

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N557560421

FACILITY: ANR Pipeline Company - Bridgman Compressor Station		SRN / ID: N5575
LOCATION: 3372 Browntown Rd, BRIDGMAN		DISTRICT: Kalamazoo
CITY: BRIDGMAN		COUNTY: BERRIEN
CONTACT: Michael Weston ,		ACTIVITY DATE: 10/06/2021
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On October 6, 2021 AQD staff (Matt Deskins) went to conduct an unannounced scheduled inspection of the ANR Pipeline (SRN: N5575) facility located in Bridgman, Berrien County. The facility is a compressor station whose main function is to maintain certain pressures in pipelines that transport sweet natural gas from ANRs southwest mainline to storage facilities or local distribution companies. The facility is considered a major source of emissions for NO_x, CO, VOCs, and HAPs and currently operates under Renewable Operating Permit No. MI-ROP-N5575-2018. The facility has five 1550 hp reciprocating internal combustion engines (RICE), three 1125 hp turbines, one 12,000 hp RICE, and one 585 hp RICE emergency generator which all operate on natural gas. According to file information, all of the preceding equipment was exempt from air permitting because they were installed prior to 1967 except for the 12,000 hp engine, one of 1125 hp turbines, and the 585 hp emergency generator. The 12,000 hp engine and the 1125 hp turbine were installed after the 1967 cut off date but were still exempt from permitting under a former Rule 36. The 585 hp emergency generator was installed in September of 2007 to replace two 370 hp generators. It was installed under the AQD Rule 285(g) permit exemption but is subject to 40 CFR Part 63 Subpart ZZZZ (RICE MACT). The facility also has a 5.021 MMbtu/hr boiler that is natural gas fired. It is subject to 40 CFR Part 63 Subpart DDDDD (NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters). Staff will not make any compliance determination regarding the Boiler MACT since the AQD is not delegated by the EPA to enforce it. Lastly, in February of 2021 the facility was issued PTI No. 92-20 which is for all new equipment ((1) 15,327 hp Solar Mars 100 Turbine, (1) 10,953 hp Solar Taurus 70 Turbine, and a natural gas fired 4 stroke lean burn Waukesha 880 hp RICE) that will ultimately be replacing all of the equipment mentioned above once it is installed and operating properly. The facility has submitted a "Notice of Construction" for installation of the new equipment as required by the permit and it is staff's understanding that construction is still on-going. The purpose of the inspection was to determine the facilities compliance with their ROP and any other state and/or federal air regulations that the AQD is delegated to enforce. Staff will also take along their new PTI should any of that equipment be installed and operational, even if on a trial basis. Staff departed for the facility at approximately 9:30 a.m.

Staff arrived at the facility at approximately 10:40 a.m. The facility is still surrounded by fencing but with the new construction that is going on, staff wasn't sure where to enter now to gain access to the office area. Staff ended up entering at one of the construction entrances and was told by Security Personnel that they needed to go over to another entrance off of Pardee Road which borders the facility to the north. Staff proceeded over to that entrance where they stopped at another Security check point. Staff introduced them self and stated the purpose of the visit. Staff then was allowed to proceed back to the office area. Staff then parked, proceeded to the office area, and were greeted by Mike Weston (Electrical Instrumentation and Control (EIC) Technician) whom staff has met with on previous inspections. Staff greeted Mike and stated the purpose of the visit. Staff then asked if they still had to sign in and Mike mentioned that all visitors now had to do it on-line. Staff then had to use their phone camera and hover it over a QR Code until a web link showed. Staff then had to open the link, fill out personal information along with COVID

questions, and then submit it. Staff would later have to do this again when leaving the facility. Staff also gave another ANR employee (Rod Watson) their State I.D. so he could make a photocopy of it as is required for all ANR visitors. Once this was done, staff then sat down at a table with Mike to go over and sign off on all the safety procedures in place at the facility. After all the procedural things were finished, staff asked Mike some general questions regarding the facility. The following is a summary of that discussion.

According to Mike, ANR still currently has 7 full time employees that work a regular 8-hour shift Monday through Friday. He said that they still alternate on-call duties during the non-work hours. Mike said that all the equipment listed in the current ROP is still the same but as staff probably observed, construction is currently on-going for the new permitted equipment and associated buildings. Staff asked when they figured construction would be complete and trial operations started. Mike mentioned that it would probably be sometime after the first of the year at the earliest. He said that once they determine that the new equipment is "good to go" that they will then remove all the existing units. Staff then asked what equipment was currently running to which Mike replied that none of the units were operating and that everything was shut down due to load demand. Staff then asked if the natural gas demand still determines which piece or pieces of equipment are operated at any given time and Mike said that it still was. NOTE: Staff had been told during previous inspections that what equipment is being operated at any given time is dependent on the demand and how much flow (scfm) is being required/requested. The facility then relates that amount to how much horsepower will be required to achieve that. They will then operate the equipment that most closely matches up to what will achieve the required flow pressure. Staff then went on a short tour of the facility with Mike prior to looking at any records. The following is a summary of the facilities equipment that staff viewed during the tour and some information regarding them.

The 585 hp emergency generator: It was manufactured by Waukesha and as mentioned previously in this report, replaced the two 370 hp Ingersoll-Rand generators and was installed under the AQD Rule 285(g) permit exemption. The generator is all automated and senses any fluctuations with incoming power. If the facility should lose power, the generator automatically starts-up and will automatically shutdown when main power is restored. They still have to run it some on a monthly basis for testing purposes and they log the hours that this is done so they can calculate how many hours the engine has actually run during power outages. The engine was exempt from 40 CFR Part 63 Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) because it was only used for emergency purposes. The facility was required to provide an initial notification regarding this and did so upon the engine's installation. However, with the amendments to Subpart ZZZZ that took effect, it is now subject to the regulation and its requirements are included in the ROP.

The 5.021 MMBtu/hr boiler was installed in 1972 and was manufactured by Kewanee. As mentioned in the opening paragraph, it is subject to the Boiler MACT Subpart DDDDD. It was in operation during staff's inspection.

The five 1550 hp Clark RICEs designated as Units 1 through 5. None of the units were operating during staff's inspection. These engines are all existing lean burn 4-stroke engines constructed before December 19, 2002 and there are no applicability requirements of the RICE MACT at major sources of HAPs.

The three 1125 hp Solar Saturn turbines which are designated as Units 6 through 8 and none were operating during staff's inspection. These turbines are not subject to any federal NSPS, NESHAP/MACT, because of their date of installation. The one designated as Unit 8 was installed under a permit exemption back in 1968.

The 12,000 hp Clark RICE designated as Unit 9. This unit was not operating during staff's inspection. This engine is also not subject to 40 CFR Part 63 Subpart ZZZZ because it is also considered an existing lean burn engine which is exempt from the requirements. The engine is subject though to the R 336.1818 rules for NOx emission reductions during the ozone control period (May 1 through September 30) of each calendar year. The facility had to develop a plan to comply with this rule and ultimately came up with an allowable NOx limit of 6.6 grams per brake horsepower hour. The facility has been testing the engine during every ozone season since 2007 and to date it has met the emission limit. The testing for the 2021 ozone season was performed on July 7th and the results indicated emissions at 5.9 grams. The test results were also reviewed by TPU and found acceptable.

Staff then proceeded with Mike back to the office. Once back at the office staff proceeded to go over the ROP and its requirements. In an effort to limit the time spent at the site, staff asked Mike to have Chris Waltman (Senior Environmental Specialist) e-mail them to staff so staff could review them later. Mike did that and Chris e-mailed them to staff that same day. The following are the various emission units and special conditions of MI-ROP-N5575-2018. Following each special condition will be staff's comments regarding the facilities compliance status with them.

****Please note that staff did not include any requirements that were N/A in the ROP below.**

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
EUBG001	Clark model HBA6T; 1550 HP natural gas fired reciprocating internal combustion compressor engine.	01-01-1950/NA	FGEQUIPMENT

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation	
		Date/ Modification Date	Flexible Group ID
EUBG002	Clark model HBA6T; 1550 HP natural gas fired reciprocating internal combustion compressor engine.	01-01-1950/NA	FGEQUIPMENT
EUBG003	Clark model HBA6T; 1550 HP natural gas fired reciprocating internal combustion compressor engine.	01-01-1950/NA	FGEQUIPMENT
EUBG004	Clark model HBA6T; 1550 HP natural gas fired reciprocating internal combustion compressor engine.	01-01-1950/NA	FGEQUIPMENT
EUBG005	Clark model HBA6T; 1550 HP natural gas fired reciprocating internal combustion compressor engine.	01-01-1950/NA	FGEQUIPMENT
EUBG006	Solar model Saturn-SC; 1125 HP natural gas fired turbine.	08-01-1967/NA	FGEQUIPMENT
EUBG007	Solar model Saturn-SC; 1125 HP natural gas fired turbine.	08-01-1967/NA	FGEQUIPMENT
EUBG008	Solar model Saturn-SC; 1125 HP natural gas fired turbine. Installed under exemption.	08-01-1968/NA	FGEQUIPMENT
EUBG009	Clark model TCVC20M; 12,000 HP natural gas fired reciprocating internal combustion compressor engine. Installed under exemption.	01-01-1973/NA*	NA
EUBG011	Waukesha model H24GL HCR; 585 HP natural gas fired emergency generator. Installed under exemption.	09-01-2007/NA	NA

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation	
		Date/ Modification Date	Flexible Group ID
EUBG012	Kewanee model L3S-150-G; 5.021 MMBtu-hr natural gas fired boiler.	01-01-1972/NA	NA

*Facility was permitted to install a modified fuel injection system in 2003 to improve combustion and lower NOx emissions.

EUBG009

EMISSION UNIT CONDITIONS

DESCRIPTION

Clark model TCVC20M; 12,000 HP natural gas fired reciprocating internal combustion compressor engine. Installed under exemption.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx (Oxides of Nitrogen)	174.6 pph ^{2,3}	Pounds per hour. This limit applies during the non-ozone control period of October 1 through April 30 of each calendar year.	EUBG009	SC V.1 SC VI.1 SC VI.2	40 CFR 52.21 R 336.1213(3)
2. NOx	6.6 grams per brake horsepower-hour	Grams per brake horsepower hour. This limit applies during the ozone control period of May 1 through September 30	EUBG009	SC VI.3 SC VI.4	R 336.1818(3)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
		of each calendar year.			

AQD Comment: Appears to be in COMPLIANCE. The facility had to test for the emission limit stated in number one above once within the effective dates of the ROP and this was conducted in 2017. The average NOx emissions during the 3 runs was approximately 138 pounds per hour. The facility has been testing for compliance with the limit in number two above every year during the ozone season. The testing this year was done on July 7th and the results indicated compliance with emissions being 5.9 grams.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any affected engine (as defined in R 336.1818(1)(a)) during the ozone control period of May 1 through September 30 of each calendar year unless the permittee complies with a department approved compliance plan as described in R 336.1818 (3)(a). (R 336.1818(3))

AQD Comment: Appears to be in COMPLIANCE. The facility has an approved compliance plan and they appear to be meeting its requirements.

V. TESTING/SAMPLING

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

1. The permittee shall verify NOx emission rates from EUBG009 by testing at the owner's expense, in accordance with the Department requirements, at a minimum, every five years from the date of the last test. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

AQD Comment: Appears to be in COMPLIANCE. The facility tested in 2017 and will have 5 years from the previous test date to test again. If the engine is still in place in 2022, they may have to test it again.

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 monitor and record, in a satisfactory manner, the natural gas usage rate for EUBG009 on a monthly basis.^{2,3} (40 CFR 52.21)

AQD Comment: Appears to be in COMPLIANCE. The facility is doing.

2. The permittee shall record, in a satisfactory manner, the hours of operation of EUBG009 on a monthly basis. **(R 336.1213(3)(b))**

AQD Comment: Appears to be in COMPLIANCE. The facility is doing this.

3. The permittee shall perform monitoring sufficient to yield data for each ozone period that is representative of a source's compliance with the NOx emission rate limit. The monitoring may include one of the following: **(R 336.1818(4)(a)(ii))**
 - a. Performance tests consistent with either of the following:
 - i. The provisions of 40 CFR Part 60, Subpart A and appendices A, B, and F and Part 75 (2005).
 - ii. The provisions of ASTM D6522-00 (2005).
 - b. A parametric monitoring program that specifies operating parameters, and their ranges, that shall provide reasonable assurance that each engine's emissions are consistent with the requirements of R 336.1818(3).
 - c. A predictive emissions measurement system that relies on automated data collection from instruments.
 - d. A continuous emission monitoring system that complies with procedures set forth in 40 CFR Part 60, Subpart A and appendix B, and with the quality assurance procedures in appendix F; or 40 CFR Part 75, and associated appendices, as applicable and acceptable to the department.

AQD Comment: Appears to be in COMPLIANCE. The facility has been conducting this testing every ozone season using the provisions of ASTM D6522-00.

4. The permittee shall maintain records of the following: **(R 336.1818(4)(b)(ii))**
 - a. Identification and location of each engine subject to R 336.1818.
 - b. Calendar date of record.
 - c. The number of hours the unit is operated during each ozone control period compared to the projected operating hours.
 - d. Quantity of natural gas used on a monthly basis.
 - e. The results of all compliance tests.

AQD Comment: Appears to be in COMPLIANCE. The facility is doing all the above and only EUBG009 is subject to the regulation. The projected operating hours it will be operated during the ozone season is 3,672 hours according to their compliance plan. Since the rule took effect in 2007 the facility has been under this amount.

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 postmarked or 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 postmarked or received by appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. For all compliance/performance testing conducted to meet the requirements of R 336.1818(3), the permittee shall submit the following:
 - a. A test plan not less than 30 days before the scheduled test date. **(R 336.1818(4)(a)(i))**
 - b. Test results (two copies) within 60 days following completion of the testing. **(R 336.1818(4)(c))**

AQD Comment: Appears to be in COMPLIANCE. The facility is meeting the requirements listed in 1 through 4 above by submitting all the required reports.

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement, maintain, have on site, and make available for review, the "Compliance Plan for Stationary Internal Combustion Engines" dated April 2006, or any subsequently approved plan that describes how NO_x emission rate requirements for EUBG009 will be met during the ozone season. The permittee shall submit any modifications to this compliance plan to the department for review and approval. **(R 336.1818(3)(a))**

AQD Comment: Appears to be in COMPLIANCE. The facility has a Compliance Plan and it hasn't needed to be modified yet to date.

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).

³This condition was originally established in a Permit to Install (PTI) under the federal PSD Rule for Pollution Control Projects (40 CFR 52.21(z)) and was subsequently vacated by the US Court of Appeals, DC Circuit, on February 8, 2008.

EUBG011

EMISSION UNIT CONDITIONS

DESCRIPTION

Waukesha model H24GL HCR; 585 HP natural gas fired emergency generator. Installed under exemption.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines: (40 CFR 63.6640(f))

a. There is no time limit on the use of emergency stationary RICE in emergency situations. (40 CFR 63.6640(f)(1))

b. You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2):

- i. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
 - ii. Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see 40 CFR 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
 - iii. Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency. (40 CFR 63.6640(f)(2)(i))
- c. Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (40 CFR 63.6640(f)(3))

AQD Comment: Appears to be in COMPLIANCE. The facility is meeting the requirements listed in 1a through 1c above. The facility runs it for 0.6 hours per month for maintenance checks and have typically been under 10 hours of operation for a calendar year.

VI. MONITORING/RECORDKEEPING

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

1. Records of the occurrence and duration of each malfunction of operation or the air pollution control monitoring equipment. (40 CFR 63.6655(a)(2), 40 CFR 63.6660)

AQD Comment: Appears to be in COMPLIANCE. Staff was told that the unit has hardly had to run since it was installed and therefore it hasn't had any malfunctions.

2. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (40 CFR 63.6655(a)(5), 40 CFR 63.6660, 40 CFR 63.6605(b))

AQD Comment: Appears to be in COMPLIANCE. Staff was told that the unit has hardly had to run since it was installed and therefore it hasn't had any malfunctions.

3. Records to demonstrate compliance with the operating limitations in SC III.1. (40 CFR 63.6655(d), 40 CFR 63.6660)

AQD Comment: Appears to be in COMPLIANCE. The unit is only run for readiness testing (maintenance) and emergency situations. The hours it has run is under the hours that are allowed.

4. Records of the maintenance conducted to demonstrate the stationary RICE was operated and maintained according to the manufacturer's emission related written instructions or developed maintenance plan. (40 CFR 63.6655(e), 40 CFR 63.6660)

AQD Comment: Appears to be in COMPLIANCE. The facility maintains records electronically of maintenance done on all the equipment.

5. Records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation, including what classified the operation as emergency and how many hours were spent during non-emergency operation. (40 CFR 63.6655(f), 40 CFR 63.6660)

AQD Comment: Appears to be in COMPLIANCE. The unit has an hour meter and they track how long it runs for emergency and non-emergency purposes.

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. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

AQD Comment: Appears to be in COMPLIANCE. The facility is meeting the requirements listed in 1 through 4 above by submitting the required reports.

IX. OTHER REQUIREMENT(S)

The permittee shall comply with all provisions of the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) as specified in 40 CFR Part 63 Subparts A and ZZZZ, as they apply to EUBG011 at a major source of HAPs. (40 CFR Part 63, Subparts A and ZZZZ)

AQD Comment: Appears to be in COMPLIANCE. The facility appears to be complying with the regulation.

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).

NOTE Staff did not make a compliance determination regarding the emission unit below (EUBG012) (Boiler) because the AQD is not delegated by the EPA to enforce the regulation (NESHAP 40 CFR Part 63**

Subpart DDDDD). However, the facility is submitting reports to the EPA as well as to the AQD.

EUBG012

EMISSION UNIT CONDITIONS

DESCRIPTION

Kewanee model L3S-150-G; 5.021 MMBtu-hr natural gas fired boiler.

II. MATERIAL LIMIT(S)

1. The permittee shall only burn fuels as allowed in the Unit designed to burn gas 1 subcategory definition in 40 CFR 63.7575. (40 CFR 63.7499(I))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must meet the requirements in paragraphs (a)(1) and (3) of 40 CFR 63.7500, as listed below, except as provided in paragraphs (b) and (e) of 40 CFR 63.7500, stated in SC III.2 and SC III.3. The permittee must meet these requirements at all times the affected unit is operating, except as provided in paragraph (f) of 40 CFR 63.7500, stated in SC III.4: **(40 CFR 63.7500(a))**
 - a. The permittee must meet each work practice standard in Table 3 of 40 CFR Part 63, Subpart DDDDD that applies to the boiler or process heater, for each boiler or process heater at the source. **(40 CFR 63.7500(a)(1))**
 - b. At all times, the permittee must operate and maintain any affected source (as defined in 40 CFR 63.7490, stated in SC IX.1), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.7500(a)(3))**
2. As provided in 40 CFR 63.6(g), EPA may approve use of an alternative to the work practice standards. **(40 CFR 63.7500(b))**
3. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13 of 40 CFR Part 63, Subpart DDDDD, or the operating limits in Table 4 of 40 CFR Part 63, Subpart DDDDD. Boilers and process heaters in the units designed to burn gas 1 fuel subcategory with a heat input capacity: **(40 CFR 63.7500(e))**
 - a. Greater than 5 million Btu per hour and less than 10 million Btu per hour must complete a tune-up every 2 years as specified in 40 CFR 63.7540, stated in. **(40 CFR 63.7500(e))**
4. The above standards apply at all times the affected unit is operating, except during periods of startup and shutdown during which time the permittee must comply only with items 5 and 6 of Table 3 of 40 CFR Part 63, Subpart DDDDD. **(40 CFR 63.7500(f))**
5. The permittee must complete an initial tune-up by following the procedures described in 40 CFR 63.7540(a)(10)(i) through (vi), stated in SC IX.7, no later than the compliance date specified in 40 CFR 63.7495, stated in SC IX.3 (no later than January 31, 2016, except as provided in 40 CFR 63.6(i)), except as specified in paragraph (j) of 40 CFR 63.7510. The permittee must complete the one-time energy assessment specified in Table 3 of 40 CFR Part 63, Subpart DDDDD no later than the compliance date specified in 40 CFR 63.7495, stated in SC IX.3 (no later than January 31, 2016). **(40 CFR 63.7510(e))**

6. If the permittee is required to meet an applicable tune-up work practice standard, the permittee must conduct an annual performance tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.7.a; biennial performance tune-up according to 40 CFR 63.7540(a)(11), stated in SC IX.7.b; or 5-year performance tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.7.c. Each annual tune-up specified in 40 CFR 63.7540(a)(10) must be no more than 13 months after the previous tune-up. Each biennial tune-up specified in 40 CFR 63.7540(a)(11) must be conducted no more than 25 months after the previous tune-up. Each 5-year tune-up specified in 40 CFR 63.7540(a)(12) must be conducted no more than 61 months after the previous tune-up. **(40 CFR 63.7515(d))**
7. For startup and shutdown, the permittee must meet the work practice standards according to items 5 and 6 of Table 3 of 40 CFR Part 63, Subpart DDDDD. **(40 CFR 63.7540(d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. **The boiler or process heater shall have a heat input capacity of less than 10 MMBtu per hour. (40 CFR Part 63, Subpart DDDDD)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee must keep records according to paragraphs (a)(1) and (2) of 40 CFR 63.7555, as listed below: **(40 CFR 63.7555(a))**
 - a. A copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.7555(a)(1))**
 - b. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR 63.10(b)(2)(viii). **(40 CFR 63.7555(a)(2))**
2. **If the permittee operates a unit in the unit designed to burn gas 1 subcategory that is subject to 40 CFR Part 63, Subpart DDDDD, and the permittee uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under 40 CFR Part 63, other gas 1 fuel, or gaseous fuel subject to another subpart of 40 CFR Part 63 or Parts 60, 61, or 65, the permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies. (40 CFR 63.7555(h))**
3. **The permittee's records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). (40 CFR 63.7560(a))**
4. **As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (40 CFR 63.7560(b))**
5. **The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee can keep the records off site for the remaining 3 years. (40 CFR 63.7560(c))**

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. The permittee must meet the notification requirements in 40 CFR 63.7545 according to the schedule in 40 CFR 63.7545, both stated in SC VII.8 through SC VII.11, and in Subpart A of 40 CFR Part 63. **(40 CFR 63.7495(d))**
5. If the permittee owns or operates an existing unit with a heat input capacity of less than 10 million Btu per hour or a unit in the unit designed to burn gas 1 subcategory, the permittee must submit a signed statement in the Notification of Compliance Status report that indicates that the permittee conducted a tune-up of the unit. **(40 CFR 63.7530(d))**
6. The permittee must include with the Notification of Compliance Status a signed certification that either the energy assessment was completed according to Table 3 of 40 CFR Part 63, Subpart DDDDD, and that the assessment is an accurate depiction of the facility at the time of the assessment, or that the maximum number of on-site technical hours specified in the definition of energy assessment applicable to the facility has been expended. **(40 CFR 63.7530(e))**
7. The permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in 40 CFR 63.7545(e), stated in SC VII.11. **(40 CFR 63.7530(f))**
8. The permittee must report each instance in which they did not meet each emission limit and operating limit in Tables 1 through 4 or 11 through 13 to this subpart that applies. These instances are deviations from the emission limits or operating limits, respectively, in this subpart. These deviations must be reported according to the requirements in 40 CFR 63.7550, cited in SC VII 14. **(40 CFR 63.7540(b))**
9. The permittee must submit to the Administrator all of the notifications in 40 CFR 63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (6), and 40 CFR 63.9(b) through (h) that apply to the permittee by the dates specified. **(40 CFR 63.7545(a))**
10. As specified in 40 CFR 63.9(b)(2), if the permittee starts up the affected source before January 31, 2013, the permittee must submit an Initial Notification not later than 120 days after January 31, 2013. **(40 CFR 63.7545(b))**
11. If the permittee is required to conduct an initial compliance demonstration as specified in 40 CFR 63.7530, the permittee must submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii). For the initial compliance demonstration for each boiler or process heater, the permittee must submit the Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of all performance test and/or other initial compliance demonstrations for all boiler or process heaters at the facility according to 40 CFR 63.10(d)(2). The Notification of Compliance Status report must contain all the information specified in paragraphs (e)(1) through (8), as applicable. If the permittee is not required to conduct an initial compliance demonstration as specified in 40 CFR 63.7530(a), the Notification of Compliance Status must only contain the information specified in paragraphs (e)(1) and (8) and must be submitted within 60 days of the January 31, 2016 compliance date: **(40 CFR 63.7545(e))**
 - a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by

the permittee or the EPA through a petition process to be a non-waste under 40 CFR 241.3, whether the fuel(s) were a secondary material processed from discarded non-hazardous secondary materials within the meaning of 40 CFR 241.3, and justification for the selection of fuel(s) burned during the compliance demonstration. **(40 CFR 63.7545(e)(1))**

- b. In addition to the information required in 40 CFR 63.9(h)(2), your notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official: **(40 CFR 63.7545(e)(8))**
 - i. **“This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR Part 63, Subpart DDDDD at this site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi).” (40 CFR 63.7545(e)(8)(i))**
 - ii. **“This facility has had an energy assessment performed according to 40 CFR 63.7530(e).” (40 CFR 63.7545(e)(8)(ii))**
 - iii. **Except for units that burn only natural gas, refinery gas, or other gas 1 fuel, or units that qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act, include the following: “No secondary materials that are solid waste were combusted in any affected unit.” (40 CFR 63.7545(e)(8)(iii))**
12. If the permittee has switched fuels or made a physical change to the boiler or process heater and the fuel switch or physical change resulted in the applicability of a different subcategory, the permittee must provide notice of the date upon which the permittee switched fuels or made the physical change within 30 days of the switch/change. The notification must identify: **(40 CFR 63.7545(h))**
 - a. The name of the owner or operator of the affected source, as defined in 40 CFR 63.7490, stated in SC IX.1, the location of the source, the boiler(s) and process heater(s) that have switched fuels, were physically changed, and the date of the notice. **(40 CFR 63.7545(h)(1))**
 - b. The currently applicable subcategory under 40 CFR Part 63, Subpart DDDDD. **(40 CFR 63.7545(h)(2))**
 - c. The date upon which the fuel switch or physical change occurred. **(40 CFR 63.7545(h)(3))**
 13. The permittee must submit each report in Table 9 of 40 CFR Part 63, Subpart DDDDD that applies. **(40 CFR 63.7550(a))**
 14. Unless the EPA Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee must submit each report, according to paragraph (h) of 40 CFR 63.7550, stated in SC VII.17, by the date in Table 9 of 40 CFR Part 63, Subpart DDDDD and according to the requirements in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below. For units that are subject only to a requirement to conduct an annual tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.7.a, biennial tune-up according to 40 CFR 63.7540(a)(11), stated in SC IX.7.b, or 5-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.7.c, and not subject to emission limits or Table 4 operating limits, the permittee may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below, instead of a semiannual compliance report: **(40 CFR 63.7550(b))**
 15. The first semiannual compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495, stated in SC IX.3, and ending on June 30 or December 31, whichever date is the first date that occurs at least 180 days after the compliance date that is specified for the source in 40 CFR 63.7495, stated in SC IX.3. If submitting an annual, biennial, or 5-year compliance report, the first compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495 and ending on December 31 within 1, 2, or 5 years, as applicable, after the January 31, 2016 compliance date. **(40 CFR 63.7550(b)(1))**

16. The first semiannual compliance report must be postmarked or submitted no later than July 31 or January 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495, stated in SC IX.3. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than January 31.

(40 CFR 63.7550(b)(2), (40 CFR 63.10(a)(5))

- c. Each subsequent semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Annual, biennial, and 5-year compliance reports must cover the applicable 1, 2, or 5-year periods from January 1 to December 31. **(40 CFR 63.7550(b)(3))**
- d. Each subsequent semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the semiannual reporting period. Annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than March 15. **(40 CFR 63.7550(b)(4), (40 CFR 63.10(a)(5))**
15. The first and subsequent compliance reports may be submitted according to the dates specified in SC VII.2 for semiannual ROP reporting. **(40 CFR 63.7550(b)(5))**
16. A compliance report must contain the following information depending on how the permittee chooses to comply with the limits set in this rule: **(40 CFR 63.7550(c))**
- a. If the facility is subject to the requirements of a tune up the permittee must submit a compliance report with the information in SC VII.18 (d)(i) through (iii) and (ix) **(40 CFR 63.7550(c)(1))**
- b. 40 CFR 63.7550(c)(5) is as follows:
- i. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**
 - ii. Process unit information, emissions limitations, and operating parameter limitations. **(40 CFR 63.7550(c)(5)(ii))**
 - iii. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**
 - iv. The total operating time during the reporting period. **(40 CFR 63.7550(c)(5)(iv))**
 - v. Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.7.a, biennial tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.7.b, or 5-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.7.c. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**
17. The permittee must submit the reports according to the procedures specified in paragraphs (h)(1) through (3) of 40 CFR 63.7550, as listed below: **(40 CFR 63.7550(h))**
- a. The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI website (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to 40 CFR Part 63,

Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 63.13. The permittee must begin submitting reports via CEDRI no later than 90-days after the form become available in CEDRI. **(40 CFR 63.7550(h)(3))**

IX. OTHER REQUIREMENT(S)

1. 40 CFR Part 63, Subpart DDDDD applies to existing affected sources as described in paragraph (a)(1) of 40 CFR 63.7490, as listed below: (40 CFR 63.7490(a))

a. The affected source of 40 CFR Part 63, Subpart DDDDD is the collection at a major source of all existing industrial, commercial, and institutional boilers and process heaters within a subcategory as defined in 40 CFR 63.7575. (40 CFR 63.7490(a)(1))

2. A boiler or process heater is existing if it is not new or reconstructed, as defined below: (40 CFR 63.7490(d))

a. A boiler or process heater is new if the permittee commences construction of the boiler or process heater after June 4, 2010, and the permittee meets the applicability criteria at the time the permittee commences construction. (40 CFR 63.7490(b))

b. A boiler or process heater is reconstructed if the permittee meets the reconstruction criteria as defined in 40 CFR 63.2, the permittee commences reconstruction after June 4, 2010, and the permittee meets the applicability criteria at the time the permittee commence reconstruction. (40 CFR 63.7490(c))

3. If the permittee has an existing boiler or process heater, the permittee must comply with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016, except as provided in 40 CFR 63.6(i). (40 CFR 63.7495(b))

4. If the permittee has an area source that increases its emissions or its potential to emit such that it becomes a major source of HAP, paragraph (c)(2) of 40 CFR 63.7495, as listed below, applies to the permittee: (40 CFR 63.7495(c))

a. Any existing boiler or process heater at the existing source must be in compliance with 40 CFR Part 63, Subpart DDDDD within 3 years after the source becomes a major source. (40 CFR 63.7495(c)(2))

5. The permittee must be in compliance with the emission limits, work practice standards, and operating limits of 40 CFR Part 63, Subpart DDDDD. These emission and operating limits apply at all times the affected unit is operating except for the periods noted in 40 CFR 63.7500(f), stated in SC III.4. (40 CFR 63.7505(a))

6. For affected sources (as defined in 40 CFR 63.7490, stated in SC IX.1) that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the permittee must complete a subsequent tune-up by following the procedures described in 40 CFR 63.7540(a)(10)(i) through (vi), stated in SC IX.7.a, and the schedule described in 40 CFR 63.7540(a)(13),

stated in SC IX.7.d, for units that are not operating at the time of their scheduled tune-up. (40 CFR 63.7515(g))

7. The permittee must demonstrate continuous compliance with the work practice standards in Table 3 of 40 CFR Part 63, Subpart DDDDD that applies according to the methods specified in paragraphs (a)(10) through (13) of 40 CFR 63.7540, as listed below: **(40 CFR 63.7540(a))**
 - a. If the boiler or process heater has a heat input capacity of 10 million Btu per hour or greater, the permittee must conduct an annual tune-up of the boiler or process heater to demonstrate continuous compliance as specified in paragraphs (a)(10)(i) through (vi) of 40 CFR 63.7540, as listed below. The tune-up must be conducted while burning the type of fuel (or fuels in case of units that routinely burn a mixture) that provided the majority of the heat input to the boiler or process heater over the 12 months prior to the tune-up. This frequency does not apply to units with continuous oxygen trim systems that maintain an optimum air to fuel ratio: **(40 CFR 63.7540(a)(10))**
 - i. **As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to tune-up or delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. (40 CFR 63.7540(a)(10)(i))**
 - ii. **Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (40 CFR 63.7540(a)(10)(ii))**
 - iii. **Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. (40 CFR 63.7540(a)(10)(iii))**
 - iv. **Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject. (40 CFR 63.7540(a)(10)(iv))**
 - v. **Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. (40 CFR 63.7540(a)(10)(v))**
 - vi. **Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (a)(10)(vi)(A) through (C) of 40 CFR 63.7540, as listed below: (40 CFR 63.7540(a)(10)(vi))**
 1. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**
 2. A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10)(vi)(B))**

3. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. **(40 CFR 63.7540(a)(10)(vi)(C))**
- b. If the boiler or process heater has a heat input capacity of less than 10 million Btu per hour (except as specified in paragraph (a)(12) of 40 CFR 63.7540), the permittee must conduct a biennial tune-up of the boiler or process heater as specified in paragraphs (a)(10)(i) through (vi) of 40 CFR 63.7540 to demonstrate continuous compliance. **(40 CFR 63.7540(a)(11))**
 - c. If the boiler or process heater has a continuous oxygen trim system that maintains an optimum air to fuel ratio, or a heat input capacity of less than or equal to 5 million Btu per hour and the unit is in the units designed to burn gas 1 subcategory, the permittee must conduct a tune-up of the boiler or process heater every 5 years as specified in paragraphs (a)(10)(i) through (vi) of 40 CFR 63.7540 to demonstrate continuous compliance. The permittee may delay the burner inspection specified in paragraph (a)(10)(i) of 40 CFR 63.7540 until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. **(40 CFR 63.7540(a)(12))**
 - d. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. **(40 CFR 63.7540(a)(13))**

8. Table 10 of 40 CFR Part 63, Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 applies to the permittee. **(40 CFR 63.7565)**

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 the 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
FGEQUIPMENT	Engines and turbines installed as grandfathered or exempt sources and have not been modified.	EUBG001 EUBG002 EUBG003 EUBG004 EUBG005 EUBG006 EUBG007 EUBG008

<p>FGEQUIPMENT</p> <p>FLEXIBLE GROUP CONDITIONS</p>

DESCRIPTION

Engines and turbines installed as grandfathered or exempt sources and have not been modified.

Emission Units: EUBG001, EUBG002, EUBG003, EUBG004, EUBG005, EUBG006, EUBG007, EUBG008

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only fire natural gas in the turbines and engines at this facility.²
(R 336.1201(1))

AQD Comment: Appears to be in COMPLIANCE. All equipment is fired by natural gas only.

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record the natural gas consumption rate for each emission unit listed in FGEQUIPMENT on a monthly basis. (R 336.1213(3)(b))

AQD Comment: Appears to be in COMPLIANCE. The facility is doing this.

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. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

AQD Comment: Appears to be in COMPLIANCE. The facility is meeting the requirements listed in 1 through 4 above by submitting the required reports.

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).

INSPECTION CONCLUSION:

The facility appears to be in COMPLIANCE with ROP No. MI-ROP-N5575-2018 and all other state and any federal air regulations that the AQD is delegated to enforce at the present time. Since the facility is still constructing the equipment permitted under PTI 92-20, no compliance determinations were made with regards to it's requirements other than any pertinent "Notifications" that needed to be submitted.

NAME Matt Derh

DATE 10-13-21

SUPERVISOR RIL 10/22/21