

Archaea Energy Inc.
4444 Westheimer Road, Suite
450G Houston Texas 77027



March 11, 2022

MDEQ – AQD
Detroit Office - District Supervisor
Cadillac Place, Suite 2-300
3058 West Grand Blvd.
Detroit, MI 48202-6058

Subject: M-001 Rule 216(2) Change Notification (PTI-98-11D)
M-001 Rule 215 Change Notification: New Responsible Official for Canton Renewables
State Registration No. P0270
MI-ROP-P0270-2012a
MI-PTI-98-11D-2020

On behalf of Canton Renewables, LLC (Canton), Archaea Energy, Inc. (f/k/a Aria Energy, LLC), submits the enclosed Change Notifications required by Rule 216(2) and 215(5).

On May 19, 2020, Canton requested a minor modification to ROP-MI-P0270-2012 to replace the Open Flare annual operating hour restriction with a revised operating restriction of 498,802 MMBtu/yr calculated monthly, on a 12-month rolling basis. On December 15, 2020, was issued PTI 98-11D to facilitate the change to the Open Flare operational limitation. Canton Renewables is submitting the enclosed change notification request PTI 98-11D be incorporated into the Renewal Operating Permit as required by Rule **216(1)(a)(v)**.

Also, as required by Rule **215(5)**, we are advising EGLE of the change to Canton Renewables, LLC Responsible Official to –

John (J.P.) McNeil
(m) 404.862.3782
jmcneil@archaea.energy

Payment Remittance & Invoice Address -
By Email: PREFERRED
AriaAccounts.Payable@archaea.energy

By Mail:
Canton Renewables, LLC
46280 Dylan Drive, Ste 200
Novi, MI 48377

Please let us know if you have any questions regarding this matter.

Sincerely,

ARCHAEA ENERGY, INC / CANTON RENEWABLES, LLC

A handwritten signature in cursive script that reads "Emily Zambuto".

Emily Zambuto
Director of Environmental Compliance

Enclosure – **Form M-001** Administrative Amendment & **C-001**

With copy to –

EGLE Air Quality Division
Permit Section
P.O. Box 30260
Lansing, MI 48909-7760

EGLE, Air Quality Division
350 Ottawa Avenue NW
Unit 10
Grand Rapids, MI 49503
EGLE-ROP@michigan.gov



RENEWABLE OPERATING PERMIT M-001: RULE 215 CHANGE NOTIFICATION RULE 216 AMENDMENT/MODIFICATION APPLICATION

This information is required by Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment.

1. SRN P0270	2. ROP Number MI-ROP-P0270-2012a	3. County Wayne
4. Stationary Source Name Canton Renewables, LLC		
5. Location Address 4345 South Lilley Road		6. City Canton Twp.
<p>7. Submittal Type - <i>The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.</i></p> <p><input type="checkbox"/> Rule 215(1) Notification of change. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 215(2) Notification of change. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 215(3) Notification of change. <i>Complete Items 8 – 11 and 14</i></p> <p><input type="checkbox"/> Rule 215(5) Notification of change. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. <i>Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions.</i></p> <p><input checked="" type="checkbox"/> Rule 216(2) Minor Modification. <i>Complete Items 8 – 12 and 14</i></p> <p><input type="checkbox"/> Rule 216(3) Significant Modification. <i>Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions.</i></p> <p><input type="checkbox"/> Rule 216(4) State-Only Modification. <i>Complete Items 8 – 12 and 14</i></p>		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> <u>12/15/2020</u>		9. Change in emissions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>10. Description of Change - <i>Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).</i></p> <p>Canton Renewables received a PTI Mod to replace the Open Flare annual operating hour restriction with a revised operating restriction of 498,802 MMBtu/yr calculated monthly, on a 12-month rolling basis.</p>		
11. New Source Review Permit(s) to Install (PTI) associated with this application? If Yes, enter the PTI Number(s) <u>98-11D</u> - - - - -		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>12. Compliance Status - <i>A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.</i></p> <p>a. Is the change identified above in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>c. If the change includes a future applicable requirement(s), will timely compliance be achieved? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		
13. Operator's Additional Information ID - <i>Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.</i>		AI
14. Contact Name Emily Zambuto	Telephone No. (585) 948-4616	E-mail Address ezambuto@archaea.energy
15. This submittal also updates the ROP renewal application submitted on <u>03/14/2017</u> <i>(If yes, a mark-up of the affected pages of the ROP must be attached.)</i>		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A

NOTE: A CERTIFICATION FORM (C-001) SIGNED BY A RESPONSIBLE OFFICIAL MUST ACCOMPANY ALL SUBMITTALS

For Assistance
Contact: 800-662-9278

www.michigan.gov/egle

EULFGPLANT EMISSION UNIT CONDITIONS
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DESCRIPTION: Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: 3,200 scfm regenerative thermal oxidizer and 4,200 scfm open flare.

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EULFGPLANT unless a malfunction abatement plan (MAP) as described in Rule 911(2), for EULFGPLANT, the thermal oxidizer and the flare, has been submitted within 60 days of initial equipment start-up, and is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)
498,802 MMBtu/yr
2. The permittee shall not operate the open flare for more than 1,248 hours per 12-month rolling time period as determined at the end of each calendar month.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901, R 336.2803, R 336.2804)
3. The permittee shall only burn treated product gas from EULFGPLANT in the open flare except during periods of emergency shut down of EULFGPLANT, the open flare may also be utilized to control the ammonia stream from the chillers for EULFGPLANT.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901, R 336.2803, R 336.2804)
4. The open flare shall comply with provisions of 40 CFR Part 60 Subpart A and shall be operated at all times when product gases may be vented to the flare.² (40 CFR 60.18(e))
4. The open flare shall be operated with no visible emissions, as determined by the methods specified in 40 CFR 60.18(f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.² (40 CFR 60.18(c)(1))

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EULFGPLANT unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes maintaining a minimum combustion chamber temperature of 1400 °F and a minimum retention time of 0.5 seconds.² (R 336.1224, R 336.1225, R 336.1702, R 336.1910)



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8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> <u>11/19/2021</u>		9. Change in emissions? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>10. Description of Change - <i>Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).</i></p> <p>Change to the Responsible Official only: New RO - John (J.P.) McNeil, Senior Vice President of Operation Canton Renewables, LLC 4444 Westheimer Road, Ste 450G Houston, TX 77027 p. (404) 862-3782 jmcneil@archaea.energy</p>		
11. New Source Review Permit(s) to Install (PTI) associated with this application?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, enter the PTI Number(s) - - - - -		
<p>12. Compliance Status - <i>A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.</i></p> <p>a. Is the change identified above in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>c. If the change includes a future applicable requirement(s), will timely compliance be achieved? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		
13. Operator's Additional Information ID - <i>Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.</i>		AI
14. Contact Name Emily Zambuto	Telephone No. (585) 948-4616	E-mail Address ezambuto@archaea.energy
15. This submittal also updates the ROP renewal application submitted on <u>03/14/2017</u> <i>(If yes, a mark-up of the affected pages of the ROP must be attached.)</i>		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A



RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.


This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN P0270
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Stationary Source Name Canton Renewables, LLC	
City Canton Twp.	County Wayne

SUBMITTAL CERTIFICATION INFORMATION	
1. Type of Submittal <i>Check only one box.</i>	
<input type="checkbox"/> Initial Application (Rule 210)	<input checked="" type="checkbox"/> Notification / Administrative Amendment / Modification (Rules 215/216)
<input type="checkbox"/> Renewal (Rule 210)	<input type="checkbox"/> Other, describe on AI-001
2. If this ROP has more than one Section, list the Section(s) that this Certification applies to _____	
3. Submittal Media <input checked="" type="checkbox"/> E-mail <input type="checkbox"/> FTP <input type="checkbox"/> Disk <input checked="" type="checkbox"/> Paper	
4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal.	
AI	

CONTACT INFORMATION	
Contact Name Emily Zambuto	Title Director of Environmental Compliance
Phone number 585-948-4616	E-mail address ezambuto@archaea.energy

This form must be signed and dated by a Responsible Official.				
Responsible Official Name John (J.P.) McNeil			Title Senior Vice President of Operations	
Mailing address 4444 Westheimer Road, Ste 450G				
City Houston	State TX	ZIP Code 77027	County Harris	Country USA
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.				
			03/14/2022	
Signature of Responsible Official			Date	