



2/19/2024

***Via Division Portal Electronic Submittal***

Michael Kennedy, Director  
Kentucky Division for Air Quality  
300 Sower Blvd, Second Floor  
Frankfort, Kentucky 40601

Re: Application for Permit Renewal  
East Kentucky Power Cooperative, Inc. – Pendleton LGTE Site  
Permit No. V-18-010 R1  
Agency Interest #: 77788

Dear Mr. Kennedy:

East Kentucky Power Cooperative, Inc. (EKPC) operates the Pendleton Landfill Gas To Energy Site located at 1374 Bryan Griffin Road, Butler, KY 41006. EKPC currently operates the Landfill-Gas-To-Energy site in accordance with Permit No. V-18-010 R1.

The current permit was originally issued on August 21, 2019 and subsequently revised on September 6, 2019. The current permit is scheduled to expire on August 21, 2024. EKPC is submitting the enclosed application for renewal of the permit pursuant to 401 KAR 52:020, Section 12, and Section G of the permit.

EKPC looks forward to working with the Division during the renewal process. Should you have any questions, please feel free to contact me.

Sincerely,

*Jerry Purvis*

Jerry Purvis, Vice President  
Environmental Affairs

cc: Rick Shewekah, KDAQ  
Zach Bittner, KDAQ

4775 Lexington Road  
P.O. Box 707  
Winchester, Kentucky 40392  
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Kevin Moore, EKPC  
Robert Webb, EKPC

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**APPLICATION FOR RENEWAL OF  
TITLE V, OPERATING PERMIT  
V-18-010 R1**

**EAST KENTUCKY POWER COOPERATIVE, INC.  
PENDLETON LANDFILL GAS TO ENERGY SITE  
AGENCY INTEREST NO. 77788  
SOURCE ID. NO. 21-191-00022**

**Prepared by:**

**EAST KENTUCKY POWER COOPERATIVE, INC.  
P. O. Box 707  
4775 Lexington Road  
Winchester, Kentucky 40392-0707**

## 1.0 INTRODUCTION

East Kentucky Power Cooperative, Inc. (EKPC) operates the Pendleton Landfill Gas To Energy Site (Pendleton) located at 1374 Bryan Griffin Road, Butler, KY 41006. EKPC currently operates the Landfill-Gas-To-Energy (LGTE) site in accordance with Permit No. V-18-010 R1, which will expire on August 21, 2024. The current permit was originally issued on August 21, 2019, and subsequently revised on September 6, 2019.

EKPC leases property from the Pendleton County landfill necessary for its LGTE operations and purchases gas from the landfill. However, the landfill is separately owned and operated, there is no shared control nor are there any shared employees. Each entity is subject to separate compliance requirements under the Clean Air Act. Neither the landfill nor EKPC can speak for the other, nor can either assure compliance for the other. Neither has access to the other's operational information and neither can direct compliance decisions or obligations of the other. EKPC and the landfill are not interdependent. EKPC utilizes all the gas it purchases. No landfill gas is ever purchased and returned. We understand that any landfill gas not purchased is automatically sent to the landfill flare. The LGTE engines can be operated on a number of different fuels and thus EKPC is not limited to the sole use of landfill gas.

The landfill gas is directly converted into electricity at EKPC's facility. EKPC accepts delivery of the landfill gas at the interconnection point outside the LGTE compressor room. Prior to the demarcation point, EKPC understands that the landfill uses a knockout pot, filter and blower to dewater, compress and filter the landfill gas. Additionally, EKPC owns and operates skids within its facility that filter, dewater and compress the gas to protect its engines by assuring no water is introduced in the process. EKPC performs a weekly fuel skid inspection to assure the compressor is running. Filter changes occur according to manufacturer specifications. Records of the weekly inspections are kept at the site. EKPC is therefore able to provide its own assurances that the fuel it combusts has been filtered, dewatered and compressed in compliance with the current permit condition; however, it does not have the information or authority to provide assurances as to the processes used by the landfill. The EKPC LGTE system is sealed for proper operation. There is no point where gas can be vented to the atmosphere during normal operation. The system cannot operate if air is introduced into the pipes during startup. If necessary, a manual vent to the atmosphere with a manual valve can be opened only during startup and to allow air to be purged from the lines.

EKPC submits this application for renewal of the permit pursuant to 401 KAR 52:020 Section 12 and Section G of the permit. Pursuant to 401 KAR 52:020 Section 4(2)(c), this renewal application is timely and provides "only the information that is new or different from the most recent source-wide permit application."

## **2.0 CHANGES SINCE LAST SOURCE WIDE APPLICATION**

There have been no changes to the emission units covered by this permit. The site remains the same as at the time of the last source wide permit application and EKPC is proposing no changes in this permit renewal.

## **3.0 EMISSION CALCULATIONS**

EKPC has reviewed emission calculations for the unit at the site during the last permitting process and has determined that no changes to emission factors or other components of the emission calculations have occurred since the last source wide permit application. Thus no changes are proposed.

## **4.0 CONCLUSION**

EKPC is submitting this application for renewal of the existing Title V permit for the Pendleton Landfill-Gas-To-Energy Site in accordance with 401 KAR 52:020 Section 12 and Section G of the permit. The existing permit expires on August 21, 2024. This renewal application is being submitted at least six months in advance of the expiration date for the current permit. Pursuant to 401 KAR 52:020 Section 4(2)(c), this renewal permit application provides “only the information that is new or different from the most recent source-wide permit application.” Therefore, this submittal is timely and complete such that the terms and conditions of the previous permit shall remain in effect until the renewal permit has been issued should the renewal permit not be issued before the expiration of the previous permit as specified in 401 KAR 52:020 Section 12(6)(a)-(b) and Section G of the permit.

## **5.0 ATTACHMENT**

A DEP 7007AI Form is attached hereto and incorporated herein.

**Division for Air Quality**

300 Sower Boulevard  
 Frankfort, KY 40601  
 (502) 564-3999

**DEP7007AI**

**Administrative Information**

- Section AI.1: Source Information
- Section AI.2: Applicant Information
- Section AI.3: Owner Information
- Section AI.4: Type of Application
- Section AI.5: Other Required Information
- Section AI.6: Signature Block
- Section AI.7: Notes, Comments, and Explanations

**Additional Documentation**

Additional Documentation attached

**Source Name:** East Kentucky Power Cooperative, Inc.

**KY EIS (AFS) #:** 21- 191-00022

**Permit #:** V-18-010

**Agency Interest (AI) ID:** 77788

**Date:** 14-Feb-24

**Section AI.1: Source Information**

<b>Physical Location</b>	<b>Street:</b>	<u>1374 Bryan Griffin Road</u>		
<b>Address:</b>	<b>City:</b>	<u>Butler</u>	<b>County:</b>	<u>Pendleton</u>
			<b>Zip Code:</b>	<u>41006</u>
<b>Mailing Address:</b>	<b>Street or P.O. Box:</b>	<u>1374 Bryan Griffin Road</u>		
	<b>City:</b>	<u>Butler</u>	<b>State:</b>	<u>KY</u>
			<b>Zip Code:</b>	<u>41006</u>

**Standard Coordinates for Source Physical Location**

**Longitude:** 84.406 (decimal degrees)      **Latitude:** 38.734 (decimal degrees)

**Primary (NAICS) Category:** Electric Power Generation      **Primary NAICS #:** 221112

<b>Classification (SIC) Category:</b>		<u>Electric Power Generation</u>	<b>Primary SIC #:</b>	<u>4911</u>
<b>Briefly discuss the type of business conducted at this site:</b>		<u>Generation of electrical power from landfill gas combustion</u>		
<b>Description of Area Surrounding Source:</b>	<input checked="" type="checkbox"/> Rural Area	<input type="checkbox"/> Industrial Park	<input type="checkbox"/> Residential Area	<b>Is any part of the source located on federal land?</b>
	<input type="checkbox"/> Urban Area	<input type="checkbox"/> Industrial Area	<input type="checkbox"/> Commercial Area	
<b>Approximate distance to nearest residence or commercial property:</b>		<u>approx. 100 feet</u>	<b>Property Area:</b>	<u>approx, 1800 acres</u>
		<b>Is this source portable?</b>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?</b>				
<b>NPDES/KPDES:</b>	<input type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input checked="" type="checkbox"/> N/A	
<b>Solid Waste:</b>	<input type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input checked="" type="checkbox"/> N/A	
<b>RCRA:</b>	<input type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input checked="" type="checkbox"/> N/A	
<b>UST:</b>	<input type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input checked="" type="checkbox"/> N/A	
<b>Type of Regulated Waste Activity:</b>	<input type="checkbox"/> Mixed Waste Generator	<input type="checkbox"/> Generator	<input type="checkbox"/> Recycler	<input type="checkbox"/> Other: _____
	<input type="checkbox"/> U.S. Importer of Hazardous Waste	<input type="checkbox"/> Transporter	<input type="checkbox"/> Treatment/Storage/Disposal Facility	<input checked="" type="checkbox"/> N/A

## Section AI.2: Applicant Information

**Applicant Name:** East Kentucky Power Cooperative, Inc.

**Title:** (if individual) \_\_\_\_\_

**Mailing Address:** **Street or P.O. Box:** 4775 Lexington Road, P.O. Box 707

**City:** Winchester **State:** KY **Zip Code:** 40392-0707

**Email:** (if individual) \_\_\_\_\_

**Phone:** 859-744-4812

### Technical Contact

**Name:** Kevin Moore

**Title:** Manager, Air Quality

**Mailing Address:** **Street or P.O. Box:** 4775 Lexington Road, P.O. Box 707

**City:** Winchester **State:** KY **Zip Code:** 40392-0707

**Email:** kevin.moore@ekpc.coop

**Phone:** 859-745-4157 ext. 6221

### Air Permit Contact for Source

**Name:** Jerry Purvis

**Title:** Vice President, Environmental Affairs

**Mailing Address:** **Street or P.O. Box:** 4775 Lexington Road, P.O. Box 707

**City:** Winchester **State:** KY **Zip Code:** 40392-0707

**Email:** jerry.purvis@ekpc.coop

**Phone:** 859-744-4812



**Section AI.3: Owner Information**

**Owner same as applicant**

**Name:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Mailing Address:** **Street or P.O. Box:** \_\_\_\_\_  
**City:** \_\_\_\_\_ **State:** \_\_\_\_\_ **Zip Code:** \_\_\_\_\_

**Email:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

**List names of owners and officers of the company who have an interest in the company of 5% or more.**

**Name**

**Position**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Section AI.4: Type of Application**

**Current Status:**       Title V    Conditional Major    State-Origin       General Permit       Registration       None

Name Change       Initial Registration       Significant Revision       Administrative Permit Amendment

**Requested Action:**       Renewal Permit       Revised Registration       Minor Revision       Initial Source-wide Operating Permit  
*(check all that apply)*

502(b)(10)Change       Extension Request       Addition of New Facility       Portable Plant Relocation Notice

Revision       Off Permit Change       Landfill Alternate Compliance Submittal       Modification of Existing Facilities

Ownership Change       Closure

**Requested Status:**       Title V    Conditional Major    State-Origin       PSD       NSR       Other: \_\_\_\_\_

**Is the source requesting a limitation of potential emissions?**       Yes       No

<p><b>Pollutant:</b>      <b>Requested Limit:</b></p> <p><input type="checkbox"/> Particulate Matter      _____</p> <p><input type="checkbox"/> Volatile Organic Compounds (VOC)      _____</p> <p><input type="checkbox"/> Carbon Monoxide      _____</p> <p><input type="checkbox"/> Nitrogen Oxides      _____</p> <p><input type="checkbox"/> Sulfur Dioxide      _____</p> <p><input type="checkbox"/> Lead      _____</p>	<p><b>Pollutant:</b>      <b>Requested Limit:</b></p> <p><input type="checkbox"/> Single HAP      _____</p> <p><input type="checkbox"/> Combined HAPs      _____</p> <p><input type="checkbox"/> Air Toxics (40 CFR 68, Subpart F)      _____</p> <p><input type="checkbox"/> Carbon Dioxide      _____</p> <p><input type="checkbox"/> Greenhouse Gases (GHG)      _____</p> <p><input type="checkbox"/> Other      _____</p>
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**For New Construction:**

**Proposed Start Date of Construction:**      **Proposed Operation Start-Up Date:** *(MM/YYYY)*

*(MM/YYYY)*      \_\_\_\_\_      \_\_\_\_\_

**For Modifications:**

**Proposed Start Date of Modification:**      **Proposed Operation Start-Up Date:** *(MM/YYYY)*

*(MM/YYYY)*      \_\_\_\_\_      \_\_\_\_\_

**Applicant is seeking coverage under a permit shield.**       Yes       No      **Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application. \***

\* No changes to non-applicable requirements since last permit action

**Section AI.5 Other Required Information**

**Indicate the documents attached as part of this application:**

- |                                                                                            |                                                                                   |
|--------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| <input type="checkbox"/> DEP7007A Indirect Heat Exchangers and Turbines                    | <input type="checkbox"/> DEP7007CC Compliance Certification                       |
| <input type="checkbox"/> DEP7007B Manufacturing or Processing Operations                   | <input type="checkbox"/> DEP7007DD Insignificant Activities                       |
| <input type="checkbox"/> DEP7007C Incinerators and Waste Burners                           | <input type="checkbox"/> DEP7007EE Internal Combustion Engines                    |
| <input type="checkbox"/> DEP7007F Episode Standby Plan                                     | <input type="checkbox"/> DEP7007FF Secondary Aluminum Processing                  |
| <input type="checkbox"/> DEP7007J Volatile Liquid Storage                                  | <input type="checkbox"/> DEP7007GG Control Equipment                              |
| <input type="checkbox"/> DEP7007K Surface Coating or Printing Operations                   | <input type="checkbox"/> DEP7007HH Haul Roads                                     |
| <input type="checkbox"/> DEP7007L Mineral Processes                                        | <input type="checkbox"/> Confidentiality Claim                                    |
| <input type="checkbox"/> DEP7007M Metal Cleaning Degreasers                                | <input type="checkbox"/> Ownership Change Form                                    |
| <input type="checkbox"/> DEP7007N Source Emissions Profile                                 | <input type="checkbox"/> Secretary of State Certificate                           |
| <input type="checkbox"/> DEP7007P Perchloroethylene Dry Cleaning Systems                   | <input type="checkbox"/> Flowcharts or diagrams depicting process                 |
| <input type="checkbox"/> DEP7007R Emission Offset Credit                                   | <input type="checkbox"/> Digital Line Graphs (DLG) files of buldings, roads, etc. |
| <input type="checkbox"/> DEP7007S Service Stations                                         | <input type="checkbox"/> Site Map                                                 |
| <input type="checkbox"/> DEP7007T Metal Plating and Surface Treatment Operations           | <input type="checkbox"/> Map or drawing depicting location of facility            |
| <input type="checkbox"/> DEP7007V Applicable Requirements and Compliance Activities        | <input type="checkbox"/> Safety Data Sheet (SDS)                                  |
| <input type="checkbox"/> DEP7007Y Good Engineering Practice and Stack Height Determination | <input type="checkbox"/> Emergency Response Plan                                  |
| <input type="checkbox"/> DEP7007AA Compliance Schedule for Non-complying Emission Units    | <input type="checkbox"/> Other: _____                                             |
| <input type="checkbox"/> DEP7007BB Certified Progress Report                               |                                                                                   |

**Section AI.6: Signature Block**

**I, the undersigned, hereby certify under penalty of law, that I am a responsible official\*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.**

Jerry Purvis  
Authorized Signature

2/19/2024  
Date

Jerry Purvis  
Type or Printed Name of Signatory

Vice President, Environmental Affairs  
Title of Signatory

\*Responsible official as defined by 401 KAR 52:001.