Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

Alliance Dairies
4951 NW 170th Street
Trenton, Florida 32693

Authorized Representative:
Ron St. John, Owner

Air Permit No. 0750091-001-AC
Date of Issue: Draft
Expiration Date: Draft

Air Construction Permit

This is the final air construction permit, which authorizes the construction of a genset with two flares. The proposed project will occur at Alliance Dairies, which is a Dairy Farm (Standard Industrial Classification No. 0241). The facility is located in Levy County at 4951 NW 170th Street, Trenton, Florida. The UTM coordinates are Zone 17, 319.62 km E; 3274.45 km N. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Draft

_____ _____

Khalid Al-Nahdy, P. E. Date
District Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on ____Draft____ to the persons listed below.

Ron St. John, Owner, Alliance Dairies (allianced@svic.net)
Del Bottcher, P.E., Soil and Water Engineering Technology, Inc. (dbottcher@swet.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Proposed Project

The applicant has proposed to construct a 1000 kW HGM 560 Guascor genset to deliver power to the dairy and excess power to the grid. The genset will run on biogas produced by a 15M gallon methane digester. Excess biogas that cannot be consumed by the genset will be flared.

New Facility

A 1,000 kW HGM 560 Guascor Genset will be located at the facility. The genset is a spark-ignition (SI) 4 stroke lean burn internal combustion engine (ICE). This emissions unit is subject to 40 CFR 60, Subpart JJJJ. The genset engine specifications are as follows:

Make: Guascor
Model: HGM 560
RPM: 1200 rpm
HP: 1395 bhp
Date of Manufacture: 2011

Biogas from the facility's methane digester will be used to fuel the engine to generate power for the facility and deliver excess power to the grid. Two flares will be installed as a backup relief mechanism to flare off any excess biogas. The flares are only expected to operate when the genset is down for service or maintenance. The genset does not have a voluntary manufacturer's certification as described in 40 CFR 60, Subpart JJJJ.

The genset is subject to 40 CFR 63, Subpart ZZZZ. However, this subpart states that compliance with 40 CFR 60, Subpart JJJJ, is sufficient to satisfy the requirements of 40 CFR 63, Subpart ZZZZ.

This permit consists of one genset:

E.U. ID No.	Brief Description
-001	1000 kW HGM 560 Guascor genset

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

Applicable Unit Specific Rule (s)

These emissions unit are regulated under the following:
NSPS, 40 CFR 60, Subpart JJJJ
NESHAP, 40 CFR 63, Subpart ZZZZ

1. Permitting Authority: The permitting authority for this project is the Northeast District Air Program, Florida Department of Environmental Protection (Department). The Northeast District's mailing address is 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the North East District Office. The mailing address and phone number of the District Office is: 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 904/256-1700.

3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.
   e. Appendix E. Subpart A of NSPS – General Provision.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.
   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Application for Non - Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A completed Application for Air Permit - Non Title V Source (DEP Form No. 62-210.900(3), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this construction permit. To properly apply for a construction permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit. [Rules 62-4.055 and 62-4.220, F.A.C.]

This section of the permit addresses the following emissions unit/units.

E.U. ID No.	Brief Description
001	1000 kW HGM 560 Guascor genset

The units are subject to the following regulations:

NSPS, Subpart JJJJ--Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
NESHAP, Subpart ZZZZ--National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

[Permitting note: According to 40 CFR 63.6590(c)(1), compliance with NSPS, Subpart JJJJ shall be considered compliance with NESHAP, Subpart ZZZZ for this emissions unit.]

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

1. Hours of Operation. The hours of operation are not restricted.
[Rules 62-4.160(2), 62-210.200(PTE), F.A.C.]

2. Maximum Operating Rate. The maximum biogas fuel consumption rate is 14,280 cubic feet/hour.
[Rules 62-4.160(2), 62-210.200(PTE), F.A.C.]

Emissions Limitations and Work Practice Standards

3. Emissions Limits. The units are subject to the emissions limit as stated in Table 1 below.

Table 1: Pollutant Emissions Limits

Pollutant	Emissions Limit in g/HP-hr (ppmvd @ 15% O_2)	Rule
VOC	1.0 (80)	40 CFR 60.4233(e) and Table 1 to Subpart JJJJ of NSPS
NOx	2.0 (150)	
CO	5.0 (610)	

4. Operation & Maintenance. Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in Specific Condition 3 over the entire life of the engine.
[40 CFR 60.4234]

Compliance Demonstration and Testing Requirements

5. If you are an owner or operator of a stationary SI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test

and furnish the Department with a written report of the results of such performance test within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup. Performance testing shall be conducted subsequently every 8,760 operating hours or 3 years, whichever comes first, thereafter to demonstrate compliance. [40 CFR 60.4243(b)(2)(ii), 40 CFR 60.8(a)]

6. Test Method. The owner or operator shall conduct the performance tests according to procedures as described below:

(a) Each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and according to the requirements in §60.8 (Appendix E of this permit) and under the specific conditions that are specified by Table 2 of this permit.

(b) You may not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in §60.8(c) (Appendix E of this permit). If your stationary SI internal combustion engine is non-operational, you do not need to startup the engine solely to conduct a performance test; however, you must conduct the performance test immediately upon startup of the engine.

(c) You must conduct three separate test runs for each performance test required in this section, as specified in §60.8(f) (Appendix E of this permit). Each test run must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and last at least 1 hour.

(d) To determine compliance with the NO_X mass per unit output emission limitation, convert the concentration of NO_X in the engine exhaust using Equation 1 of this section:

$$ER = \frac{C_d \times 1.912 \times 10^{-3} \times Q \times T}{HP - hr} \qquad \text{(Eq. 1)}$$

Where:

ER = Emission rate of NO_X in g/HP-hr.

C_d= Measured NO_X concentration in parts per million by volume (ppmv).

1.912×10^{-3} = Conversion constant for ppm NO_X to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meter per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, horsepower-hour (HP-hr).

(e) To determine compliance with the CO mass per unit output emission limitation, convert the concentration of CO in the engine exhaust using Equation 2 of this section:

$$ER = \frac{C_d \times 1.164 \times 10^{-3} \times Q \times T}{HP - hr} \qquad \text{(Eq. 2)}$$

Where:

ER = Emission rate of CO in g/HP-hr.

C_d= Measured CO concentration in ppmv.

1.164×10^{-3} = Conversion constant for ppm CO to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

(f) For purposes of this subpart, when calculating emissions of VOC, emissions of formaldehyde should not be included. To determine compliance with the VOC mass per unit output emission limitation, convert the concentration of VOC in the engine exhaust using Equation 3 of this section:

$$ER = \frac{C_d \times 1.833 \times 10^{-3} \times Q \times T}{HP - hr} \qquad \text{(Eq. 3)}$$

Where:

ER = Emission rate of VOC in g/HP-hr.

Cd= VOC concentration measured as propane in ppmv.

1.833×10^{-3} = Conversion constant for ppm VOC measured as propane, to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

(g) If the owner/operator chooses to measure VOC emissions using either Method 18 of 40 CFR part 60, appendix A, or Method 320 of 40 CFR part 63, appendix A, then it has the option of correcting the measured VOC emissions to account for the potential differences in measured values between these methods and Method 25A. The results from Method 18 and Method 320 can be corrected for response factor differences using Equations 4 and 5 of this section. The corrected VOC concentration can then be placed on a propane basis using Equation 6 of this section.

$$RF_i = \frac{C_{Mi}}{C_{Ai}} \qquad \text{(Eq. 4)}$$

Where:

RF_i= Response factor of compound i when measured with EPA Method 25A.

C_{Mi}= Measured concentration of compound i in ppmv as carbon.

C_{Ai}= True concentration of compound i in ppmv as carbon.

$$C_{icorr} = RF_i \times C_{imeas} \qquad \text{(Eq. 5)}$$

Where:

C_{icorr}= Concentration of compound i corrected to the value that would have been measured by EPA Method 25A, ppmv as carbon.

C_{imeas}= Concentration of compound i measured by EPA Method 320, ppmv as carbon.

$$C_{Peq} = 0.6098 \times C_{icorr} \qquad \text{(Eq. 6)}$$

Where:

C_{Peq}= Concentration of compound i in mg of propane equivalent per DSCM.

[40 CFR 60.4244]

Notification, Reporting and Recordkeeping Requirements

7. Owners and operators of all stationary SI ICE must keep records of the following information:

(1) All notifications submitted to comply with this subpart and all documentation supporting any notification.
(2) Maintenance conducted on the engine.
(3) If the stationary SI internal combustion engine is not a certified engine, documentation that the engine meets the emission standards.
[40 CFR 60.4245(a)]

8. Owners and operators of stationary SI ICE greater than or equal to 500 HP that have not been certified by an engine manufacturer to meet the emission standards in 40 CFR 60.4231 must submit an initial notification as required in §60.7(a)(1) of Appendix E of this permit. The notification must include the following information:

(1) Name and address of the owner or operator;
(2) The address of the affected source;
(3) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;
(4) Emission control equipment; and
(5) Fuel used.
[40 CFR 60.4245(c)]

9. Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in Specific Condition 6 within 60 days after the test has been completed.
[40 CFR 60.4245(d)]

10. Table 3 to this subpart shows which parts of the General Provisions in Appendix E apply to you.
[40 CFR 60.4246]

Table 2: Test Methods [Specific Condition 6(a)]

For each	Complying with the requirement to	You must	Using	According to the following requirements
1. Stationary SI internal combustion engine demonstrating compliance according to §60.4244	a. limit the concentration of NO_X in the stationary SI internal combustion engine exhaust	i. Select the sampling port location and the number of traverse points;	(1) Method 1 or 1A of 40 CFR part 60, Appendix A or ASTM Method D6522–00(2005)	(a) If using a control device, the sampling site must be located at the outlet of the control device.
		ii. Determine the O_2 concentration of the stationary internal combustion engine exhaust at the sampling port location;	(2) Method 3, 3A, or 3B of 40 CFR part 60, appendix A or ASTM Method D6522–00(2005)	(b) Measurements to determine O_2 concentration must be made at the same time as the measurements for NO_X concentration.
		iii. If necessary, determine the exhaust flow rate of the stationary internal combustion engine exhaust;	(3) Method 2 or 19 of 40 CFR part 60	
		iv. If necessary, measure moisture content of the stationary internal combustion engine exhaust at the sampling port location; and	(4) Method 4 of 40 CFR part 60, appendix A, Method 320 of 40 CFR part 63, appendix A, or ASTM D 6348–03 (incorporated by reference, see §60.17)	(c) Measurements to determine moisture must be made at the same time as the measurement for NO_X concentration.
		v. Measure NO_X at the exhaust of the stationary internal combustion engine	(5) Method 7E of 40 CFR part 60, appendix A, Method D6522–00(2005), Method 320 of 40 CFR part 63, appendix A, or ASTM D 6348–03 (incorporated by reference, see §60.17)	(d) Results of this test consist of the average of the three 1-hour or longer runs.

	b. limit the concentration of CO in the stationary SI internal combustion engine exhaust	i. Select the sampling port location and the number of traverse points;	(1) Method 1 or 1A of 40 CFR part 60, Appendix A or ASTM Method D6522–00(2005)	(a) If using a control device, the sampling site must be located at the outlet of the control device.
		ii. Determine the O_2 concentration of the stationary internal combustion engine exhaust at the sampling port location;	(2) Method 3, 3A, or 3B of 40 CFR part 60, appendix A or ASTM Method D6522–00(2005)	(b) Measurements to determine O_2 concentration must be made at the same time as the measurements for CO concentration.
		iii. If necessary, determine the exhaust flow rate of the stationary internal combustion engine exhaust;	(3) Method 2 or 19 of 40 CFR part 60	
		iv. If necessary, measure moisture content of the stationary internal combustion engine exhaust at the sampling port location; and	(4) Method 4 of 40 CFR part 60, appendix A, Method 320 of 40 CFR part 63, appendix A, or ASTM D 6348–03 (incorporated by reference, see §60.17)	(c) Measurements to determine moisture must be made at the same time as the measurement for CO concentration.
		v. Measure CO at the exhaust of the stationary internal combustion engine	(5) Method 10 of 40 CFR part 60, appendix A, ASTM Method D6522–00(2005), Method 320 of 40 CFR part 63, appendix A, or ASTM D 6348–03 (incorporated by reference, see §60.17)	(d) Results of this test consist of the average of the three 1-hour or longer runs.
	c. limit the concentration of VOC in the stationary SI internal combustion	i. Select the sampling port location and the number of traverse points;	(1) Method 1 or 1A of 40 CFR part 60, Appendix A	(a) If using a control device, the sampling site must be located at the outlet of the control device.

	engine exhaust			
		ii. Determine the O_2 concentration of the stationary internal combustion engine exhaust at the sampling port location;	(2) Method 3, 3A, or 3B of 40 CFR part 60, appendix A or ASTM Method D6522–00(2005)	(b) Measurements to determine O_2 concentration must be made at the same time as the measurements for VOC concentration.
		iii. If necessary, determine the exhaust flow rate of the stationary internal combustion engine exhaust;	(3) Method 2 or 19 of 40 CFR part 60	
		iv. If necessary, measure moisture content of the stationary internal combustion engine exhaust at the sampling port location; and	(4) Method 4 of 40 CFR part 60, appendix A, Method 320 of 40 CFR part 63, appendix A, or ASTM D 6348–03 (incorporated by reference, see §60.17)	(c) Measurements to determine moisture must be made at the same time as the measurement for VOC concentration.
		v. Measure VOC at the exhaust of the stationary internal combustion engine	(5) Methods 25A and 18 of 40 CFR part 60, appendix A, Method 25A with the use of a methane cutter as described in 40 CFR 1065.265, Method 18 or 40 CFR part 60, appendix A, Method 320 of 40 CFR part 63, appendix A, or ASTM D 6348–03 (incorporated by reference, see §60.17)	(d) Results of this test consist of the average of the three 1-hour or longer runs.

Table 3: General Provision Applicability

General provisions citation	Subject of citation	Applies to subpart	Explanation
§60.1	General applicability of the General Provisions	Yes	
§60.2	Definitions	Yes	Additional terms defined in §60.4248.
§60.3	Units and abbreviations	Yes	
§60.4	Address	Yes	
§60.5	Determination of construction or modification	Yes	
§60.6	Review of plans	Yes	
§60.7	Notification and Recordkeeping	Yes	Except that §60.7 only applies as specified in §60.4245.
§60.8	Performance tests	Yes	Except that §60.8 only applies to owners and operators who are subject to performance testing in subpart JJJJ.
§60.9	Availability of information	Yes	
§60.10	State Authority	Yes	
§60.11	Compliance with standards and maintenance requirements	Yes	Requirements are specified in subpart JJJJ.
§60.12	Circumvention	Yes	
§60.13	Monitoring requirements	No	
§60.14	Modification	Yes	
§60.15	Reconstruction	Yes	
§60.16	Priority list	Yes	
§60.17	Incorporations by reference	Yes	
§60.18	General control device requirements	No	
§60.19	General notification and reporting requirements	Yes	