

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
P0317

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-P0317-2012a

AMERESCO WOODLAND MEADOWS ROMULUS LLC

SRN: P0317

Located at

4620 Hannan Road, Wayne, Wayne County, Michigan 48184

Permit Number: MI-ROP-P0317-2012a

Staff Report Date: September 24, 2012

Amended Date: February 2, 2016

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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SEPTEMBER 24, 2012, STAFF REPORT

MI-ROP-P0317-2012

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Stationary Source Mailing Address:	Ameresco Woodland Meadows, LLC 4620 Hannan Road Wayne, Michigan 48184
Source Registration Number (SRN):	P0317
North American Industry Classification System (NAICS) Code:	
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201200037
Responsible Official:	Ben J. Heuser, Director-Plant Operations 715-549-6023
AQD Contact:	Erik A. Gurshaw, Environmental Quality Analyst 313-456-4704
Date Permit Application Received:	February 28, 2012
Date Application Was Administratively Complete:	March 12, 2012
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	September 24, 2012
Deadline for Public Comment:	October 24, 2012

Source Description

Ameresco Woodland Meadows, LLC is a landfill gas (LFG) treatment facility. The facility compresses, dewateres, and filters LFG which is generated by Woodland Meadows RDF. After the LFG is treated, it is sent to a third party end user via a pipeline. Besides the LFG treatment equipment, the facility has an oil/waste separation system which is used in conjunction with treating LFG and a cold cleaner which is used to clean parts.

Prior to the date ROP renewal applications were due for Woodland Meadows RDF and Ameresco Woodland Meadows, LLC, each entity submitted a written request to the DEQ to be issued separate ROPs. The previous ROP was separated into two sections: Section 1 for Woodland Meadows RDF and Section 2 for Ameresco Woodland Meadows, LLC. The two facilities will be issued two separate ROPs, but are still considered to be one stationary source for regulatory purposes. This determination was made since the contractual and spatial relationship between the two facilities establishes Woodland Meadows RDF as the controlling entity of the partnership. Therefore, the two facilities are considered to be one stationary source under the definition of stationary source in Michigan Air Pollution Rule 336.1119(r).

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) in the **2011** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	0
Lead (Pb)	0
Nitrogen Oxides (NO _x)	0
Particulate Matter (PM)	0
Sulfur Dioxide (SO ₂)	0
Volatile Organic Compounds (VOCs)	0
Total Hazardous Air Pollutants (HAPs)	0

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

In addition to the pollutants listed above that have been reported in MAERS, the potential to emit of Greenhouse Gases in tons per year of CO₂e is less than 100,000. CO₂e is a calculation of the combined global warming potentials of six Greenhouse Gases (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride).

See Parts C and D in the draft ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

Wayne County is currently designated by the U.S. Environmental Protection Agency (USEPA) as a non-attainment area with respect to the PM 2.5 standard. Wayne County is currently designated as attainment/unclassified for all other criteria pollutants.

No emissions units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit of all criteria pollutants was less than 100 tons per year.

EUGASTREATMENT at the stationary source is subject to the New Source Performance Standards for Municipal Solid Waste Landfills promulgated in 40 CFR, Part 60, Subparts A and WWW.

EUGASTREATMENT at the stationary source is subject to the Maximum Achievable Control Technology Standards for Municipal Solid Waste Landfills promulgated in 40 CFR, Part 63, Subparts A and AAAA.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

No emission units are subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. M4449-2007, Section 2 are identified in Appendix 6 of the ROP.

PTI Number	
C-10386	NA

Streamlined/Subsumed Requirements

This permit does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

Part E of the draft ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the draft ROP pursuant to Rule 213(6)(a)(ii).

Processes in Application Not Identified in Draft ROP

There were no processes listed in the ROP application as exempt devices under Rule 212(4). Exempt devices are not subject to any process-specific emission limits or standards in any applicable requirement.

Draft ROP Terms/Conditions Not Agreed to by Applicant

This permit does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by the DEQ

The AQD proposes to approve this permit. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the U.S. Environmental Protection Agency (USEPA) is allowed up to 45 days to review the draft permit and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Wilhemina McLemore, Detroit District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

Purpose

A Staff Report dated September 24, 2012, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Ben Heuser, Director-Plant Operations 715-549-6023
AQD Contact:	Erik A. Gurshaw, Environmental Quality Analyst 313-456-4704

Summary of Pertinent Comments

No pertinent comments were received during the 30-day public comment period.

Changes to the September 24, 2012 Draft ROP

No changes were made to the draft ROP.

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**FEBRUARY 2, 2016 STAFF REPORT FOR
RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE
AMENDMENT**

MI-ROP-P0317-2012

Purpose

On December 12, 2012, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-P0317-2012 to Ameresco Woodland Meadows, LLC pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(1)(a)(i-iv).

General Information

Responsible Official:	Nathan W. Hall, Director of Operations
AQD Contact:	Caryn E. Owens, Environmental Quality Analyst 231-876-4414
Application Number:	201600020
Date Application For Administrative Amendment Was Submitted:	January 8, 2016

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for an Administrative Amendment pursuant to R 336.1216(1)(a)(i).

Description of Changes to the ROP

Facility name change from Ameresco Woodland Meadows, LLC to Ameresco Woodland Meadows Romulus LLC. This change became effective January 5, 2016.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Administrative Amendment to the ROP.

Action Taken by the DEQ

The AQD approved an Administrative Amendment to ROP No. MI-ROP-P0317-2012a, as requested by the stationary source. The delegated decision maker for the AQD is the District Supervisor.