

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

July 3, 2024

PERMIT TO INSTALL
80-24

ISSUED TO
American Municipal Power – Marshall Generating Station

LOCATED AT
906 South Marshall Avenue
Marshall, Michigan 49068

IN THE COUNTY OF
Calhoun

STATE REGISTRATION NUMBER
P1461

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: June 24, 2024	
DATE PERMIT TO INSTALL APPROVED: July 3, 2024	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install 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 this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit 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 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. 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 Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. 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)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

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))	Flexible Group ID
EUENGINE1	A 3629 HP (2500 kW) natural gas-fired peaking engine with a model year of 2011 or later.	FGENGINES
EUENGINE2	A 3629 HP (2500 kW) natural gas-fired peaking engine with a model year of 2011 or later.	FGENGINES
EUENGINE3	A 3629 HP (2500 kW) natural gas-fired peaking engine with a model year of 2011 or later.	FGENGINES
EUENGINE4	A 3629 HP (2500 kW) natural gas-fired peaking engine with a model year of 2011 or later.	FGENGINES

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

FLEXIBLE GROUP SPECIAL CONDITIONS

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
FGENGINES	Four 3629 HP (2500 kW) natural gas-fired peaking engines with model years of 2011 or later.	EUENGINE1 EUENGINE2 EUENGINE3 EUENGINE4

FGENGINES FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Four 3629 HP (2500 kW) natural gas-fired peaking engines with model years of 2011 or later.

Emission Unit: EUENGINE1, EUENGINE2, EUENGINE3, EUENGINE4

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. CO	2.0 g/hp-hr	Hourly	Each engine in FGENGINES	SC III.2 SC III.3 SC V.1	40 CFR 60.4233(e), Table 1 of 40 CFR Part 60 Subpart JJJJ, 40 CFR 52.21 (c) & (d)
2. NO _x	1.0 g/hp-hr	Hourly	Each engine in FGENGINES	SC III.2 SC III.3 SC V.1	40 CFR 60.4233(e), Table 1 of 40 CFR Part 60 Subpart JJJJ, 40 CFR 52.21 (c) & (d)
3. VOC	0.7 g/hp-hr ^a	Hourly	Each engine in FGENGINES	SC III.2 SC III.3 SC V.1	40 CFR 60 4233(e), Table 1 of 40 CFR Part 60 Subpart JJJJ, 40 CFR 52.21 (c) & (d)

^a For purposes of this emission limit, when calculating emissions of VOC, emissions of formaldehyde should not be included. (See Table 1 to 40 CFR 60 Subpart JJJJ.)

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in each engine in FGENGINES. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21 (c) & (d), 40 CFR 60.4248)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any engine in FGENGINES for more than 2000 hours per year based on a 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21 (c) & (d))**
2. The permittee shall operate and maintain each engine included in FGENGINES such that it meets the emission limits over the entire life of the engine. **(40 CFR 60.4234)**

3. If the permittee purchased a certified engine, according to procedures specified in 40 CFR Part 60 Subpart JJJJ, for the same model year, the permittee shall meet the following requirements for FGEngines:
 - a) Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions,
 - b) May only adjust engine settings according to and consistent with the manufacturer's emission-related written instructions,
 - c) Meet the requirements as specified in 40 CFR 1068, subparts A through D, as they apply to the engine.

If the permittee does not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered an uncertified engine. **(40 CFR 60.4243(b)(1))**

4. If the permittee purchased an uncertified engine or a certified engine operating in an uncertified manner, the permittee shall keep a maintenance plan for FGEngines and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 60.4243(b)(2))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each engine in FGEngines with non-resettable hours meters to track the operating hours. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a))**
2. The maximum rated power output of each engine in FGEngines shall not exceed 3629 HP (2500 kW), as certified by the equipment manufacturer. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 60.4233)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. For any engine included in FGEngines that is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:
 - a) Conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup or from when any of the engines in FGEngines is not considered certified.
 - b) If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4244.
 - c) Conduct subsequent performance testing every 8,760 hours of engine operation or every 3 years thereafter, whichever comes first, to demonstrate compliance with the applicable emission standards.

No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. 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 336.2001, 40 CFR 60.4243(b)(2), 40 CFR 60.4244)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21 (c) & (d), 40 CFR Part 60, Subpart JJJJ)**
2. The permittee shall keep records of all notifications submitted to comply with 40 CFR Part 60 Subpart JJJJ, as required in SC VII.2, and all documentation supporting any notification. **(40 CFR 60.4245(a))**

3. For certified engines in FGENGINEs, the permittee shall keep, in a satisfactory manner, the following records:
 - a) Documentation indicating that each engine has been maintained according to manufacturer written instructions, is certified to meet the emission standards, and other information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable.

The permittee shall keep all records on file and make them available to the Department upon request.
(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d), 40 CFR 60.4243, 40 CFR 60.4245(a))

4. For uncertified engines in FGENGINEs (or engines operating in an uncertified manner), the permittee shall keep, in a satisfactory manner, the following records:
 - a) Testing for each engine, as required in SC V.1.
 - b) Maintenance activities and maintenance plan for each engine, as required by SC III.4.

The permittee shall keep all records on file and make them available to the Department upon request.
(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d), 40 CFR 60.4243, 40 CFR 60.4245(a))

5. The permittee shall monitor and record, the total hours of operation per engine in FGENGINEs on a monthly and 12- month rolling time period basis, and the hours of operation that are recorded through the non-resettable hour meters per engine in FGENGINEs, on a calendar year basis, in a manner acceptable to the AQD District Supervisor. **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d), 40 CFR 60.4243, 40 CFR 60.4245)**

VII. REPORTING

1. The permittee shall submit a notification specifying whether each engine included in FGENGINEs will be operated in a certified or an uncertified manner to the AQD District Supervisor, in writing, within 30 days following permit issuance and within 30 days of switching the manner of operation. **(R 336.1201(3), 40 CFR Part 60, Subpart JJJJ)**
2. If any engine in FGENGINEs has not been certified by an engine manufacturer to meet the emission standards in 40 CFR 60.4231, the permittee shall submit an initial notification as required in 40 CFR 60.7(a)(1). The notification must include the following information:
 - a) The date construction of the engine commenced.
 - b) Name and address of the owner or operator.
 - c) The address of the affected source.
 - d) The engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement.
 - e) The emission control equipment.
 - f) Fuel used in the engine.

The notification must be postmarked no later than 30 days after construction commenced for each engine.
(40 CFR 60.7(a)(1), 40 CFR 60.4245(c))

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 / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVENGINE1	20	63	R 336.1225, 40 CFR 52.21 (c) & (d)

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
2. SVENGINE2	20	63	R 336.1225, 40 CFR 52.21 (c) & (d)
3. SVENGINE3	20	63	R 336.1225, 40 CFR 52.21 (c) & (d)
4. SVENGINE4	20	72 ^a	R 336.1225, 40 CFR 52.21 (c) & (d)
^a From the date of permit issuance until no later than December 31, 2024, the stack must be at a minimum 48 feet above the ground.			

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, Subparts A and JJJJ, as they apply to any engine in FGENGINES. **(40 CFR Part 60, Subparts A & JJJJ, 40 CFR 63.6590(c))**
2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and ZZZZ, as they apply to any engine in FGENGINES. **(40 CFR Part 63, Subparts A & ZZZZ, 40 CFR 63.6585)**