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

April 4, 2023

PERMIT TO INSTALL 48-23

ISSUED TO Meadowbrook Ag-Grid, LLC

LOCATED AT

333 East Tupper Lake Road Lake Odessa, Michigan 48849

IN THE COUNTY OF

Ionia

STATE REGISTRATION NUMBER P1317

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:

March 28, 2023

DATE PERMIT TO INSTALL APPROVED: April 4, 2023	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS	2
POLLUTANT / MEASUREMENT ABBREVIATIONS	3
GENERAL CONDITIONS	4
EMISSION UNIT SPECIAL CONDITIONS	6
EMISSION UNIT SUMMARY TABLE	6
EUGCU	
EUFLARE	10
EUBOILER	
EUCHP	14
APPENDIX A	
APPENDIX B	

COMMON ACRONYMS

AQD BACT CAA CAM CEMS CFR COMS Department/department/EGLE EU FG GACS GC GHGS HVLP ID IRSL ITSL LAER MACT MAERS MAP MSDS NA NAAQS NESHAP NSPS NSR PS SS NSR PS SS NSR PS SC SCR SCR SCR SCR SCR SCR SCR SCR	Air Quality Division Best Available Control Technology Clean Air Act Compliance Assurance Monitoring Continuous Emission Monitoring System Code of Federal Regulations Continuous Opacity Monitoring System Michigan Department of Environment, Great Lakes, and Energy Emission Unit Flexible Group Gallons of Applied Coating Solids General Condition Greenhouse Gases High Volume Low Pressure* Identification Initial Risk Screening Level Lowest Achievable Emission Rate Maximum Achievable Control Technology Michigan Air Emissions Reporting System Malfunction Abatement Plan Material Safety Data Sheet Not Applicable National Ambient Air Quality Standards National Emission Standard for Hazardous Air Pollutants New Source Performance Standards New Source Review Performance Specification Prevention of Significant Deterioration Permanent Total Enclosure Permit to Install Reasonable Available Control Technology Renewable Operating Permit Special Condition Selective Catalytic Reduction State Registration Number To Be Determined Toxicity Equivalence Quotient United States Environmental Protection Agency
VE	Visible Emissions

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm BTU $^{\circ}C$ CO CO ₂ e dscf dscm $^{\circ}F$ gr HAP Hg hr HP H ₂ S kW Ib m mg mm MM MW NMOC NO _x ng PM PM10 PM2.5 pph PM10 PM2.5 pph ppmv ppmv ppmv ppmv psia psig scf sec SO ₂ TAC Temp THC tpy	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 Milligram Millimeter Milligram Megawatts Non-Methane Organic Compounds Oxides of Nitrogen Nanogram Particulate Matter 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 Particulate Matter equal to or less than 2.5 microns in diameter Particulate Matter equal to or less than 2.5 microns in diameter Parts per million Parts per million by volume Parts per million by volume Parts per million by volume Parts per million by weight Pounds per square inch gauge Standard cubic feet Seconds Sulfur Dioxide Toxic Air Contaminant Temperature Total Hydrocarbons Tons per year
Temp	Temperature
	•
	Microgram
μg μm	Micrometer or Micron
VOC	Volatile Organic Compounds
vee yr	Year
יי	i dui

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))	Flexible Group ID
EUGCU	Gas cleaning and upgrading unit including an iron sponge, adsorption chiller, and activated carbon media. EUGCU is used to upgrade the raw anaerobic biogas (collected from either the digesters or lagoon) to meet pipeline specifications. Following H ₂ S removal, the biogas will be injected into the pipeline and sold as renewable natural gas.	NA
EUFLARE	One digester gas flare used as backup for EUGCU. The flare is capable of burning up to 700 scfm, giving a heat input capacity of 27.6 MMBtu/hr when using the estimated higher heating value of the biogas of 656.5 Btu/scf.	NA
EUBOILER	Natural gas-fired boiler used to provide heat to the digesters when additional heat is necessary. Maximum heat input: 5 MMBTU/hr.	NA
EUCHP	Combined heat and power (CHP) unit with a maximum heat input of 4.95 MMBTU/hr. The CHP unit is used to supply electricity to the gas upgrading unit, and any excess electricity will be sent off-site to the electrical grid.	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 an iron sponge, adsorption chiller, and activated carbon media. EUGCU is used to upgrade the raw anaerobic biogas (collected from either the digesters or lagoon) to meet pipeline specifications. Following H₂S removal, the biogas will be injected into the pipeline and sold as renewable natural gas.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

- 1. The hydrogen sulfide (H₂S) concentration of the tail gas exiting EUGCU shall not exceed 200 ppmv. (R 336.1225, 40 CFR 52.21(c) & (d))
- 2. The volumetric flow rate for the tail gas vented from EUGCU shall not exceed a maximum of 240 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)**

Meadowbrook Ag-Grid, LLC (P1317) Permit No. 48-23

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)

- The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a device to monitor the H₂S content at the outlet of the activated carbon filters of EUGCU. 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)
- The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a device to monitor and record the volumetric flow rate of tail gas vented from EUGCU, 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))
- 3. No later than 180 days after the completion of installation of the equipment, the permittee shall submit to the AQD District Supervisor, for review and approval, Best Management Practices Plan (BMPP) for the use of ferric chloride to reduce the H₂S concentration in the digester. The BMPP plan, at a minimum, should include the following:
 - a) A detailed plan for when ferric chloride should be added into the digester, including parameters that will be monitored, the amount and what frequency the ferric chloride will be added.
 - b) A detailed plan explaining how the ferric chloride will reduce the H₂S concentration in the digester.
 - c) The normal operating range of the H₂S concentration in the digester

If at any time the BMPP fails to address or inadequately addresses the addition of ferric chloride into the digester, the permittee shall amend the BMPP within 45 days after such an event occurs. The permittee shall also amend the BMPP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the BMPP and any amendments to the BMPP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the BMPP or amended BMPP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures and/or operational changes to achieve compliance with all applicable emission limits and permit conditions. **(R 336.1205)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall 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)
- The permittee shall keep, in a satisfactory manner, daily records of the H₂S concentration in the tail 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 tail gas 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. <u>REPORTING</u>

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:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVGCU	4	22	40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

EUFLARE EMISSION UNIT CONDITIONS

DESCRIPTION

One digester gas flare used as backup for EUGCU. The flare is capable of burning up to 700 scfm, giving a heat input capacity of 27.6 MMBtu/hr when using the estimated higher heating value of the biogas of 656.5 Btu/scf.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. SO ₂	30.1 tpy	12-month rolling time period as determined at the end of each calendar		SC VI.6	40 CFR 52.21(c) & (d)
		month			

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. H ₂ S concentration of the biogas	1,000 ppmv	Operating Day	EUFLARE	SC VI.3	R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d)

- 2. 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))
- 3. The volumetric feed rate for EUFLARE shall not exceed a maximum of 700 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 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)**

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 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)

- The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a device to monitor and record the volumetric flow rate of biogas 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))
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the H₂S content of biogas sent to EUFLARE. (R 336.1224, R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 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, daily records of the H₂S 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))
- 4. 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))
- 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))

6. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total SO₂ 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. <u>REPORTING</u>

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:

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

IX. OTHER REQUIREMENT(S)

NA

EUBOILER EMISSION UNIT CONDITIONS

DESCRIPTION

Natural gas-fired boiler used to provide heat to the digesters when additional heat is necessary. Maximum heat input: 5 MMBTU/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in EUBOILER. (R 336.1225, R 336.1702)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The maximum heat input capacity of EUBOILER shall not exceed 5 MMBTU/hr. (R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))

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))

NA

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

EUCHP EMISSION UNIT CONDITIONS

DESCRIPTION

Combined heat and power (CHP) engine greater than 500 hp, fueled with digester gas (referred to as *biogas* in this permit). Engine ordered after June 12, 2006 and manufactured on or after July 1, 2007. Engine is subject to requirements under 40 CFR 60 Subpart JJJJ.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
-				1 1		
1.	NOx	2.0 g/bhp-hr	Hourly	EUCHP	SC V.1	40 CFR 60.4233(e)
		OR				Table 1 to Subpart JJJJ
		150 ppmvd at				of Part 60
		15% O2				
2.	CO	5.0 g/bhp-hr	Hourly	EUCHP	SC V.1	40 CFR 60.4233(e)
		OR	-			Table 1 to Subpart JJJJ
		610 ppmvd at				of Part 60
		15% O ₂				or r art oo
3.	VOC ^A	1.0 g/bhp-hr	Hourly	EUCHP	SC V.1	40 CFR 60.4233(e)
5.	VUC	0 1	ribully	LUCHF	30 0.1	
		OR				Table 1 to Subpart JJJJ
		80 ppmvd at				of Part 60
		15% O ₂				
A		f Part 60 Subpart	IIII when calci	Ilating emissions o	of volatile organ	ic compounds emissions

^A For purposes of Part 60 Subpart JJJJ, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

II. MATERIAL LIMIT(S)

1. The permittee shall burn only biogas in EUCHP. The permittee shall not burn biogas with a hydrogen sulfide content greater than 1,000 ppm. (R 336.1224, R 336.1225, R 336.1702(a))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall operate and maintain EUCHP 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 EUCHP 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 maximum heat input capacity of EUCHP shall not exceed 4.95 MMBTU/hr. (R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))

- 2. The permittee shall equip and maintain EUCHP with non-resettable hours meters to track the operating hours. (40 CFR 60.4243)
- 3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the H₂S content of biogas sent to EUCHP 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))

V. TESTING/SAMPLING

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

1. The permittee shall conduct an initial performance test shall, except as provided in 40 CFR 60.4243(b), for EUCHP within one year after startup of the engine and every 8,760 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). 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 EUCHP 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))**
- The permittee shall keep, in a satisfactory manner, continuous records of the H₂S content of the digester biogas routed to EUCHP. 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))

VII. <u>REPORTING</u>

- 1. The permittee shall submit an initial notification as required by 40 CFR 60.7(a)(1) for EUCHP 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 EUCHP. (40 CFR Part 60 Subpart JJJJ)

VIII. STACK/VENT RESTRICTION(S)

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCHP*	14	26	40 CFR 52.21(c) & (d)
*Includes a rain sleeve			

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 EUCHP. **(40 CFR Part 60 Subparts A and JJJJ)**
- The permittee shall comply with all applicable 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 EUCHP. (40 CFR, Part 63, Subparts A and ZZZZ)

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 H₂S concentration.

Calculation for Monthly SO₂ Emissions using digester biogas H₂S Monitoring:

The following calculation for SO_2 emissions shall utilize the continuous H_2S concentration measurements and continuous flow rate measurements.

 $SO_{2} Monthly \left(\frac{ton SO_{2}}{month}\right) = \left(\sum A ppm * B \frac{MMscf Biogas}{min}\right) * \frac{1440 min}{day} * \frac{days}{month} * \frac{64.06 \ lb SO2}{lb - mol} * \frac{lb - mol}{385.3 \ scf} * \frac{ton}{2,000 \ lb}$

Where:

A = ppm sulfur content, as H_2S B = flow rate digester biogas burned in EUFLARE