	FGICEENGINES	SC VI.2, SC VI.5	R 336.1205(1)(a)

# III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall only burn treated landfill gas in FGICEENGINES. (R 336.1225, R 336.1331, R 336.1702)
- 2. The permittee shall not operate EUICEENGINE1 and EUICEENGINE2 unless the existing malfunction abatement/preventative maintenance plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. Within 180 days after trial operation of EUICEENGINE3, the permittee shall submit, implement, and maintain a revised version of the existing malfunction abatement/preventative maintenance plan, or an alternate plan approved by the AQD District Supervisor, that incorporates requirements for EUICEENGINE3. 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, 40 CFR 52.21(c) & (d))

### 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 EUICEENGINE1 and EUICEENGINE2 shall not exceed 2,233 bhp, as specified by the equipment manufacturer. (R 336.1205(1)(a), R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))
- 3. The design capacity of EUICEENGINE3 shall not exceed 2,242 bhp, as specified by the equipment manufacturer. (R 336.1205(1)(a), R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))
- 4. The permittee shall equip and maintain FGICEENGINES with a device to monitor and record the daily fuel usage. (R 336.1205, R 336.1225, R 336.1702)

### V. TESTING/SAMPLING

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

 Within every 5 years from the date of completion of the most recent stack test, the permittee shall verify CO, NOx, and SO<sub>2</sub> emission rates from each engine in FGICEENGINES, 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	
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, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))** 

2. Within every 5 years from the date of completion of the most recent stack test, the permittee shall verify formaldehyde emission rates from one or more engines 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:

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. 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)** 

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3. The permittee shall verify the hydrogen sulfide (H<sub>2</sub>S) 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 H<sub>2</sub>S (TRS equivalent) concentration of the landfill gas sample exceeds 1,000 ppmv, the permittee shall sample and record the H<sub>2</sub>S (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 H<sub>2</sub>S (TRS equivalent) concentration of the landfill gas (determined from 4 weekly samples) is maintained below 1,000 ppmv for one month after an exceedance, the permittee may resume monthly 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 (R 336.1205(3), R 336.1225, R 336.2001, R 336.2003, R 336.2004, Department upon request. 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))

- 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, 40 CFR 52.21(c) & (d))
- 2. The permittee shall continuously monitor and record, in a satisfactory manner, the landfill gas usage for FGICEENGINES. (R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))
- 3. The permittee shall calculate and record the SO<sub>2</sub> emission rates from FGICEENGINES using the equation in Appendix A. The calculations shall utilize, at a minimum, monthly gas sampling data collected for SC V.3, the monthly gas usage, and the monthly hours of operation. All records shall be kept on file at the facility and make them available to the Department upon request. (R 336.1205(3)), 40 CFR 52.21 (c) & (d))
- 4. 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.
  - 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, 40 CFR 52.21(c) & (d))

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- 5. 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 methane 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, 40 CFR 52.21(c) & (d))

### VII. <u>REPORTING</u>

- 1. The permittee shall notify the AQD district office within 10 business days of when the frequency of the gas sampling changes for any reason. (R 336.1201(3))
- The permittee shall notify the AQD District Supervisor of an engine change-out and submit a description of the engine and acceptable emissions data to show that the alternate engine is equivalent-emitting or loweremitting. The data shall be submitted within 30-days of the engine change out. (R 336.1205, R 336.1702(a), R 336.1911, 40 CFR 52.21 (c) & (d))

### 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. SVICEENG1	14.0	65.0	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVICEENG2	14.0	65.0	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVICEENG3	14.0	60.0	R 336.1225, 40 CFR 52.21(c) & (d)

### IX. OTHER REQUIREMENT(S)

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 500 hp, fueled with landfill/digester gas. Engine(s) ordered after June 12, 2006 and manufactured on or after July 1, 2007.

Emission Unit: EUICEENGINE1, EUICEENGINE2, EUICEENGINE3

### POLLUTION CONTROL EQUIPMENT

NA

### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Applicable Requirements
NOx	3.0 g/hp-hr or 220 ppmvd at 15% O <sub>2</sub> (Limit applies to each engine)	Hourly	Each engine in FGRICENSPS	SC V.1	40 CFR 60.4233(e) Table 1 to Subpart JJJJ of Part 60
CO	5.0 g/hp-hr or 610 ppmvd at 15% O <sub>2</sub> (Limit applies to each engine)	Hourly	Each engine in FGRICENSPS	SC V.1	40 CFR 60.4233(e) Table 1 to Subpart JJJJ of Part 60
VOC*	1.0 g/hp-hr or 80 ppmvd at 15% O <sub>2</sub> (Limit applies to each engine)	Hourly	Each engine in FGRICENSPS	SC V.1	40 CFR 60.4233(e) Table 1 to Subpart JJJJ of Part 60
*per the NSPS, formaldehyde is not 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))
- 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 each engine in 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))

 The permittee shall conduct a performance test for each engine in FGRICENSPS, to verify NO<sub>x</sub>, CO, and VOC emission rates. The permittee shall conduct a performance test within 8,760 hours of operation from November 5, 2019 or three years from November 5, 2019, whichever occurs first, to demonstrate compliance. 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. <u>REPORTING</u>

NA

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

NA

### IX. OTHER REQUIREMENT(S)

 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).

# FGRICEMACT FLEXIBLE GROUP CONDITIONS

### DESCRIPTION

New, existing, 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 Unit: EUICEENGINE1, EUICEENGINE2, EUICEENGINE3

### POLLUTION CONTROL EQUIPMENT

NA

### I. EMISSION LIMIT(S)

NA

### II. MATERIAL LIMIT(S)

NA

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

- 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 minimize 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 PARAMETER(S)

1. FGRICEMACT shall equip and maintain a fuel meter to monitor and record the daily fuel usage and volumetric flow rate of the landfill gas used. (40 CFR 63.6625(c)

### 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 engines in FGRICEMACT, which fire landfill gas or digester gas equivalent to 10 percent 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. <u>REPORTING</u>

- 1. The permittee shall submit an annual report for FGRICEMACT in accordance with Table 7 of 40 CFR Part 63, Subpart ZZZZ to the appropriate AQD district office by no later than January 31.
  - The following information shall be included in this annual report:a) The fuel flow rate and the heating values that were used in the permittee's calculations. Also, the permittee must demonstrate that the percentage of heat input provided by landfill gas or digester gas is equivalent
  - to 10 percent or more of the total fuel consumption on an annual basis. (40 CFR 63.6650(g)(1))
    b) The operating limits provided in the permittee's federally enforceable permit, and any deviations from these limits. (40 CFR 63.6650(g)(2))
  - c) Any problems or errors suspected from the fuel flow rate meters. (40 CFR 63.6650(g)(3)) (40 CFR 63.6650(g), 40 CFR 63.6650(b)(5))

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

NA

### IX. OTHER REQUIREMENT(S)

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).

### APPENDIX A Procedures for Calculating Emissions

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 engine.

Calculation for Monthly SO<sub>2</sub> Emissions using gas sampling:

The following calculation for SO<sub>2</sub> emissions shall utilize the monthly 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.

Equation 1

$$SO2 \ Emissions \ (tons \ per \ month) = \frac{(X \ scf \ H_2S)}{MMcf \ LFG} \times \frac{1.1733 \ mols \ S}{1 \ ft^3 \ H_2S} \times \frac{34.08 \ grams \ H_2S}{1 \ mol \ S} \times \frac{1 \ lb}{453.59 \ grams} \times \frac{1 \ ton}{2,000 \ lbs} \times \frac{1.88 \ SO_2}{H_2S} MW \times LFG$$

Where:  $\mathbf{X} = \text{ppm sulfur content, as } H_2S$  S = Sulfur  $MW = \text{Molecular Weight of } SO_2 \text{ to } H_2S$  $\text{LFG}_{\text{monthly}} = \text{Actual Landfill Gas Usage per month (ft<sup>3</sup>/month)}$ 

Equation 2

$$SO_2 \ Emission \ Factor \ \left(lbs \frac{SO_2}{MMcf} LFG\right) = \frac{\frac{(X \ scf \ H_2S)}{MMcf \ LFG} \times \frac{1 \ scf \ SO_2}{scf \ H_2S} \times \frac{64.06 \ lb \ SO_2}{mol}}{\frac{385 \ ft^3}{mol}}$$

Where:  $\mathbf{X} = \text{ppm} \text{ sulfur content, as } H_2S$