MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

October 15, 2018

PERMIT TO INSTALL
353-08A

ISSUED TO
Coca Cola North America

LOCATED AT
38279 Red Arrow Highway
Paw Paw, Michigan

IN THE COUNTY OF
Van Buren

STATE REGISTRATION NUMBER
A6630

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: **April 19, 2018**	
DATE PERMIT TO INSTALL APPROVED: **October 15, 2018**	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant/Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
ANSI	American National Standards Institute	°C	Degrees Celsius
BACT	Best Available Control Technology	CO	Carbon Monoxide
CAA	Clean Air Act	dscf	Dry standard cubic foot
CEM	Continuous Emission Monitoring	dscm	Dry standard cubic meter
CFR	Code of Federal Regulations	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H_2S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NO_x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality	PM	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM10	PM less than 10 microns diameter
MSDS	Material Safety Data Sheet	PM2.5	PM less than 2.5 microns diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	pph	Pound per hour
NSPS	New Source Performance Standards	ppm	Parts per million
NSR	New Source Review	ppmv	Parts per million by volume
PS	Performance Specification	ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge
PTI	Permit to Install	scf	Standard cubic feet
RACT	Reasonably Available Control Technology	sec	Seconds
ROP	Renewable Operating Permit	SO_2	Sulfur Dioxide
SC	Special Condition	THC	Total Hydrocarbons
SCR	Selective Catalytic Reduction	tpy	Tons per year
SRN	State Registration Number	µg	Microgram
TAC	Toxic Air Contaminant	VOC	Volatile Organic Compounds
TEQ	Toxicity Equivalence Quotient	yr	Year
VE	Visible Emissions		
ppd	Pound per day		

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**

2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**

3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**

4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**

5. The AQD District Supervisor shall be notified, in writing, of a change in ownership or operational control of the stationary source or emission unit(s) authorized by this Permit to Install pursuant to R 336.1219. The notification shall include all of the information required by R 336.1219(1)(a) and (b). In addition, a new owner or operator must submit a written statement pursuant to R 336.1219(1)(c), agreeing to and accepting the terms and conditions of this Permit to Install, and shall notify the AQD District Supervisor of any change in the contact person for this Permit to Install. **(R 336.1219)**

6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**

7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**

8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. **(R 336.1301)**
    a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
    b) A visible emission limit specified by an applicable federal new source performance standard.
    c) A visible emission limit specified as a condition of this Permit to Install.

12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EUDIGESTER	An anaerobic treatment process for wastewater with boiler P03, boiler P04 and flare P02 for controlling the biogas created by the process.	2002	FGDIGEST
EUP02	Flare	2002	FGDIGEST
EUP03	A 33.4 MM BTU/hr natural gas and biogas fired boiler.	January 30, 2009	FGDIGEST
EUP04	A 36.7 MMBtu/hr natural gas and digester gas (biogas) boiler. The boiler operates either on 100% natural gas, or up to 7.2 MMBtu/hr biogas.	2017	FGDIGEST
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

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
FGDIGEST	An anaerobic treatment process for wastewater. Biogas generated from the wastewater treatment process is combusted in boiler P03, boiler P04 or is sent to a flare P02 for controlling the biogas created by the process (EUDIGESTER).	EUDIGESTER, EUP02, EUP03, EUP04

The following conditions apply to: FGDIGEST

DESCRIPTION: An anaerobic treatment process for wastewater. Biogas generated from the wastewater treatment process is combusted in boiler P03, boiler P04 or is sent to a flare P02 for controlling the biogas created by the process.

Emission Units: EUDIGESTER, EUP02, EUP03, EUP04

POLLUTION CONTROL EQUIPMENT: EUP02, EUP03, and EUP04

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Hydrogen Sulfide	0.13 pph[1]	Hourly	EUP02	SC V.2	R 336.1224, R 336.1225
2. Hydrogen Sulfide	3.1 ppd[1]	Daily Basis	EUP02	SC V.1, SCVI.5	R 336.1224, R 336.1225
3. NO_x	3.27 pph	Hourly	EUP03	SC V.2	R 336.1205(2)(a)
4. NO_x	3.60 pph	Hourly	EUP04	SC V.2	R 336.1205(3)(a)
5. CO	2.75 pph	Hourly	EUP03	SC V.2	R 336.1205(3)(a)
6. CO	3.02 pph	Hourly	EUP04	SC V.2	R 336.1205(3)(a)

II. MATERIAL LIMITS

1. The permittee shall only burn biogas from EUDIGESTER and either natural gas or biogas in EUP03 and EUP04[1]. **(R 336.1224, R 336.1225)**

2. The natural gas usage for EUP03and EUP04 shall not exceed 602 million standard cubic feet per 12-month rolling time period as determined at the end of each calendar month. **(**R 336.1205(1)(a) & (3))

III. PROCESS/OPERATIONAL RESTRICTIONS

1. Within 30 calendar days of the date of permit approval, the permittee shall submit to the AQD District Supervisor, for review and approval, a malfunction abatement plan for EUP02, EUP03 and EUP04. The permittee shall not operate FGDIGEST unless the approved malfunction abatement plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, EUP02, EUP03, and EUP04 or monitoring equipment during malfunction events, and a program for corrective action for such events. If the malfunction abatement 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 malfunction abatement plan within 45 days after such an event occurs[1]. **(R 336.1224, R 336.1225, R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUDIGESTER unless (EUP03 and/or EUP04) and EP02 are installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining and operating EUP03, EUP04 and EP02 as required by the malfunction abatement plan[1]. **(R 336.1224, R 336.1225, R 336.1910)**

2. The permittee shall equip and maintain EUDIGESTER with a device to monitor the biogas flow rate[1]. **(R 336.1224, R 336.1225, R 336.1910)**

3. The permittee shall equip and maintain EU03 with an auto-ignition system to ensure the flare is lit before biogas is diverted to it and to ensure the flare burns continuously while biogas is diverted to it. The permittee shall address procedures for the proper maintenance and operation of the pilot in the malfunction abatement plan[1]. **(R 336.1224, R 336.1225, R 336.1910).**

4. The permittee shall not operate EUDIGESTER unless emissions are routed to either EUP02 (the flare), and either EUP03 and/or EUP04. **(R 336.1225)**

V. TESTING/SAMPLING

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

1. The permittee shall take a weekly sample of the biogas stream from EUDIGESTER to determine the hydrogen sulfide concentration of the biogas by using a method approved by the AQD District Supervisor. The permittee may submit a request to reduce the frequency of the samples to the AQD District Supervisor[1]. **(R 336.1224, R 336.1225)**

2. Within 90 days of notification from the Air Quality Division, the permittee shall verify Hydrogen Sulfide, NOx and CO emission rates from EUP03 and EUP04 by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed below. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 45 prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit 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 336.1224, R 336.1225, 40 CFR 52.21(c) & (d))**

Reference Test Method Table

Pollutant	Test Method Reference
NO_x	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor the biogas flow rate from EUDIGESTER on a continuous basis[1]. **(R 336.1224, R 336.1225)**

2. The permittee shall keep records of the daily meter readings of the amount of biogas from EUDIGESTER sent to EUP03, EUP04, and EU02. The permittee shall keep these records on file and make them available to the department upon request[1]. **(R 336.1224, R 336.1225)**

3. The permittee shall keep records of the determinations of the hydrogen sulfide concentration of the biogas from EUDIGESTER, obtained as required by SC V.1. The permittee shall keep these records on file and make them available to the department upon request[1]. **(R 336.1224, R 336.1225)**

4. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition[1]. **(R 336.1224, R 336.1225, R 336.1205))**

5. The permittee shall calculate the hydrogen sulfide emissions from EUP02 on a weekly basis. The permittee shall keep these records on file and make them available to the department upon request[1]. **(R 336.1224, R 336.1225)**

6. The permittee shall maintain a log of any time EUP03, EUP04 and/or EU02 are off-line or not operating properly. This log shall be referred to as the maintenance status log, and the permittee shall keep the log on file and make it available to the department upon request[1]. **(R 336.1224, R 336.1225)**

7. The permittee shall keep records of the amount of natural gas combusted in EUP03, and EUP04 on a monthly basis. These records shall be kept on file and make them available to the department upon request[1]. **(R 336.1224, R 336.1225, 40 CFR Part 60, Subpart Dc)**

VII. REPORTING

NA

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVP02	10	30	R 336.1225
2. SVP03[1]	24	26*	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVP04[1]	26	24	R 336.1225, 40 CFR 52.21(c) & (d)
*This stack is not required to discharge unobstructed vertically upwards to the ambient air.			

IX. OTHER REQUIREMENTS

1. 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 Dc, as they apply to EUP03 and EUP04. **(40 CFR Part 60 Subparts A & Dc)**

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