MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

EFFECTIVE DATE: March 28, 2012

REVISION DATE: June 28, 2016

ISSUED TO

DEARBORN INDUSTRIAL GENERATION, L.L.C.

State Registration Number (SRN): N6631

LOCATED AT

2400 Miller Road, Dearborn, Wayne County, Michigan 48121

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N6631-2012a

Expiration Date: March 28, 2017

Administratively Complete ROP Renewal Application due between
September 28, 2015 and September 28, 2016

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Article II, Chapter 1, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to PA 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N6631-2012a

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Article II, Chapter 1, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to PA 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

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Wilhemina McLemore, Detroit District Supervisor

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a source-wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements will be identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined or subsumed, or is state only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**

- Those conditions that are hereby incorporated in a state only enforceable Source-wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**

- Those conditions that are hereby incorporated in federally enforceable Source- wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**

2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**

3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**

4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
   a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
   c. Inspect, at reasonable times, any of the following:
      i. Any stationary source.
      ii. Any emission unit.
      iii. Any equipment, including monitoring and air pollution control equipment.
      iv. Any work practices or operations regulated or required under the ROP.
   d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.

5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**

7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**

8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**

10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; "a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP." The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part)**:
    a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
    b. A limit specified by an applicable federal new source performance standard.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
    a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.[1] **(R 336.1901(a))**
    b. Unreasonable interference with the comfortable enjoyment of life and property.[1] **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**

14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**

15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
    a. The date, location, time, and method of sampling or measurements.
    b. The dates the analyses of the samples were performed.
    c. The company or entity that performed the analyses of the samples.
    d. The analytical techniques or methods used.
    e. The results of the analyses.
    f. The related process operating conditions or parameters that existed at the time of sampling or measurement.

17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**

19. A responsible official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**

20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
    a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
    b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
    c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:

a. Submitting a certification by a responsible official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a responsible official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**

24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**

25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a responsible official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
    a. The applicable requirements are included and are specifically identified in the ROP.
    b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

    Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
    a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
    b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
    c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
    d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
    a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
    b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
    c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
    d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
    e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**

31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**

32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
    a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
    b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
    c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
    d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(7))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.

37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
    c. The date on which a regulated substance is first present above a threshold quantity in a process.

40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.

41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.[2] **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.[2] **(R 336.1201(8), Section 5510 of Act 451)**

45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.[2] **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.[2] **(R 336.1201(4))**

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the source-wide terms and conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no source-wide conditions, this section will be left blank.

SOURCE-WIDE CONDITIONS

DESCRIPTION

The source consists of one simple cycle combustion turbine, two combined cycle combustion turbines, three natural gas/blast furnace gas boilers, two blast furnace gas flares, and two emergency generators. A detailed description of each emission unit is contained in the Emission Unit Summary Table, Part C.

POLLUTION CONTROL EQUIPMENT

All three combustion turbines are equipped with dry low NOx combustors.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Formaldehyde	9.9 tpy[2]	12-month rolling time period as determined at the end of each calendar month	FGPLANT	GC 13, SC VI.1	**R 336.1205(1)(a)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (**R 336.1213(3)(b)(ii))**

1. Testing shall be conducted within 180 days of the issuance of this permit if an acceptable emissions test has not been conducted within 5 years prior to the issuance of the RO permit, unless the permittee has submitted to the AQD District Supervisor an acceptable demonstration that the most recent acceptable test remains valid and representative. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R 336.1213(3), R 336.2003, R 336.2004)**

2. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep records of monthly and previous 12-month formaldehyde emission calculations for each boiler and turbine included in FGPLANT, consistent with the document entitled “Protocol for Demonstrating

Continuous Compliance with the Emission Limitations of ROP-MI-N6631-2004" dated May 31, 2011, or subsequent revisions to this document as provided under condition VI.2.[2] (**R 336.1205(1)(a))**

2. If it becomes necessary to revise, modify or update the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6631-2004" dated May 31, 2011, the permittee shall resubmit the document to the District Supervisor for review and written approval before implementing such revisions, modifications, or updates.[2] **(R 336.1205(1)(a))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. (**R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCTG1	One simple cycle General Electric Model PG7241 combustion turbine. The turbine is fired exclusively with pipeline quality natural gas and has a design heat input rating of 1,586 MM Btu per hour. The rated output capacity of the unit is approximately 170 megawatts.	6/01/1999 8/12/2015	FGTURBINES
EUCTG2	One combined cycle General Electric Model PG7241 combustion turbine. The turbine is fired exclusively with pipeline quality natural gas and has a design heat input rating of 1,626 MM Btu per hour. The heated and pressurized exhaust gases from the turbine are utilized to power an electric generator shaft and are then sent to an unfired heat recovery steam generator. The rated output capacity of the unit is approximately 179 megawatts.	7/23/2001 8/12/2015	FGTURBINES FGNSPSKKKK
EUCTG3	One combined cycle General Electric Model PG7241 combustion turbine. The turbine is fired exclusively with pipeline quality natural gas and has a design heat input rating of 1,626 MM Btu per hour. The heated and pressurized exhaust gases from the turbine are utilized to power an electric generator shaft and are then sent to an unfired heat recovery steam generator. The rated output capacity of the unit is approximately 179 megawatts.	7/9/2001 8/12/2015	FGTURBINES FGNSPSKKKK

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBOILER1	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBOILERS
EUBOILER2	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBOILERS
EUBOILER3	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBOILERS
EUBFGFLARE1	One blast furnace gas flare equipped with a natural gas pilot flame. This flare is fired exclusively with blast furnace gas and is designed to operate when the blast furnace gas/natural gas boilers are not operating. The flare is rated at an approximate heat input of 480 MM Btu/hour.	3/1/1999	FGBFGFLARES
EUBFGFLARE2	One blast furnace gas flare equipped with a natural gas pilot flame. This flare is fired exclusively with blast furnace gas and is designed to operate when the blast furnace gas/natural gas boilers are not operating. The flare is rated at an approximate heat input of 1292 MM Btu/hour.	5/1/1999	FGBFGFLARES
EU3516GEN1	Caterpillar model 3516 reciprocating engine – 1.7 megawatts and 14.4 MMBtu/hour heat input.	10/1/2003	FGEMERGENCYGENS
EU3516GEN2	Caterpillar model 3516 reciprocating engine – 1.7 megawatts and 14.4 MMBtu/hour heat input.	10/1/2003	FGEMERGENCYGENS

EUCTG1
EMISSION UNIT CONDITIONS

DESCRIPTION

One simple cycle General Electric Model PG7241 combustion turbine. The turbine is fired exclusively with pipeline quality natural gas and has a design heat input rating of 1,586 MM Btu per hour. The rated output capacity of the unit is approximately 170 megawatts.

Flexible Group ID: FGTURBINES

POLLUTION CONTROL EQUIPMENT

Dry low NOx combustor

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NOx as NO_2	9 ppmv at 15% O_2 on a dry basis[2]	Test Protocol*	EUCTG1	SC VI.2, GC 13	**R 336.1205(1)(a), R 336.2802(4), 40 CFR Part 60 Subpart GG**
2. NOx as NO_2	72 pph	720-hour rolling average as determined at the end of each hour that the unit operates	EUCTG1	SC VI.2, SC VI.4, GC 13	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d)**
3. CO	9 ppmv at 15% O_2 on a dry basis[2]	Test Protocol*	EUCTG1	SC VI.3, GC 13	**R 336.1205(1)(a), R 336.2802(4)**
4. CO	30 pph[2]	720-hour rolling average as determined at the end of each hour that the unit operates	EUCTG1	SC VI.3, SC VI.4, GC 13	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(d)**
5. VOC	2.8 pph[2]	Test Protocol*	EUCTG1	SC V.1, SC VI.1	**R 336.1205(1)(a), R 336.2802(4)**
6. PM10	9 pph[2]	Test Protocol*	EUCTG1	SC V.1, SC VI.1	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d)**
*Test Protocol shall specify averaging time.					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. Testing to verify PM10 and VOC emission limits shall be conducted within five years of the most recent valid performance test, and thereafter every five years, unless the permittee has submitted to the AQD District Supervisor an acceptable demonstration that the most recent acceptable test remains valid and representative. **(R 336.1213(3), R 336.2003, R 336.2004)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall install calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the natural gas usage rate in EUCTG1 on an hourly and monthly basis. The heating value of the natural gas in Btu per cubic foot shall be determined on a monthly basis from one sample taken from the main gas pipeline into the facility on the permittee's property. Upon request, the AQD District Supervisor may authorize a different sampling method and/or sampling schedule.[2] **(40 CFR Part 75, Appendix D, R 336.1205(1)(a))**

2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a device to monitor and record the NOx (as NO_2) emissions from EUCTG1 on a continuous basis. Installation and operation of the continuous emission monitoring system (CEMS) or equivalent Predictive Emissions Monitoring System (PEMS) shall meet the timelines, requirements, and reporting detailed in 40 CFR Part 60 Appendix F. If the permittee chooses to use a PEMS in lieu of a CEMS to monitor NOx emissions, the permittee shall follow the protocol as approved by the Environmental Protection Agency (EPA). **(R 336.1213(3), 40 CFR Part 60 Subpart GG, 40 CFR Part 75 Subpart E, 40 CFR Part 75.66(d))**

3. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a device to monitor and record the CO emissions from EUCTG1 on a continuous basis. Installation and operation of the CEMS or equivalent PEMS shall meet the timelines, requirements, and reporting detailed in 40 CFR Part 60 Appendix F. If the permittee chooses to use a PEMS in lieu of a CEMS to monitor CO emissions, the permittee shall follow the protocol as approved by the EPA. **(R 336.1213(3), 40 CFR Part 75 Subpart E, 40 CFR Part 75.66(d))**

4. The permittee shall maintain the following records:[2] **(40 CFR Part 75, R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d))**
   a. Hourly NOx emission rate, in pph.
   b. Hourly CO emission rate, in pph.
   c. 720-hour rolling average NOx emission rate in pph, based on actual hours of turbine operation.
   d. 720-hour rolling average CO emission rate in pph, based on actual hours of turbine operation.
   e. Monthly hours of turbine operation including startup and shutdown.
   f. Total monthly PM10 emission rate in tons per month.
   g. Total monthly VOC emission rate in tons per month.

5. The permittee shall verify compliance with the emission limitations for EUCTG1 by following the procedures and methodologies contained in the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of MI-ROP-N6631-2004" dated May 31, 2011, or subsequent revisions to this document as provided under special condition VI.6.[2] (**R 336.1205(1)(a))**

6. If it becomes necessary to revise, modify or update the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of MI-ROP-N6631-2004" dated May 31, 2011, the permittee shall submit the revised document to the District Supervisor for review and written approval before implementing such revisions, modifications, or updates.[2] **(R 336.1205(1)(a))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall include test program summary, test schedule, and the quality assurance measures to be applied. **(R 336.1213(3), R 336.2001(3))**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.1213(3), R 336.2001(4))**

6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCGT1	213[2]	60[2]	**R 336.1225 and 40 CFR 52.21(c) and (d)**

IX. OTHER REQUIREMENT(S)

1. If the permittee chooses to use a PEMS to monitor NOx emissions, the permittee shall follow the protocol delineated in the EPA April 5, 2006, approval letter for GTP1. **(40 CFR Part 75 Subpart E, 40 CFR Part 75.66(d))**

2. If the permittee chooses to use a PEMS to monitor CO emissions, the permittee shall follow the protocol delineated in Performance Specification 16 in Appendix B of 40 CFR Part 60. **(40 CFR Part 60 Appendix B).**

3. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart GG. **(40 CFR Part 60 Subparts A & GG)**

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUCTG2
EMISSION UNIT CONDITIONS

DESCRIPTION

One combined cycle General Electric Model PG7241 combustion turbine. The turbine is fired exclusively with pipeline quality natural gas and has a design heat input rating of 1,626 MM Btu per hour. The heated and pressurized exhaust gases from the turbine are utilized to power an electric generator shaft and are then sent to an unfired heat recovery steam generator. The rated output capacity of the unit is approximately 179 megawatts.

Flexible Group IDs: FGTURBINES, FGNSPSKKKK

POLLUTION CONTROL EQUIPMENT

Dry low NOx combustor

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NOx as NO_2	9 ppmv at 15% O_2 on a dry basis.	Test Protocol*	EUCTG2	SC VI.2, GC 13	**R 336.1205(1)(a), R 336.2802(4)**
2. NOx as NO_2	71 pph	720-hour rolling average as determined at the end of each hour that the unit operates	EUCTG2	SC VI.2, SC VI.5, GC 13	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d)**
3. CO	9 ppmv at 15% O_2 on a dry basis	Test Protocol*	EUCTG2	SC VI.3, GC 13	**R 336.1205(1)(a), R 336.2802(4)**
4. CO	31 pph	720-hour rolling average as determined at the end of each hour that the unit operates	EUCTG2	SC VI.3, SC VI.5, GC 13	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(d)**
5. VOC	2.8 pph	Test Protocol*	EUCTG2	SC V.1, SC VI.1	**R 336.1205(1)(a), R 336.2802(4)**
6. PM10	9 pph	Test Protocol*	EUCTG2	SC V.1, SC VI.1	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d)**
*Test Protocol shall specify averaging time.					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. Testing to verify PM10 and VOC emission limits shall be conducted within five years of the most recent valid performance test, and thereafter every five years, unless the permittee has submitted to the AQD District Supervisor an acceptable demonstration that the most recent acceptable test remains valid and representative. **(R 336.1213(3), R 336.2003, R 336.2004)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall install calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the natural gas usage rate in EUCTG2 on an hourly and monthly basis. The heating value of the natural gas in Btu per cubic foot shall be determined on a monthly basis from samples taken from the main gas pipeline into the facility on the permittee's property. Upon request, the AQD District Supervisor may authorize a different sampling method and/or sampling schedule.[2] **(R 336.1205(1)(a))**

2. The permittee shall install calibrate, maintain and operate in a satisfactory manner a device to monitor and record the NO_x (as NO_2) emissions from EUCTG2 on a continuous basis. Installation and operation of the CEMS or equivalent PEMS shall meet the timelines, requirements and reporting detailed in 40 CFR Part 60 Appendix F. If the permittee chooses to use a PEMS in lieu of a CEMS to monitor NOx emissions, the permittee shall follow the protocol delineated in the EPA September 6, 2006, approval letter for GT2100. **(R 336.1213(3), 40 CFR Part 75 Subpart E, 40 CFR Part 75.66(d))**

3. The permittee shall install calibrate, maintain and operate in a satisfactory manner a device to monitor and record the CO emissions from EUCTG2 on a continuous basis. Installation and operation of the CEMS or equivalent PEMS shall meet the timelines, requirements and reporting detailed in 40 CFR Part 60 Appendix F. If the permittee chooses to use a PEMS in lieu of a CEMS to monitor CO emissions, the permittee shall follow the protocol as approved by the EPA. **(R 336.1213(3), 40 CFR Part 75 Subpart E, 40 CFR Part 75.66(d))**

4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the O_2 concentration of the stack gases on a continuous basis.[2] **(R 336.1205(1)(a))**

5. The permittee shall maintain the following records:[2] **(R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d))**
   a. Hourly NOx emission rate, in pph.
   b. Hourly CO emission rate, in pph.
   c. 720-hour rolling average NOx emission rate in pph, based on actual hours of turbine operation.
   d. 720-hour rolling average CO emission rate in pph, based on actual hours of turbine operation.
   e. Monthly hours of turbine operation including startup and shutdown.
   f. Total monthly PM10 emission rate in tons per month.
   g. Total monthly VOC emission rate in tons per month.

6. The permittee shall verify compliance with the emission limitations for EUCTG2 by following the procedures and methodologies contained in the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of MI-ROP-N6631-2004" dated May 31, 2011, or subsequent revisions to this document as provided under special condition VI.7.[2] (**R 336.1205(1)(a))**

7. If it becomes necessary to revise, modify or update the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of MI-ROP-N6631-2004" dated May 31, 2011, the permittee shall submit the revised document to the District Supervisor for review and written approval before implementing such revisions, modifications, or updates.[2] **(R 336.1205(1)(a))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall include test program summary, test schedule, and the quality assurance measures to be applied. **(R 336.1213(3), R 336.2001(3))**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.1213(3), R 336.2001(4))**

6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCGT2	210[2]	150[2]	**R 336.1225 and 40 CFR 52.21(c) and (d)**

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUCTG3
EMISSION UNIT CONDITIONS

DESCRIPTION

One combined cycle General Electric Model PG7241 combustion turbine. The turbine is fired exclusively with pipeline quality natural gas and has a design heat input rating of 1,626 MM Btu per hour. The heated and pressurized exhaust gases from the turbine are utilized to power an electric generator shaft and are then sent to an unfired heat recovery steam generator. The rated output capacity of the unit is approximately 179 megawatts.

Flexible Group IDs: FGTURBINES, FGNSPSKKKK

POLLUTION CONTROL EQUIPMENT

Dry low NOx combustor

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NOx as NO_2	9 ppmv at 15% O_2 on a dry basis.	Test Protocol*	EUCTG3	SC VI.2, GC 13	**R 336.1205(1)(a), R 336.2802(4)**
2. NOx as NO_2	71 pph	720-hour rolling average as determined at the end of each hour that the unit operates	EUCTG3	SC VI.2, SC VI.5, GC 13	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d)**
3. CO	9 ppmv at 15% O_2 on a dry basis	Test Protocol*	EUCTG3	SC VI.3, GC 13	**R 336.1205(1)(a), R 336.2802(4)**
4. CO	31 pph	720-hour rolling average as determined at the end of each hour that the unit operates	EUCTG3	SC VI.3, SC VI.5, GC 13	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(d)**
5. VOC	2.8 pph	Test Protocol*	EUCTG3	SC V.1, SC VI.1	**R 336.1205(1)(a), R 336.2802(4)**
6. PM10	9 pph	Test Protocol*	EUCTG3	SC V.1, SC VI.1	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d)**
*Test Protocol shall specify averaging time.					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. Testing to verify PM10 and VOC emission limits shall be conducted within five years of the most recent valid performance test, and thereafter every five years, unless the permittee has submitted to the AQD District Supervisor an acceptable demonstration that the most recent acceptable test remains valid and representative. **(R 336.1213(3), R 336.2003, R 336.2004)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall install calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the natural gas usage rate in EUCTG3, on an hourly and monthly basis. The heating value of the natural gas in Btu per cubic foot shall be determined on a monthly basis from samples taken from the main gas pipeline into the facility on the permittee's property. Upon request, the AQD District Supervisor may authorize a different sampling method and/or sampling schedule.[2] **(R 336.1205(1)(a))**

2. The permittee shall install calibrate, maintain and operate in a satisfactory manner a device to monitor and record the NO_x (as NO_2) emissions from EUCTG3 on a continuous basis. Installation and operation of the CEMS or equivalent PEMS, shall meet the timelines, requirements and reporting detailed in 40 CFR Part 60 Appendix F. If the permittee chooses to use a PEMS in lieu of a CEMS to monitor NOx emissions, the permittee shall follow the protocol delineated in the EPA September 6, 2006, approval letter for GTP3100. **(R336.1213(3), 40 CFR Part 75 Subpart E, 40 CFR Part 75.66(d))**

3. The permittee shall install calibrate, maintain and operate in a satisfactory manner a device to monitor and record the CO emissions from EUCTG3 on a continuous basis. Installation and operation of the CEMS shall meet the timelines, requirements and reporting detailed in 40 CFR Part 60 Appendix F. If the permittee chooses to use a PEMS in lieu of a CEMS to monitor CO emissions, the permittee shall follow the protocol as approved by the EPA.[2] **(R336.1213(3), 40 CFR Part 75 Subpart E, 40 CFR Part 75.66(d))**

4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the O_2 concentration of the stack gases on a continuous basis.[2] **(R 336.1205(1)(a))**

5. The permittee shall maintain the following records:[2] **(R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d))**
   a. Hourly NOx emission rate, in pph.
   b. Hourly CO emission rate, in pph.
   c. 720-hour rolling average NOx emission rate in pph, based on actual hours of turbine operation.
   d. 720-hour rolling average CO emission rate in pph, based on actual hours of turbine operation.
   e. Monthly hours of turbine operation including startup and shutdown.
   f. Total monthly PM10 emission rate in tons per month.
   g. Total monthly VOC emission rate in tons per month.

6. The permittee shall verify compliance with the emission limitations for EUCTG3 by following the procedures and methodologies contained in the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of MI-ROP-N6631-2004" dated May 31, 2011, or subsequent revisions to this document as provided under special condition VI.7.[2] (**R 336.1205(1)(a))**

7. If it becomes necessary to revise, modify or update the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of MI-ROP-N6631-2004" dated May 31, 2011, the permittee shall submit the revised document to the District Supervisor for review and written approval before implementing such revisions, modifications, or updates.[2] **(R 336.1205(1)(a))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall include test program summary, test schedule, and the quality assurance measures to be applied. **(R 336.1213(3), R 336.2001(3))**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.1213(3), R 336.2001(4))**

6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCGT3	210[2]	150[2]	**R 336.1225 and 40 CFR 52.21(c) and (d)**

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP CONDITIONS

Part D outlines terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGTURBINES	This emission group consists of the simple cycle combustion turbine, and two combined cycle turbines	EUCTG1, EUCTG2, and EUCTG3
FGNSPSKKKK	This flexible group consists of the two combined cycle turbines which are subject to NSPS KKKK.	EUCTG2 and EUCTG3
FGBOILERS	This emission group consists of three natural gas and blast furnace gas fired boilers.	EUBOILER1, EUBOILER2, and EUBOILER3
FGBFGFLARES	This emission group consists of two blast furnace gas fired flares	EUBFGFLARE1 and EUBFGFLARE2
FGPLANT	This emission group contains three turbines, and three boilers	FGTURBINES and FGBOILERS
FGBFG	This emission group consists of any emission unit which combusts, or has the capability of combusting, blast furnace gas.	EUBOILER1, EUBOILER2, EUBOILER3, EUBFGFLARE1, and EUBFGFLARE2
FGEMERGENCYGENS	This emission group consists of two oil fired emergency electrical generators.	EU3516GEN1 and EU3516GEN2

FGTURBINES
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This emission group consists of the simple cycle combustion turbine, and two combined cycle turbines

Emission Units: EUCTG1, EUCTG2, AND EUCTG3

POLLUTION CONTROL EQUIPMENT

Dry low NOx combustors.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NOx as NO_2	815 tpy	12-month rolling time period as determined at the end of each calendar month	FGTURBINES	SC VI.1	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d)**
2. CO	403 tpy	12-month rolling time period as determined at the end of each calendar month	FGTURBINES	SC VI.1	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d)**
3. VOC	36 tpy	12-month rolling time period as determined at the end of each calendar month	FGTURBINES	SC VI.1	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d)**
4. PM10	118 tpy	12-month rolling time period as determined at the end of each calendar month	FGTURBINES	SC VI.1	**R 336.1205(1)(a), R 336.2802(4), 40 CFR 52.21(c) & (d)**
*Test Protocol shall specify averaging time.					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The turbines shall not be fired with any fuel other than pipeline quality natural gas. Natural gas is defined in 40 CFR Part 72 Section 72.2.[2] **(R 336.1205(1)(a))**

2. The permittee shall submit to the AQD District Supervisor and maintain on file, a plan that describes how emissions will be minimized during startup and shutdown within 60 days of completion of modifications to FGTURBINES. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. If it becomes necessary to revise, modify or update the plan, the permittee shall submit the revised plan to the District Supervisor for review and written approval before implementing such revisions, modifications, or updates. Unless notified by the AQD District Supervisor within 30 business days after plan submittal, the plan shall be deemed approved. **(R 336.1205(1)(a) & (b), R 336.1911, R 336.1912)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

See testing requirements for each emission unit.

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain the following records for FGTURBINES[2] **(R 336.1205(1)(a), R 336.2802(4))**
   a. PM10 emission rate, in tons/month, and tons per 12 month rolling time period as determined at the end of each calendar month.
   b. CO emission rate, in tons/month, and tons per 12 month rolling time period as determined at the end of each calendar month.
   c. VOC emission rate, in tons/month, and tons per 12 month rolling time period as determined at the end of each calendar month.
   d. NOx (as NO_2) emission rate, in tons/month, and tons per 12 month rolling time period as determined at the end of each calendar month.

2. The permittee shall verify compliance with the emission limitations for FGTURBINES by following the procedures and methodologies contained in the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6631-2004" dated May 31, 2011, or subsequent revisions to this document as provided under special condition VI.3.[2] **(R 336.1205(1)(a))**

3. If it becomes necessary to revise, modify or update the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6631-2004" dated May 31, 2011, the permittee shall submit the revised document to the District Supervisor for review and written approval before implementing such revisions, modifications, or updates.[2] **(R 336.1205(1)(a))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. See tables for each emission unit	See tables for each emission unit	See tables for each emission unit	**See tables for each emission unit**

IX. OTHER REQUIREMENT(S)

1. The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to Rule 299(d) and 40 CFR Part 72.9(c)(1)(i). **(R 336.1213(10))**

2. The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94 as outlined in a complete Phase II Acid Rain Permit issued by the AQD. The Phase II Acid Rain Permit No. MI-AR-55088-2012 is hereby incorporated into this ROP as Appendix 9. **(R 336.1299(2)(a))**

3. The permittee shall comply with the CAIR SO2 Trading Program provisions of 40 CFR Part 97.201 through 97.288, as adopted and modified by R 336.1420, and as outlined in any complete CAIR SO2 permit issued by the AQD. CAIR SO2 Permit No. SO2-55088-2012 is hereby incorporated into this ROP as Appendix 10. **(R 336.1420)**

4. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total SO2 emissions for the control period from the source pursuant to 40 CFR Part 97.254. **(40 CFR Part 97.254)**

5. The permittee shall comply with the CAIR NOx Annual Trading Program provisions of 40 CFR Part 97.101 through 97.188, as adopted and modified by R 336.1802a, R 336.1803, R 336.1821, and R 336.1830 through R 336.1834, and as outlined in any complete CAIR NOx Annual permit issued by the AQD. CAIR NOx Annual Permit No. NOO-55088-2012 is hereby incorporated into this ROP as Appendix 11. **(R 336.1821)**

6. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total NOx emissions for the control period from the source pursuant to 40 CFR Part 97.154. **(40 CFR Part 97.154)**

7. The permittee shall comply with the CAIR NOx Ozone Trading Program provisions of 40 CFR Part 97.301 through 97.388, as adopted and modified by R 336.1802a, R 336.1803, and R 336.1821 through R 336.1826, and as outlined in any complete CAIR NOx Ozone permit issued by the AQD. CAIR NOx Ozone Permit No. NOO-55088-2012 is hereby incorporated into this ROP as Appendix 12. **(R 336.1821)**

8. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total NOx emissions for the control period from the source pursuant to 40 CFR Part 97.354. **(40 CFR Part 97.354)**

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGNSPSKKKK
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group consists of the two combined cycle turbines which are subject to NSPS KKKK.

Emission Units: EUCTG2 and EUCTG3

POLLUTION CONTROL EQUIPMENT

Dry Low NOx Combustors

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	42 ppm at 15 percent O_2[2] or 290 ng/Joules of useful output (2.3 lb/MWh)[2]	30-day rolling average (when using a CEMS or equivalent)	EUCTG2 and EUCTG3	SC V.1, SC VI.1, SC VI.2	**40 CFR 60.4320(a)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fuel	Total potential sulfur emissions less than or equal 26 ng SO_2/Joules (0.060 lb SO_2/MMBtu) heat input[2]	NA	EUCTG2 and EUCTG3	SC VI.3, SC VI.4	**40 CFR Part 60.4330(a)(2)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate and maintain the stationary combustion turbines, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.[2] **(40 CFR 60.4333(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. If the permittee does not use the continuous emissions monitoring allowance as specified in SC VI.1, then within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup, federal Standards of Performance for New Stationary Sources require verification of NOx emission rates from each turbine included in FGNSPSKKKK, by testing at owner's expense, in accordance with 40 CFR Parts 60.8 and 60.4400.[2] **(40 CFR 60.4400)**
   a. The permittee shall conduct three separate test runs, at least 20 minutes each, at ambient temperatures greater than 0 °F, and at any load condition within ±25 percent of 100 percent peak load.
   b. Testing must be conducted annually (at least every 14 calendar months).
   c. If the stack test result is less than or equal to 75 percent of the NOx limits in SC I.1, the test plan can be changed to once every two years (at least every 26 calendar months). If subsequent test results yield NOx emissions greater than 75 percent of the NOx limit in SC I.1, annual testing must be resumed.
   d. Subsequent stack testing is not required if the permittee shows continuous compliance with the NOx emission limits with a CEMS or equivalent PEMS pursuant to 40 CFR 60.4340(b)(ii), as specified in SC VI.1.
   e. Stack testing procedures and the location of stack testing ports shall be in accordance with the applicable Federal Reference Methods, 40 CFR Part 60 Appendix A.

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. In lieu of the stack testing required in SC V.1, the permittee may instead install, calibrate, maintain and operate one of the following continuous monitoring systems:[2] **(40 CFR 60.4340(b))**
   a. Continuous emission monitoring as described in §60.4335(b) and 60.4345, or
   b. Continuous parameter monitoring as follows:
      (i) For a diffusion flame turbine without add-on selective catalytic reduction (SCR) controls, the permittee shall define parameters indicative of the unit's NOx formation characteristics, and monitor these parameters continuously.
      (ii) For any lean premix stationary combustion turbine, the permittee shall continuously monitor the appropriate parameters to determine whether the unit is operating in low-NO_x mode.
      (iii) For any turbine that uses SCR to reduce NOx emissions, the permittee shall continuously monitor appropriate parameters to verify the proper operation of the emission controls.
      (iv) For affected units that are also regulated under 40 CFR Part 75, with state approval the permittee may monitor the NO_x emission rate using the methodology in Appendix E to 40 CFR Part 75, or the low mass emissions methodology in §75.19, the requirements of this condition may be met by performing the parametric monitoring described in Section 2.3 of 40 CFR Part 75 Appendix E or in §75.19(c)(1)(iv)(H).

2. In lieu of the subsequent stack test requirements listed in SC V.1, the permittee may instead continuously monitor appropriate parameters to determine that each turbine is operating in low-NOx mode. The parameters must be continuously monitored and recorded during the initial performance test to establish acceptable values and ranges. The permittee must develop and keep on-site a parameter monitoring plan pursuant to 40 CFR 60.4355 (a)(1) through (6).[2] **(40 CFR 60.4340(b)(ii), 40 CFR 60.4355, 40 CFR 60.4410)**

3. The permittee shall monitor the sulfur content in the fuel once per turbine operating day, using the methods described in 40 CFR 60.4415, or alternate methods as described in 40 CFR 60.4360. The permittee may use a custom monitoring schedule pursuant to 40 CFR 60.4370(c) if the schedule has been approved by the EPA Administrator. Sulfur in fuel monitoring is not required if it is demonstrated that the potential sulfur emissions do not exceed 26 ng SO_2/Joules (0.060 lb SO_2/MMBtu) heat input. The demonstration shall include one of the following:[2] **(40 CFR 60.4360, 40 CFR 60.4370)**
   a. The fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content is 20 grains of sulfur per 100 standard cubic feet or less; or
   b. Representative fuel sampling data, as specified in 40 CFR Part 75, Appendix D, Section 2.3.1.4 or 2.3.2.4, shows that the sulfur content does not exceed 26 ng SO_2/Joules (0.060 lb SO_2/MMBtu) heat input.

4. The permittee shall keep, in a satisfactory manner, records of the sulfur content of the fuel once each operating day for FGNSPSKKKK, as required by SC VI.3. This condition does not apply if it is demonstrated that the potential sulfur emissions do not exceed 26 ng SO_2/Joules (0.060 lb SO_2/MMBtu) per MMBtu heat input pursuant to 40 CFR 60.4365. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(40 CFR 60.4370)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. If any of the turbines in FGNSPSKKKK contain a continuous parameter monitoring system to determine continuous compliance with the NOx emission limits pursuant to SC VI.2, the permittee shall submit excess emissions and monitor downtime in accordance with 40 CFR 60.7(c) and 40 CFR 60.4380(c). An excess emission is a 4-hour rolling operating hour average for each turbine in which any monitored parameter does not achieve the target value or is outside the acceptable range defined in the monitoring plan. Monitor downtime is any turbine operating hour in which any of the required parametric data are either not recorded or invalid. All reports must be postmarked by the 30th day following the end of each 6-month period.[2] **(40 CFR 60.4375(a), 40 CFR 60.4380(c), 40 CFR 60.4395)**

5. If the permittee is required to monitor the sulfur content in the fuel pursuant to SC VI.3 and 40 CFR 60.4360, the permittee shall submit excess emissions and monitor downtime in accordance with 40 CFR 60.7(c) and 60.4385. An excess emission is each turbine operating hour beginning on the date and hour that any sample shows an exceedance in the applicable sulfur limit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. Monitor downtime begins when a required sample is not taken by its due date or the date and hour that invalid results are obtained. Monitor downtime ends on the date and hour of the next valid sample. All reports must be postmarked by the 30th day following the end of each 6-month period.[2] **(40 CFR 60.4375(a), 40 CFR 60.4385, 40 CFR 60.4395)**

6. If the permittee demonstrates compliance with stack testing under SC V.1, the permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall include test program summary, test schedule, and the quality assurance measures to be applied. **(R 336.1213(3), R 336.2001(3))**

7. If the permittee demonstrates compliance with stack testing under SC V.1, the permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.1213(3), R 336.2001(4))**

8. If the permittee demonstrates compliance with stack testing under SC V.1, the permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart KKKK, as they apply to FGNSPSKKKK.[2] **(40 CFR Part 60 Subparts A & KKKK)**

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGBOILERS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This emission group consists of three natural gas and blast furnace gas fired boilers.

Emission Units: EUBOILER1, EUBOILER2, and EUBOILER3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM_{10}	22.3 pph[2]	Monthly average	FGBOILERS	SC VI.1	**R 336.1205(1)(a)**
2. NO_x	0.10 lb/MMBtu[2]	30-day rolling average	FGBOILERS	GC 13, SC VI.1	**R 336.1205(1)(a), 40 CFR 60 Subpart Db**
3. NO_x	76.3 pph[2]	30-day rolling average	FGBOILERS	SC VI.1	**R 336.1205(1)(a)**
4. SO_2	420 pph[2]	Daily average	FGBOILERS	SC VI.1	**R 336.1205(1)(a),**
5. SO_2	1839.6 tpy[2]	12-month rolling time period	FGBOILERS	SC VI.1	**R 336.1205(3),**
6. CO	64.1 pph[2]	30-day rolling average	FGBOILERS	SC VI.1	**R 336.1205(1)(a)**
7. VOC	7.5 pph[2]	Monthly average	FGBOILERS	SC VI.1	**R 336.1205(1)(a), R 336.1702(a)**
8. VOC	84 tpy[2]	12-month rolling time period	FGBOILERS	SC VI.1	**R 336.1205(3)**

Notes:
1. Items 1, 2, 3, 6 and 7 above are applicable to each boiler in FGBOILERS
2. Items 4, 5, and 8 above apply to the combined total of all three boilers in FGBOILERS

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The boilers in FGBOILERS shall not be fired with any fuel other than pipeline natural gas (NG) or a mixture of natural gas and blast furnace gas (BFG).[2] (**R 336.1205(1)(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. Testing shall be conducted within 180 days of the issuance of this permit if an acceptable emissions test has not been conducted within 5 years prior to the issuance of the RO permit, unless the permittee has submitted to the AQD District Supervisor an acceptable demonstration that the most recent acceptable test remains valid and representative. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R 336.1213(3), R 336.2003, R 336.2004).** If the permittee chooses to use a Predictive Emissions Monitoring System (PEMS) in lieu of a stack test to monitor CO emissions, the permittee shall follow the protocol delineated in Performance Specification 16 in Appendix B of 40 CFR Part 60. **(40 CFR Part 60 Appendix B)**

2. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. (**R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall verify compliance with the emission limitations for FGBOILERS by following the procedures and methodologies contained in the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-N6631-2004" dated May 31, 2011, or subsequent revisions to this document as provided under special condition VI.10.[2] **(R 336.1205(1)(a))**

2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the NO_x emissions from each boiler in FGBOILERS on a continuous basis. Installation and operation of each continuous emission monitoring system (CEMS) shall meet the timelines, requirements and reporting detailed in 40 CFR Part 60 Appendix F.[2] **(40 CFR 60, Subparts A and Db).** If the permittee chooses to use a Predictive Emissions Monitoring System (PEMS) in lieu of a Continuous Emissions Monitor System (CEMS) to monitor NOx emissions, the permittee shall follow the protocol as approved by the Environmental Protection Agency. **(40 CFR Part 75 Subpart E, 40 CFR Part 75.66(d))**

3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the CO emissions from each boiler in FGBOILERS on a continuous basis. Installation and operation of each continuous emission monitoring system (CEMS) shall meet the timelines, requirements and reporting detailed in 40 CFR Part 60 Appendix F.[2] **(R336.1213(3)).** If the permittee chooses to use a Predictive Emissions Monitoring System (PEMS) in lieu of a Continuous Emissions Monitoring System (CEMS) to monitor CO emissions, the permittee shall follow the protocol as approved by the Environmental Protection Agency. **(40 CFR Part 60 Appendix B)**

4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the SO_2 emissions from each boiler in FGBOILERS on a continuous basis. Installation and operation of each continuous emission monitoring system (CEMS) shall meet the timelines, requirements and reporting detailed in 40 CFR Part 60 Appendix F.[2] **(R336.1205(1)(a)).** If the permittee chooses to use a Predictive Emissions Monitoring System (PEMS) in lieu of a Continuous Emissions Monitoring System (CEMS) to monitor SO2 emissions, the permittee shall follow the protocol delineated in Performance Specification 16 in Appendix B of 40 CFR Part 60. **(40 CFR Part 60 Appendix B)**

5. The permittee shall compile hourly and daily sulfur dioxide emission rate calculations and make these emission rate calculations available to the AQD for inspection. **(R 336.1213(3))**

6. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the O_2 concentration of each stack gas on a continuous basis.[2] **(40 CFR 60, Subparts A and Db)**

7. The permittee shall install calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the natural gas usage rate of each boiler in FGBOILERS on a daily basis in cubic feet per day. The heating value of the natural gas in Btu per cubic foot shall be determined on a monthly basis from samples

taken at a point in the pipeline to FGBOILERS on the permittee's property. Upon request, the AQD District Supervisor may authorize a different method and/or sampling schedule.[2] **(R 336.1205(1)(a))**

8. The permittee shall install calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the blast furnace gas usage rate of each boiler in FGBOILERS on a daily basis in cubic feet per day. The heating value of the blast furnace gas in Btu per cubic foot shall be determined on a monthly basis from samples taken at a point in the pipeline to FGBOILERS on the permittee's or the BFG supplier's property. Upon request, the AQD District Supervisor may authorize a different method and/or sampling schedule.[2] **(R 336.1205(1)(a))**

9. The permittee shall maintain the following records:[2]
   - Hourly NO_x and SO_2 emission rates from each boiler, lb/MMBtu and lbs/hr.
   - 30-day rolling average NO_x emission rates (lb/MMBtu and lb/hr) from each boiler as determined at the end of each steam generating unit operating day.
   - Total daily NOx and SO_2 emissions (lbs/day) at the end of each day.
   - Total monthly NO_x and SO_2 emissions (lbs) at the end of each calendar month.
   - Annual NO_x and SO_2 emission rate (tons/year), based on a 12-month rolling time period as determined at the end of each calendar month.
   - Hours each boiler operated on natural gas only on a monthly basis.
   - Hours each boiler operated on a mixture of natural gas and blast furnace gas on a monthly basis.
   - Caloric value of natural gas (Btu/cubic foot) on a monthly basis.
   - Caloric value of blast furnace gas (Btu/cubic foot) on a monthly basis.
   - Amount of natural gas consumed in each boiler in cubic feet on a monthly basis.
   - Amount of blast furnace gas consumed in each boiler in cubic feet on a monthly basis.
   - Calculated PM_{10} emission rate, lbs/hour, based upon a monthly averaging period.
   - Calculated CO emission rate, lbs/hour, based upon a monthly averaging period.
   - Calculated VOC emission rate, lbs/hour, based upon a monthly averaging period.
   - Calculated PM10 emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
   - Calculated CO emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
   - Calculated VOC emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.

   (40 CFR 60 Subparts A and Db, R 336.1205(1)(a))

10. If it becomes necessary to revise, modify or update the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-N6631-2004" dated May 31, 2011, the permittee shall re-submit the document to the District Supervisor for review and written approval before implementing such revisions, modifications, or updates.[2] **(R 336.1205(1)(a))**

See Appendices 3 and 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. All source emissions data and operating data required to be submitted under 40 CFR Part 60, Subparts A and Db shall be submitted to the District Supervisor in an acceptable format within 30 days following the end of the calendar quarter in which the data were collected.[2] **(40 CFR Part 60, Subparts A and Db)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOILER1	126[2]	185[2]	**R 336.1225 and 40 CFR 52.21(c) and (d)**
2. SVBOILER2	126[2]	185[2]	**R 336.1225 and 40 CFR 52.21(c) and (d)**
3. SVBOILER3	126[2]	185[2]	**R 336.1225 and 40 CFR 52.21(c) and (d)**

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the CAIR SO2 Trading Program provisions of 40 CFR Part 97.201 through 97.288, as adopted and modified by R 336.1420, and as outlined in any complete CAIR SO2 permit issued by the AQD. CAIR SO2 Permit No. SO2-55088-2012 is hereby incorporated into this ROP as Appendix 10. **(R 336.1420)**

2. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total SO2 emissions for the control period from the source pursuant to 40 CFR Part 97.254. **(40 CFR Part 97.254)**

3. The permittee shall comply with the CAIR NOx Annual Trading Program provisions of 40 CFR Part 97.101 through 97.188, as adopted and modified by R 336.1802a, R 336.1803, R 336.1821, and R 336.1830 through R 336.1834, and as outlined in any complete CAIR NOx Annual permit issued by the AQD. CAIR NOx Annual Permit No. NOO-55088-2012 is hereby incorporated into this ROP as Appendix 11. **(R 336.1821)**

4. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total NOx emissions for the control period from the source pursuant to 40 CFR Part 97.154. **(40 CFR Part 97.154)**

5. The permittee shall comply with the CAIR NOx Ozone Trading Program provisions of 40 CFR Part 97.301 through 97.388, as adopted and modified by R 336.1802a, R 336.1803, and R 336.1821 through R 336.1826, and as outlined in any complete CAIR NOx Ozone permit issued by the AQD. CAIR NOx Ozone Permit No. NOO-55088-2012 is hereby incorporated into this ROP as Appendix 12. **(R 336.1821)**

6. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total NOx emissions for the control period from the source pursuant to 40 CFR Part 97.354. **(40 CFR Part 97.354)**

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGBFGFLARES
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This emission group consists of two blast furnace gas fired flares.

Emission Units: EUBFGFLARE1, EUBFGFLARE2

POLLUTION CONTROL EQUIPMENT

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. CO	301.2 pph[2]	Monthly average	FGBFGFLARES	SC VI.2, SC VI.4	**R 336.1205(1(a)**
2. NOx	96.6 pph[2]	Monthly average	FGBFGFLARES	SC VI.2, SC VI.4	**R 336.1205(1(a)**
3. PM	7.4 pph[2]	Monthly average	FGBFGFLARES	SC VI.2, SC VI.4	**R 336.1205(1(a)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Both flares in FGBFGFLARES shall be equipped with automatic ignition systems consisting of a thermocouple, or other device approved by the Department. The automatic ignition systems for the flares in FGBFGFLARES shall be operated and maintained such that the blast furnace gas is continuously combusted whenever blast furnace gas is sent to the blast furnace gas flare.[2] **(R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall install calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the blast furnace gas usage rate of each flare in FGFBGFLARES on a daily basis in cubic feet per day. The heating value of the blast furnace gas in Btu per cubic foot shall be determined on a monthly basis from samples taken at a point in the pipeline to FGBFGFLARES on the permittee's or the BFG supplier's property. Upon request, the AQD District Supervisor may authorize a different method and/or sampling schedule.[2] **(R 336.1205(1)(a))**

2. The permittee shall verify compliance with the emission limitations for FGBFGFLARES by following the procedures and methodologies contained in the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-ROP-N6631-2004" dated May 31, 2011, or subsequent revisions to this document as provided under special condition VI.5.[2] **(R 336.1205(1)(a))**

3. The permittee shall keep monthly records for each blast furnace gas flare included in FGBFGFLARES of the amount of blast furnace gas consumed in million cubic feet.[2] **(R 336.1205(1)(a))**

4. The permittee shall keep records for each blast furnace gas flare included in FGBFGFLARES of the monthly average NO_x, CO and PM emission calculations consistent with the calculation methodologies contained in the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-ROP-N6631-2004" dated May 31, 2011, or subsequent revisions to this document as provided under special condition VI.5. All records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205(1)(a))**

5. If it becomes necessary to revise, modify or update the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-ROP-N6631-2004" dated May 31, 2011, the permittee shall re-submit the document to the District Supervisor for review and written approval before implementing such revisions, modifications, or updates.[2] **(R 336.1205(1)(a))**

See Appendices 3 and 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGBFG
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This emission group consists of any emission unit which combusts, or has the capability of combusting, blast furnace gas.

Emission Units: EUBFGFLARE1, EUBFGFLARE2, EUBOILER1, EUBOILER2, and EUBOILER3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	1087.1 tpy[2]	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	**R 336.1205(1)(a)**
2. CO	1798 tpy[2]	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	**R 336.1205(1)(a)**
3. PM	237.1 tpy[2]	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	**R 336.1205(1)(a)**
4. SO2	673 pph[2,*]	Daily average	FGBFG	SC VI.1, SC VI.2	**R 336.1205(1)(a), 40 CFR 52.21 (c) and (d)**
5. SO2	2947.7 tpy[2]	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	**R 336.1205(1)(a)**
NOTE: * Does not apply during periods of startup, shutdown and malfunction(s).					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall verify compliance with the emission limitations for FGBFG by following the procedures and methodologies contained in the document entitled “Protocol for Demonstrating Continuous Compliance with the

Emission Limitations of ROP MI-ROP-N6631-2004" dated May 31**,** 2011, or subsequent revisions to this document as provided under special condition VI.3.[2] **(R 336.1205(1)(a))**

2. The permittee shall maintain the following records[2]
   - Calculated PM emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
   - Calculated CO emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
   - Calculated NO_x emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
   - Calculated SO_2 emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
   - Calculated SO_2 emission rate, lbs/hour, based upon a daily averaging period.

   (R 336.1205(1)(a))

3. If it becomes necessary to revise, modify or update the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-ROP-N6631-2004" dated May 31, 2011, the permittee shall re-submit the document to the District Supervisor for review and written approval before implementing such revisions modifications, or updates.[2] **(R 336.1205(1)(a))**

See Appendices 3 and 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
See tables for each emission unit	See tables for each emission unit	See tables for each emission unit	**See tables for each emission unit**

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGEMERGENCYGENS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two Caterpillar model 3516 reciprocating engine emergency generators. Each generator is rated at 1.7 megawatts generating capacity and 14.8 MMBtu/hour heat input.

Emission Units: EU3516GEN1 and EU3516GEN2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	0.0369 pounds per kW-Hr (each generator)[2]	Test Protocol	FGEMERGENCYGENS	GC 13	**R 336.1201(3)**
2. NOx	63.1 pounds per hour (each generator)[2]	Hourly	FGEMERGENCYGENS	SC VI.2	**R 336.1201(3)**
3. CO	0.009 pounds per kW-Hr (each generator)[2]	Test Protocol	FGEMERGENCYGENS	GC 13	**R 336.1201(3)**
4. CO	15.3 pounds per hour (each generator)[2]	Hourly	FGEMERGENCYGENS	SC VI.3	**R 336.1201(3)**
5. SO2	120 parts per million by volume at 50% excess air (each generator)	As determined averaged over a three-hour time period otherwise determined by the testing protocol agreed upon by AQD	FGEMERGENCYGENS	GC 13	**R 336.1401(1)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fuel sulfur content	0.05% by weight (each generator)[2]	Instantaneous	FGEMERGENCYGENS	SC VI.4	**R 336.1201(3)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGEMERGENCYGENS for more than 1,000 generator-hours per year. Generator-hour is defined as the sum of the total hours each generator operates during a calendar year including startup and shutdown.[2] **(R336.1201(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (**R 336.1213(3)(b)(ii))**

2. The permittee shall monitor and record the daily electrical output (KW-hr) and hours of operation of each emission unit during each calendar day in which the emission unit(s) operated.[2] (**R 336.1201(3))**

3. The permittee shall calculate and record the daily NO_x emissions (lbs) by multiplying the daily electrical output (kW-hr) of each emission unit by the maximum emission limit (lb/kW-hr) specified in special condition I.1 for each calendar day in which the emission unit(s) operated. The permittee shall calculate the hourly NO_x emission rate (lbs/hr) for each emission unit by dividing the associated total daily NO_x emissions (lbs) by the hours of operation.[2] **(R 336.1205(1)(a) and R 336.1205(3))**

3. The permittee shall calculate and record the daily CO emissions (lbs) by multiplying the daily electrical output (kW-hr) of each emission unit by the maximum emission limit (lb/kW-hr) specified in special condition I.3 for each calendar in which the emission unit(s) operated. The permittee shall calculate the hourly CO emission rate (lbs/hr) for each emission unit by dividing the associated total daily CO emissions (lbs) by the hours of operation.[2] (**R 336.1205(1)(a) and R 336.1205(3))**

4. The permittee shall keep a complete record of fuel oil specifications or fuel oil analysis, indicating the sulfur content, for each delivery of fuel oil.[2] **(R 336.201(3))**

See Appendices 3 and 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV351601	14[2]	23.4[2]	**R 336.1201(3), 40 CFR paragraphs (c) and (d), R 336.1224, R 336.1225**
2. SV351602	14[2]	23.4[2]	**R 336.1201(3), 40 CFR paragraphs (c) and (d), R 336.1224, R 336.1225**

IX. OTHER REQUIREMENT(S)

1. The permittee shall maintain and operate FGEMERGENCYGENS according to the procedures outlined in the preventative maintenance plan recommended by the generator manufacturer.[2] **(R 336.1213(3))**

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

E. NON-APPLICABLE REQUIREMENTS

At the time of ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Abbreviations & Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
gr	Grains	psig	Pounds per square inch gauge
HAP	Hazardous Air Pollutant	PeTE	Permanent Total Enclosure
Hg	Mercury	PTI	Permit to Install
hr	Hour	RACT	Reasonable Available Control Technology
HP	Horsepower	ROP	Renewable Operating Permit
H_2S	Hydrogen Sulfide	SC	Special Condition
HVLP	High Volume Low Pressure *	scf	Standard cubic feet
ID	Identification (Number)	sec	Seconds
IRSL	Initial Risk Screening Level	SCR	Selective Catalytic Reduction
ITSL	Initial Threshold Screening Level	SO_2	Sulfur Dioxide
LAER	Lowest Achievable Emission Rate	SRN	State Registration Number
lb	Pound	TAC	Toxic Air Contaminant
m	Meter	Temp	Temperature
MACT	Maximum Achievable Control Technology	THC	Total Hydrocarbons
MAERS	Michigan Air Emissions Reporting System	tpy	Tons per year
MAP	Malfunction Abatement Plan	µg	Microgram
MDEQ	Michigan Department of Environmental Quality	VE	Visible Emissions
mg	Milligram	VOC	Volatile Organic Compounds
mm	Millimeter	yr	Year

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

Appendix 2. Schedule of Compliance

A Schedule of Compliance for any applicable requirements that the permittee is not in compliance with at the time of ROP issuance is supplemental to, and shall not sanction non-compliance with, the underlying applicable requirements on which it is based.

The permittee shall adhere to this schedule of compliance and submit the required certified progress reports accordingly.

Compliance Plan

The permittee outlined the details of achieving compliance in a narrative compliance plan. The details of the compliance plan are outlined below.

Schedule of Compliance

The following schedule of compliance conforms with the provisions of Rule 119(a) and Rule 213(4).

The permittee shall continue to comply with the requirements set forth in Consent Order AQD No. 31-2003 and as specified in FGBOILERS, Parts I and V.

Progress Reports

The permittee shall submit certified Progress Reports to the appropriate District Supervisor of the AQD using the MDEQ Report Certification form (EQP 5736). Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor. **(R 336.1213(4)(b))**

Progress reports shall contain the following information:

The projected dates for achieving scheduled activities, milestones or compliance as required in the schedule of compliance. **(R 336.1213(4)(b)(i))**

The actual dates that the activities, milestones, or compliance are achieved. **(R 336.1213(4)(b)(i))**

An explanation of why any dates in the schedule of compliance were not or will not be met. **(R 336.1213(4)(b)(ii))**

A description of any preventative or corrective measures adopted in order to ensure that the schedule of compliance is met. **(R 336.1213(4)(b)(ii))**

Appendix 3. Monitoring Requirements

Monitoring procedures, methods, and/or specifications for showing compliance with all of the emission limits contained in this permit are contained in the Continuous Compliance Plan which was submitted under permit 253-02. This document is entitled “Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP No. MI-ROP-N6631-2004” dated May 31, 2011.

Appendix 4. Recordkeeping

Recordkeeping parameters, frequency of recordkeeping, and recordkeeping methodologies are contained in the Continuous Compliance Plan entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP No. MI-ROP-N6631-2004," dated May 31, 2011.

Appendix 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No. MI-ROP-N6631-2004**: This includes any PTI that were incorporated into the Source-wide PTI No MI-PTI-N6631-2004 through amendments or modifications and any PTI that remained off-permit until this ROP renewal.**

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-N6631-2012.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
72-15	201600065/June 28, 2016	Incorporate PTI 72-15, which upgrades three existing natural gas fired combustion turbines, (EUCTG1, EUCTG2, and EUCTG3). Included are upgrades to both hardware and software of the turbines, which will improve performance of EUCTG2 and EUCTG3 in terms of capacity, heat rate, and maintenance schedule. The upgrades will improve performance of EUCTG1 in terms of heat rate and capacity during warm weather conditions only (i.e., heat rate and capacity will not exceed maximum during cold weather). These modifications also triggered the applicability of NSPS KKKK for the combustion turbines EUCTG2 and EUCTG3 due to the increase in the hourly emission rate and hardware upgrades. EUCTG1 is a simple cycle combustion turbine used as a peaking unit. EUCTG2 and EUCTG3 are combined cycle combustion turbines that operate as base load units.	EUCTG1 EUCTG2 EUCTG3 FGTURBINES FGNSPSKKKK

Appendix 7. Emission Calculations

Procedures and methodology for showing compliance with the emission limits contained in this permit are contained in the Continuous Compliance Plan entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of Permit No. 253-02" dated February 18, 2003.

Appendix 8. Reporting

A. Annual, Semi-annual, and Deviation Certification Reporting

The permittee shall use the MDEQ Report Certification form (EQP 5736) and MDEQ Deviation Report form (EQP 5737) for the annual, semi-annual and deviation certification reporting referenced in the Reporting section of the source-wide, emission unit and/or flexible group special conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

The permittee shall use the following approved formats and procedures for the reporting requirements referenced in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions, Therefore, Part B of this appendix is not applicable.

Appendix 9. Acid Rain Permit

Michigan Department Of Environmental Quality
Air Quality Division

PHASE II ACID RAIN PERMIT
Permit No. MI-AR-55088-2012

Permittee	Dearborn Industrial Generation
Address	2400 Miller Rd., Dearborn, MI
SRN	N6631
ORIS code	55088
Issue Date	March 28, 2012
Effective:	Issuance date of this facility's Renewable Operating Permit at the facility in accordance with 40 CFR 72.73.
Expiration	This permit shall expire when the facility's Renewable Operating Permit expires, in accordance with 40 CFR 72.73.
ROP No.	MI-ROP-N6631-2012

The Acid Rain Permit Contents

1. A statement of basis prepared by the Air Quality Division (AQD) containing:

   References to statutory and regulatory authorities, and with comments, notes, and justification that apply to the source in general;

2. Terms and conditions including:

   A table of sulfur dioxide allowances to be allocated during the term of the permit, if applicable, authorized by this permit during Phase II. Unless they are subject to sections 405(g)(2) or (3) of the Clean Air Act, new units are not allocated allowances in 40 CFR part 73 and must obtain allowances by other means (sec. 403(e) of the Clean Air Act).;

   Comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process, and any additional requirements; and,

   Any applicable nitrogen oxides compliance plan. Unless they are coal fired utility units regulated pursuant to sections 404, 405, or 409 of the Clean Air Act, new units are not subject to the acid rain nitrogen oxides requirements [40 CFR 76.1(a)].

3. The permit application that this source submitted, as corrected by the AQD. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the application.

Statement of Basis

Statutory and Regulatory Authorities

In accordance with the Natural Resources and Environmental Protection Act, 1994 PA 451 and Titles IV and V of the Clean Air Act, the Michigan Department of Environmental Quality, Air Quality Division (AQD), issues this permit pursuant to the provisions of R 336.1210 to R 336.1218, and R 336.1299(d).

For further information contact:

Brian Carley
Environmental Quality Specialist
Michigan Department of Environmental Quality
Air Quality Division
301 Louis Glick Highway
Jackson, Michigan 49201
Telephone: (517) 780-7843
Facsimile: (517) 780-7437

There are no comments, notes and/or justification that apply to the source in general for this section.

Terms and Conditions:

Phase II Sulfur Dioxide Allowance Allocation and Nitrogen Oxides Requirements for each affected unit.

		2011	2012	2013	2014	2015
Unit EUCTG 1	SO_2 allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under § 73.34(c) of this chapter) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				

		2011	2012	2013	2014	2015
Unit EUCTG 2	SO_2 allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under § 73.34(c) of this chapter) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				

		2011	2012	2013	2014	2015
Unit EUCTG 3	SO_2 allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under § 73.34(c) of this chapter) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				

Comments, notes and justifications regarding permit decisions, and changes made to the permit application forms during the review process: None.

Permit Application: (attached)

Acid Rain Permit Application submitted February 25, 2011

Acid Rain Permit Application

For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: ~ revised ~ for Acid Rain permit renewal

STEP 1

Identify the facility name, State, and plant (ORIS) code.

Dearborn Industrial Generation	MI	55088
Facility (Source) Name	State	Plant Code

STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a."

a	b
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)
EUCTG1	Yes
EUCTG2	Yes
EUCTG3	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes

Permit Requirements

STEP 3

Read the standard requirements.

(1) The designated representative of each affected source and each affected unit at the source shall:

(i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;

(2) The owners and operators of each affected source and each affected unit at the source shall:

(i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and

(ii) Have an Acid Rain Permit.

Monitoring Requirements

(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.

(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.

(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

(1) The owners and operators of each source and each affected unit at the source shall:

(i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and

(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.

(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:

(i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or

(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

(1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
(2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
(i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

(ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certifications, and other submissions

and all records made or required under the Acid Rain Program; and,
(iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
(2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:
(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating

Effect on Other Authorities, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;

STEP 3, Cont'd.

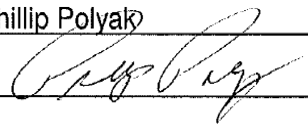
(2) Limiting the number of allowances a source can hold; *provided,* that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements

under such State law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4
Read the certification statement, sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and 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 statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Phillip Polyak	
Signature 	Date FEB 22, 2011

Appendix 10. CAIR Sulfur Dioxide Budget Permit

Michigan Department Of Environmental Quality
Air Quality Division

CAIR Sulfur Dioxide Budget Permit
Permit No. MI-SO2-55088-2012

Permittee	Dearborn Industrial Generation
Address	2400 Miller Rd., Dearborn, MI
SRN	N6631
ORIS code	55088
Issue Date	March 28, 2012
Expiration	This permit shall expire when the facility's Renewable Operating Permit (ROP) expires in accordance with 40 CFR 97.221(b).
ROP No.	MI-ROP-N6631-2012

This permit incorporates automatically the definitions of terms under Air Pollution Control Rule 336.1420.

This permit incorporates automatically, upon recordation by the EPA Administrator in accordance with 40 CFR part 97 subpart FFF, GGG, or III every allocation, transfer, or deduction of a SO2 allowance to or from the compliance accounts of the CAIR SO2 unit(s) covered by the permit.

The owners and operators of the source must comply with the standard requirements and special provisions set forth in this permit.

This permit incorporates any attached comments, notes or justifications regarding permit decisions and changes made to the permit application forms during the review process.

Units covered under this permit

AQD Unit ID	Unit Type			
EU00001	☐ Stationary Boiler	☐ Combined Cycle System	**X** Combustion Turbine	☐ Other
EU00002	☐ Stationary Boiler	**X** Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00003	☐ Stationary Boiler	**X** Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00004	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00005	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00006	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other

Permit Application:

CAIR SO2 Annual Permit application submitted February 25, 2011

Standard requirements

(a) Permit requirements.

(1) The CAIR designated representative of each CAIR SO2 source required to have a ROP and each CAIR SO2 unit required to have a ROP at the source shall:

(i) Submit to the permitting authority a complete CAIR permit application under § 97.222 in accordance with the deadlines specified in § 97.221; and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR SO2 source required to have a ROP and each CAIR SO2 unit required to have a ROP at the source shall have a CAIR permit issued by the permitting authority under subpart CCC of 40 CFR part 97 for the source and operate the source and the unit in compliance with such CAIR permit.

(b) Monitoring, Reporting, and Recordkeeping Requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR SO2 source and each CAIR SO2 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subpart HHH of 40 CFR part 97.

(2) The emissions measurements recorded and reported in accordance with subpart HHH of 40 CFR part 97 shall be used to determine compliance by each CAIR SO2 source with the CAIR SO2 emissions limitation under paragraph (c) of this permit.

(c) Sulfur Dioxide Emission Requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO2 source and each CAIR SO2 unit at the source shall hold, in the source's compliance account, a tonnage equivalent in CAIR SO2 allowances available for compliance deductions for the control period, as determined in accordance with § 97.254(a) and (b), not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO2 units at the source, as determined in accordance with subpart HHH of 40 CFR part 97.

(2) A CAIR SO2 unit shall be subject to the requirements under paragraph (c)(1) of this section for the control period starting on the later of January 1, 2010 or the deadline for meeting the unit(s monitor certification requirements under § 97.270(b)(1),(2), or (5) and for each control period thereafter.

(3) A CAIR SO2 allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this section, for a control period in a calendar year before the year for which the CAIR SO2 allowance was allocated.

(4) CAIR SO2 allowances shall be held in, deducted from, or transferred into or among CAIR SO2 Allowance Tracking System accounts in accordance with subparts FFF, GGG, and III of 40 CFR part 97.

(5) A CAIR SO2 allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO2 Trading Program. No provision of the CAIR SO2 Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.205 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(6) A CAIR SO2 allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart FFF, GGG, or III of 40 CFR part 97, every allocation, transfer, or deduction of a CAIR SO2 allowance to or from a CAIR SO2 source's compliance account is incorporated automatically in any CAIR permit of the source.

(d) Excess emissions requirements.

If a CAIR SO2 source emits sulfur dioxide during any control period in excess of the CAIR SO2 emissions limitation, then:
(1) The owners and operators of the source and each CAIR SO2 unit at the source shall surrender the CAIR SO2 allowances required for deduction under § 97.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

(e) Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR SO2 source and each CAIR SO2 unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the permitting authority or the Administrator.

(i) The certificate of representation under § 97.213 for the CAIR designated representative for the source and each CAIR SO2 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.213 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with subpart HHH of 40 CFR part 97, provided that to the extent that subpart HHH of 40 CFR part 97 provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR SO2 Trading Program.

(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR SO2 Trading Program or to demonstrate compliance with the requirements of the CAIR SO2 Trading Program.

(2) The CAIR designated representative of a CAIR SO2 source and each CAIR SO2 unit at the source shall submit the reports required under the CAIR SO2 Trading Program, including those under subpart HHH of 40 CFR part 97.

(f) Liability.

(1) Each CAIR SO2 source and each CAIR SO2 unit shall meet the requirements of the CAIR SO2 Trading Program.
(2) Any provision of the CAIR SO2 Trading Program that applies to a CAIR SO2 source or the CAIR designated representative of a CAIR SO2 source shall also apply to the owners and operators of such source and of the CAIR SO2 units at the source.
(3) Any provision of the CAIR SO2 Trading Program that applies to a CAIR SO2 unit or the CAIR designated representative of a CAIR SO2 unit shall also apply to the owners and operators of such unit.

(g) Effect On Other Authorities.

No provision of the CAIR SO2 Trading Program, a CAIR permit application, a CAIR permit, or an exemption under § 97.205 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR SO2 source or CAIR SO2 unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

Appendix 11. CAIR Annual Nitrogen Oxide Budget Permit

Michigan Department Of Environmental Quality
Air Quality Division

CAIR Annual Nitrogen Oxide Budget Permit
Permit No. MI-NOA-55088-2012

Permittee	Dearborn Industrial Generation
Address	2400 Miller Rd., Dearborn, MI
SRN	N6631
ORIS code	55088
Issue Date	March 28, 2012
Expiration	This permit shall expire when the facility's Renewable Operating Permit expires in accordance with Air Pollution Control Rule 336.1821.
ROP No.	MI-ROP-N6631-2012

This permit incorporates automatically the definitions of terms under Air Pollution Control Rule 336.1803.

This permit incorporates automatically, upon recordation by the EPA Administrator in accordance with Air Pollution Control Rule 336.1830, 336.1831 and 336.1834 every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx Budget unit(s) covered by the permit.

The owners and operators of the source must comply with the standard requirements and special provisions set forth in this permit.

This permit incorporates any attached comments, notes or justifications regarding permit decisions and changes made to the permit application forms during the review process.

Units covered under this permit

AQD Unit ID	Unit Type			
EU00001	☐ Stationary Boiler	☐ Combined Cycle System	**X** Combustion Turbine	☐ Other
EU00002	☐ Stationary Boiler	**X** Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00003	☐ Stationary Boiler	**X** Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00004	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00005	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00006	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other

Permit Application:

CAIR NOx Annual Permit application submitted February 25, 2011

Standard Requirements

(a) **Permit Requirements**.

(1) The CAIR designated representative of each CAIR NOX source required to have a Renewable Operating Permit (ROP) and each CAIR NOX unit required to have a ROP at the source shall:

> (i) Submit to the Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) a complete CAIR permit application under R 336.1821(3) in accordance with the deadlines specified in 40 CFR 97.121; and
> (ii) Submit in a timely manner any supplemental information that the MDEQ-AQD determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR NOX source required to have a ROP and each CAIR NOX unit required to have a ROP at the source shall have a CAIR permit issued by the MDEQ-AQD under subpart CC of 40 CFR part 97 for the source and operate the source and the unit in compliance with such CAIR permit.

(b) **Monitoring, Reporting, and Recordkeeping Requirements.**

(1) The owners and operators, and the CAIR designated representative, of each CAIR NOX source and each CAIR NOX unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subpart HH of 40 CFR part 97.

(2) The emissions measurements recorded and reported in accordance with subpart HH of 40 CFR part 97 shall be used to determine compliance by each CAIR NOX source with the CAIR NOX emissions limitation under paragraph (c) of this permit.

(c) **Nitrogen Oxides Emission Requirements.**

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NOX source and each CAIR NOX unit at the source shall hold, in the source's compliance account, CAIR NOX allowances available for compliance deductions for the control period under 40 CFR 97.154(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NOX units at the source, as determined in accordance with subpart HH of 40 CFR part 97.

(2) A CAIR NOX unit shall be subject to the requirements under paragraph (c)(1) for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.170(b)(1), (2), or (5) and for each control period thereafter.

(3) A CAIR NOX allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this section, for a control period in a calendar year before the year for which the CAIR NOX allowance was allocated.

(4) CAIR NOX allowances shall be held in, deducted from, or transferred into or among CAIR NOX Allowance Tracking System accounts in accordance with subparts EE, FF, GG, or II of 40 CFR part 97.

(5) A CAIR NOX Ozone Season allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NOX Ozone Season Trading Program. No provision of the CAIR NOX Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.105 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(6) A CAIR NOX allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NOX Annual Trading Program. No provision of the CAIR NOX Annual Trading Program, the CAIR permit application, the CAIR permit, or an exemption under 40 CFR 97.105 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(7) A CAIR NOX allowance does not constitute a property right.

(8) Upon recordation by the Administrator under subpart EE, FF, GG, or II of 40 CFR part 97, every allocation, transfer, or deduction of a CAIR NOX allowance to or from a CAIR NOX source's compliance account is incorporated automatically in any CAIR permit of the source.

(d) **Excess Emissions Requirements.**

If a CAIR NOX source emits nitrogen oxides during any control period in excess of the CAIR NOX emissions limitation, then:

(1) The owners and operators of the source and each CAIR NOX unit at the source shall surrender the CAIR NOX allowances required for deduction under 40 CFR 97.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and

(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, the Clean Air Act, and applicable State rules.

(e) **Recordkeeping and Reporting Requirements.**

(1) Unless otherwise provided, the owners and operators of the CAIR NOX source and each CAIR NOX unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the MDEQ-AQD or the Administrator.

(i) The certificate of representation under § 97.113 for the CAIR designated representative for the source and each CAIR NOX unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.113 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with subpart HH of 40 CFR part 97.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NOX Annual Trading Program.

(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NOX Annual Trading Program or to demonstrate compliance with the requirements of the CAIR NOX Annual Trading Program.

(2) The CAIR designated representative of a CAIR NOX source and each CAIR NOX unit at the source shall submit the reports required under the CAIR NOX Annual Trading Program, including those under subpart HH of 40 CFR part 97.

(f) **Liability.**

(1) Each CAIR NOX source and each CAIR NOX unit shall meet the requirements of the CAIR NOX Annual Trading Program.

(2) Any provision of the CAIR NOX Annual Trading Program that applies to a CAIR NOX source or the CAIR designated representative of a CAIR NOX source shall also apply to the owners and operators of such source and of the CAIR NOX units at the source.

(3) Any provision of the CAIR NOX Annual Trading Program that applies to a CAIR NOX unit or the CAIR designated representative of a CAIR NOX unit shall also apply to the owners and operators of such unit.

(g) **Effect on Other Authorities.**

No provision of the CAIR NOX Annual Trading Program, a CAIR permit application, a CAIR permit, or an exemption under § 97.105 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NOX source or CAIR NOX unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

Appendix 12. CAIR Ozone Nitrogen Oxide Budget Permit

Michigan Department Of Environmental Quality
Air Quality Division

CAIR Ozone Nitrogen Oxide Budget Permit
Permit No. MI-NOO-55088-2012

Permittee	Dearborn Industrial Generation
Address	2400 Miller Rd., Dearborn, MI
SRN	N6631
ORIS code	55088
Issue Date	March 28, 2012
Expiration	This permit shall expire when the facility's Renewable Operating Permit expires in accordance with Air Pollution Control Rule 336.1821.
ROP No.	MI-ROP-N6631-2012

This permit incorporates automatically the definitions of terms under Air Pollution Control Rule 336.1803.

This permit incorporates automatically, upon recordation by the EPA Administrator in accordance with Air Pollution Control Rule 336.1822, 336.1823 and 336.1834 every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx Budget unit(s) covered by the permit.

The owners and operators of the source must comply with the standard requirements and special provisions set forth in this permit.

This permit incorporates any attached comments, notes or justifications regarding permit decisions and changes made to the permit application forms during the review process.

Units covered under this permit

AQD Unit ID	Unit Type			
EU00001	☐ Stationary Boiler	☐ Combined Cycle System	**X** Combustion Turbine	☐ Other
EU00002	☐ Stationary Boiler	**X** Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00003	☐ Stationary Boiler	**X** Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00004	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00005	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EU00006	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other

Permit Application:

CAIR NOx Ozone Season Permit application submitted February 25, 2011

Standard Requirements

(a) **Permit Requirements**.

(1) The CAIR designated representative of each CAIR NOX source required to have a Renewable Operating Permit (ROP) and each CAIR NOX unit required to have a ROP at the source shall:

> (i) Submit to the Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) a complete CAIR permit application under R 336.1821(3) in accordance with the deadlines specified in 40 CFR 97.321; and
> (ii) Submit in a timely manner any supplemental information that the MDEQ-AQD determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR NOX source required to have a ROP and each CAIR NOX unit required to have a ROP at the source shall have a CAIR permit issued by the MDEQ-AQD under subpart CCCC of 40 CFR part 97 for the source and operate the source and the unit in compliance with such CAIR permit.

(b) **Monitoring, Reporting, and Recordkeeping Requirements.**

(1) The owners and operators, and the CAIR designated representative, of each CAIR NOX source and each CAIR NOX unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subpart HHHH of 40 CFR part 97.

(2) The emissions measurements recorded and reported in accordance with subpart HHHH of 40 CFR part 97 shall be used to determine compliance by each CAIR NOX source with the CAIR NOX emissions limitation under paragraph (c) of this permit.

(c) **Nitrogen Oxides Emission Requirements.**

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NOX source and each CAIR NOX unit at the source shall hold, in the source's compliance account, CAIR NOX allowances available for compliance deductions for the control period under 40 CFR 97.354(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NOX units at the source, as determined in accordance with subpart HHHH of 40 CFR part 97.

(2) A CAIR NOX unit shall be subject to the requirements under paragraph (c)(1) for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.370(b)(1), (2), (3) or (7) and for each control period thereafter.

(3) A CAIR NOX allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this permit, for a control period in a calendar year before the year for which the CAIR NOX allowance was allocated.

(4) CAIR NOX allowances shall be held in, deducted from, or transferred into or among CAIR NOX Allowance Tracking System accounts in accordance with subparts EEEE, FFFF, GGGG, or IIII of 40 CFR part 97.

(5) A CAIR NOX Ozone Season allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NOX Ozone Season Trading Program. No provision of the CAIR NOX Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.305 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(6) A CAIR NOX allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EEEE, FFFF, GGGG, or IIII of 40 CFR part 97, every allocation, transfer, or deduction of a CAIR NOX allowance to or from a CAIR NOX source's compliance account is incorporated automatically in any CAIR permit of the source.

(d) **Excess Emissions Requirements.**

If a CAIR NOX source emits nitrogen oxides during any control period in excess of the CAIR NOX emissions limitation, then:

(1) The owners and operators of the source and each CAIR NOX unit at the source shall surrender the CAIR NOX allowances required for deduction under 40 CFR 97.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and

(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, the Clean Air Act, and applicable State rules.

(e) **Recordkeeping and Reporting Requirements.**

(1) Unless otherwise provided, the owners and operators of the CAIR NOX source and each CAIR NOX unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the MDEQ-AQD or the Administrator.

(i) The certificate of representation under § 97.313 for the CAIR designated representative for the source and each CAIR NOX unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.313 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with subpart HHHH of 40 CFR part 97.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NOX Ozone Trading Program.

(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NOX Ozone Trading Program or to demonstrate compliance with the requirements of the CAIR NOX Ozone Trading Program.

(2) The CAIR designated representative of a CAIR NOX source and each CAIR NOX unit at the source shall submit the reports required under the CAIR NOX Ozone Trading Program, including those under subpart HHHH of 40 CFR part 97.

(f) **Liability.**

(1) Each CAIR NOX source and each CAIR NOX unit shall meet the requirements of the CAIR NOX Ozone Trading Program.

(2) Any provision of the CAIR NOX Ozone Trading Program that applies to a CAIR NOX source or the CAIR designated representative of a CAIR NOX source shall also apply to the owners and operators of such source and of the CAIR NOX units at the source.

(3) Any provision of the CAIR NOX Ozone Trading Program that applies to a CAIR NOX unit or the CAIR designated representative of a CAIR NOX unit shall also apply to the owners and operators of such unit.

(g) **Effect on Other Authorities.**

No provision of the CAIR NOX Ozone Trading Program, a CAIR permit application, a CAIR permit, or an exemption under § 97.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NOX source or CAIR NOX unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.