



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Craig W. Butler, Director

7/7/2015

Certified Mail

Mr. Bruce Bailey
 Lime Lakes Energy, LLC
 5755 Granger Rd
 Ste 320
 Independence, OH 44131

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677000621
 Permit Number: P0118941
 Permit Type: Administrative Modification
 County: Summit

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

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 Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Lime Lakes Energy, LLC**

Facility ID:	1677000621
Permit Number:	P0118941
Permit Type:	Administrative Modification
Issued:	7/7/2015
Effective:	7/7/2015
Expiration:	9/15/2021



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
Lime Lakes Energy, LLC

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Final Permit-to-Install and Operate
Lime Lakes Energy, LLC
Permit Number: P0118941
Facility ID: 1677000621
Effective Date: 7/7/2015

Authorization

Facility ID: 1677000621
Application Number(s): A0053513
Permit Number: P0118941
Permit Description: Administrative modification PTIO to correct the size of the engine actually installed from 2233 HP to 530 HP.
Permit Type: Administrative Modification
Permit Fee: \$200.00
Issue Date: 7/7/2015
Effective Date: 7/7/2015
Expiration Date: 9/15/2021
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Lime Lakes Energy, LLC
1743 Vanderhood Road
Barberton, OH 44203

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:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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



Final Permit-to-Install and Operate
Lime Lakes Energy, LLC
Permit Number: P0118941
Facility ID: 1677000621
Effective Date: 7/7/2015

Authorization (continued)

Permit Number: P0118941
Permit Description: Administrative modification PTIO to correct the size of the engine actually installed from 2233 HP to 530 HP.

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

Emissions Unit ID:	B001
Company Equipment ID:	CHPU #1
Superseded Permit Number:	P0108653
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Lime Lakes Energy, LLC
Permit Number: P0118941
Facility ID: 1677000621
Effective Date: 7/7/2015

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
Lime Lakes Energy, LLC
Permit Number: P0118941
Facility ID: 1677000621
Effective Date: 7/7/2015

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Lime Lakes Energy, LLC

Permit Number: P0118941

Facility ID: 1677000621

Effective Date: 7/7/2015

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
Lime Lakes Energy, LLC
Permit Number: P0118941
Facility ID: 1677000621
Effective Date: 7/7/2015

C. Emissions Unit Terms and Conditions

1. B001, CHPU #1

Operations, Property and/or Equipment Description:

530 HP combined heat power unit (CHPU) fired with biogas and natural gas

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.	ORC 3704.03(T)	Carbon monoxide (CO) emissions shall not exceed 2.5 grams per hp-hr and 12.8 tons per year. Sulfur dioxide (SO ₂) emissions shall not exceed 2.5 pounds per hour and 11.0 tons per year.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Nitrogen oxides (NO _x) emissions shall not exceed 1.0 gram per hp-hr and 5.1 tons per year. Volatile organic compound (VOC) emissions shall not exceed 0.84 gram per hp-hr and 4.3 tons per year. Particulate emissions (PE) shall not exceed 0.006 pound per million Btu and 0.40 ton per year.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)b. below.
d.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)(5)	PE shall not exceed 0.310 pound per million Btu of actual heat input.
f.	OAC rule 3745-18-06(G)	Exempt pursuant to OAC rule 3745-18-06(B). Heat input rated capacity equal to or less than 10 million Btu per hour.
g.	OAC rule 3745-110-02(A)(2)(b) OAC rule 3745-110-03(F)	Exempt. Subject to the more stringent requirements of 40 CFR Part 60, Subpart JJJJ.
h.	40 CFR Part 60, Subpart JJJJ 40 CFR 60.4233(e) [In accordance with 40 CFR 60.4230(a)(4)(i), this emissions unit is a stationary spark ignition (SI) internal combustion engine (ICE) with a maximum engine power greater than or equal to 500 HP.]	The emissions limitations established by this rule are less stringent than the emissions limitations established by ORC 3704.03(T) See b)(2)c., b)(2)d., c)(1), d)(3), d)(4) and f)(2) below.
i.	40 CFR 60.1 – 19 40 CFR 60.4246	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 60.1 – 19 apply.
j.	40 CFR Part 63, Subpart ZZZZ 40 CFR 63.6590(c)(1)	A new or reconstructed area source operating in compliance with Part 60 Subpart JJJJ is the demonstration of compliance for 40 CFR 63 Subpart ZZZZ.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet

been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to NO_x, VOC and PE emissions from this air contaminant source since the uncontrolled potential to emit for emissions of PE and SO₂ is less than 10 tons per year; and
 - ii. The requirements of 40 CFR Part 60, Subpart JJJJ §60.4233(e) become effective for NO_x and VOC emissions:
 - (a) 2.0 grams of NO_x per hp-hr or 150 ppmvd at 15% O₂; and
 - (b) 1.0 gram of VOC per hp-hr or 80 ppmvd at 15% O₂.
- c. The stationary spark ignition (SI) internal combustion engine (ICE) is subject to and shall be operated in compliance with the requirements of 40 CFR Part 60, Subpart JJJJ, the standards of performance for stationary SI ICE.
- d. The stationary SI ICE has been or shall be purchased certified by the manufacturer to emission standards as stringent as those identified in 40 CFR 60.4233(e) and found in Table 1 of Part 60, Subpart JJJJ, for lean burn engines greater than or equal to 500 HP and less than 1,350 HP, manufactured on or after 7/1/10, and burning landfill or digester gas.

c) **Operational Restrictions**

- (1) The stationary SI ICE shall be installed, operated, and maintained according to the manufacturer's specifications, written instructions, and procedures over the entire life of the engine. The permittee shall operate and maintain the stationary SI ICE to achieve the emission standards identified in 40 CFR 60.4233(e) and found in Table 1 of NSPS Subpart JJJJ over the entire life of the engine. Any air-to-fuel ratio controllers shall be set by the manufacturer and/or according to the operations manual, to ensure proper operation of the engine and control device and to minimize emissions.
- (2) The permittee shall only burn natural gas or digester gas with a minimum heat content of 500 Btu/scf in this emissions unit.
- (3) Digester gas combusted in this emissions unit shall not exceed 500 parts per million on a volume basis (ppm_v) of hydrogen sulfide once a steady system is established in the digester, but not later than six months after seed sludge is initially introduced into the digester. During the commissioning phase the digester gas combusted in this emissions unit shall not exceed 1000 ppm_v of hydrogen sulfide.

The commissioning phase is the period of time once seed sludge is introduced into the digester until a steady system is established that can be fed the design-case feedstock load on a daily basis.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall perform daily checks, when the emissions unit is in operation firing digester gas and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

The permittee may, upon receipt of written approval from the Ohio EPA, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

- (2) The permittee shall maintain the manufacturer's certification on site or at a central location for all facility ICE and it shall be made available for review upon request. If the manufacturer's certification is not kept on site, the permittee shall maintain a log for the location of each ICE and it shall identify the agency-assigned emissions unit number, the manufacturer's identification number, and the identification number of the certificate. The manufacturer's operations manual shall be maintained at the same location as the ICE.

- (3) The permittee shall maintain the following records and make them available upon request:
 - a. all notifications submitted to comply with and all documentation supporting compliance with Part 60 Subpart JJJJ;
 - b. records of all maintenance conducted on the engine;
 - c. the certification from the manufacturer, documenting that the engine is certified to meet the emission standards identified in 40 CFR 60.4231(e); and
 - d. the information identified in 40 CFR parts 90, 1048, 1054, and/or 1060 that is required to be provided by the manufacturer to the operator/owner, as applicable to the model year and horsepower of the engine.
- (4) The permittee shall maintain monthly records of the natural gas and biogas fuel usage in this emissions unit in millions of standard cubic feet.
- (5) For each day during which the permittee burns a fuel other than biogas or natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (6) The permittee shall maintain daily records of the average sulfur concentration (as H₂S) in ppm_v of the digester gas combusted in this emissions unit.
- (7) 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 ± 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 90% of the allowable concentration, or the lower limit of the accuracy of the monitoring method as determined by the permittee, 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, 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.

- (8) The permittee shall maintain monthly records of the heat content of the digester gas, in Btu/scf.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.

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. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

NO_x emissions shall not exceed 1.0 gram per hp-hr and 5.1 tons per year.

Applicable Compliance Method:

If required, compliance with the NO_x emission limitation shall be determined in accordance with U.S. EPA Reference Methods 1-4 and 7E of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the g/hp-hr mass emission limitation by 8760 hours per year, multiplying the result by the maximum bHp (530 bHp), multiplying the result by 0.0022 lb/g, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the g/hp-hr limitation is maintained.

c. Emission Limitation:

VOC emissions shall not exceed 0.84 gram per hp-hr and 4.3 tons per year.

Applicable Compliance Method:

If required, compliance with the VOC emission limitation shall be determined in accordance with U.S. EPA Reference Methods 1-4 and 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the g/hp-hr mass emission limitation by 8760 hours per year, multiplying the result by the maximum bHp (530 bHp), multiplying the result by 0.0022 lb/g, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the g/hp-hr limitation is maintained.



d. Emission Limitation:

PE shall not exceed 0.006 pound per million Btu and 0.40 ton per year.

PE shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the emission limitations through the results of exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

The annual emission limitation was developed by multiplying the lb/mmBtu mass emission limitation by 266 MCF, multiplying the result by 500 btu/CF, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the lb/mmBtu limitation is maintained.

e. Emission Limitation:

CO emissions shall not exceed 2.5 grams per hp-hr and 12.8 tons per year.

Applicable Compliance Method:

If required, compliance with the CO emission limitation shall be determined in accordance with U.S. EPA Reference Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the g/hp-hr mass emission limitation by 8760 hours per year, multiplying the result by the maximum bHp (530 bHp), multiplying the result by 0.0022 lb/g, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the g/hp-hr limitation is maintained.

f. Emission Limitation:

SO₂ emissions shall not exceed 2.5 pounds per hour and 11.0 tons per year.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emissions limitation through the required monitoring and recordkeeping in d)(7) and using the following equation:

$$E = \text{Gross output of engine (mmBtu/hr)} * (10^6 \text{ Btu} / 1 \text{ mmBtu}) * (1 / \text{digester gas heat content}) * (\text{H}_2\text{S ppm}_v / 1,000,000) * 0.088 \text{ lb H}_2\text{S/ft}^3 \text{ H}_2\text{S} * 1.88 \text{ lb SO}_2/\text{lb H}_2\text{S} \\ = \text{SO}_2\text{lb/hr}$$

Where:

$E = \text{SO}_2$ emissions rate, lb/hr

Digester gas heat content = average heat content of digester gas in Btu/scf from d)(8).

$\text{H}_2\text{S ppm}_v =$ average concentration of H_2S in digester gas, from d)(2)

Compliance with the annual emissions limitation shall be demonstrated by multiplying the calculated SO_2 lb/hr by 8,760 hours per year and dividing by 2,000 pounds per ton.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in 40 CFR, Part 60 Appendix A.

- (2) If the engine was purchased without an EPA certificate of conformity, the engines will need to meet the performance testing requirements of 40 CFR 60.4243(b)(2)(i) and the permittee will be required to conduct an initial performance test to demonstrate compliance with the emission limits from Part 60 Subpart JJJJ.

g) Miscellaneous Requirements

- (1) The complete MACT and NSPS requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.