

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

December 13, 2021

**PERMIT TO INSTALL**  
108-21

**ISSUED TO**  
Highland RNG, LLC

**LOCATED AT**  
8549 Stein Road  
Sebewaing, Michigan 48759

**IN THE COUNTY OF**  
Huron

**STATE REGISTRATION NUMBER**  
P1236

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>November 4, 2021</b>	
DATE PERMIT TO INSTALL APPROVED: <b>December 13, 2021</b>	SIGNATURE:
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.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Flexible Group ID</b>
EUGCU	Gas Cleaning and Upgrading Unit including activated carbon filter pre-treatment and a three (3) stage membrane. The GCU is used to upgrade the raw anaerobic digester gas to meet pipeline specifications.	NA
EUFLARE	One digester gas flare used as backup for the EUGCU. The flare is capable of burning up to 465 scfm, giving a heat input capacity of 16.6 MMBtu/hr when using the estimated higher heating value of the digester gas of 597 Btu/scf.	NA

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.

## **EUGCU EMISSION UNIT CONDITIONS**

### **DESCRIPTION**

Gas Cleaning and Upgrading Unit including activated carbon filter pre-treatment and a three (3) stage membrane. The GCU is used to upgrade the raw anaerobic digester gas to meet pipeline specifications.

**Flexible Group ID:** NA

### **POLLUTION CONTROL EQUIPMENT**

NA

#### **I. EMISSION LIMIT(S)**

NA

#### **II. MATERIAL LIMIT(S)**

1. The hydrogen sulfide (H<sub>2</sub>S) concentration of the vent gas exiting EUGCU shall not exceed 5 ppmv at all times. **(R 336.1225, 40 CFR 52.21(c) & (d))**
2. The volumetric feed rate for the tail gas vented from EUGCU shall not exceed a maximum of 115 standard cubic feet per minute at all times. **(R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21)**

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

1. No later than 90 days after the completion of installation of the equipment, the permittee shall submit to the AQD District Supervisor, for review and approval, a preventative maintenance/malfunction abatement plan (PM/MAP) for EUGCU. After approval of the PM/MAP by the AQD District Supervisor, the permittee shall not operate EUGCU unless the PM/MAP, or an alternate plan approved by the AQD District Supervisor, is implemented, and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum, the plan shall include:
  - a) Identification of the equipment and, if applicable, air-cleaning device and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair.
  - b) Description of the items or conditions to be inspected and frequency of the inspections or repairs.
  - c) Identification of the equipment and, if applicable, air-cleaning device, operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of these parameters and a description of the method of monitoring or surveillance procedures.
  - d) Identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - e) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the PM/MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the PM/MAP within 45 days after such an event occurs. The permittee shall also amend the PM/MAP within 45 days if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the PM/MAP and any amendments to the PM/MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the PM/MAP or amended PM/MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1224, R 336.1225, R 336.1910, R 336.1911, R 336.1912)**



2. No later than 90 days after permit issuance, the permittee shall submit, implement, and maintain a nuisance minimization plan for odors as described in Appendix A, for EUGCU. If at any time the plan fails to address or inadequately addresses odor management, the permittee shall amend the plan within 45 days after such an event occurs. The permittee shall also amend the plan within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the plan or amended plan shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to minimize odors. **(R 336.1901)**

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

1. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a device to monitor the H<sub>2</sub>S content at the outlet of the activated carbon filters of EUGCU on a continuous basis. Continuous shall be defined in this permit at least one reading every 15 minutes. Satisfactory manner includes operating and maintaining EUGCU in accordance with an approved PM / MAP for EUGCU, as required in SC III.1. **(R 336.1224, R 336.1225, R 336.1901)**
2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a device to monitor and record the volumetric flow rate of digester biogas vented from EUGCU, on a continuous basis. **(R 336.1224, R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d))**

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

NA

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

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

1. The permittee shall keep, in a satisfactory manner, all records related to, or as required by, the PM/MAP. **(R 336.1224, R 336.1225, R 336.1910, R 336.1911, R 336.1912)**
2. The permittee shall keep, in a satisfactory manner, continuous records of the H<sub>2</sub>S concentration in the vent gas exiting EUGCU. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d))**
3. The permittee shall keep, in a satisfactory manner, continuous records of the volumetric flow rate of digester biogas vented from EUGCU. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d))**

#### **VII. REPORTING**

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUGCU. **(R 336.1201(7)(a))**

#### **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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVEP2	6	8.5	40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENT(S)**

NA

**EUFLARE  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

One digester gas flare used as backup for the EUGCU. The flare is capable of burning up to 465 scfm, giving a heat input capacity of 16.6 MMBtu/hr when using the estimated higher heating value of the digester gas of 597 Btu/scf.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

NA

**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. SO <sub>2</sub>	15.7 tpy	12-month rolling time period as determined at the end of each calendar month	EUFLARE	SC VI.8	40 CFR 52.21(c) & (d)

**II. MATERIAL LIMIT(S)**

<b>Material</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
1. H <sub>2</sub> S concentration of the biogas	500 ppmv <sup>A</sup>	Operating Day	EUFLARE	SC VI.4	R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d)
2. H <sub>2</sub> S concentration of the biogas	5,000 ppmv <sup>B</sup>	Operating Day	EUFLARE	SC VI.4, SC VI.5	R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d)

<sup>A</sup> This limit applies for 325 days per 12-month rolling time period.

<sup>B</sup> This limit applies for 40 days per 12-month rolling time period.

3. Other than sweet pilot gas, the permittee shall burn only gas produced by the anaerobic digester (digester biogas) in EUFLARE. **(R 336.1225, 40 CFR 52.21(c) & (d))**
4. The volumetric feed rate for EUFLARE shall not exceed a maximum of 465 standard cubic feet per minute at all times. **(R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21)**

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

1. The permittee shall not operate EUFLARE for more than 4,860 hours per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1224, R 336.1225, R 336.1702, R 336.1901, 40 CFR 52.21(c) & (d))**

2. No later than 90 days after the completion of installation of the equipment, the permittee shall submit to the AQD District Supervisor, for review and approval, a preventative maintenance / malfunction abatement plan (PM / MAP) for EUFLARE. After approval of the PM / MAP by the AQD District Supervisor, the permittee shall not operate EUFLARE unless the PM / MAP, or an alternate plan approved by the AQD District Supervisor, is implemented, and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum, the plan shall include:
  - a) Identification of the equipment and, if applicable, air-cleaning device and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair.
  - b) Description of the items or conditions to be inspected and frequency of the inspections or repairs.
  - c) Identification of the equipment and, if applicable, air-cleaning device, operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of these parameters and a description of the method of monitoring or surveillance procedures.
  - d) Identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - e) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the PM/MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the PM/MAP within 45 days after such an event occurs. The permittee shall also amend the PM/MAP within 45 days if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the PM / MAP and any amendments to the PM/MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the PM/MAP or amended PM/MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1224, R 336.1225, R 336.1910, R 336.1911, R 336.1912)**

3. No later than 90 days after permit issuance, the permittee shall submit, implement, and maintain a nuisance minimization plan for odors as described in Appendix A, for EUFLARE. If at any time the plan fails to address or inadequately addresses odor management, the permittee shall amend the plan within 45 days after such an event occurs. The permittee shall also amend the plan within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the plan or amended plan shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to minimize odors. **(R 336.1901)**

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

1. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a device to monitor and record the volumetric flow rate of digester gas burned in EUFLARE, on a continuous basis. Continuous shall be defined in this permit at least one reading every 15 minutes. **(R 336.1224, R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d))**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the H<sub>2</sub>S content of digester gas sent to EUFLARE. **(R 336.1224, R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d))**

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

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 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))**

2. The permittee shall keep, in a satisfactory manner, all records related to, or as required by, the PM/MAP. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, R 336.1912, 40 CFR 52.21(c) & (d))**
3. The permittee shall keep, in a satisfactory manner acceptable to the AQD District Supervisor, a log of the monthly and 12-month rolling basis operating hours of EUFLARE. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21)**
4. The permittee shall keep, in a satisfactory manner, daily records of the H<sub>2</sub>S content of the digester biogas routed to EUFLARE, for each day that the flare is operated. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d))**
5. The permittee shall keep, in a satisfactory manner, the number of days where the H<sub>2</sub>S content of the digester biogas is greater than 500 ppmv on a monthly and 12-month rolling time period. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d))**
6. The permittee shall keep, in a satisfactory manner, continuous records of the volumetric flow rate of digester biogas routed to EUFLARE. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d))**
7. The permittee shall keep, in a satisfactory manner, records of the total volume (MMscf) digester biogas burned in EUFLARE on a monthly and 12-month rolling time period. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))**
8. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total SO<sub>2</sub> mass emissions for EUFLARE. Calculations shall be performed using data collected through the devices required in SC IV.1 and SC IV.2 as described in Appendix B. The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 52.21(c) & (d))**

## **VII. REPORTING**

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUFLARE. **(R 336.1201(7)(a))**

## **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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVEP1	6	10	40 CFR 52.21(c) & (d)

## **IX. OTHER REQUIREMENT(S)**

NA

## **APPENDIX A**

### **Nuisance Minimization Plan: Odors**

#### **I. Introduction**

Purpose, description of each potential source of odors, permit number, background information, etc.

#### **II. Potential Sources of Odorous Emissions and Related Equipment**

Listing of equipment at source that could generate potential odors. Identify process and/or equipment, control equipment (if applicable), and any other information necessary to aid in addressing a complaint if received.

#### **III. Maintenance Schedule**

Description of maintenance schedule for equipment, procedures, etc.

#### **IV. Best Management Practices/Housekeeping Measures**

Identify best management practices and housekeeping measures the source will use to aid in the minimization of odorous emissions. Explain how odors will be minimized during all startups, shutdowns, and malfunctions. The plan shall incorporate procedures recommended by the equipment manufacturer(s), as well as incorporating standard industry practices.

#### **V. Odor Incident Notification/Investigation/Response**

Describe procedures that shall be taken to address odor complaints. Identify the individual(s) at the facility who will be responsible for initiating the response procedures upon the receipt of an odor complaint notification from the AQD, a neighbor, or other source. The response should include taking records that include the date and time of the complaint, meteorological data for the timeframe specified in the complaint, identification of the equipment/process that is most likely to be the source of the complaint, steps taken to identify any maintenance or corrective action necessary for the equipment involved, and other measures utilized by the permittee to address the complaint.

## APPENDIX B Procedures for Calculating Emissions

The permittee shall demonstrate compliance with the emission limits in this permit by monitoring digester biogas flow rates and digester biogas H<sub>2</sub>S concentration.

### Calculation for Monthly SO<sub>2</sub> Emissions using digester biogas H<sub>2</sub>S Monitoring:

The following calculation for SO<sub>2</sub> emissions shall utilize the continuous H<sub>2</sub>S concentration measurements and continuous flow rate measurements.

$$SO_2 \text{ Monthly } \left( \frac{\text{ton } SO_2}{\text{month}} \right) = \left( \sum A \text{ ppm} * B \frac{\text{MMscf Biogas}}{\text{min}} \right) * \frac{1440 \text{ min}}{\text{day}} * \frac{\text{days}}{\text{month}} * \frac{64.06 \text{ lb } SO_2}{\text{lb - mol}} * \frac{\text{lb - mol}}{385.3 \text{ scf}} * \frac{\text{ton}}{2,000 \text{ lb}}$$

Where:

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

B = flow rate digester biogas burned in EUFLARE