

Public Notice of intent to issue

Air

Permit 15300034-101

520 Lafayette Road North St. Paul, MN 55155-4194

General information

Public comment period begins: July 24, 2024

Public comment period ends: August 23, 2024

Name and address of Permittee: Facility name and location:

Novilla RNG LLC
435 Joe Jall Dr
435 Joe Jall Dr
43695 State 287
437 Ypsilanti, MI 48197
438 Long Prairie, MN 563

Long Prairie, MN 56347-5315

Todd County

MPCA contact person:

Alfredo Rincon-Gonzalez Industrial Division

Minnesota Pollution Control Agency

520 Lafayette Rd St. Paul, MN 55155 Phone: 651-757-2158

Email: <u>alfredo.rincon.gonzalez@state.mn.us</u> File manager phone: 651-757-2728 or

844-828-0942

A draft permit and supporting documentation are available are available for review on the MPCA Public Notices webpage at https://www.pca.state.mn.us/get-engaged/public-comments. Additional materials relating to the issuance of this permit are available for inspection by appointment at any MPCA office (https://www.pca.state.mn.us/about-mpca/contact-us) between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday. The MPCA will mail or email a copy of the draft permit upon request. Comments, petitions, and other requests must be received at the MPCA in writing on or before the public comment period end date and U.S. Mail comments must be received by 4:30 p.m.

Description of North Star RNG LLC

North Star RNG LLC is a new renewable natural gas facility. It will process raw biogas into commercial-grade biomethane that meets natural gas pipeline quality specifications. Cow manure will be broken down in an oxygen-free environment in an aboveground anaerobic digester. A natural gas boiler will be used to reach and maintain operating temperatures in the anaerobic digester. The purpose of plant is to cleanup and compress the biogas from the anaerobic digestor and converting it to renewable natural gas (RNG). This is accomplished through the separation of certain constituents from the biogas so that it meets pipeline quality specifications. Pipeline quality RNG will be 99% methane. The separated constituents, which include carbon dioxide (CO₂), hydrogen sulfide (H₂S), and small amounts of methane, are commonly referred to as tail gas. Thus, Methane will be injected into a natural gas pipeline junction or will be transported offsite via truck, in compressed natural gas (CNG) trailers.

A thermal oxidizer will control the tail gases from the biogas processing. A backup flare will combust off-specification products during start-up, shut-down, malfunction events, and when the membrane separation plant will not operate. The main pollutants of concern from the processes will be CO₂ and Sulfur Dioxide (SO₂).

The preliminary determination to issue this Air permit is tentative.

The permit action is for construction and operation of the facility. The permit action is a Part 70 perating permit therefore, the draft permit has been placed on public notice.

A summary of the Potential to Emit (PTE) in tons per year is as follows:

Pollutant	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOCs	CO	CO ₂ e	All HAPs
Total Facility PTE	1.15	1.15	1.15	135	7.19	43.3	44.8	1600	3.04

PM = Particulate Matter PM₁₀ = PM, 10 microns and smaller

 $PM_{2.5} = PM$, 2.5 microns and smaller $SO_2 = Sulfur Dioxide$

 $NO_x = Nitrogen Oxides$ VOCs = Volatile Organic Compounds

CO = Carbon Monoxide CO₂e = Carbon Dioxide Equivalents as defined in Minn. R. 7007.0100 HAP = Hazardous Air Pollutant -- if used and not defined above

The Permittee is not required to submit a pollution prevention progress report pursuant to Minn. Stat. § 115D.08.

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Procedure for public participation

As stated in Minn. R. chs. 7000 and 7001, there are three formal procedures for public participation in the MPCA's consideration of this matter. Interested persons may:

- 1) Submit written comments on the draft permit.
- 2) Petition the MPCA to hold a public informational meeting.
- 3) Petition the MPCA to hold a contested case hearing.

Submitting written comments

Comments may be submitted:

- 1) Online at https://mpca.commentinput.com/comment/search; or
- 2) By U.S. postal mail to the following address:

Alfredo Rincon-Gonzalez Minnesota Pollution Control Agency 520 Lafayette Rd St. Paul, MN 55155 Phone: 651-757-2158

Email: alfredo.rincon.gonzalez@state.mn.us

Submitted comments or petitions must state:

- 1) Your interest in the permit application or the draft permit.
- 2) The action you wish the MPCA to take, including specific references to the section of the draft permit you believe should be changed.
- The reasons supporting your position, stated with sufficient specificity as to allow the MPCA to investigate the merits of the position.

Public informational meeting

A public informational meeting is an informal meeting during which interested persons can ask questions concerning the proposed facility. MPCA staff will be present to provide information. If an interested person would like the MPCA to hold a public informational meeting, the person should include all information identified above and in addition include a statement of the reasons the person desires the MPCA to hold a public informational meeting and the issues that the person would like the agency to address at the public informational meeting.

Contested Case Hearing

A contested case hearing is a formal proceeding before an administrative law judge empowered to advise the MPCA regarding issues of fact. As described in Minn. R. 7000.1800, persons who submit petitions for a contested case hearing must also state the issues they propose to address in a contested case hearing, the specific relief requested or resolution of the matter, and the reasons (which may be in the form of proposed findings) supporting an MPCA decision to hold a contested case hearing. Failure to comply with these rules exactly may result in a denial of the request. To the extent known, the petitioner may also submit a list of prospective witnesses to be called at a hearing, a proposed list of publications, references, or studies to be introduced at a hearing and the approximate time required for the petitioner to present the matter at a hearing. The decision whether to hold a contested case hearing will be made under Minn. R. 7000.1900.

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