



5/21/2015

Mr. Joe Amabeli
City of Alliance Wastewater Treatment Plant
12551 Rockhill Ave N.E.
Alliance, OH 44601

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1576015004
Permit Number: P0110953
Permit Type: Initial Installation
County: Stark

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- How to appeal this permit
• How to save money, reduce pollution and reduce energy consumption
• How to give us feedback on your permitting experience
• How to get an electronic copy of your permit

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

Certified Mail

Table with 2 columns: Status (No) and Description (TOXIC REVIEW, SYNTHETIC MINOR TO AVOID MAJOR NSR, CEMS, MACT/GACT, NSPS, NESHAPS, NETTING, MODELING SUBMITTED, SYNTHETIC MINOR TO AVOID TITLE V, FEDERALLY ENFORCABLE PTIO (FEPTIO), SYNTHETIC MINOR TO AVOID MAJOR GHG)

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Canton City Health Department at (330)489-3385 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Canton



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
City of Alliance Wastewater Treatment Plant**

| | |
|----------------|----------------------|
| Facility ID: | 1576015004 |
| Permit Number: | P0110953 |
| Permit Type: | Initial Installation |
| Issued: | 5/21/2015 |
| Effective: | 5/21/2015 |
| Expiration: | 5/21/2025 |



Division of Air Pollution Control
Permit-to-Install and Operate
for
City of Alliance Wastewater Treatment Plant

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Final Permit-to-Install and Operate
City of Alliance Wastewater Treatment Plant
Permit Number: P0110953
Facility ID: 1576015004
Effective Date: 5/21/2015

Authorization

Facility ID: 1576015004
Application Number(s): A0045537
Permit Number: P0110953
Permit Description: Initial installation permit for two anaerobic digesters, a sludge heater boiler and a digester gas flare which were installed previously at an existing waste water treatment facility.
Permit Type: Initial Installation
Permit Fee: \$400.00
Issue Date: 5/21/2015
Effective Date: 5/21/2015
Expiration Date: 5/21/2025
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

City of Alliance Wastewater Treatment Plant
12251 Rockhill Ave N.E.
Alliance, OH 44601

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

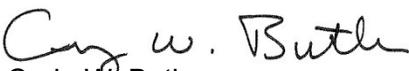
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0110953

Permit Description: Initial installation permit for two anaerobic digesters, a sludge heater boiler and a digester gas flare which were installed previously at an existing waste water treatment facility.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

| | |
|-----------------------------------|------------------------------------|
| Emissions Unit ID: | B004 |
| Company Equipment ID: | Sludge Heater Boiler |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P001 |
| Company Equipment ID: | Biomass Digester System with Flare |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install and Operate
City of Alliance Wastewater Treatment Plant
Permit Number: P0110953
Facility ID: 1576015004
Effective Date: 5/21/2015

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
City of Alliance Wastewater Treatment Plant
Permit Number: P0110953
Facility ID: 1576015004
Effective Date: 5/21/2015

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
City of Alliance Wastewater Treatment Plant
Permit Number: P0110953
Facility ID: 1576015004
Effective Date: 5/21/2015

C. Emissions Unit Terms and Conditions



1. B004, Sludge Heater Boiler

Operations, Property and/or Equipment Description:

Digester biogas-fired and natural gas-fired boiler manufactured by Envirex, Serial #83-271, with a maximum heat input capacity of 1.875 mmBTU/hr, used for process heat. Biogas generated by the anaerobic sludge digester onsite. Natural gas used as an auxiliary fuel when needed.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|--|
| a. | OAC rule 3745-31-05(A)(3), as effective 08/15/1982 [Best Available Technology (BAT) for sources installed prior to August 3, 2006] | Visible particulate emissions from the stack serving this emissions unit shall not exceed 5% opacity as a six-minute average. See b)(2)a. |
| b. | OAC rule 3745-17-07(A)(1) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| c. | OAC rule 3745-17-10(B)(1) | Particulate emissions (PE) shall not exceed 0.020 pound per million BTU (lb/mmBTU) actual heat input. |
| d. | OAC rule 3745-18-06(B) | Exempt. See b)(2)b. |



(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) was determined to be compliance with the operational restrictions c)(1) and c)(2) and the terms and conditions of this permit.
- b. Fuel burning equipment, which has a rated heat input capacity equal to or less than ten mmBTU per hour total rated capacity are exempt from this rule.

c) Operational Restrictions

- (1) The permittee shall burn only digester gas and/or natural gas with a minimum heat content of 500 BTU/scf, in this emissions unit.
- (2) Digester gas combusted in this emissions unit shall not exceed 1000 parts per million on a volume basis (ppm_v) of hydrogen sulfide.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day the permittee burns a fuel other than natural gas or digester gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall monitor and record hydrogen sulfide concentrations when operating the emissions unit with digester gas using one of the two following options:

Option 1: Weekly gas detector tube sampling. The accuracy of gas detector tubes is presumed to be $\pm 10\%$, unless the permittee is able to demonstrate better accuracy of the detector tubes compared to a certified gas standard. The permittee shall perform gas detector tube monitoring in accordance with the manufacturer's instructions for use of the detector tubes and associated sampling system. Any deviations from the manufacturer's instructions should be recorded with the concentration results of the sampling.

Option 2: Continuous digester gas monitoring system. The permittee may install a sampling and analysis system to continuously monitor and record the H₂S content of the digester gas. The permittee shall properly install, operate, and maintain a continuous digester gas H₂S monitoring device and recorder that measures and records the H₂S concentrations in the digester gas when the emissions unit is in operation, including periods of startup and shutdown. The H₂S monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 5 and shall be capable of accurately measuring the H₂S concentration. The H₂S monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee.

Whenever the monitored value for hydrogen sulfide exceeds the limit in term c)(2) as measured by either of the above monitoring options, the permittee shall promptly



investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the hydrogen sulfide concentration below the maximum limit specified in this permit in term c)(2), unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. hydrogen sulfide readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (3) The permittee shall maintain monthly records of the heat content of the digester gas, in BTU/scf.
- (4) The permittee shall maintain monthly records of the natural gas and digester gas fuel usage in this unit in millions of standard cubic feet (mmft³).

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this



permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements in d)(1), d)(2) and d)(3):
 - a. all periods of time during which the permittee burns a fuel other than natural gas or digester gas in this emissions unit and the type and quantity of fuel burned;
 - b. each month during which digester gas with a minimum heat content of less than allowed by c)(1) was burned in this emissions unit; and
 - c. each period during which digester gas containing an H₂S concentration greater than allowed by c)(2) was burned.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions limitation:

Particulate emissions (PE) shall not exceed 0.020 lb/mmBTU actual heat input.

Applicable compliance method:

The PE limitation is a rule based limitation. Compliance can be assumed by comparing the rule based limitation to the available AP-42 emission factors, as shown below.

AP-42, Chapter 2.4 for municipal solid waste landfill gas boilers (the best approximation to this emission unit available), Table 2.4-5 (11/98) lists the emission factor for PE as 8.2 lbs/mmft³. In order to compare this emission factor to the rule based limitation, it was converted from lbs/mmft³ to lbs/mmBTU, as shown below, using the minimum allowable heat content from term c)(1).

$$\frac{8.2 \text{ lbs PE}}{\text{mmft}^3} \times \frac{1 \text{ ft}^3}{100 \text{ BTU}} \times \frac{10^6 \text{ BTU}}{\text{mmBTU}} \times \frac{\text{mmft}^3}{10^6 \text{ ft}^3} = 0.0164 \text{ lb PE / mmBTU}$$

0.0164 lb PE/mmBTU is less than the 0.020 lb PE/MMBtu limitation.

If required, compliance with the particulate emissions limitation shall be determined through emission testing performed in accordance with U.S. EPA Method 5.

b. Emissions limitation:

Visible particulate emissions shall not exceed 5% opacity as a six-minute average.



Applicable compliance method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) For Informational Purposes Only:

For informational purposes associated with determining emissions for reports, the emissions from this emissions unit were calculated for the purpose of developing this permit by using the following methodologies.

Note: This emission unit consists of a boiler burning digester gas only or a combination of digester gas and natural gas.

a. Carbon monoxide (CO) emissions from digester gas burning:

The hourly potential to emit (PTE) for carbon monoxide (CO) was determined by multiplying the maximum heat input of the boiler (1.875 mmBTU/hr) by 1 over the minimum heat content of digester gas operational restriction in term c)(1) (1 ft³ / 500 BTU) by the COemissions factor over the volume of digester fuel burned (5.7 lbs CO / mmft³) and by balancing the equation by multiplying by (10⁶ Btu / 1 mmBtu) and by (1 mmft³ / 10⁶ ft³), as shown below. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 2.4 Table 2.4-5 (11/98) for landfill boilers (the best approximation for this emission unit available).

$$= \frac{.875 \text{ mmBTU}}{\text{hr}} \times \frac{1 \text{ ft}^3}{500 \text{ BTU}} \times \frac{5.7 \text{ lbs CO}}{\text{mmft}^3} \times \frac{10^6 \text{ BTU}}{\text{mmBTU}} \times \frac{\text{mmft}^3}{10^6 \text{ ft}^3} = .021 \text{ lb CO / hr}$$

The annual PTE was determined by multiplying the hourly value by 8760 hours of operation per year, and then dividing by 2000 pounds per ton, as shown below.

$$= \frac{0.021 \text{ lb CO}}{\text{hr}} \times \frac{8760 \text{ hrs}}{\text{year}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} = .092 \text{ tons CO / year}$$

b. Nitrogen oxides (NO_x) emissions from digester gas burning:

The hourly PTE for nitrogen oxides (NO_x) was determined by multiplying the maximum heat input of the boiler (1.875 mmBTU/hr) by 1 over the minimum heat content of digester gas operational restriction in term c)(1) (1 ft³ / 500 BTU) by the NO_x emissions factor over the volume of digester fuel burned (33 lbs NO_x / mmft³) and by balancing the equation by multiplying by (10⁶ Btu / 1 mmBtu) and by (1 mmft³ / 10⁶ ft³), as shown below. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 2.4 Table 2.4-5 (11/98) for landfill boilers (the best approximation for this emission unit available).



$$= \frac{.875 \text{ mmBTU}}{\text{hr}} \left| \frac{1 \text{ ft}^3}{500 \text{ BTU}} \right| \left| \frac{3 \text{ lbs NO}_x}{\text{mmft}^3} \right| \left| \frac{10^6 \text{ BTU}}{\text{mmBTU}} \right| \left| \frac{\text{mmft}^3}{10^6 \text{ ft}^3} \right| = .12 \text{ lb NO}_x / \text{hr}$$

The annual PTE was determined by multiplying the hourly value by 8760 hours of operation per year, and then dividing by 2000 pounds per ton, as shown below.

$$= \frac{.124 \text{ lb NO}_x}{\text{hr}} \left| \frac{8760 \text{ hrs}}{\text{year}} \right| \left| \frac{1 \text{ ton}}{2000 \text{ lbs}} \right| = 54 \text{ tons NO}_x / \text{year}$$

c. Sulfur dioxide (SO₂) emissions from digester gas burning:

The hourly PTE for sulfur dioxide (SO₂) was determined by multiplying the maximum heat input of the boiler (1.875 mmBTU/hr) by 1 over the minimum heat content of digester gas operational restriction in term c)(1) (1 ft³ / 500 BTU) by the H₂S ppm_v emissions operational restriction in term c)(2) over parts per million by volume for an ideal gas (10³ppm_v / 10⁶) by the hydrogen sulfide density (0.088 lb H₂S / ft³ H₂S) by stoichiometric ratio of the molecular weight of SO₂ and H₂S (1.88 lb SO₂ / 1 lb H₂S) and by balancing the equation by multiplying by (10⁶ Btu / 1 mmBtu), as shown below.

$$= \frac{.875 \text{ mmBTU}}{\text{hr}} \left| \frac{1 \text{ ft}^3}{500 \text{ BTU}} \right| \left| \frac{10^3 \text{ H}_2\text{S ppm}_v}{10^6} \right| \left| \frac{.088 \text{ lb H}_2\text{S}}{\text{ft}^3 \text{ H}_2\text{S}} \right| \left| \frac{1.88 \text{ lb SO}_2}{\text{lb H}_2\text{S}} \right| \left| \frac{10^6 \text{ BTU}}{\text{mmBTU}} \right| = 0.62 \text{ lb SO}_2 / \text{hr}$$

The annual PTE was determined by multiplying the hourly value by 8760 hours of operation per year, and then dividing by 2000 pounds per ton, as shown below.

$$= \frac{0.62 \text{ lb SO}_2}{\text{hr}} \left| \frac{8760 \text{ hrs}}{\text{year}} \right| \left| \frac{1 \text{ ton}}{2000 \text{ lbs}} \right| = 72 \text{ tons SO}_2 / \text{year}$$

d. Particulate emissions (PE) from digester gas burning:

The hourly PTE for particulate emissions (PE) was determined by multiplying the maximum heat input of the boiler (1.875 mmBTU/hr) by 1 over the minimum heat content of digester gas operational restriction in term c)(1) (1 ft³ / 500 BTU) by the PE emissions factor over the volume of digester fuel burned (8.2 lbs PE / mmft³) and by balancing the equation by multiplying by (10⁶ Btu / 1 mmBtu) and by (1 mmft³ / 10⁶ ft³), as shown below. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 2.4 Table 2.4-5 (11/98) for landfill boilers (the best approximation for this emission unit available).

$$= \frac{.875 \text{ mmBTU}}{\text{hr}} \left| \frac{1 \text{ ft}^3}{500 \text{ BTU}} \right| \left| \frac{8.2 \text{ lbs PE}}{\text{mmft}^3} \right| \left| \frac{10^6 \text{ BTU}}{\text{mmBTU}} \right| \left| \frac{\text{mmft}^3}{10^6 \text{ ft}^3} \right| = .031 \text{ lb PE} / \text{hr}$$

The annual PTE was determined by multiplying the hourly value by 8760 hours of operation per year, and then dividing by 2000 pounds per ton, as shown below.

$$= \frac{0.031 \text{ lb PE}}{\text{hr}} \left| \frac{8760 \text{ hrs}}{\text{year}} \right| \left| \frac{1 \text{ ton}}{2000 \text{ lbs}} \right| = 14 \text{ tons PE} / \text{year}$$



e. Volatile organic compounds (VOC) emissions from digester gas burning:

The hourly PTE for volatile organic compounds (VOC) was determined by multiplying the maximum heat input of the boiler (1.875 mmBTU/hr) by 1 over the minimum heat content of digester gas operational restriction in term c)(1) (1 ft³ / 500 BTU) by the VOCemissions factor over the volume of digester fuel burned (3.0 lbs VOC / mmft³) and by balancing the equation by multiplying by (10⁶ Btu / 1 mmBtu) and by (1 mmft³ / 10⁶ ft³), as shown below. This emission factor is specified in USEPA WebFIRE database available on the Technology Transfer Network (TTN) and CHIEF website for SCC code 10300701 for POTW Digester Gas-fired Boiler.

$$= \frac{.875 \text{ mmBTU}}{\text{hr}} \left| \frac{1 \text{ ft}^3}{500 \text{ BTU}} \right| \left| \frac{3.0 \text{ lbs VOC}}{\text{mmft}^3} \right| \left| \frac{10^6 \text{ BTU}}{\text{mmBTU}} \right| \left| \frac{\text{mmft}^3}{10^6 \text{ ft}^3} \right| = 0.11 \text{ lb VOC / hr}$$

The annual PTE was determined by multiplying the hourly value by 8760 hours of operation per year, and then dividing by 2000 pounds per ton, as shown below.

$$= \frac{0.11 \text{ lb VOC}}{\text{hr}} \left| \frac{8760 \text{ hrs}}{\text{year}} \right| \left| \frac{1 \text{ ton}}{2000 \text{ lbs}} \right| = 0.48 \text{ tons VOC / year}$$

f. Emissions from Natural Gas Burning:

The following emission factors are specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4 Tables 1.4-1 and 1.4-2 (07/98) for uncontrolled small natural gas-fired boilers:

| Pollutant | EF(lbs/mmft ³) |
|-----------|----------------------------|
| NOx | 100 |
| CO | 84 |
| PM | 7.6 |
| SO2 | 0.6 |
| VOC | 5.5 |

Annual emissions from the combustion of natural gas, in tons per year, can be calculated by multiplying the above emission factors by the annual natural gas usage and dividing by 2000 pounds per ton. Due to the small amount of natural gas usage reported in the application (less than 5% of total fuel input), emissions from natural gas combustion are not projected to be significant.

g. Total Emissions:

The total emissions from this source are the combination of digester gas combustion and natural gas combustion emissions. The equation below shows how this is calculated:

$$\text{Emissions}_{\text{Digester Gas}} + \text{Emissions}_{\text{Natural Gas}} = \text{Emissions}_{\text{Total}}$$



2. P001, Biomass Digester System with Flare

Operations, Property and/or Equipment Description:

Biogas generated by an anaerobic sludge digester system. Excess biogas is controlled by an enclosed flare rated to burn 7,875 ft³/hr, with an estimated maximum of 4.7 mmBTU/hr. Natural gas burned as an auxiliary fuel as needed.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

h. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| a. | OAC rule 3745-31-05(A)(3), as effective 04/27/1998 [Best Available Technology (BAT) for sources installed prior to August 3, 2006] | Sulfur dioxide (SO ₂) emissions shall not exceed 1.6 pounds per hour and 7.0 tons per year. Carbon monoxide (CO) emissions shall not exceed 7.5 tons per year. Nitrogen oxides (NO _x) emissions shall not exceed 1.7 tons per year. Particulate emissions (PE) shall not exceed 0.70 tons per year. Volatile organic compounds (VOC) emissions shall not exceed 0.23 tons per year. |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| | | Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average. See b)(2)a., b)(2)b., and b)(2)f. |
| b. | OAC rule 3745-31-05(E) [State-only enforceable limitation to ensure compliance with OAC rule 3745-15-07] | See b)(2)b. and b)(2)c. |
| c. | OAC rule 3745-17-11(B) | See b)(2)d. |
| d. | OAC rule 3745-17-07(B)(1) | See b)(2)e. |
| e. | OAC rule 3745-18-06(E) | The emission limitations of this rule are less stringent than the emission limitations established by OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) was determined to be compliance with the operational restrictions c)(1) and c)(2) and the terms and conditions of this permit.
- b. The emissions from the digestion process shall be vented to the flare during any instance when digester gas is present in the feedstock equilibrium tank, primary digester, or dual purpose tank and the combined heat and power unit (B004) is not firing digester gas.
- c. Anaerobic digesters, including all associated equipment and grounds, shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. Process weight is defined in OAC rule 3745-17-01(B)(17).
- e. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- f. The annual emissions limitations for VOC, PE, NO_x and CO are based on the emissions unit's potentials to emit. No monitoring, recordkeeping, or reporting requirements are necessary to demonstrate compliance with these emissions limitations.



- g. The permittee shall properly install, operate, and maintain a device to continuously monitor the flare pilot flame or electric arc ignition when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

c) Operational Restrictions

- (1) The permittee shall burn only digester gas and/or natural gas with a minimum heat content of 500 Btu/scf, in this emissions unit.
- (2) Digester gas combusted in this emissions unit shall not exceed 1000 parts per million on a volume basis (ppm_v) of hydrogen sulfide.
- (3) A pilot flame shall be maintained at all times in the flare's pilot light burner or the arcing of the flares electric arc ignition system shall pulse continually when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day the permittee burns a fuel other than natural gas or digester gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall monitor and record hydrogen sulfide concentrations when operating the emissions unit with digester gas using one of the two following options:

Option 1: Weekly gas detector tube sampling. The accuracy of gas detector tubes is presumed to be $\pm 10\%$, unless the permittee is able to demonstrate better accuracy of the detector tubes compared to a certified gas standard. The permittee shall perform gas detector tube monitoring in accordance with the manufacturer's instructions for use of the detector tubes and associated sampling system. Any deviations from the manufacturer's instructions should be recorded with the concentration results of the sampling.

Option 2: Continuous digester gas monitoring system. The permittee may install a sampling and analysis system to continuously monitor and record the H₂S content of the digester gas. The permittee shall properly install, operate, and maintain a continuous digester gas H₂S monitoring device and recorder that measures and records the H₂S concentrations in the digester gas when the emissions unit is in operation, including periods of startup and shutdown. The H₂S monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 5 and shall be capable of accurately measuring the H₂S concentration. The H₂S monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee.

Whenever the monitored value for hydrogen sulfide exceeds the limit in term c)(2) as measured by either of the above monitoring options, the permittee shall promptly



investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the hydrogen sulfide concentration below the maximum limit specified in this permit in term c)(2), unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. hydrogen sulfide readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (3) The permittee shall maintain monthly records of the heat content of the digester gas, in BTU/scf.
- (4) The permittee shall maintain daily records of all periods of time during which the electric arc system was inoperable or there was no flare pilot flame when digester gas was present in the feedstock equilibrium tank, primary digester, or dual purpose tank, and the combined heat and power unit was not firing digester gas.
- (5) The permittee shall monitor and record the volume of digester gas and natural gas flared in standard cubic feet per year, separately, and shall calculate and record the annual heat input to the flare in million Btu.



e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements in d)(1), d)(2), d)(3) and d)(4):
 - a. all periods of time during which the flares electric arc ignition system was not functioning properly or there was no flare pilot flame when digester gas was present in the feedstock equilibrium tank, primary digester, or dual purpose tank, and the combined heat and power unit (B004) was not firing digester gas;
 - b. all periods of time during which the permittee burns a fuel other than natural gas or digester gas in this emissions unit and the type and quantity of fuel burned;
 - c. each month during which digester gas with a minimum heat content of less than allowed by c)(1) was burned in this emissions unit; and
 - d. each period during which digester gas containing an H₂S concentration greater than allowed by c)(2) was burned.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Sulfur dioxide (SO₂) emissions shall not exceed 1.6 pounds per hour and 7.0 tons per year.

Applicable Compliance Method:

The hourly emission limitation for sulfur dioxide (SO₂) was established by multiplying the gas flare heat duty (4.7 mmBTU/hr) by the minimum heat content of digester gas established in c)(1) above by the H₂S ppm_v emissions operational restriction (see c)(2)) over parts per million by volume for an ideal gas (10³ppm_v / 10⁶) by the hydrogen sulfide density (0.088 lb H₂S / ft³ H₂S) by stoichiometric ratio of the molecular weight of SO₂ and H₂S (1.88 lb SO₂ / 1 lb H₂S) and by balancing the equation by multiplying by (10⁶ Btu / 1 mmBtu).



$$= \frac{4.7 \text{ mmBTU}}{\text{hr}} \left| \frac{1 \text{ ft}^3}{10 \text{ BTU}} \right| \left| \frac{\text{ppm}_v \text{ H}_2\text{S}}{10^6} \right| \left| \frac{0.88 \text{ lb H}_2\text{S}}{\text{ft}^3 \text{ H}_2\text{S}} \right| \left| \frac{88 \text{ lb SO}_2}{\text{lb H}_2\text{S}} \right| \left| \frac{10^6 \text{ BTU}}{\text{mmBTU}} \right| = 1.6 \text{ lb SO}_2 / \text{hr}$$

The annual limitation was calculated by multiplying the hourly limitation by 8760 hours of operation per year, and then dividing by 2000 pounds per ton.

$$= \frac{1.6 \text{ lb SO}_2}{\text{hr}} \left| \frac{8760 \text{ hrs}}{\text{year}} \right| \left| \frac{1 \text{ ton}}{2000 \text{ lbs}} \right| = 0.7 \text{ tons SO}_2 / \text{year}$$

The permittee shall demonstrate compliance with the short-term and annual emissions limitation through the required monitoring and recordkeeping in d)(2), d)(3) and d)(5) and using the above equations.

If required, the permittee shall confirm, through the applicable methods and procedures specified in 40 CFR Part 60.18, that the flare's exit velocity and the net heating value of the digester gas conform to the maximum design values specified by the flare manufacturer.

b. Emissions limitation:

Carbon monoxide (CO) emissions shall not exceed 7.5 tons per year.

Applicable compliance method: modus

The hourly PTE for carbon monoxide (CO) was established by multiplying the COemissions factor per mmBTU (0.37 lbs CO / mmBTU) by the flare burning capacity (4.7 mmBTU/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.5 Table 13.5-1 (9/91) for industrial flares (the best approximation for this emission unit available).

$$= \frac{4.7 \text{ mmBTU}}{\text{hr}} \left| \frac{0.37 \text{ lbs CO}}{\text{mmBTU}} \right| = 1.7 \text{ lb CO} / \text{hr}$$

The annual limitation was calculated by multiplying the hourly PTE by 8760 hours of operation per year, and then dividing by 2000 pounds per ton.

$$= \frac{1.7 \text{ lb CO}}{\text{hr}} \left| \frac{8760 \text{ hrs}}{\text{year}} \right| \left| \frac{1 \text{ ton}}{2000 \text{ lbs}} \right| = 7.5 \text{ tons CO} / \text{year}$$

The permittee shall demonstrate compliance with the annual emissions limitation through the required monitoring and recordkeeping in d)(3) and d)(5) and using the above equations.

If required, the permittee shall confirm, through the applicable methods and procedures specified in 40 CFR Part 60.18, that the flare's exit velocity and the net heating value of the digester gas conform to the maximum design values specified by the flare manufacturer.



c. Emissions limitation:

Nitrogen oxides (NO_x) emissions shall not exceed 1.7 tons per year.

Applicable compliance method:

The hourly PTE for nitrogen oxides (NO_x) was determined by multiplying the maximum heat input of the boiler (4.7 mmBTU/hr) by 1 over the minimum heat content of digester gas operational restriction in term c)(1) (1 ft³ / 500 BTU) by the NO_x emissions factor over the volume of digester fuel burned (40 lbs NO_x / mmft³) and by balancing the equation by multiplying by (10⁶ Btu / 1 mmBtu) and by (1 mmft³ / 10⁶ ft³), as shown below. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 2.4 Table 2.4-5 (11/98) for landfill flare (the best approximation for this emission unit available).

$$\Xi = \frac{4.7 \text{ mmBTU}}{\text{hr}} \times \frac{1 \text{ ft}^3}{500 \text{ BTU}} \times \frac{40 \text{ lbs NO}_x}{\text{mmft}^3} \times \frac{10^6 \text{ BTU}}{\text{mmBTU}} \times \frac{\text{mmft}^3}{10^6 \text{ ft}^3} = 0.38 \text{ lb NO}_x / \text{hr}$$

The annual limitation was determined by multiplying the hourly PTE by 8760 hours of operation per year, and then dividing by 2000 pounds per ton, as shown below.

$$\Xi = \frac{0.38 \text{ lb NO}_x}{\text{hr}} \times \frac{8760 \text{ hrs}}{\text{year}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} = 1.7 \text{ tons NO}_x / \text{year}$$

The permittee shall demonstrate compliance with the annual emissions limitation through the required monitoring and recordkeeping in d)(3) and d)(5) and using the above equations.

If required, the permittee shall confirm, through the applicable methods and procedures specified in 40 CFR Part 60.18, that the flare's exit velocity and the net heating value of the digester gas conform to the maximum design values specified by the flare manufacturer.

d. Emissions limitation:

Particulate emissions (PE) shall not exceed 0.70 tons per year.

Applicable compliance method:

The hourly PTE for particulate matter (PM) was established by multiplying the particulate matter emissions factor (17 lbs PM / mmft³) by maximum heat input of the boiler (4.7 mmBTU/hr) by 1 over the minimum heat content of digester gas operational restriction in term c)(1) (1 ft³ / 500 BTU) and by (10⁶ Btu / 1 mmBtu) and (1 mmft³ / 10⁶ ft³). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 2.4 Table 2.4-5 (11/98) for landfill flares (the best approximation for this emission unit available).



$$\begin{array}{c}
 \equiv = \frac{4.7 \text{ mmBTU}}{\text{hr}} \left| \frac{1 \text{ ft}^3}{500 \text{ BTU}} \right| \frac{17 \text{ lbs PE}}{\text{mmft}^3} \left| \frac{10^6 \text{ BTU}}{\text{mmBTU}} \right| \frac{\text{mmft}^3}{10^6 \text{ ft}^3} = 0.16 \text{ lb PE / hr}
 \end{array}$$

The annual limitation was determined by multiplying the hourly PTE by 8760 hours of operation per year, and then dividing by 2000 pounds per ton, as shown below.

$$\begin{array}{c}
 \equiv = \frac{0.16 \text{ lb NO}_x}{\text{hr}} \left| \frac{8760 \text{ hrs}}{\text{year}} \right| \frac{1 \text{ ton}}{2000 \text{ lbs}} = 70 \text{ tons PE / year}
 \end{array}$$

The permittee shall demonstrate compliance with the annual emissions limitation through the required monitoring and recordkeeping in d)(3) and d)(5) and using the above equations.

If required, the permittee shall confirm, through the applicable methods and procedures specified in 40 CFR Part 60.18, that the flare's exit velocity and the net heating value of the digester gas conform to the maximum design values specified by the flare manufacturer.

e. Emissions limitation:

Volatile organic compounds (VOC) emissions shall not exceed 0.23 tons per year.

Applicable compliance method:

The hourly PTE for volatile organic compounds (VOC) was established by multiplying the volatile organic compounds emissions factor (5.6 lbs VOC / mmft³) by maximum heat input of the boiler (4.7 mmBTU/hr) by 1 over the minimum heat content of digester gas operational restriction in term c)(1) (1 ft³ / 500 BTU) and by (10⁶ Btu / 1 mmBtu) and (1 mmft³ / 10⁶ ft³). This emission factor is specified in USEPA WebFIRE database available on the Technology Transfer Network (TTN) and CHIEF website for several SCC codes, including 50200601 for landfill waste gas flares (the best approximation for this emission unit available).

$$\begin{array}{c}
 \equiv = \frac{4.7 \text{ mmBTU}}{\text{hr}} \left| \frac{1 \text{ ft}^3}{500 \text{ BTU}} \right| \frac{6 \text{ lbs VOC}}{\text{mmft}^3} \left| \frac{10^6 \text{ BTU}}{\text{mmBTU}} \right| \frac{\text{mmft}^3}{10^6 \text{ ft}^3} = 0.053 \text{ lb VOC / hr}
 \end{array}$$

The annual limitation was calculated by multiplying the hourly PTE by 8760 hours of operation per year, and then dividing by 2000 pounds per ton.

$$\begin{array}{c}
 \equiv = \frac{0.053 \text{ lb VOC}}{\text{hr}} \left| \frac{8760 \text{ hrs}}{\text{year}} \right| \frac{1 \text{ ton}}{2000 \text{ lbs}} = 23 \text{ tons VOC / year}
 \end{array}$$

The permittee shall demonstrate compliance with the annual emissions limitation through the required monitoring and recordkeeping in d)(3) and d)(5) and using the above equations.



If required, the permittee shall confirm, through the applicable methods and procedures specified in 40 CFR Part 60.18, that the flare's exit velocity and the net heating value of the digester gas conform to the maximum design values specified by the flare manufacturer.

f. Emissions limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average.

Applicable compliance method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.