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

EFFECTIVE DATE: October 16, 2019

ISSUED TO

DTE Electric Company - Monroe Power Plant

State Registration Number (SRN): B2816

LOCATED AT

3500 East Front Street, Monroe, Michigan 48161

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2816-2019

Expiration Date: October 16, 2024

Administratively Complete ROP Renewal Application Due Between April 16, 2023 and April 16, 2024

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). 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 Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B2816-2019

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. 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 Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

Scott Miller, Jackson 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 Environment, Great Lakes, and Energy (EGLE) 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 are identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined, subsumed and/or are 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.

This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Consent Order No. AQD 26-2015 entered on September 18, 2015 between the EGLE and the permittee.

Section 1 – DTE Electric Company – Monroe Power Plant

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 a 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.
- 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).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. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, 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 the following:" ² (R 336.1301(1))
 - a. A 6-minute average of 20 % 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.

The grading of visible emissions shall be determined in accordance with Rule 303.

- 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).² (**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(5))

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.² (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(10)**)
- 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(8))

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 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 68.10(a):
 - a. June 21, 1999,
 - b. Three years after the date on which a regulated substance is first listed under 40 CFR 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, EGLE.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 of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, 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, EGLE, 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:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This 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.

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	Installation Date/	Flexible Group ID
EU-UNIT1	Boiler Unit No. 1 - Coal-fired boiler nominally rated 817 MW (gross) with low-NOx burners, Reduced Emissions Fuel (REF) sorbent system, selective catalytic reduction (SCR), dry wire electrostatic precipitators (ESP), and wet flue gas desulfurization (FGD). Fires diesel fuel oil for boiler start-up.	01-01-1968 / 03-03-2006 / 12-21-2010	FG-ProjectPC1-4, FG-COALBLRCAM, FG-MATS
EU-UNIT2	Boiler Unit No. 2 - Coal-fired boiler nominally rated 823 MW (gross) with low-NOx burners, REF sorbent system, selective catalytic reduction (SCR), dry wire electrostatic precipitators (ESP), and wet flue gas desulfurization (FGD). Fires diesel fuel oil for boiler start-up.	01-01-1969 / 03-23-2005 / 12-21-2010	FG-ProjectPC1-4, FG-COALBLRCAM, FG-MATS
EU-UNIT3	Boiler Unit No. 3 - Coal-fired boiler nominally rated 823 MW (gross) with low-NOx burners, REF sorbent system, selective catalytic reduction (SCR), dry wire electrostatic precipitators (ESP), and wet flue gas desulfurization (FGD). Fires diesel fuel oil for boiler start-up.	06-01-1969 / 8-28-2006 / 08-02-2010	FG-ProjectPC1-4, FG-COALBLRCAM, FG-MATS
EU-UNIT4	Boiler Unit No. 4 - Coal-fired boiler nominally rated 817 MW (gross) with low-NOx burners, REF sorbent system, selective catalytic reduction (SCR), dry wire electrostatic precipitators (ESP), and wet flue gas desulfurization (FGD). Fires diesel fuel oil for boiler start-up.	06-01-1969 / 11-15-2005 / 08-02-2010	FG-ProjectPC1-4, FG-COALBLRCAM, FG-MATS
EU-WFGD-QP1	252 HP diesel fuel-fired engine to operate FGD quench pump and 350-gallon elevated storage tank for diesel fuel servicing the Unit 3 stack.	11-21-2006 / 08-02-2010	FG-ProjectPC1-4, FG-WFGD-QP1&2
EU-WFGD-QP2	252 HP diesel fuel-fired engine to operate FGD quench pump and 350-gallon elevated storage tank for diesel fuel servicing the Unit 4 stack.	11-21-2006 / 08-02-2010	FG-ProjectPC1-4, FG-WFGD-QP1&2
EU-WFGD-QP3	252 HP diesel fuel-fired engine to operate FGD quench pump and 350-gallon elevated storage tank for diesel fuel servicing the Unit 1 stack.	12-1-2013	FG-ProjectPC1-4, FG-WFGD-QP3&4

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-WFGD-QP4	252 HP diesel fuel-fired engine to operate FGD quench pump and 350-gallon elevated storage tank for diesel fuel servicing the Unit 2 stack.	4-1-2014	FG-ProjectPC1-4, FG-WFGD-QP3&4
EU-CASCADES	This emission unit represents coal handling activity in the Cascades room. Coal handling activity emissions are limited by an enclosure, wet dust suppression, and baghouse dust collectors.	01-01-1968 / 11-01-1980 / 08-02-2010	FG-ProjectPC1-4
EU-TRANSFERHS	This emission unit represents coal handling activity in the Transfer House. Coal handling activity emissions are limited by an enclosure, wet dust suppression, and baghouse dust collectors.	01-01-1968 / 11-01-1980 / 08-02-2010	FG-ProjectPC1-4
EU-DUMPERHS	This emission unit represents coal handling activity in the Dumper House. Coal handling activity emissions are limited by an enclosure, wet dust suppression, and baghouse dust collectors.	01-01-1968 / 11-01-1980 / 07-12-2012	FG-ProjectPC1-4
EU-COALUNLOAD	This emission unit represents the coal unloading activities from Great Lakes ships and includes storage and pile maintenance. Coal handling activity emissions are limited by enclosures and wet dust suppression methods.	01-01-1968 / 11-01-1980 / 08-02-2010	FG-ProjectPC1-4
EU-CRUSHERHS	This emission unit represents coal handling activity in the Crusher House. Coal handling activity emissions are limited by an enclosure and baghouse dust collectors.	01-01-1968 / 1-07-2005 / 08-02-2010	FG-ProjectPC1-4
EU-PETCOKE	This emission unit represents petroleum coke handling activity, including roadway traffic and pile maintenance. Emissions are limited by partial enclosures, including a portable wind screen, and wet dust suppression.	9-5-2013	FG-ProjectPC1-4
EU-LIMESTONE	This emission unit represents limestone handling activities and includes the ship unloading process, storage and pile maintenance, and reclaims activities – including any trucking activities, and the Prep building. Limestone handling activity emissions are limited by enclosures, wet dust suppression methods, or bin vent filters.	02-01-2008 / 08-02-2010 / 12-21-2010	FG-ProjectPC1-4
EU-GYPSUMHAND	This emission unit represents gypsum handling activity in the gypsum dewatering building and the gypsum storage and loading building. Gypsum handling activity emissions are limited by a building enclosure.	02-01-2008 / 08-02-2010 / 12-21-2010	FG-ProjectPC1-4
EU-HYDRATEDLIME	Storage and handling of hydrated lime. Hydrated lime is delivered via truck and is stored in a silo.	02-01-2008 / 08-02-2010 / 12-21-2010	FG-ProjectPC1-4
EU-SOUTHAUX	South Auxiliary Boiler	01-01-1968 / 08-02-2010 / 12-21-2010	FG-AUXBOILERS, FG-MAJOR SOURCE

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Emission Unit ID	Emission Unit Description	Installation	Flexible Group ID
	Device(s))	Modification Date	
EU-NORTHAUX	North Auxiliary Boiler	01-01-1968 /	FG-AUXBOILERS,
		08-02-2010 /	FG-MAJOR
		12-21-2010	SOURCE
EU-PARTSCLNRS	Parts Cleaning Stations	NA	FG-PARTSCLNRS
EU-FIREPUMP	#2 Screen house, Rule 285(2)(g) exempt, 300	NA	FG-EMERGENS
	BHp emergency diesel engine – Cummins		
EU-BLR1-MESB	MESB Building Rule 282(2)(b) exempt, 6.3	NA	FG-MESBLDG
	mmBtu/hr process heater, subject to 40 CFR		
	Part 63 Subpart DDDDD (a.k.a. Boiler MACT)		
EU-BLR2-MESB	MESB Building Rule 282(2)(b) exempt, 6.3	NA	FG-MESBLDG
	mmBtu/hr process heater, subject to 40 CFR		
	Part 63 Subpart DDDDD (a.k.a. Boiler MACT)		
EU-NSPS4iEngines	MI R336.1285(2) exempted diesel engines,	NA	FG-NSPS4I
_	model year 2008 or later, less than 25 Hp.		

	Part 63 Subpart DDDDD (a.k.a. Boiler MACT)		
EU-BLR2-MESB	MESB Building Rule 282(2)(b) exempt, 6.3	NA	FG-MESBLDG
	mmBtu/hr process heater, subject to 40 CFR		
	Part 63 Subpart DDDDD (a.k.a. Boiler MACT)		
EU-NSPS4iEngines	MI R336.1285(2) exempted diesel engines,	NA	FG-NSPS4I
	model year 2008 or later, less than 25 Hp.		
	Engines subject to 40 CFR Part 60, Subpart III		
	as non-emergency stationary combustion		
	ignition (CI) internal combustion engines (ICE)		
	and meet 40 CFR Part 63 Subpart ZZZZ		
	requirements by meeting the requirements of		
	40 CFR Part 60 Subpart IIII.		
EU-FlyAshStorage	A fly ash storage facility. The facility consists	07/16/08	NA
	of two 75-ton surge silos (Nos. 1 and 2), a		
	3000-ton storage silo, a 200-ton load-out silo,		
	and associated blowers, pressure pumps,		
	compressors, pipe conveyor lines, and spouts.		
	Particulate emissions from the loading of		
	material into surge silo No. 1 are controlled by		
	two filter receivers (FR-101 and FR-102).		
	Particulate emissions from the transferring of		
	material out of surge slip No. 1 are controlled		
	by a bill vent liller (DH-101). Particulate		
	emissions from the loading of material into		
	surge silo No. 2 are controlled by two little		
	aminging from the transferring of material out		
	of surge sile No. 2 are controlled by a bin yent		
	filter (BH 201) Particulate emissions from the		
	storage silo will be controlled by a bin yent filter		
	(BH-301) Particulate emissions from the		
	loading of material into and the transfer of		
	material out of (truck or railcar load-out) the		
	load-out silo will be controlled by a bin vent		
	filter (BH-401).		

EU-UNIT1 EMISSION UNIT CONDITIONS

DESCRIPTION

Coal-fired cell burner boiler nominally rated at a maximum heat input of 7,624 MMBtu per hour on a fuel input basis. The boiler serves a steam turbine electric generator nominally rated at 817 MW (gross). Fires diesel fuel oil for boiler start-up and flame stabilization.

Flexible Group ID: FG-ProjectPC1-4, FG-COALBLRCAM, FG-MATS

POLLUTION CONTROL EQUIPMENT

Low-NOx burners, overfire air, Reduced Emission Fuel (REF) sorbent system, selective catalytic reduction (SCR), dry wire electrostatic precipitators (ESP), and wet flue gas desulfurization (FGD).

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Opacity	10 percent ²	6-minute average except one 6-minute average per hour of not more than 20 percent	EU-UNIT1	SC V.1, SC V.2, SC VI.2	R 336.1301(1)(c), R 336.2810, 40 CFR 52.21(j)
2.	РМ	0.011 lb/MMBtu heat input ²	24-hr rolling average as determined each hour the boiler operates	EU-UNIT1	SC V.1, SC V.2, SC VI.2	R 336.1224, R 336.1225, R 336.1331(1)(c), R 336.2810, 40 CFR 52.21(j)
3.	PM10	0.024 lb/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT1	SC V.1, SC V.2, FG- COALBLRCAM SC VI.1	R 336.2810, 40 CFR 52.21(j)
4.	PM10	183.0 pph ²	Test protocol will specify averaging time	EU-UNIT1	SC V.1, SC V.2, FG- COALBLRCAM SC VI.1	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j)
5.	SO ₂	0.107 lb/MMBtu heat input ²	24-hour rolling average as determined each hour the boiler operates	EU-UNIT1	SC VI.3, SC VI.7	R 336.1401, R 336.2810, 40 CFR 52.21(j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
6. SO ₂	815.8 pph ²	24-hour rolling average as determined each hour the boiler operates	EU-UNIT1	SC VI.3, SC VI.5, SC VI.7	R 336.2803, R 336.2804, R 336.2804, 40 CFR 52.21(c), (d), and (j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S
7. NOx	0.08 lb/MMBtu heat input ²	12-month rolling average as determined each calendar month	EU-UNIT1	SC VI.3, SC VI.8	R 336.2810, 40 CFR 52.21(j)
8. NOx	222.6 ton/month ²	12-month rolling average as determined each calendar month	EU-UNIT1	SC VI.3, SC VI.5, SC VI.8	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j)
9. CO	0.15 lb/MMBtu heat input excluding periods of start- up and shutdown ²	30-day rolling average as determined each calendar day the boiler operates	EU-UNIT1	SC VI.3, SC VI.9	R 336.2810, 40 CFR 52.21(j)
10. CO	27,446.4 lb/day 2	30-day rolling average as determined each calendar day the boiler operates	EU-UNIT1	SC VI.3, SC VI.5, SC VI.9	R 336.2804, R 336.2810, 40 CFR 52.21(d) and (j)
11. VOC	0.0034 Ib/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT1	SC III.1, SC V.1, SC V.2	R 336.1122(f), R 336.1224, R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21(i)
12. VOC	25.9 pph ²	Test protocol will specify averaging time	EU-UNIT1	SC III.1, SC V.1, SC V.2	R 336.1122(f), R 336.1224, R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21(j)
13. Lead (Pb)	1.69 x 10 ⁻⁵ Ib/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT1	SC V.1, SC V.2, FGMATS SC VI.3	R 336.1901, R 336.2810, 40 CFR 52.21(j)
14. Lead (Pb)	0.13 pph ²	Test protocol will specify averaging time	EU-UNIT1	SC V.1, SC V.2, FG- COALBLRCAM SC VI.1	R 336.1901, R 336.2804, R 336.2810, 40 CFR 52.21(d) and (j)
15. Sulfuric acid mist (H₂SO₄)	0.005 lb/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT1	SC III.1, SC V.1, SC V.2	R 336.1224, R 336.1225, R 336.2810, 40 CFR 52.21(j)

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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
16. Hydrogen Chloride (HCl)	0.0024 Ib/MMBtu heat input ¹	Test protocol will specify averaging time	EU-UNIT1	SC V.1, SC V.2, FGMATS SC VI.5	R 336.1224, R 336.1225,
17. Hydrogen Fluoride (HF)	0.00023 Ib/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT1	SC V.1, SC V.2, FG- COALBLRCAM SC VI.2	R 336.1224, R 336.1225, R 336.2810, 40 CFR 52.21(j)
18. Mercury (Hg)	0.02 lb/GW-hr gross energy output ²	12-month rolling average as determined each calendar month	EU-UNIT1	SC V.1, SC V.2, SC VI.4, SC VI.6, SC VI.10	R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2503(2)
19. Mercury (Hg)	143.1 lb/year ²	12-month rolling time period as determined at the end of each calendar month	EU-UNIT1	SC V.1, SC V.2, SC VI.4, SC VI.5, SC VI.6, SC VI.10	R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2503(2)
20. Arsenic (As)	6.3 x 10 ⁻⁶ Ib/MMBtu heat input ¹	Test protocol will specify averaging time	EU-UNIT1	SC V.1, SC V.2, FGMATS SC VI.3	R 336.1224, R 336.1225(2)

II. MATERIAL LIMIT(S)

- 1. The permittee shall only use diesel for the initial start-up fuel, flame stabilization, and overfiring. Start-up is defined in SC III.2.² (R 336.1205(1)(a) and (1)(b), R 336.2810, 40 CFR 52.21(j))
- The permittee shall only combust bituminous coal, subbituminous coal, and up to 23,652 tons per calendar month of petroleum coke in EU-UNIT1. ² (R 336.1205(1)(a) and (1)(b), R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21(j))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-UNIT1 unless a malfunction abatement plan (MAP) as described in Rule 911(2), for operation of the process and emission control equipment, is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1224, R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))
- 2. Start-up is defined as the period of time from initiation of combustion firing until the unit reaches steady state operation and the SCR is brought into service upon the flue gas reaching a minimum operating temperature for the SCR of 650°F. Shutdown is defined as that period of time beginning when the flue gas temperature entering the SCR drops below the operating temperature of the SCR system.² (R 336.1912, R 336.2810, 40 CFR 52.21(j))

3. The permittee shall not operate EU-UNIT1 unless an emissions minimization plan for all start-ups and shutdowns is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. ² (R 336.1911, R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The maximum design heat input rate of EU-UNIT1 shall not exceed 7,624 million British thermal units per hour (MMBtu/hr) on a fuel heat input basis. ² (R 336.1205(1)(a) and (1)(b))
- 2. The permittee shall not operate EU-UNIT1 unless the low-NOx burners, overfire air, SCR system, ESP, and wet FGD system are installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-UNIT1 as required in SC III.1. 2 (R 336.1224, R 336.1225, R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21(j))
- 3. The permittee shall not operate EU-UNIT1 unless the REF sorbent system is installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-UNIT1 as required in SC III.1.² (R 336.1225, R 336.1910)
- 4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a process monitor to measure mercury emissions from the unit and provide real time indicators of potential noncompliance. This process monitor, because it does not meet EPA Specification 12A, is in addition to the certified mercury monitoring system which provides quality assured data used in emissions reporting and compliance verification under the Mercury Air Toxics rule. Satisfactory manner includes operating the process monitor on a continuous basis to obtain mercury emission data such that the permittee can initiate corrective actions in the event of elevated mercury emissions. Satisfactory manner includes operating and maintaining the process monitor in accordance with an approved malfunction abatement plan. 2, 3 (R 336.1201, Act 451 324.5503(b), EPA-5-2018-113(a)-MI-07 paragraph 16)
- 5. The permittee shall install and maintain a halogenated compound application system (e.g. calcium bromide) in a satisfactory manner to promote mercury oxidation and maintain compliance with the unit's mercury emission limits. Satisfactory manner includes operating the application system when the mercury process monitor demonstrates elevated mercury emissions, and as otherwise needed for mercury emissions control in accordance with an approved malfunction abatement plan.^{2, 3} (R 336.1201 Act 451 324.5503(b), EPA-5-2018-113(a)-MI-07 paragraph 17)

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 visible emissions, PM, PM10, PM2.5, VOC, Pb, As, H₂SO₄, HCl, HF, and Hg emission rates from EU-UNIT1 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
VOC	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B;
	40 CFR Part 63, Appendix A
Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A
Mercury	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B;
	40 CFR Part 63, Appendix A
Visible Emission	40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B

HAPs	40 CER Part 63 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. ² (**R 336.1213(3)**, **R 336.2001**, **R 336.2003**, **R 336.2004**)

- The permittee shall verify the visible emissions, PM, PM10, VOC, Pb, As, H₂SO₄, HCl, HF, and Hg emission rates from EU-UNIT1, at a minimum, every five years from the date of the last test. ² (R 336.2001, R 336.2003, R 336.2004)
- The permittee shall verify the PM2.5 emission rates from EU-UNIT1, and at a minimum, must complete the test once every calendar year for the next ten years of operation after the modification on January 29, 2014.
 (R 336.2001, R 336.2003, R 336.2004)
- 4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. (R 336.1213(3), R 336.2001(4))

VI. MONITORING/RECORDKEEPING

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

- The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the PM emissions from EU-UNIT1 on a continuous basis. The permittee shall install and operate the CEM to meet the timelines, requirements and reporting detailed in Appendix 3-1. The permittee shall also meet the following requirements:² (40 CFR 52.21(j), R 336.1205, R 336.1301, R 336.1303, R 336.1331, R 336.1901, R 336.1911, R 336.2810)
 - a. The MAP required in SC III.1 shall include provisions for alternative monitoring in the event that the PM CEM is out of control based upon the results of quality assurance tests conducted in accordance with Procedure 2 of 40 CFR Part 60 (Appendix F). This alternative monitoring shall, unless alternate methods and frequencies are approved in writing by the AQD District Supervisor, require verification of the presence of visible emissions by taking 6-minute visible emission readings for EU-UNIT1 a minimum of once per calendar day when the boiler is operating. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If the permittee observes any visible emissions, the permittee shall immediately implement the following procedures:
 - i. The permittee shall perform the 6-minute visible emission readings at least once every 30 minutes until emissions are no longer visible or until emissions have been observed for more than two hours.
 - ii. If visible emissions have been observed for more than two hours, a certified reader shall determine the opacity using federal Reference Test Method 9 (40 CFR Part 60 (Appendix A)).
- 3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner device(s) to monitor and record the SO₂, NOx, and CO emissions, and oxygen or carbon dioxide (O₂ or CO₂) content of the exhaust gas from EU-UNIT1 on a continuous basis. Satisfactory manner means the permittee should follow the recommendations of the device vendor/system's designer to ensure proper installation, maintenance, and operation. The permittee shall install and operate each CEM to meet the timelines, requirements, and reported detailed in Appendix 3-1.² (40 CFR 52.21(j), 40 CFR Part 51, Appendix S, R 336.2902(2)(c), R 336.1205, R 336.2810)

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- The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the mercury emissions from EU-UNIT1 on a continuous basis. The permittee shall install and operate an Hg monitor to meet the timelines, requirements and reporting detailed in Appendix 3-1.² (R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2503(2))
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the exhaust gas flow rate from EU-UNIT1 on a continuous basis. The monitor shall be operated in accordance with procedures outlined in Appendix 3-1.² (R 336.2810, 40 CFR 52.21(j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S)
- 6. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the gross energy output from EU-UNIT1 on a continuous basis. The monitor shall be operated in accordance with procedures outlined in 40 CFR 60.49Da(k).¹ (**R 336.1224**)
- The permittee shall keep, in a satisfactory manner, hourly and 24-hour rolling average SO₂ emission rate and mass records for EU-UNIT1, as described in emission limits SC I.5 and I.6, respectively. Satisfactory manner means in a manner of that is clear to understand and read. ² (R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S)
- The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling average NOx emission rate and mass records for EU-UNIT1, as described in emission limits SC I.7, and I.8.² (R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))
- The permittee shall keep, in a satisfactory manner, daily and 30-day rolling average CO emission rate and mass records for EU-UNIT1, as described in emission limits SC I.9 and I.10.² (R 336.2804, R 336.2810, 40 CFR 52.21(d) and (j))
- 10. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling average mercury emission rate records, expressed on a basis of gross energy output, and monthly and 12-month rolling time period mercury mass emission rate records for EU-UNIT1, as described in emission limits SC I.18 and SC I.19. If the monitoring required by SC VI.4 is only capable of detecting gaseous mercury, the permittee shall use the testing required by SC V.9 to develop a correction factor to adjust the mercury monitoring data to total mercury. Based on the available testing and monitoring data, the correction factor may be adjusted upon review and approval of the AQD District Supervisor. ¹ (R 336.1224, R 336.1228, R 336.1229(2)(b))
- 11. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:
 - a. Compliance tests and any testing required under the special conditions of this permit;
 - b. Monitoring data;
 - c. Heat input calculations required to show compliance with SC IV.1;
 - d. Identification, type and the amounts of all fuels combusted in EU-UNIT1 on a calendar month basis;
 - e. Total gigawatt-hours of energy produced on a monthly basis;
 - f. Records of the duration of all times EU-UNIT1 is operated under start-up or shutdown conditions as defined in SC III.2;
 - g. All calculations necessary to show compliance with the limits contained in this permit.

All of the above information shall be stored in a format acceptable to the Air Quality Division and made available to the Department upon request. ² (R 336.1205(1)(a), R 336.1224, R 336.1225, R 336.1228, R 336.1229(2)(b), R 336.1301, R 336.1331, R 336.1401, R 336.1702(a), R 336.1901, R 336.1912, R 336.2802(4), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))

See Appendix 3-1

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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 an excess emission report (EER) and summary report in an acceptable format to the AQD District Supervisor and the TPU Supervisor within 30 days following the end of each calendar quarter as specified in 40 CFR 60.7(c) and (d). The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information: ² (R 336.1205, R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2803, R 336.2804, R 336.2810, R 336.2902(2)(c), 40 CFR Part 51, Appendix S, 40 CFR 52.21(c), (d), and (j), 40 CFR 60.7(c) and (d))
 - a. A report of each exceedance above the limits specified in the emission limits of this permit. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b. A report of all periods of the Continuous Emission Monitoring and Continuous Emission Rate Monitoring System (CEMS/CERMS), and if applicable Predictive Emission Monitoring System (PEMS), downtime and corrective action.
 - c. A report of the total operating time of the boiler during the reporting period.
 - d. A report of any periods that the CEMS/CERMS, and if applicable PEMS, exceed the instrument range.
 - e. If no exceedances or CEMS/CERMS, and if applicable PEMS, downtime occurred during the reporting period, the permittee shall report that fact.
- 5. The permittee shall submit any performance test reports, including RATA reports, to the AQD Technical Programs Unit and District Office, in a format approved by the AQD.² (R 336.1213(3)(c), R 336.2001(5), R 336.2156(c))

See Appendix 8-1

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. SV015-001	336 ²	579 ²	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the acid rain permitting provisions of 40 CFR Part 72.1 to 72.94, as outlined in a complete Phase II, Acid Rain Permit issued by the AQD. Phase II, Acid Rain Permit No. MI-AR-1733-2019 is hereby incorporated into this ROP as Appendix 9-1. (**R 336.1902(1)(q)**)

- 2. 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 R 336.1902(1)(q) and 40 CFR Part 72.9(c)(1)(i). (R 336.1213(10))
- 3. An affected existing EGU shall meet the requirements of Part 15 Emission Limitations and Prohibitions Mercury. (R 336.2503(1))
- 4. The permittee shall comply with the provisions of the Cross State Air Pollution Rule NOx Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAA, and identified in Appendix 10-1. (40 CFR Part 97, Subpart AAAAA)
- 5. The permittee shall comply with the provisions of the Cross State Air Pollution Rule NOx Ozone Season Group 2 Trading Program, as specified in 40 CFR Part 97, Subpart EEEEE, and identified in Appendix 10-1. (40 CFR Part 97, Subpart EEEEE)
- 6. The permittee shall comply with the provisions of the Cross State Air Pollution Rule SO₂ Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix 10-1. (40 CFR Part 97, Subpart CCCCC)

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

³This condition is federally enforceable and was originally established in the consent decree settling, "U.S. v DTE Energy Company, Civil Action No. EPA-5-2018-113(a)-MI-07" and also pursuant to Act 451, Section 324.5503(b), and will remain in effect after termination of the consent decree.

EU-UNIT2 EMISSION UNIT CONDITIONS

DESCRIPTION

Coal-fired cell burner boiler nominally rated at a maximum heat input of 7,624 MMBtu per hour on a fuel input basis. The boiler serves a steam turbine electric generator nominally rated at 823 MW (gross). Fires No. 2 fuel oil for boiler start-up and flame stabilization.

Flexible Group ID: FG-ProjectPC1-4, FG-COALBLRCAM, FG-MATS

POLLUTION CONTROL EQUIPMENT

Low-NOx burners, overfire air, REF sorbent system, selective catalytic reduction (SCR), dry wire electrostatic precipitators (ESP), and wet flue gas desulfurization (FGD).

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable
			Coontaine		. coung mourou	Requirements
1.	Opacity	10 percent ²	6-minute average except	EU-UNIT2	SC V.1,	R 336.1301(1)(c),
			one 6-minute average		SC V.2	R 336.2810,
			per hour of not more than 20 percent		SC VI.2	40 CFR 52.21(j)
2.	PM	0.011 lb/MMBtu	24-hr rolling average as	EU-UNIT2	SC V.1,	R 336.1224,
		heat input ²	determined each hour		SC V.2	R 336.1225,
			the boiler operates		SC VI.2	R 336.1331(1)(c),
						R 336.2810,
						40 CFR 52.21(j)
3.	PM10	0.024 lb/MMBtu	Test protocol will specify	EU-UNIT2	SC V.1,	R 336.2810,
		heat input ²	averaging time		SC V.2,	40 CFR 52.21(j)
					FG-	
					COALBLRCAM	
L					SC VI.1	
4.	PM10	183.0 pph ²	Test protocol will specify	EU-UNIT2	SC V.1,	R 336.2803,
			averaging time		SC V.2,	R 336.2804,
					FG-	R 336.2810,
					COALBLRCAM	40 CFR 52.21(c),
					SC VI.1	(d), and (j)
5.	SO ₂	0.107 lb/MMBtu	24-hour rolling average	EU-UNIT2	SC VI.3,	R 336.1401,
		heat input ²	as determined each hour		SC VI.7	R 336.2810,
			the boiler operates			40 CFR 52.21(j),
						R 336.2902(2)(c),
						40 CFR Part 51,
						Appendix S

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
6. SO ₂	815.8 pph ²	24-hour rolling average as determined each hour the boiler operates	EU-UNIT2	SC VI.3, SC VI.5, SC VI.7	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S
7. NOx	0.08 lb/MMBtu heat input ²	12-month rolling average as determined each calendar month	EU-UNIT2	SC VI.3, SC VI.8	R 336.2810, 40 CFR 52.21(j)
8. NOx	222.6 ton/month ²	12-month rolling average as determined each calendar month	EU-UNIT2	SC VI.3, SC VI.5, SC VI.8	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j)
9. CO	0.15 lb/MMBtu heat input excluding periods of start- up and shutdown ²	30-day rolling average as determined each calendar day the boiler operates	EU-UNIT2	SC VI.3, SC VI.9	R 336.2810, 40 CFR 52.21(j)
10. CO	27,446.4 lb/day 2	30-day rolling average as determined each calendar day the boiler operates	EU-UNIT2	SC VI.3, SC VI.5, SC VI.9	R 336.2804, R 336.2810, 40 CFR 52.21(d) and (j)
11. VOC	0.0034 Ib/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT2	SC III.1, SC V.1, SC V.2	R 336.1122(f), R 336.1224, R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21(j)
12. VOC	25.9 pph ²	Test protocol will specify averaging time	EU-UNIT2	SC III.1, SC V.1, SC V.2	R 336.1122(f), R 336.1224, R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21(j)
13. Lead (Pb)	1.69 x 10 ⁻⁵ Ib/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT2	SC V.1, SC V.2, FGMATS SC VI.3	R 336.1901, R 336.2810, 40 CFR 52.21(j)
14. Lead (Pb)	0.13 pph ²	Test protocol will specify averaging time	EU-UNIT2	SC V.1, SC V.2, FG- COALBLRCAM SC VI.1	R 336.1901, R 336.2804, R 336.2810, 40 CFR 52.21(d) and (j)
15. Sulfuric acid mist (H ₂ SO ₄)	0.005 lb/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT2	SC III.1, SC V.1, SC V.2	R 336.1224, R 336.1225, R 336.2810, 40 CFR 52.21(j)

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Pollutant	Limit	Time Period/ Operating	Equipment	Monitoring/	Underlying
		Scenario		Testing Method	Applicable
				-	Requirements
16. Hydrogen	0.0024	Test protocol will specify	EU-UNIT2	SC V.1,	R 336.1224,
Chloride	lb/MMBtu heat	averaging time		SC V.2,	R 336.1225,
(HCI)	input ¹			FGMATS	
				SC VI.5	
17. Hydrogen	0.00023	Test protocol will specify	EU-UNIT2	SC V.1,	R 336.1224,
Fluoride (HF)	lb/MMBtu	averaging time		SC V.2,	R 336.1225,
	heat input ²			FG-	R 336.2810,
				COALBLRCAM	40 CFR 52.21(j)
				SC VI.2	
18. Mercury (Hg)	0.02 lb/GW-hr	12-month rolling average	EU-UNIT2	SC V.1,	R 336.1224,
	gross energy	as determined each		SC V.2,	R 336.1228,
	output ²	calendar month		SC VI.4,	R 336.1229(2)(b),
				SC VI.6,	R 336.2503(2)
				SC VI.10	
19. Mercury (Hg)	144.2 lb/year ²	12-month rolling time	EU-UNIT2	SC V.1,	R 336.1224,
		period as determined at		SC V.2,	R 336.1228,
		the end of each calendar		SC VI.4,	R 336.1229(2)(b),
		month		SC VI.5,	R 336.2503(2)
				SC VI.6,	
				SC VI.10	
20. Arsenic (As)	6.3 x 10 ⁻⁶	Test protocol will specify	EU-UNIT2	SC V.1,	R 336.1224,
	lb/MMBtu heat	averaging time		SC V.2,	R 336.1225(2)
	input ¹			FGMATS	
				SC VI.3	

II. MATERIAL LIMIT(S)

- 1. The permittee shall only use diesel for the initial start-up fuel, flame stabilization, and overfiring. Start-up is defined in SC III.2.² (R 336.1205(1)(a) and (1)(b), R 336.2810, 40 CFR 52.21(j))
- The permittee shall only combust bituminous coal, subbituminous coal, and up to 23,652 tons per calendar month of petroleum coke in EU-UNIT2.² (R 336.1205(1)(a) and (1)(b), R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21(j))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-UNIT2 unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment, is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1224, R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))
- Start-up is defined as the period of time from initiation of combustion firing until the unit reaches steady state operation and the SCR (after start-up and shakedown) is brought into service upon the flue gas reaching a minimum operating temperature for the SCR of 650°F. Shutdown is defined as that period of time beginning

when the flue gas temperature entering the SCR drops below the operating temperature of the SCR system.² (R 336.1912, R 336.2810, 40 CFR 52.21(j))

The permittee shall not operate EU-UNIT2 unless an emissions minimization plan for start-ups and shutdowns has been implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices.² (R 336.1911, R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The maximum design heat input rate of EU-UNIT2 shall not exceed 7,624 million British thermal units per hour (MMBtu/hr) on a fuel heat input basis.² (R 336.1205(1)(a) and (1)(b))
- The permittee shall not operate EU-UNIT2 unless the low-NOx burners, overfire air, SCR system, ESP, and wet FGD system are installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-UNIT2 as required in SC III.1.² (R 336.1224, R 336.1225, R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21(j))
- 3. The permittee shall not operate EU-UNIT2 unless the REF sorbent system is installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-UNIT2 as required in SC III.1.² (R 336.1225, R 336.1910)
- 4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a process monitor to measure mercury emissions from the unit and provide real time indicators of potential noncompliance. This process monitor, because it does not meet EPA Specification 12A, is in addition to the certified mercury monitoring system which provides quality assured data used in emissions reporting and compliance verification under the Mercury Air Toxics rule. Satisfactory manner includes operating the process monitor on a continuous basis to obtain mercury emission data such that the permittee can initiate corrective actions in the event of elevated mercury emissions. Satisfactory manner includes operating and maintaining the process monitor in accordance with an approved malfunction abatement plan. ^{2, 3} (R 336.1201, Act 451 324.5503(b), EPA-5-2018-113(a)-MI-07 paragraph 16)
- 5. The permittee shall install and maintain a halogenated compound application system (e.g. calcium bromide) in a satisfactory manner to promote mercury oxidation and maintain compliance with the unit's mercury emission limits. Satisfactory manner includes operating the application system when the mercury process monitor demonstrates elevated mercury emissions, and as otherwise needed for mercury emissions control in accordance with an approved malfunction abatement plan. ^{2, 3} (R 336.1201 Act 451 324.5503(b), EPA-5-2018-113(a)-MI-07 paragraph 17)

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 visible emissions, PM, PM10, PM2.5, VOC, Pb, As, H2SO4, HCl, HF, and Hg emission rates from EU-UNIT2 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
VOC	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B;
	40 CFR Part 63, Appendix A

Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A
Mercury	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B;
	40 CFR Part 63, Appendix A
Visible Emission	40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B
HAPs	40 CFR Part 63, 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. ² (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

- The permittee shall verify the visible emissions, PM, PM10, VOC, Pb, As, H2SO4, HCI, HF, and Hg emission rates from EU-UNIT2, at a minimum, every five years from the date of the last test. ² (R 336.2001, R 336.2003, R 336.2004)
- The permittee shall verify the PM2.5 emission rates from EU-UNIT2, and at a minimum, must complete the test once every calendar year for the next ten years of operation after the modification on November 13, 2014. ² (R 336.2001, R 336.2003, R 336.2004)
- 4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. (R 336.1213(3), R 336.2001(4))

VI. MONITORING/RECORDKEEPING

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

- The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the PM emissions from EU-UNIT2 on a continuous basis. The permittee shall install and operate the CEM to meet the timelines, requirements and reporting detailed in Appendix 3-1. The permittee shall also meet the following requirements:² (R 336.1205, R 336.1301, R 336.1303, R 336.1331, R 336.1901, R 336.1911, R 336.2810, 40 CFR 52.21(j))
 - a. The MAP required in SC III.1 shall include provisions for alternative monitoring in the event that the PM CEM is out of control based upon the results of quality assurance tests conducted in accordance with Procedure 2 of 40 CFR Part 60 (Appendix F). This alternative monitoring shall, unless alternate methods and frequencies are approved in writing by the AQD District Supervisor, require verification of the presence of visible emissions by taking 6-minute visible emission readings for EU-UNIT2 a minimum of once per calendar day when the boiler is operating. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If the permittee observes any visible emissions, the permittee shall immediately implement the following procedures:
 - i. The permittee shall perform the 6-minute visible emission readings at least once every 30 minutes until emissions are no longer visible or until emissions have been observed for more than two hours.
 - ii. If visible emissions have been observed for more than two hours, a certified reader shall determine the opacity using federal Reference Test Method 9 (40 CFR Part 60 (Appendix A)).

Section 1 DTE Electric Company – Monroe Power Plant Expiration Date:October 16, 2024

- ROP No: MI-ROP-B2816-2019 PTI No: MI-PTI-B2816-2019
- 3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner device(s) to monitor and record the SO₂, NOx, and CO emissions, and oxygen or carbon dioxide (O_2 or CO₂) content of the exhaust gas from EU-UNIT2 on a continuous basis. The permittee shall install and operate each CEM to meet the timelines, requirements and reporting detailed in Appendix 3-1.2 (R 336.1205, R 336.2810, 40 CFR 52.21(i), R 336.2902(2)(c), 40 CFR Part 51, Appendix S)
- 4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the mercury emissions from EU-UNIT2 on a continuous basis. The permittee shall install and operate an Hg monitor to meet the timelines, requirements and reporting detailed in Appendix 3-1.2 (R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2503(2))
- 5. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the exhaust gas flow rate from EU-UNIT2 on a continuous basis. The monitor shall be operated in accordance with procedures outlined in Appendix 3-1.2 (R 336.2810, 40 CFR 52.21(j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S)
- 6. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the gross energy output from EU-UNIT2 on a continuous basis. The monitor shall be operated in accordance with procedures outlined in 40 CFR 60.49Da(k).¹ (R 336.1224)
- 7. The permittee shall keep, in a satisfactory manner, hourly and 24-hour rolling average SO₂ emission rate and mass records for EU-UNIT2, as described in emission limits SC I.5 and I.6, respectively.² (R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S)
- 8. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling average NOx emission rate and mass records for EU-UNIT2, as described in emission limits SC I.7, and I.8.2 (R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))
- 9. The permittee shall keep, in a satisfactory manner, daily and 30-day rolling average CO emission rate and mass records for EU-UNIT2, as described in emission limits SC I.9 and I.10.² (R 336.2804, R 336.2810, 40 CFR 52.21(d), and (j))
- 10. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling average mercury emission rate records, expressed on a basis of gross energy output, and monthly and 12-month rolling time period mercury mass emission rate records for EU-UNIT2, as described in emission limits SC I.18 and SC I.19. If the monitoring required by SC VI.4 is only capable of detecting gaseous mercury, the permittee shall use the testing required by SC V.9 to develop a correction factor to adjust the mercury monitoring data to total mercury. Based on the available testing and monitoring data, the correction factor may be adjusted upon review and approval of the AQD District Supervisor.¹ (R 336.1224, R 336.1228, R 336.1229(2)(b))
- 11. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:
 - Compliance tests and any testing required under the special conditions of this permit; a.
 - Monitoring data; b.
 - C. Heat input calculations required to show compliance with SC IV.1;
 - d. Identification, type and the amounts of all fuels combusted in EU-UNIT2 on a calendar month basis;
 - Total gigawatt-hours of energy produced on a monthly basis; e.
 - Records of the duration of all times EU-UNIT2 is operated under start-up or shutdown conditions as defined f. in SC III.2;
 - g. All calculations necessary to show compliance with the limits contained in this permit.

All of the above information shall be stored in a format acceptable to the Air Quality Division and made available to the Department upon request.² (R 336.1205(1)(a), R 336.1224, R 336.1225, R 336.1228, R 336.1229(2)(b), R 336.1301, R 336.1331, R 336.1401, R 336.1702(a), R 336.1901, R 336.1912, R 336.2802(4), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))

See Appendix 3-1

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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))
- 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 an excess emission report (EER) and summary report in an acceptable format to the AQD District Supervisor and the TPU Supervisor within 30 days following the end of each calendar quarter as specified in 40 CFR 60.7(c) and (d). The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:² (R 336.1205, R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2803, R 336.2804, R 336.2810, R 336.2902(2)(c), 40 CFR Part 51, Appendix S, 40 CFR 52.21(c), (d), and (j), 40 CFR 60.7(c) and (d))
 - a. A report of each exceedance above the limits specified in the emission limits of this permit. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b. A report of all periods of the Continuous Emission Monitoring and Continuous Emission Rate Monitoring System (CEMS/CERMS), and if applicable Predictive Emission Monitoring System (PEMS), downtime and corrective action.
 - c. A report of the total operating time of the boiler during the reporting period.
 - d. A report of any periods that the CEMS/CERMS, and if applicable PEMS, exceed the instrument range.
 - e. If no exceedances or CEMS/CERMS, and if applicable PEMS, downtime occurred during the reporting period, the permittee shall report that fact.
- 5. The permittee shall submit any performance test reports including RATA 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), R 336.2156(c))

See Appendix 8-1

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. SV015-002	336 ²	579 ²	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with the acid rain permitting provisions of 40 CFR Part 72.1 to 72.94, as outlined in a complete Phase II, Acid Rain Permit issued by the AQD. Phase II, Acid Rain Permit No. MI-AR-1733-2019 is hereby incorporated into this ROP as Appendix 9-1. (R 336.1902(1)(g))
- 2. 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 R 336.1902(1)(q) and 40 CFR Part 72.9(c)(1)(i). (R 336.1213(10))
- 3. An affected existing EGU shall meet the requirements of Part 15 Emission Limitations and Prohibitions -Mercury. (R 336.2503(1))
- 4. The permittee shall comply with the provisions of the Cross State Air Pollution Rule NO_x Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAA, and identified in Appendix 10-1. (40 CFR Part 97, Subpart AAAAA)
- 5. The permittee shall comply with the provisions of the Cross State Air Pollution Rule NO_X Ozone Season Group 2 Trading Program, as specified in 40 CFR Part 97, Subpart EEEEE, and identified in Appendix 10-1. (40 CFR Part 97, Subpart EEEEE)
- 6. The permittee shall comply with the provisions of the Cross State Air Pollution Rule SO₂ Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix 10-1. (40 CFR Part 97, Subpart CCCCC)

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 is federally enforceable and was originally established in the consent decree settling, "U.S. v DTE Energy Company, Civil Action No. EPA-5-2018-113(a)-MI-07" and also pursuant to Act 451, Section 324.5503(b), and will remain in effect after termination of the consent decree.

EU-UNIT3 EMISSION UNIT CONDITIONS

DESCRIPTION

Coal-fired cell burner boiler nominally rated at a maximum heat input of 7,624 MMBtu per hour on a fuel input basis. The boiler serves a steam turbine electric generator nominally rated at 823 MW (gross). Fires No. 2 fuel oil for boiler start-up and flame stabilization.

Flexible Group ID: FG-ProjectPC1-4, FG-COALBLRCAM, FG-MATS

POLLUTION CONTROL EQUIPMENT

Low-NOx burners, overfire air, REF sorbent system, selective catalytic reduction (SCR), dry wire electrostatic precipitators (ESP), and wet flue gas desulfurization (FGD).

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable
						Requirements
1.	Opacity	10 percent ²	6-minute average except	EU-UNIT3	SC V.1,	R 336.1301(1)(c)
			one 6-minute average		SC V.2,	R 336.2810
			per hour of not more than 20 percent		SC VI.2	40 CFR 52.21(j)
2.	PM	0.011 lb/MMBtu	24-hr rolling average as	EU-UNIT3	SC V.1,	R 336.1224
		heat input ²	determined each hour		SC V.2,	R 336.1225
			the boiler operates		SC VI.2	R 336.1331(1)(c)
						R 336.2810
						40 CFR 52.21(j)
3.	PM10	0.024 lb/MMBtu	Test protocol will specify	EU-UNIT3	SC V.1,	R 336.2810
		heat input ²	averaging time		SC V.2,	40 CFR 52.21(j)
					FG-	
					COALBLRCAM	
					SC VI.1	
4.	PM10	183.0 pph ²	Test protocol will specify	EU-UNIT3	SC V.1,	R 336.2803
			averaging time		SC V.2,	R 336.2804
					FG-	R 336.2810,
					COALBLRCAM	40 CFR 52.21(c),
					SC VI.1	(d), and (j)
5.	SO ₂	0.107 lb/MMBtu	24-hour rolling average	EU-UNIT3	SC VI.3,	R 336.1401
		heat input ²	as determined each hour		SC VI.7	R 336.2810
			the boiler operates			40 CFR 52.21(j)
						R 336.2902(2)(c)
						40 CFR Part 51,
1						Appendix S

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
6. SO ₂	815.8 pph ²	24-hour rolling average as determined each hour the boiler operates	EU-UNIT3	SC VI.3, SC VI.5, SC VI.7	R 336.2803 R 336.2804 R 336.2810 40 CFR 52.21(c), (d), and (j), R 336.2902(2)(c) 40 CFR Part 51, Appendix S
7. NOx	0.08 lb/MMBtu heat input ²	12-month rolling average as determined each calendar month	EU-UNIT3	SC VI.3, SC VI.8	R 336.2810 40 CFR 52.21(j)
8. NOx	222.6 ton/month ²	12-month rolling average as determined each calendar month	EU-UNIT3	SC VI.3, SC VI.5, SC VI.8	R 336.2803 R 336.2804 R 336.2810 40 CFR 52.21(c), (d), and (j)
9. CO	0.15 lb/MMBtu heat input excluding periods of start- up and shutdown ²	30-day rolling average as determined each calendar day the boiler operates	EU-UNIT3	SC VI.3, SC VI.9	R 336.2810 40 CFR 52.21(j)
10. CO	27,446.4 lb/day 2	30-day rolling average as determined each calendar day the boiler operates	EU-UNIT3	SC VI.3, SC VI.5, SC VI.9	R 336.2804 R 336.2810 40 CFR 52.21(d) and (j)
11. VOC	0.0034 Ib/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT3	SC III.1, SC V.1, SC V.2	R 336.1122(f) R 336.1224 R 336.1225 R 336.1702(a) R 336.2810 40 CFR 52.21(j)
12. VOC	25.9 pph ²	Test protocol will specify averaging time	EU-UNIT3	SC III.1, SC V.1, SC V.2	R 336.1122(f) R 336.1224 R 336.1225 R 336.1702(a) R 336.2810 40 CFR 52.21(j)
13. Lead (Pb)	1.69 x 10 ⁻⁵ Ib/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT3	SC V.1, SC V.2, FGMATS SC VI.3	R 336.1901 R 336.2810 40 CFR 52.21(j)
14. Lead (Pb)	0.13 pph ²	Test protocol will specify averaging time	EU-UNIT3	SC V.1, SC V.2, FG- COALBLRCAM SC VI.1	R 336.1901 R 336.2804 R 336.2810 40 CFR 52.21(d) and (j)
15. Sulfuric acid mist (H ₂ SO ₄)	0.005 lb/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT3	SC III.1, SC V.1, SC V.2	R 336.1224 R 336.1225 R 336.2810 40 CFR 52.21(j)

					-
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Pollutant	Limit	Time Period/ Operating	Equipment	Monitoring/	Underlying
		Scenario		Testing Method	Applicable
					Requirements
16. Hydrogen	0.0024	Test protocol will specify	EU-UNIT3	SC V.1,	R 336.1224
Chloride	lb/MMBtu heat	averaging time		SC V.2,	R 336.1225
(HCI)	input ¹			FGMATS	
				SC VI.5	
17. Hydrogen	0.00023	Test protocol will specify	EU-UNIT3	SC V.1,	R 336.1224
Fluoride (HF)	lb/MMBtu	averaging time		SC V.2,	R 336.1225
	heat input ²			FG-	R 336.2810
	-			COALBLRCAM	40 CFR 52.21(j)
				SC VI.2	
18. Mercury (Hg)	0.02 lb/GW-hr	12-month rolling average	EU-UNIT3	SC V.1,	R 336.1224
	gross energy	as determined each		SC V.2,	R 336.1228
	output ²	calendar month		SC VI.4,	R 336.1229(2)(b)
	-			SC VI.6,	R 336.2503(2)
				SC VI.10	
19. Mercury (Hg)	144.2 lb/year ²	12-month rolling time	EU-UNIT3	SC V.1,	R 336.1224
		period as determined at		SC V.2,	R 336.1228
		the end of each calendar		SC VI.4,	R 336.1229(2)(b)
		month		SC VI.5,	R 336.2503(2)
				SC VI.6,	. ,
				SC VI.10	
20. Arsenic (As)	6.3 x 10 ⁻⁶	Test protocol will specify	EU-UNIT3	SC V.1,	R 336.1224
	lb/MMBtu heat	averaging time		SC V.2,	R 336.1225(2)
	input ¹			FGMATS	. ,
				SC VI.3	

II. MATERIAL LIMIT(S)

- 1. The permittee shall only use diesel for the initial start-up fuel, flame stabilization, and overfiring. Start-up is defined in SC III.2.² (R 336.1205(1)(a) and (1)(b), R 336.2810, 40 CFR 52.21(j))
- The permittee shall only combust bituminous coal, subbituminous coal, and up to 23,652 tons per calendar month of petroleum coke in EU-UNIT3.² (R 336.1205(1)(a) and (1)(b), R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21(j))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-UNIT3 unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment, is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1224, R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))
- Start-up is defined as the period of time from initiation of combustion firing until the unit reaches steady state operation and the SCR is brought into service upon the flue gas reaching a minimum operating temperature for the SCR of 650°F. Shutdown is defined as that period of time beginning when the flue gas temperature entering the SCR drops below the operating temperature of the SCR system.² (R 336.1912, R 336.2810, 40 CFR 52.21(j))
The permittee shall not operate EU-UNIT3 unless an emissions minimization plan for start-ups and shutdowns has been implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices.² (R 336.1911, R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The maximum design heat input rate of EU-UNIT3 shall not exceed 7,624 million British thermal units per hour (MMBtu/hr) on a fuel heat input basis.² (R 336.1205(1)(a) and (1)(b))
- The permittee shall not operate EU-UNIT3 unless the low-NOx burners, overfire air, SCR system, ESP, and wet FGD system are installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-UNIT3 as required in SC III.1.² (R 336.1224, R 336.1225, R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21(j))
- 3. The permittee shall not operate EU-UNIT3 unless the REF sorbent system is installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-UNIT3 as required in SC III.1.² (R 336.1225, R 336.1910)
- 4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a process monitor to measure mercury emissions from the unit and provide real time indicators of potential noncompliance. This process monitor, because it does not meet EPA Specification 12A, is in addition to the certified mercury monitoring system which provides quality assured data used in emissions reporting and compliance verification under the Mercury Air Toxics rule. Satisfactory manner includes operating the process monitor on a continuous basis to obtain mercury emission data such that the permittee can initiate corrective actions in the event of elevated mercury emissions. Satisfactory manner includes operating and maintaining the process monitor in accordance with an approved malfunction abatement plan. ^{2, 3} (R 336.1201, Act 451 324.5503(b), EPA-5-2018-113(a)-MI-07 paragraph 16)
- 5. The permittee shall install and maintain a halogenated compound application system (e.g. calcium bromide) in a satisfactory manner to promote mercury oxidation and maintain compliance with the unit's mercury emission limits. Satisfactory manner includes operating the application system when the mercury process monitor demonstrates elevated mercury emissions, and as otherwise needed for mercury emissions control in accordance with an approved malfunction abatement plan. ^{2, 3} (R 336.1201 Act 451 324.5503(b), EPA-5-2018-113(a)-MI-07 paragraph 17)

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 visible emissions, PM, PM10, PM2.5, VOC, Pb, As, H2SO4, HCl, HF, and Hg emission rates from EU-UNIT3 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control
	Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
VOC	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B;
	40 CFR Part 63, Appendix A

Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A
Mercury	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B;
-	40 CFR Part 63, Appendix A
Visible Emission	40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B
HAPs	40 CFR Part 63, 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. ² (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

- The permittee shall verify the visible emissions, PM, PM10, VOC, Pb, As, H2SO4, HCl, HF, and Hg emission rates from EU-UNIT3, at a minimum, every five years from the date of the last test. ² (R 336.2001, R 336.2003, R 336.2004)
- The permittee shall verify the PM2.5 emission rates from EU-UNIT3, and at a minimum, must complete the test once every calendar year for the next ten years of operation after the modification in November 2009. ² (R 336.2001, R 336.2003, R 336.2004)
- 4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. (R 336.1213(3), R 336.2001(4))

VI. MONITORING/RECORDKEEPING

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

- The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the PM emissions from EU-UNIT3 on a continuous basis. The permittee shall install and operate the CEM to meet the timelines, requirements and reporting detailed in Appendix 3-1. The permittee shall also meet the following requirements: ² (R 336.1205, R 336.1301, R 336.1303, R 336.1331, R 336.1901, R 336.1911, R 336.2810, 40 CFR 52.21(j), 40 CFR 64.6(c)(1)(iii))
 - a. The MAP required in SC III.1 shall include provisions for alternative monitoring in the event that the PM CEM is out of control based upon the results of quality assurance tests conducted in accordance with Procedure 2 of 40 CFR Part 60 (Appendix F). This alternative monitoring shall, unless alternate methods and frequencies are approved in writing by the AQD District Supervisor, require verification of the presence of visible emissions by taking 6-minute visible emission readings for EU-UNIT3 a minimum of once per calendar day when the boiler is operating. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If the permittee observes any visible emissions, the permittee shall immediately implement the following procedures:
 - i. The permittee shall perform the 6-minute visible emission readings at least once every 30 minutes until emissions are no longer visible or until emissions have been observed for more than two hours.
 - ii. If visible emissions have been observed for more than two hours, a certified reader shall determine the opacity using federal Reference Test Method 9 (40 CFR Part 60 (Appendix A)).

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- The permittee shall install, calibrate, maintain and operate in a satisfactory manner device(s) to monitor and record the SO₂, NOx, and CO emissions, and oxygen or carbon dioxide (O₂ or CO₂) content of the exhaust gas from EU-UNIT3 on a continuous basis. The permittee shall install and operate each CEM to meet the timelines, requirements and reporting detailed in Appendix 3-1.² (R 336.1205, R 336.2810, 40 CFR 52.21(j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S, 40 CFR 64.6(c)(1)(iii))
- 4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the mercury emissions from EU-UNIT3 on a continuous basis. The permittee shall install and operate an Hg monitor to meet the timelines, requirements and reporting detailed in Appendix 3-1.² (R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2503(2))
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the exhaust gas flow rate from EU-UNIT3 on a continuous basis. The monitor shall be operated in accordance with procedures outlined in Appendix 3-1.² (R 336.2810, 40 CFR 52.21(j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S)
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the gross energy output from EU-UNIT3 on a continuous basis. The monitor shall be operated in accordance with procedures outlined in 40 CFR 60.49Da(k).¹ (R 336.1224)
- The permittee shall keep, in a satisfactory manner, hourly and 24-hour rolling average SO₂ emission rate and mass records for EU-UNIT3, as described in emission limits SC I.5 and I.6, respectively.² (R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S)
- The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling average NOx emission rate and mass records for EU-UNIT3, as described in emission limits SC I.7, and I.8.² (R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))
- The permittee shall keep, in a satisfactory manner, daily and 30-day rolling average CO emission rate and mass records for EU-UNIT3, as described in emission limits SC I.9 and I.10.² (R 336.2804, R 336.2810, 40 CFR 52.21(d), and (j))
- 10. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling average mercury emission rate records, expressed on a basis of gross energy output, and monthly and 12-month rolling time period mercury mass emission rate records for EU-UNIT3, as described in emission limits SC I.18 and SC I.19. If the monitoring required by SC VI.4 is only capable of detecting gaseous mercury, the permittee shall use the testing required by SC V.9 to develop a correction factor to adjust the mercury monitoring data to total mercury. Based on the available testing and monitoring data, the correction factor may be adjusted upon review and approval of the AQD District Supervisor.¹ (R 336.1224, R 336.1228, R 336.1229(2)(b))
- 11. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:
 - a. Compliance tests and any testing required under the special conditions of this permit;
 - b. Monitoring data;
 - c. Heat input calculations required to show compliance with SC IV.1;
 - d. Identification, type and the amounts of all fuels combusted in EU-UNIT3 on a calendar month basis;
 - e. Total gigawatt-hours of energy produced on a monthly basis;
 - f. Records of the duration of all times EU-UNIT3 is operated under start-up or shutdown conditions as defined in SC III.2;
 - g. All calculations necessary to show compliance with the limits contained in this permit.

All of the above information shall be stored in a format acceptable to the Air Quality Division and made available to the Department upon request.² (R 336.1205(1)(a), R 336.1224, R 336.1225, R 336.1228, R 336.1229(2)(b),

R 336.1301, R 336.1331, R 336.1401, R 336.1702(a), R 336.1901, R 336.1912, R 336.2802(4), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))

See Appendix 3-1

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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 an excess emission report (EER) and summary report in an acceptable format to the AQD District Supervisor and the TPU Supervisor within 30 days following the end of each calendar quarter as specified in 40 CFR 60.7(c) and (d). The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:² (R 336.1205, R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2803, R 336.2804, R 336.2810, R 336.2902(2)(c), 40 CFR Part 51, Appendix S, 40 CFR 52.21(c), (d), and (j), 40 CFR 60.7(c) and (d))
 - a. A report of each exceedance above the limits specified in the emission limits of this permit. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b. A report of all periods of the Continuous Emission Monitoring and Continuous Emission Rate Monitoring System (CEMS/CERMS), and if applicable Predictive Emission Monitoring System (PEMS), downtime and corrective action.
 - c. A report of the total operating time of the boiler during the reporting period.
 - d. A report of any periods that the CEMS/CERMS, and if applicable PEMS, exceed the instrument range.
 - e. If no exceedances or CEMS/CERMS, and if applicable PEMS, downtime occurred during the reporting period, the permittee shall report that fact.
- 5. The permittee shall submit any performance test reports including RATA 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), R 336.2156(c))

See Appendix 8-1

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. SV016-003	336 ²	579 ²	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with the acid rain permitting provisions of 40 CFR Part 72.1 to 72.94, as outlined in a complete Phase II, Acid Rain Permit issued by the AQD. Phase II, Acid Rain Permit No. MI-AR-1733-2019 is hereby incorporated into this ROP as Appendix 9-1. (**R 336.1902(1)(q)**)
- 2. 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 R 336.1902(1)(q) and 40 CFR Part 72.9(c)(1)(i). (R 336.1213(10))
- 3. An affected existing EGU shall meet the requirements of Part 15 Emission Limitations and Prohibitions Mercury. (R 336.2503(1))
- 4. The permittee shall comply with the provisions of the Cross State Air Pollution Rule NO_x Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAA, and identified in Appendix 10-1. **(40 CFR Part 97, Subpart AAAAA)**
- 5. The permittee shall comply with the provisions of the Cross State Air Pollution Rule NO_x Ozone Season Group 2 Trading Program, as specified in 40 CFR Part 97, Subpart EEEEE and identified in Appendix 10-1. **(40 CFR Part 97, Subpart EEEEE)**
- 6. The permittee shall comply with the provisions of the Cross State Air Pollution Rule SO₂ Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix 10-1. **(40 CFR Part 97, Subpart CCCCC)**

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 is federally enforceable and was originally established in the consent decree settling, "U.S. v DTE Energy Company, Civil Action No. EPA-5-2018-113(a)-MI-07" and also pursuant to Act 451, Section 324.5503(b), and will remain in effect after termination of the consent decree.

EU-UNIT4 EMISSION UNIT CONDITIONS

DESCRIPTION

Coal-fired cell burner boiler nominally rated at a maximum heat input of 7,624 MMBtu per hour on a fuel input basis. The boiler serves a steam turbine electric generator nominally rated at 817 MW (gross). Fires No. 2 fuel oil for boiler start-up and flame stabilization.

Flexible Group ID: FG-ProjectPC1-4, FG-COALBLRCAM, FG-MATS

POLLUTION CONTROL EQUIPMENT

Low-NOx burners, overfire air, REF sorbent system, selective catalytic reduction (SCR), dry wire electrostatic precipitators (ESP), and wet flue gas desulfurization (FGD).

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating	Equipment	Monitoring/	Underlying
			Scenario		lesting Method	Applicable Requirements
1.	Opacity	10 percent ²	6-minute average except	EU-UNIT4	SC V.1,	R 336.1301(1)(c),
			one 6-minute average		SC V.2,	R 336.2810,
			per hour of not more		SC VI.2	40 CFR 52.21(j)
			than 20 percent			
2.	PM	0.011 lb/MMBtu	24-hr rolling average as	EU-UNIT4	SC V.1,	R 336.1224,
		heat input 2	determined each hour		SC V.2,	R 336.1225,
			the boiler operates		SC VI.2	R 336.1331(1)(c),
						R 336.2810,
_	DM40		Test metes el millomesif.		001/4	40 CFR 52.21(j)
3.	PINITU	0.024 ID/MIMBtu	lest protocol will specify	EU-UNIT4		R 336.2810,
		neat input 2	averaging time		SC V.2,	40 CFR 52.21(J)
1	DM10	192 0 pph 2	Test protocol will aposify			D 336 3003
4.	FIVITU	103.0 ppn -	averaging time	EU-UNIT4	SCV.1,	R 330.2003, D 336 2804
			averaging time		50 V.2, FC	D 336 2810
						40 CER 52 21(c)
					SC VI 1	(d), and (i)
5	SO ₂	0 107 lb/MMBtu	24-hour rolling average	FU-UNIT4	SC VI 3	R 336.1401.
Ŭ.	002	heat input ²	as determined each hour	20 01111	SC VL7	R 336.2810.
			the boiler operates			40 CFR 52.21(i).
						R 336.2902(2)(c).
						40 CFR Part 51,
						Appendix S
6.	SO ₂	815.8 pph ²	24-hour rolling average	EU-UNIT4	SC VI.3,	R 336.2803,
			as determined each hour		SC VI.5,	R 336.2804,
			the boiler operates		SC VI.7	R 336.2810,
			-			40 CFR 52.21(c),
						(d), and (j),
						R 336.2902(2)(c),
						40 CFR Part 51,
						Appendix S

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
7. NOx	0.08 lb/MMBtu heat input ²	12-month rolling average as determined each calendar month	EU-UNIT4	SC VI.3, SC VI.8	R 336.2810, 40 CFR 52.21(j)
8. NOx	222.6 ton/month ²	12-month rolling average as determined each calendar month	EU-UNIT4	SC VI.3, SC VI.5, SC VI.8	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j)
9. CO	0.15 lb/MMBtu heat input excluding periods of start- up and shutdown ²	30-day rolling average as determined each calendar day the boiler operates	EU-UNIT4	SC VI.3, SC VI.9	R 336.2810, 40 CFR 52.21(j)
10. CO	27,446.4 lb/day 2	30-day rolling average as determined each calendar day the boiler operates	EU-UNIT4	SC VI.3, SC VI.5, SC VI.9	R 336.2804, R 336.2810, 40 CFR 52.21(d) and (j)
11. VOC	0.0034 Ib/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT4	SC III.1, SC V.1, SC V.2	R 336.1122(f), R 336.1224, R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21(j)
12. VOC	25.9 pph ²	Test protocol will specify averaging time	EU-UNIT4	SC III.1, SC V.1, SC V.2	R 336.1122(f), R 336.1224, R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21(j)
13. Lead (Pb)	1.69 x 10 ⁻⁵ Ib/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT4	SC V.1, SC V.2, FGMATS SC VI.3	R 336.1901, R 336.2810, 40 CFR 52.21(j)
14. Lead (Pb)	0.13 pph ²	Test protocol will specify averaging time	EU-UNIT4	SC V.1, SC V.2, FG- COALBLRCAM SC VI.1	R 336.1901, R 336.2804, R 336.2810, 40 CFR 52.21(d) and (j)
15. Sulfuric acio mist (H₂SO	d 0.005 lb/MMBtu 4) heat input ²	Test protocol will specify averaging time	EU-UNIT4	SC III.1, SC V.1, SC V.2	R 336.1224, R 336.1225, R 336.2810, 40 CFR 52.21(j)
16. Hydrogen Chloride (HCl)	0.0024 Ib/MMBtu heat input ¹	Test protocol will specify averaging time	EU-UNIT4	SC V.1, SC V.2, FGMATS SC VI.5	R 336.1224, R 336.1225
17. Hydrogen Fluoride (H	F) 0.00023 Ib/MMBtu heat input ²	Test protocol will specify averaging time	EU-UNIT4	SC V.1, SC V.2, FG- COALBLRCAM SC VI.2	R 336.1224, R 336.1225, R 336.2810, 40 CFR 52.21(j)

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	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
18.	Mercury (Hg)	0.02 lb/GW-hr gross energy output ²	12-month rolling average as determined each calendar month	EU-UNIT4	SC V.1, SC V.2, SC VI.4, SC VI.6, SC VI.6	R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2503(2)
19.	Mercury (Hg)	143.1 lb/year ²	12-month rolling time period as determined at the end of each calendar month	EU-UNIT4	SC V.1, SC V.2, SC VI.4, SC VI.5, SC VI.6, SC VI.10	R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2503(2)
20.	Arsenic (As)	6.3 x 10 ⁻⁶ Ib/MMBtu heat input ¹	Test protocol will specify averaging time	EU-UNIT4	SC V.1, SC V.2, FGMATS SC VI.3	R 336.1224, R 336.1225(2)

II. MATERIAL LIMIT(S)

- 1. The permittee shall only use diesel for the initial start-up fuel, flame stabilization, and overfiring. Start-up is defined in SC III.2.² (R 336.1205(1)(a) and (1)(b), R 336.2810, 40 CFR 52.21(j))
- The permittee shall only combust bituminous coal, subbituminous coal, and up to 23,652 tons per calendar month of petroleum coke in EU-UNIT4.² (R 336.1205(1)(a) and (1)(b), R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21(j))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-UNIT4 unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment, is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1224, R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))
- 2. Start-up is defined as the period of time from initiation of combustion firing until the unit reaches steady state operation and the SCR is brought into service upon the flue gas reaching a minimum operating temperature for the SCR of 650°F. Shutdown is defined as that period of time beginning when the flue gas temperature entering the SCR drops below the operating temperature of the SCR system.² (R 336.1912, R 336.2810, 40 CFR 52.21(j))
- The permittee shall not operate EU-UNIT4 unless an emissions minimization plan for start-ups and shutdowns has been implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices.² (R 336.1911, R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))

IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

1. The maximum design heat input rate of EU-UNIT4 shall not exceed 7,624 million British thermal units per hour (MMBtu/hr) on a fuel heat input basis.² (R 336.1205(1)(a) and (1)(b))

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- The permittee shall not operate EU-UNIT4 unless the low-NOx burners, overfire air, SCR system, ESP, and wet FGD system are installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-UNIT4 as required in SC III.1.² (R 336.1224, R 336.1225, R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21(j))
- 3. The permittee shall not operate EU-UNIT4 unless the REF sorbent system is installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-UNIT4 as required in SC III.1.² (R 336.1225, R 336.1910)
- 4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a process monitor to measure mercury emissions from the unit and provide real time indicators of potential noncompliance. This process monitor, because it does not meet EPA Specification 12A, is in addition to the certified mercury monitoring system which provides quality assured data used in emissions reporting and compliance verification under the Mercury Air Toxics rule. Satisfactory manner includes operating the process monitor on a continuous basis to obtain mercury emission data such that the permittee can initiate corrective actions in the event of elevated mercury emissions. Satisfactory manner includes operating and maintaining the process monitor in accordance with an approved malfunction abatement plan. ^{2, 3} (R 336.1201, Act 451 324.5503(b), EPA-5-2018-113(a)-MI-07 paragraph 16)
- 5. The permittee shall install and maintain a halogenated compound application system (e.g. calcium bromide) in a satisfactory manner to promote mercury oxidation and maintain compliance with the unit's mercury emission limits. Satisfactory manner includes operating the application system when the mercury process monitor demonstrates elevated mercury emissions, and as otherwise needed for mercury emissions control in accordance with an approved malfunction abatement plan. ^{2, 3} (R 336.1201 Act 451 324.5503(b), EPA-5-2018-113(a)-MI-07 paragraph 17)

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 visible emissions, PM, PM10, PM2.5, VOC, Pb, As, H2SO4, HCl, HF, and Hg emission rates from EU-UNIT4 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control
	Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
VOC	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B;
	40 CFR Part 63, Appendix A
Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A
Mercury	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B;
	40 CFR Part 63, Appendix A
Visible Emission	40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B
HAPs	40 CFR Part 63, 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. ² (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

- The permittee shall verify the visible emissions, PM, PM10, VOC, Pb, As, H2SO4, HCI, HF, and Hg emission rates from EU-UNIT4, at a minimum, every five years from the date of the last test. ² (R 336.2001, R 336.2003, R 336.2004)
- The permittee shall verify the PM2.5 emission rates from EU-UNIT4, and at a minimum, must complete the test once every calendar year for the next ten years of operation after the modification on July 12, 2012. ² (R 336.2001, R 336.2003, R 336.2004)
- 4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. (R 336.1213(3), R 336.2001(4))

VI. MONITORING/RECORDKEEPING

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

- The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the PM emissions from EU-UNIT4 on a continuous basis. The permittee shall install and operate the CEM to meet the timelines, requirements and reporting detailed in Appendix 3-1. The permittee shall also meet the following requirements:² (R 336.1205, R 336.1301, R 336.1303, R 336.1331, R 336.1901, R 336.1911, R 336.2810, 40 CFR 52.21(j))
 - a. The MAP required in SC III.1 shall include provisions for alternative monitoring in the event that the PM CEM is out of control based upon the results of quality assurance tests conducted in accordance with Procedure 2 of 40 CFR Part 60 (Appendix F). This alternative monitoring shall, unless alternate methods and frequencies are approved in writing by the AQD District Supervisor, require verification of the presence of visible emissions by taking 6-minute visible emission readings for EU-UNIT4 a minimum of once per calendar day when the boiler is operating. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If the permittee observes any visible emissions, the permittee shall immediately implement the following procedures:
 - i. The permittee shall perform the 6-minute visible emission readings at least once every 30 minutes until emissions are no longer visible or until emissions have been observed for more than two hours.
 - ii. If visible emissions have been observed for more than two hours, a certified reader shall determine the opacity using federal Reference Test Method 9 (40 CFR Part 60 (Appendix A)).
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner device(s) to monitor and record the SO₂, NOx, and CO emissions, and oxygen or carbon dioxide (O₂ or CO₂) content of the exhaust gas from EU-UNIT4 on a continuous basis. The permittee shall install and operate each CEM to meet the timelines, requirements and reporting detailed in Appendix 3-1.² (R 336.1205, R 336.2810, 40 CFR 52.21(j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S)
- 4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the mercury emissions from EU-UNIT4 on a continuous basis. The permittee shall install and operate an Hg monitor to meet the timelines, requirements and reporting detailed in Appendix 3-1.² (R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2503(2))
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the exhaust gas flow rate from EU-UNIT4 on a continuous basis. The monitor shall be operated in accordance with procedures outlined in Appendix 3-1.² (R 336.2810, 40 CFR 52.21(j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S)

- The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the gross energy output from EU-UNIT4 on a continuous basis. The monitor shall be operated in accordance with procedures outlined in 40 CFR 60.49Da(k).¹ (R 336.1224)
- The permittee shall keep, in a satisfactory manner, hourly and 24-hour rolling average SO₂ emission rate and mass records for EU-UNIT4, as described in emission limits SC I.5 and I.6, respectively.² (R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j), R 336.2902(2)(c), 40 CFR Part 51, Appendix S)
- The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling average NOx emission rate and mass records for EU-UNIT4, as described in emission limits SC I.7, and I.8.² (R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))
- The permittee shall keep, in a satisfactory manner, daily and 30-day rolling average CO emission rate and mass records for EU-UNIT4, as described in emission limits SC I.9 and I.10.² (R 336.2804, R 336.2810, 40 CFR 52.21(d) and (j))
- 10. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling average mercury emission rate records, expressed on a basis of gross energy output, and monthly and 12-month rolling time period mercury mass emission rate records for EU-UNIT4, as described in emission limits SC I.18 and SC I.19. If the monitoring required by SC VI.4 is only capable of detecting gaseous mercury, the permittee shall use the testing required by SC V.9 to develop a correction factor to adjust the mercury monitoring data to total mercury. Based on the available testing and monitoring data, the correction factor may be adjusted upon review and approval of the AQD District Supervisor.¹ (R 336.1224, R 336.1228, R 336.1229(2)(b))
- 11. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:
 - a. Compliance tests and any testing required under the special conditions of this permit;
 - b. Monitoring data;
 - c. Heat input calculations required to show compliance with SC IV.1;
 - d. Identification, type and the amounts of all fuels combusted in EU-UNIT4 on a calendar month basis;
 - e. Total gigawatt-hours of energy produced on a monthly basis;
 - f. Records of the duration of all times EU-UNIT4 is operated under start-up or shutdown conditions as defined in SC III.2;
 - g. All calculations necessary to show compliance with the limits contained in this permit.

All of the above information shall be stored in a format acceptable to the Air Quality Division and made available to the Department upon request.² (R 336.1205(1)(a), R 336.1224, R 336.1225, R 336.1228, R 336.1229(2)(b), R 336.1301, R 336.1331, R 336.1401, R 336.1702(a), R 336.1901, R 336.1912, R 336.2802(4), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j))

See Appendix 3-1

VII. <u>REPORTING</u>

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

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- 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 an excess emission report (EER) and summary report in an acceptable format to the AQD District Supervisor and the TPU Supervisor within 30 days following the end of each calendar guarter as specified in 40 CFR 60.7(c) and (d). The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:² (R 336.1205, R 336.1224, R 336.1228, R 336.1229(2)(b), R 336.2803, R 336.2804, R 336.2810, R 336.2902(2)(c), 40 CFR Part 51, Appendix S, 40 CFR 52.21(c), (d), and (j), 40 CFR 60.7(c) and (d))
 - a. A report of each exceedance above the limits specified in the emission limits of this permit. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b. A report of all periods of the Continuous Emission Monitoring and Continuous Emission Rate Monitoring System (CEMS/CERMS), and if applicable Predictive Emission Monitoring System (PEMS), downtime and corrective action.
 - c. A report of the total operating time of the boiler during the reporting period.
 - d. A report of any periods that the CEMS/CERMS, and if applicable PEMS, exceed the instrument range.
 - e. If no exceedances or CEMS/CERMS, and if applicable PEMS, downtime occurred during the reporting period, the permittee shall report that fact.
- 5. The permittee shall submit any performance test reports including RATA 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), R 336.2156(c))

See Appendix 8-1

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. SV016-004	336 ²	579 ²	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with the acid rain permitting provisions of 40 CFR Part 72.1 to 72.94, as outlined in a complete Phase II, Acid Rain Permit issued by the AQD. Phase II, Acid Rain Permit No. MI-AR-1733-2019 is hereby incorporated into this ROP as Appendix 9-1. (R 336.1902(1)(q))
- 2. 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 R 336.1902(1)(q) and 40 CFR Part 72.9(c)(1)(i). (R 336.1213(10))
- 3. An affected existing EGU shall meet the requirements of Part 15 Emission Limitations and Prohibitions -Mercury. (R 336.2503(1))

- 4. The permittee shall comply with the provisions of the Cross State Air Pollution Rule NO_x Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAA, and identified in Appendix 10-1. **(40 CFR Part 97, Subpart AAAAA)**
- The permittee shall comply with the provisions of the Cross State Air Pollution Rule NO_X Ozone Season Group 2 Trading Program, as specified in 40 CFR Part 97, Subpart EEEEE, and identified in Appendix 10-1. (40 CFR Part 97, Subpart EEEEE)
- 6. The permittee shall comply with the provisions of the Cross State Air Pollution Rule SO₂ Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix 10-1. **(40 CFR Part 97, Subpart CCCCC)**

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 is federally enforceable and was originally established in the consent decree settling, "U.S. v DTE Energy Company, Civil Action No. EPA-5-2018-113(a)-MI-07" and also pursuant to Act 451, Section 324.5503(b), and will remain in effect after termination of the consent decree.

EU-CASCADES EMISSION UNIT CONDITIONS

DESCRIPTION

This emission unit represents coal handling activity in the Cascades room. Coal handling activity emissions are limited by an enclosure, wet dust suppression, wet scrubbers, or baghouse dust collectors.

Flexible Group ID: FG-ProjectPC1-4

POLLUTION CONTROL EQUIPMENT

Cascade room particulate control device (SV-D1), Cascade room particulate control device (SV-D2), Cascade room particulate control device (SV-D4), Cascade room particulate control device (SV-D5), Cascade room particulate control device (SV-D6), enclosures, water sprays, and/or dust suppressants.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating	Equipment	Monitoring/	Underlying
		Scenario		Testing Method	Applicable
					Requirements
1. Opacity	10 percent ^{2, a}	Test protocol will specify averaging time.	Exhaust vents SV-D1, SV-D2, SV-D3	SC VI.2	R 336.1301(1)(c)
2. Opacity	5 percent ^{2, a}	Test protocol will specify averaging time.	Exhaust vents SV-D4, SV-D5, SV-D6	SC VI.2	R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j)
3. PM	0.10 pounds per 1000 pounds of exhaust gases 2, b	Test protocol will specify averaging time	Exhaust vents SV-D1, SV-D2, SV-D3, SV-D4, SV-D5, SV-D6	SC III.2, SC V.3, SC VI.2	R 336.1331(1)
4. PM	0.020 gr / dscf of exhaust gases ^{2, a}	Test protocol will specify averaging time	SV-D1, SV-D2, SV-D3	SC III.2, SC V.3, SC VI.2	R 336.1331(1)(c)
5. PM	0.004 gr / dscf of exhaust gases ^{2, a}	Test protocol will specify averaging time	SV-D4, SV-D5, SV-D6	SC III.2, SC V.3, SC VI.2	R 336.1331(1)(c), R 336.2810, 40 CFR 52.21(j)
6. PM10	5.95 pph ^{2, a}	Test protocol will specify averaging time	SV-D1, SV-D2, SV-D3	SC III.2, SC V.3, SC VI.2	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
7. PM2.5	5.95 pph ^{2, a}	Test protocol will specify averaging time	SV-D1, SV-D2, SV-D3	SC III.2, SC V.1	R 336.2902(2)(c), 40 CFR Part 51, Appendix S
12. PM10	1.19 pph ^{2, a}	Test protocol will specify averaging time	SV-D4, SV-5	SC III.2, SC V.3, SC VI.2	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d) and (j)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
13. PM2.5	1.19 pph ^{2, a}	Test protocol will specify averaging time	SV-D4, SV-D5	SC III.2, SC V.1	R 336.2902(2)(c), 40 CFR Part 51, Appendix S
16. PM10	1.21 pph ^{2, a}	Test protocol will specify averaging time	SV-D6	SC III.2, SC V.3, SC VI.2	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c) (d) and (j)
16. PM2.5	1.21 pph ^{2, a}	Test protocol will specify averaging time	SV-D6	SC III.2, SC V.1	R 336.2902(2)(c), 40 CFR Part 51 (Appendix S)

a - These emission limits apply to each dust collector after that dust collector has been upgraded.

b - This emission limit applies to each dust collector until that dust collector has been upgraded.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-CASCADES unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1371, R 336.1372, R 336.1901, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j), Act 451 Section 324.5524)
- 2. The permittee shall not operate EU-CASCADES unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction. the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any portion of EU-CASCADES unless the associated enclosures, water sprays, or particulate control devices are installed, maintained and operated in a satisfactory manner. The permittee shall equip each upgraded particulate control device with broken bag leak detectors, or an alternative monitoring method, approved in writing by the AQD District Supervisor. Satisfactory manner includes operating and Section 1 DTE Electric Company – Monroe Power Plant Expiration Date:October 16, 2024 PTI No: MI-PTI-B2816-2019

maintaining each control device in accordance with an approved MAP for EU-CASCADES as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

 The permittee shall not operate EU-CASCADES unless the external conveyor hoods or enclosures are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-CASCADES as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d) and (j))

V. <u>TESTING/SAMPLING</u>

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

- The permittee shall verify PM2.5 emission rates from upgraded particulate control devices in EU-CASCADES or a representative emission unit by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 51, Appendix M. 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 336.2001, R 336.2003, R 336.2004, R 336.2902(2)(c), 40 CFR 51 (Appendix S))
- The permittee shall verify the PM2.5 emission rates from EU-CASCADES, at a minimum, once every five years for the next ten years after the modification. (R 336.2001, R 336.2003, R 336.2004, R 336.2902(2)(c), 40 CFR 51 (Appendix S))
- 3. Upon request by AQD, the permittee shall verify PM and PM10 emission rates from upgraded particulate control devices in EU-CASCADES by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10	40 CFR Part 51, Appendix M

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)

4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. (R 336.1213(3), R 336.2001(4))

VI. MONITORING/RECORDKEEPING

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

- The permittee shall keep monitoring records from the upgraded particulate control device's broken bag leak detectors, or alternative monitoring measures, as approved by the AQD District Supervisor on each particulate control device of EU-CASCADES.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))
- 2. If the permittee does not install a bag leak detection system on the upgraded particulate control devices per the alternative monitoring requirements outlined in SC IV.1, the permittee shall perform and document non-certified

visible emissions observations as required in SC I.1 and I.2 on a daily basis when the emission point in EU-CASCADES is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes on that emission point to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by the issuing Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EU-CASCADES.² (R 336.1201(7)(b))
- 5. 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))

See Appendix 8-1

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:

Section 1 DTE Electric Company – Monroe Power Plant ROP No: MI-ROP-B2816-2019 Expiration Date:October 16, 2024 PTI No: MI-PTI-B2816-2019

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-D1	38 ²	200 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
2. SV-D2	38 ²	200 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
3. SV-D3	38 ²	200 2	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
4. SV-D4	38 ²	200 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
5. SV-D5	38 ²	200 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
6. SV-D6	38 ²	200 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This 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).

EU-TRANSFERHS EMISSION UNIT CONDITIONS

DESCRIPTION

This emission unit represents coal handling activity in the Transfer House. Coal handling activity emissions are limited by an enclosure, wet dust suppression, and/or baghouse dust collectors.

Flexible Group ID: FG-ProjectPC1-4

POLLUTION CONTROL EQUIPMENT

Water sprays and dust suppressants are used in this area.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating	Equipment	Monitoring/	Underlying
		Scenario		Testing	Applicable
				Method	Requirements
1. Opacity	5 percent ^{2, a}	Test protocol will specify	Each individual	SC VI.2	R 336.1301(1)(c),
		averaging time	fabric filter in		R 336.2810,
			EU-TRANSFERHS		40 CFR 52.21 (j)
			(vents SV-		
			DC01/DC22, SV-		
			DC02/DC23,		
			SV-DC21, SV-DC15,		
			SV-DC17, SV-DC19)		
2. PM	0.10 pounds	Test protocol will specify	Each individual	SC III.2,	R 336.1331(1)
	per 1000	averaging time	fabric filter in	SC V.3,	
	pounds of		EU-TRANSFERHS	SC VI.2	
	exhaust gases		(vents SV-		
	2, b		DC01/DC22, SV-		
			DC02/DC23,		
			SV-DC21, SV-DC15,		
			SV-DC17)		
3. PM	0.010 gr / dscf	Test protocol will specify	SV-DC01/DC22,	SC III.2,	R 336.1331(1)(c)
	of exhaust	averaging time	SV-DC02/DC23,	SC V.3,	
	gases ^{2, a}		SV-DC21, SV-DC15	SC VI.2	
4. PM	0.020 gr / dscf	Test protocol will specify	SV-DC17,	SC III.2,	R 336.1331(1)(c)
	of exhaust	averaging time	SV-DC19	SC V.3,	
	gases ^{2, a}			SC VI.2	
5. PM10	1.93 pph ^{2, a}	Test protocol will specify	SV-DC01/DC22,	SC III.2,	R 336.2803,
		averaging time	SV-DC02/DC23	SC V.3,	R 336.2804,
				SC VI.2	40 CFR 52.21 (c)
					and (d)
6. PM2.5	1.93 pph ^{2, a}	Test protocol will specify	SV-DC01/DC22,	SC III.2,	R 336.2902(2)(c),
		averaging time	SV-DC02/DC23	SC V.1	40 CFR Part 51,
					Appendix S
9. PM10	1.29 pph ^{2, a}	Test protocol will specify	SV-DC21	SC III.2,	R 336.2803,
		averaging time		SC V.3,	R 336.2804,
				SC VI.2	40 CFR 52.21 (c)
					and (d)

ROP No: MI-ROP-B2816-2019 Expiration Date:October 16, 2024 PTI No: MI-PTI-B2816-2019

Section 1 DTE Electric Company – Monroe Power Plant	E
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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
10. PM2.5	1.29 pph ^{2, a}	Test protocol will specify averaging time	SV-DC21	SC III.2, SC V.1	R 336.2902(2)(c), 40 CFR Part 51, Appendix S
11. PM10	1.54 pph ^{2, a}	Test protocol will specify averaging time	SV-DC15	SC III.2, SC V.3, SC VI.2	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
12. PM2.5	1.54 pph ^{2, a}	Test protocol will specify averaging time	SV-DC15	SC III.2, SC V.1	R 336.2902(2)(c), 40 CFR Part 51, Appendix S
13. PM10	2.40 pph ^{2, a}	Test protocol will specify averaging time	SV-DC17	SC III.2, SC V.3, SC VI.2	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
14. PM2.5	2.40 pph ^{2, a}	Test protocol will specify averaging time	SV-DC17	SC III.2, SC V.1	R 336.2902(2)(c), 40 CFR Part 51, Appendix S
15. PM10	2.74 pph ²	Test protocol will specify averaging time	SV-DC19	SC III.2, SC V.3, SC VI.2	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c) and (d)
16. PM2.5	2.74 pph ²	Test protocol will specify averaging time	SV-DC19	SC III.2, SC V.1	R 336.2902(2)(c), 40 CFR Part 51, Appendix S

a - These emission limits apply to each dust collector after that dust collector has been upgraded or recommissioned.

b - This emission limit applies to each dust collector until that dust collector has been upgraded or recommissioned.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-TRANSFERHS unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1371, R 336.1372, R 336.1901, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j), Act 451 Section 324.5524)
- 2. The permittee shall not operate EU-TRANSFERHS unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor

for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

3. Once the dust collectors for Transfer House 1 and Transfer House 2 have been upgraded or recommissioned, the permittee shall not operate the Transfer House 1 and Transfer House 2 portions of EU-TRANSFERHS for more than 12 hours per calendar day.² (R 336.1205(1)(a), R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate any portion of EU-TRANSFERHS unless the associated enclosures, water sprays, and/or fabric filters are installed, maintained and operated in a satisfactory manner. The permittee shall equip each upgraded or recommissioned fabric filter with broken bag leak detectors, or an alternative monitoring method, approved in writing by the AQD District Supervisor. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-TRANSFERHS as required in SC III.2. (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21 (c), and (d))
- 2. The permittee shall not operate EU-TRANSFERHS unless the external conveyor hoods or enclosures are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-TRANSFERHS as required in SC III.2. (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))

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 PM2.5 emission rates from upgraded or recommissioned dust collectors in EU-TRANSFERHS or a representative emission unit by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 51, Appendix M. 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. ² (R 336.2001, R 336.2003, R 336.2004, 40 CFR 51 (Appendix S))
- 2. The permittee shall verify the PM2.5 emission rates from EU-TRANSFERHS, at a minimum, once every five years for the next ten years after the modification or being recommissioned.² (R 336.2001, R 336.2003, R 336.2004, 40 CFR 51 (Appendix S))
- 3. Upon request by AQD, the permittee shall verify PM and PM10 emission rates from upgraded particulate control devices in EU-TRANSFERHS by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10	40 CFR Part 51, Appendix M

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)

4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. ² (R 336.1213(3), R 336.2001(4))

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 keep monitoring records from the broken bag leak detectors, or alternative monitoring measures, as approved by the AQD District Supervisor on each upgraded fabric filter of EU-TRANSFERHS.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))
- 2. If the permittee does not install a bag leak detection system per the alternative monitoring requirements outlined in SC IV.1, the permittee shall perform and document non-certified visible emissions observations as required in SC I.1 on a daily basis when the emission point in EU-TRANSFERHS is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j))
- 3. Once the dust collectors for Transfer House 1 and Transfer House 2 have been upgraded or recommissioned, the permittee shall keep, in a satisfactory manner, daily records of the Transfer House 1 and Transfer House 2 portions of EU-TRANSFERHS.² (R 336.1205(1)(a), R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by the issuing Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EU-TRANSFERHS.² (R 336.1201(7)(b))
- 5. 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))

See Appendix 8-1

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. SV-DC01/DC22*	55 ²	40 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
2. SV-DC02/DC23*	55 ²	40 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
3. SV-DC21*	51 ²	16 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
4. SV-DC15*	30 ²	50 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
5. SV-DC17*	30 ²	46 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
6. SV-DC19*	30 ²	121 2	R 336.1901, R 336.2803, R 336.2804, 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).

EU-DUMPERHS EMISSION UNIT CONDITIONS

DESCRIPTION

This emission unit represents coal handling activity in the Dumper House. Coal handling activity emissions are limited by an enclosure, wet dust suppression, and/or baghouse dust collectors.

Flexible Group ID: FG-ProjectPC1-4

POLLUTION CONTROL EQUIPMENT

Dumper house dust collector (SV-DC24), enclosures and/or dust suppressants.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Opacity	5 percent ²	Test protocol will specify averaging time	SV-DC24	SC VI.2	R 336.1301(1)(c)
2. PM	0.005 gr / dscf of exhaust gases ²	Test protocol will specify averaging time	SV-DC24	SC III.2, SC V.3, SC VI.2	R 336.1331(1)(c)
3. PM10	6.44 pph ²	Test protocol will specify averaging time	SV-DC24	SC III.2, SC V.3, SC VI.2	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
4. PM2.5	6.44 pph ²	Test protocol will specify averaging time	SV-DC24	SC III.2, SC V.1	R 336.2902(2)(c), 40 CFR Part 51, Appendix S

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-DUMPERHS unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1371, R 336.1372, R 336.1901, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j), Act 451 Section 324.5524)

2. The permittee shall not operate EU-DUMPERHS unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate any portion of EU-DUMPERHS unless the associated enclosures, water sprays, and/or fabric filters are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-DUMPERHS as required in SC III.2. (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))
- The permittee shall not operate EU-DUMPERHS unless the external conveyor hoods are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-DUMPERHS as required in SC III.2. (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

V. TESTING/SAMPLING

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

- The permittee shall verify PM2.5 emission rates from EU-DUMPERHS or a representative emission unit by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 51, Appendix M. 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. ² (R 336.2001, R 336.2003, R 336.2004, 40 CFR 51 (Appendix S))
- The permittee shall verify the PM2.5 emission rates from EU-DUMPERHS, at a minimum, once every five years for the next ten years after the modification on July 12, 2012. ² (R 336.2001, R 336.2003, R 336.2004, 40 CFR 51 (Appendix S))
- Upon request by AQD, the permittee shall verify PM and PM10 emission rates from upgraded particulate control devices in EU-DUMPERHS by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10	40 CFR Part 51, Appendix M

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)

4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. (**R 336.1213(3), R336.2001(4)**)

See Appendix 5-1

VI. MONITORING/RECORDKEEPING

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

- The permittee shall keep monitoring records from the broken bag leak detectors, or alternative monitoring measures, as approved by the AQD District Supervisor on each fabric filter of EU-DUMPERHS.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))
- 2. The permittee shall perform and document non-certified visible emissions observations as required in SC I.1 on a daily basis when the emission point in EU-DUMPERHS is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c))

VII. <u>REPORTING</u>

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

See Appendix 8-1

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. SV-DC24North	48 ²	25 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
2. SV-DC24South	48 2	25 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

NA

<u>Footnotes</u>: 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).

EU-CRUSHERHS EMISSION UNIT CONDITIONS

DESCRIPTION

This emission unit represents coal handling activity in the Crusher House. Coal handling activity emissions are limited by enclosures, wet sprays, and/or dust suppressants. The dust collectors (DC05) in this area have been decommissioned.

Flexible Group ID: FG-ProjectPC1-4

POLLUTION CONTROL EQUIPMENT

Enclosures, wet sprays, or dust suppressants

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable
					Requirements
1. Opacity	5 percent ^{2, a}	Test protocol will specify	Each individual	SC VI.2	R 336.1301(1)(c),
		averaging time	fabric filter in		R 336.2810,
			EU-CRUSHERHS		40 CFR 52.21 (j)
2. PM	0.10 pounds per 1000 pounds of exhaust gases ^{2,} ^b	Test protocol will specify averaging time	EU-CRUSHERHS	SC III.2	R 336.1331(1)
2. PM	0.004 gr / dscf of exhaust gases ^{2,}	Test protocol will specify averaging time	Each individual fabric filter in	SC III.2, SC V.3	R 336.1331, R 336.2810,
	а		EU-CRUSHERHS		40 CFR 52.21 (j)
3. PM10	0.99 pph ^{2, a}	Test protocol will specify averaging time	SV-DC05	SC III.2, SC V.3	R 336.2803, R 336.2804, 40 CFR 52.21 (c), (d) and (j)
4. PM2.5	0.99 pph ^{2, a}	Test protocol will specify averaging time	SV-DC05	SC III.2, SC V.1	R 336.2902(2)(c), 40 CFR Part 51, Appendix S

a - These emission limits apply to each dust collector after that dust collector has been recommissioned.

b - This emission limit applies until the dust collector has been recommissioned.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-CRUSHERHS unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the

permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1371, R 336.1372, R 336.1901, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j), Act 451 Section 324.5524)

2. The permittee shall not operate EU-CRUSHERHS unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate any portion of EU-CRUSHERHS unless the associated enclosures and/or fabric filters are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-CRUSHERHS as required in SC III.2.² (R 336.1901, 336.1910, 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))
- The permittee shall not operate EU-CRUSHERHS unless the external conveyor hoods or enclosures are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-CRUSHERHS as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d) and (j))

V. TESTING/SAMPLING

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

- 1. Within 180 days of the dust collectors being recommissioned, the permittee shall verify the PM2.5 emission rates from EU-CRUSHERHS or a representative emission unit by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 51, Appendix M. 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. ² (R 336.2001, R 336.2003, R 336.2004, 40 CFR 51 (Appendix S))
- The permittee shall verify the PM2.5 emission rates from EU-CRUSHERHS, at a minimum, once every five years for the next ten years after being recommissioned. ² (R 336.2001, R 336.2003, R 336.2004, 40 CFR 51 (Appendix S))
- Upon request by AQD, the permittee shall verify PM and PM10 emission rates from upgraded particulate control devices in EU-CRUSHERHS by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10	40 CFR Part 51, Appendix M

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**)

4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. ² (R 336.1213(3), R 336.2001(4))

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 keep monitoring records from the broken bag leak detectors, or alternative monitoring measures, as approved by the AQD District Supervisor on each fabric filter of EU-CRUSHERHS.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))
- 2. The permittee shall perform and document non-certified visible emissions observations as required in SC I.1 on a daily basis when the emission point in EU-CRUSHERHS is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD. (R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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))
- 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. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by the issuing Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EU-CRUSHERHS.² (R 336.1201(7)(b))
- 5. 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))

See Appendix 8-1

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 with an asterisk (*) indicating a non-vertical discharge:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-DC05*	30 ²	40 ²	R 336.1901, R 336.2803, R 336.2804, 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).

EU-COALUNLOAD EMISSION UNIT CONDITIONS

DESCRIPTION

This emission unit represents the coal unloading activities from Great Lakes ships and includes storage and pile maintenance. Coal handling activity emissions are limited by an enclosures and wet dust suppression methods.

Flexible Group ID: FG-ProjectPC1-4

POLLUTION CONTROL EQUIPMENT

Coal handling activity emissions are limited by an enclosures and wet suppression methods.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Opacity	10 percent ²	Test protocol will specify averaging time	The drop points and transfer points of EU-COALUNLOAD	SC VI.1	R 336.1301(1)(c)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-COALUNLOAD unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1371, R 336.1372, R 336.1901, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j), Act 451 Section 324.5524)
- 2. The permittee shall not operate EU-COALUNLOAD unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate any portion of EU-COALUNLOAD unless the associated enclosures and/or water sprays are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-COALUNLOAD as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))
- The permittee shall not operate EU-COALUNLOAD unless the external conveyor hoods or enclosures are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-COALUNLOAD as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, 336.2804, 40 CFR 52.21 (c) and (d))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

 The permittee shall perform and document non-certified visible emissions observations as required in SC I.1 on a daily basis when EU-COALUNLOAD is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the noncertified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c))

VII. <u>REPORTING</u>

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

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

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).

EU-PETCOKE EMISSION UNIT CONDITIONS

DESCRIPTION

This emission unit represents petroleum coke handling activity, including roadway traffic, ship and rail unloading, and pile maintenance. Emissions are limited by partial enclosures, including a portable wind screen, dust collector, and wet dust suppression.

Flexible Group ID: FG-ProjectPC1-4

POLLUTION CONTROL EQUIPMENT

Partial enclosures, including a portable wind screen, dust collector, and dust suppressants.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Opacity	10 percent ²	Test protocol will specify averaging time	The drop points, transfer points, and emission points of EU-PETCOKE	SC VI.1	R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-PETCOKE unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² R 336.1371, R 336.1372, R 336.1901, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j), Act 451 Section 324.5524)
- 2. The permittee shall not operate EU-PETCOKE unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction. the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

3. The permittee shall not operate the wheeled traffic portion of EU-PETCOKE for more than 16 hours per calendar day.² (R 336.1205(1)(a), R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate any portion of EU-PETCOKE unless the associated partial enclosures and water sprays are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-PETCOKE as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))
- The permittee shall not operate EU-PETCOKE unless the enclosures are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-PETCOKE as required in SC III.2. ² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d) and (j))
- The permittee shall not operate the haul truck activities associated with EU-PETCOKE unless the wheel wash system is installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-PETCOKE as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d) and (j))

V. <u>TESTING/SAMPLING</u>

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

NA

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 perform and document non-certified visible emissions observations as required in SC I.1 on a daily basis when the emission point in EU-PETCOKE is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j))
- 2. The permittee shall keep, in a satisfactory manner, daily records of the hours of operation of the wheeled traffic portion of EU-PETCOKE.² (R 336.1205(1)(a), R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))

VII. <u>REPORTING</u>

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

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

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).
EU-LIMESTONE EMISSION UNIT CONDITIONS

DESCRIPTION

This emission unit represents limestone and limestone slurry handling activities and includes the ship unloading process, storage and pile maintenance, and reclaim activities - including any trucking activities, and the Prep building. Limestone handling activity emissions are limited by enclosures, wet dust suppression methods, or bin vent filters.

Flexible Group ID: FG-ProjectPC1-4

POLLUTION CONTROL EQUIPMENT

Three silos, each with a bin vent filter (SV-26A1, SV-26A2, and SV26A3). Limestone handling activity emissions are limited by enclosures, wet suppression methods, or bin vent filters.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating	Equipment	Monitoring/	Underlying
		Scenario		Testing	Applicable
				Method	Requirements
1. Opacity	10 percent ²	Test protocol will specify	Any exterior drop	SC VI.1	R 336.1301(1)(c),
		averaging time	points and transfer		R 336.2810,
			points of		40 CFR 52.21 (j),
			EU-LIMESTONE		40 CFR 60.672(b)
2. Opacity	5 percent ²	Test protocol will specify	The bin vent filters	SC VI.1	R 336.1301(1)(c),
		averaging time	in EU-LIMESTONE		R 336.2810,
			(SV-26A1, SV-		40 CFR 52.21 (j),
			26A2, and SV26A3)		40 CFR
					60.672(a)(2)
3. PM	0.004 gr / dscf	Test protocol will specify	SV-26A1,	SC III.2,	R 336.1331,
	of exhaust	averaging time	SV-26A2,	SC VI.1	R 336.2810, 40
	gases ²		SV26A3		CFR 52.21 (j)
4. PM10	0.0046pph ²	Test protocol will specify	SV-26A1,	SC III.2,	R 336.2803,
		averaging time	SV-26A2,	SC VI.1	R 336.2804,
			SV26A3		R 336.2810,
					40 CFR 52.21 (c),
					(d) and (j)
5. PM2.5	0.0046 pph ²	Test protocol will specify	SV-26A1,	SC III.2,	R 336.2902(2)(c),
		averaging time	SV-26A2,	SC VI.1	40 CFR Part 51,
			SV26A3		Appendix S

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-LIMESTONE unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive

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dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1371, R 336.1372, R 336.1901, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j), Act 451 Section 324.5524)

2. The permittee shall not operate EU-LIMESTONE unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP and any amendments to the MAP to the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate any portion of EU-LIMESTONE unless the associated pollution control equipment is installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-LIMESTONE as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))
- The permittee shall not operate EU-LIMESTONE unless the external conveyor hoods are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-LIMESTONE as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d) and (j))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- The permittee shall perform and document non-certified visible emissions observations as required in SC I.1 and SC I.2 on a daily basis when the emission point in EU-LIMESTONE is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j), 40 CFR 60.676))
- 2. Permittee shall maintain and operate two PM10 ambient air monitors, one at the existing east monitoring site located at the edge of the plant property at the shore of Lake Erie, and the other at the DTE Electric monitoring station which is located at the end of Dunbar Road.² (R 336.1201(3))

VII. <u>REPORTING</u>

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

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- 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. Data from the two PM10 ambient air monitors shall be provided to the AQD within 30 days following the end of the month in which the data were collected. If there is any sampling data over 150 ug/m³ (24-hour value after rounding to the nearest 10 ug/m³), the facility shall include a summary of the that data, the investigation, and the corrective action taken.² (**R 336.1201(3)**, **R 336.1213(3)**)

See Appendix 8-1

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 with an asterisk (*) indicating a non-vertical discharge:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-26A1*	12 ²	115 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
2. SV-26A2*	12 ²	115 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
3. SV-26A3*	12 ²	115 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

 The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and OOO, as they apply to EU-LIMESTONE.² (40 CFR Part 60, Subparts A and OOO)

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).

EU-GYPSUMHAND EMISSION UNIT CONDITIONS

DESCRIPTION

This emission unit represents gypsum handling activity in the gypsum dewatering building and the gypsum storage and loading building. Gypsum handling activity emissions are limited by a building enclosure.

Flexible Group ID: FG-ProjectPC1-4

POLLUTION CONTROL EQUIPMENT

Loading operations take place in a building.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Opacity	7 percent ²	Test protocol will specify averaging time	The gypsum storage and handling building portion of EU-GYPSUMHAND	SC VI.1	R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j), 40 CFR 60.672(e)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-GYPSUMHAND unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1371, R 336.1372, R 336.1901, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j), Act 451 Section 324.5524)
- 2. The permittee shall not operate EU-GYPSUMHAND unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

3. The permittee shall not operate the haul truck activities associated with EU-GYPSUMHAND for more than 16 hours per calendar day.² (R 336.1205(1)(a), R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate EU-GYPSUMHAND unless the associated enclosures are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-GYPSUMHAND as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d) and (j))
- The permittee shall not operate the haul truck activities associated with EU-GYPSUMHAND unless the wheel wash system is installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-GYPSUMHAND as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d) and (j))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- The permittee shall perform and document non-certified visible emissions observations as required in SC I.1 on a daily basis when EU-GYPSUMHAND is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the noncertified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j), 40 CFR 60.676)
- The permittee shall keep, in a satisfactory manner, daily records of the hours of operation for the haul truck activities associated with EU-GYPSUMHAND.² (R 336.1205(1)(a), R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))

VII. <u>REPORTING</u>

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

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

 The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and OOO, as they apply to EU-GYPSUMHAND.² (40 CFR Part 60, Subparts A and OOO)

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).

EU-HYDRATEDLIME EMISSION UNIT CONDITIONS

DESCRIPTION

Storage and handling of hydrated lime. Hydrated lime is delivered via truck to facility for silo storage.

Flexible Group ID: FG-ProjectPC1-4

POLLUTION CONTROL EQUIPMENT

Bin vent filters (SV-26B1 and SV-26B2) on each of the two silos, enclosures and dust suppressants.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Opacity	10 percent ²	Test protocol will specify averaging time	Any exterior drop points and transfer points of EU- HYDRATEDLIME	SC VI.1	R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j)
2. Opacity	5 percent ²	Test protocol will specify averaging time	The bin vent filter in EU- HYDRATEDLIME (SV-26B1 and SV- 26B2)	SC VI.1	R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j)
3. PM	0.004 gr / dscf of exhaust gases ²	Test protocol will specify averaging time	SV-26B1 and SV- 26B2	SC III.2, SC VI.1	R 336.1331, R 336.2810, 40 CFR 52.21 (j)
4. PM10	0.045 pph ²	Test protocol will specify averaging time	SV-26B1 and SV- 26B2	SC III.2, SC VI.1	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d) and (j)
5. PM2.5	0.045 pph ²	Test protocol will specify averaging time	SV-26B1 and SV- 26B2	SC III.2, SC VI.1	R 336.2902(2)(c), 40 CFR Part 51, Appendix S

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-HYDRATEDLIME unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective

procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1371, R 336.1372, R 336.1901, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j), Act 451 Section 324.5524)

2. The permittee shall not operate EU-HYDRATEDLIME unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

IV. DESIGN/EQUIPMENT PARAMETER(S)

 The permittee shall not operate any portion of EU-HYDRATEDLIME unless the pollution control equipment is installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-HYDRATEDLIME as required in SC III.2.² (R 336.1901, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21 (c), (d), and (j))

V. TESTING/SAMPLING

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

NA

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 perform and document non-certified visible emissions observations as required in SC I.1 and SC I.2 on a daily basis when EU-HYDRATEDLIME is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c), R 336.2810, 40 CFR 52.21 (j))

VII. <u>REPORTING</u>

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

See Appendix 8-1

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 with an asterisk (*) indicating a non-vertical discharge:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-26B1*	18 ²	89 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
2. SV-26B2*	18 ²	89 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This 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).

EU-FlyAshStorage EMISSION UNIT CONDITIONS

DESCRIPTION

A fly ash storage facility. The facility consists of two 75-ton surge silos (Nos. 1 and 2), a 3000-ton storage silo, a 200-ton load-out silo, and associated blowers, pressure pumps, compressors, pipe conveyor lines, and spouts.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Two filter receivers (Nos. FR-101 and FR-102) and bin vent filter (BH-101) on surge silo No. 1, two filter receivers (Nos. FR-201 and FR-202) and bin vent filter (BH-201) on surge silo No. 2, bin vent filter (BH-301) on the storage silo, and bin vent filter (BH-401) on the load-out silo.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.026 lbs. per 1000 lbs. of exhaust gases *, ^{2, 3}	Test protocol will specify averaging time	EU-FlyAshStorage	SC VI.1	R 336.1331
2. PM-10	0.3 Pounds Per Hour ^{2, 4}	Test protocol will specify averaging time	Each filter receiver portion of EU-FlyAshStorage	SC VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
3. PM-10	0.05 Pounds Per Hour ^{2, 5}	Test protocol will specify averaging time	The surge silo No. 1 portion and the surge silo No. 2 portion of EU-FlyAshStorage	SC VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
4. PM-10	1.4 Pounds Per Hour ²	Test protocol will specify averaging time	The storage silo portion of EU-FlyAshStorage	SC VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
5. PM-10	0.35 Pounds Per Hour ²	Test protocol will specify averaging time	The load-out silo portion of EU-FlyAshStorage	SC VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
6. Opacity	10% ²	6-minute average	Each of the eight exhaust stack portions of EU-FlyAshStorage	SC VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

The 0.026 pounds per 1000 pounds of exhaust gas limit is a concentration limit that applies independently to each of the eight exhaust stacks associated with EU-FlyAshStorage.

⁴ The 0.3 pounds per hour limit is a mass limit that applies independently to each of the four filter receivers and shall be determined from stacks SVFR-101, SVFR-102, SVFR-201, and SVBH-202.

The 0.05 pounds per hour limit is a mass limit that applies independently to each of the two surge silos and shall be determined from stacks SVBH-101 and SVBH-201.

Calculated on a dry gas basis.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall not operate EU-FlyAshStorage unless a program for continuous fugitive emissions control for all plant roadways, the plant yard, and all material handling operations approved by the AQD District Supervisor has been implemented and is maintained.² (R 336.1225, R 336.1371, R 336.1372, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d), Act 451 324.5524)
- 2. The permittee shall not maintain any outside fly ash storage piles in conjunction with EU-FlyAshStorage.² (R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not load material into the surge silo No. 1 portion of EU-FlyAshStorage unless the two filter receivers (Nos. FR-101 and FR-102) are installed, maintained, and operated in a satisfactory manner.² (R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
- The permittee shall not transfer material out of the surge silo No. 1 portion of EU-FlyAshStorage unless the bin vent filter (BH-101) is installed, maintained, and operated in a satisfactory manner.² (R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
- 3. The permittee shall not load material into the surge silo No. 2 portion of EU-FlyAshStorage unless the two filter receivers (Nos. FR-201 and FR-202) are both installed, maintained, and operated in a satisfactory manner.² (R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
- The permittee shall not transfer material out of the surge silo No. 2 portion of EU-FlyAshStorage unless the bin vent filter (BH-201) is installed, maintained, and operated in a satisfactory manner.² (R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
- The permittee shall not operate the storage silo portion of EU-FlyAshStorage unless the bin vent filter (BH-301) is installed, maintained, and operated in a satisfactory manner.² (R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
- The permittee shall not operate or transfer material out of the load-out silo portion of EU-FlyAshStorage unless the bin vent filter (BH-401) is installed, maintained, and operated in a satisfactory manner.² (R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

 The permittee shall perform and document non-certified visible emissions observations from each of the eight exhaust stacks associated with EU-FlyAshStorage once per week when the emission unit is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD. (R 336.1213(3))

VII. <u>REPORTING</u>

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

See Appendix 8-4

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 with an asterisk (*) indicating a non-vertical discharge:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVFR-101 *, ²	NA	45	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SVFR-102 *, ²	NA	45	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
3. SVBH-101 *, ²	NA	45	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
4. SVFR-201 *, ²	NA	45	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
5. SVFR-202 *, ²	NA	45	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
6. SVBH-201 *, ²	NA	45	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
7. SVBH-301 *, ²	NA	92	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
8. SVBH-401 *, ²	NA	94	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This 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
FG-ProjectPC1-4	The project increased the capacity to use subbituminous	EU-UNIT1,
	coal and added petroleum coke to provide additional	EU-UNIT2,
	fuels for Units 1, 2, 3, and 4; installed four (4) wet FGD	EU-UNIT3,
	quench pumps; modifications to the fuel handling	EU-UNIT4,
	systems; the installed new material handling systems for	EU-WFGD-QP1,
	limestone and gypsum; and installed of a new fuel	EU-WFGD-QP2,
	handling system for petroleum coke. This resulted in a	EU-WFGD-QP3,
	minor nonattainment source modification by use of the	EU-WFGD-QP4,
	actual-to-projected-actual applicability test.	EU-CASCADES,
		EU-TRANSFERHS,
		EU-DUMPERHS,
		EU-COALUNLOAD,
		EU-CRUSHERHS,
		EU-PETCOKE,
		EU-LIMESTONE,
		EU-GYPSUMHAND, and
		EU-HYDRATEDLIME
FG-COALBLRCAM	Specifies CAM requirements for coal-fired boilers	EU-UNIT1,
		EU-UNIT2,
		EU-UNIT3,
		EU-UNIT4,
FGAUXBOILERS	Requirements for existing Boilers and Process Heaters	EU-NORTHAUX,
	at major sources of Hazardous Air Pollutants per	EU-SOUTHAUX
	40 CFR Part 63, Subpart DDDDD which qualify as	
	"limited use" units. "Limited use boilers or process	
	heaters" as defined in 40 CFR 63.7575 burn any amount	
	of solid, liquid, or gaseous fuels and have a federally	
	enforceable average annual capacity factor of no more	
	than 10 percent.	
FG-WFGD-QP1&2	Quench Pump 1 servicing the Unit 3 stack and Quench	EU-WFGD-QP1,
	Pump 2 servicing the Unit 4 stack	EU-WFGD-QP2
FG-WFGD-QP3&4	Quench Pump 3 servicing the Unit 1 stack and Quench	EU-WFGD-QP3,
	Pump 4 servicing the Unit 2 stack	EU-WFGD-QP4
FG-PARTSCLNRS	Any cold cleaner that is grandfathered or exempt from	EU-PARTSCLNRS
	Rule 201 pursuant to Rule 278, 278a and Rule	
	281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners	
	were placed into operation prior to July 1, 1979. New	
	cold cleaners were placed into operation on or after	
	July 1, 1979.	

ROP No: MI-ROP-B2816-2019

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-MESBLDG	Two (2) existing, 6.3 MMBtu/hr, heating boilers, subject to 40CFR63, Subpart DDDDD. Boilers are exempt from Michigan Rule 201 permit requirements pursuant to Rule 278 & Rule 282(2)(b)	EU-BLR1_MESB EU-BLR2_MESB
FG-EMERGENS	Onsite, stationary, emergency engines exempt from Rule 201 pursuant to Rule 278 and Rule 285(2)(g). Emergency engines are subject to 40 CFR 63 Subpart ZZZZ.	EU-FIREPUMP
FGMATS	40 CFR Part 63, Subpart UUUUU (a.k.a. Mercury and Air Toxics Standards or MATS) requirements for existing coal-fired electric utility steam generating unit(s) (EGU) rated more than 25 megawatts electric (MWe) that serve(s) a generator producing electricity for sale and designed to burn coal that is not low rank virgin coal (calorific value of \geq 8,300 Btu/pound).	EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4
FG-NSPS4I	Onsite, stationary, non-emergency engines exempt from Rule 201 pursuant to Rule 278 and Rule 285(2)(g). Engines are subject to 40 CFR Part 60, Subpart IIII and subject to 40 CFR 63 Subpart ZZZZ.	EU-NSPS4iEngines

ROP No: MI-ROP-B2816-2019 PTI No: MI-PTI-B2816-2019

FG-ProjectPC1-4 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

The project increased the capacity to use subbituminous coal and added petroleum coke to provide additional fuels for Units 1, 2, 3, and 4; installed four (4) wet FGD guench pumps; modifications to the fuel handling systems; the installed new material handling systems for limestone and gypsum; and installed of a new fuel handling system for petroleum coke. This resulted in a minor nonattainment source modification by use of the actual-to-projected-actual applicability test.

Emission Units: EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4, EU-WFGD-QP1, EU-WFGD-QP2, EU-WFGD-QP3, EU-WFGD-QP4, EU-CASCADES, EU-TRANSFERHS, EU-DUMPERHS, EU-COALUNLOAD, EU-CRUSHERHS, EU-PETCOKE, EU-LIMESTONE, EU-GYPSUMHAND, and EU-HYDRATEDLIME

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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 five years. (R 336.1213(3)(b)(ii))

NA

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 calculate and keep records of PM2.5 and SO₂ emissions from EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4, EU-WFGD-QP1, EU-WFGD-QP2, EU-WFGD-QP3, and EU-WFGD-QP4 in tons per calendar year. The recordkeeping period shall begin on the first day of the month during which EU-UNIT3 and EU-UNIT4 commence operation (after the modification) and continue for consecutive calendar months. The calculations and records shall be kept in the format described in Appendix 4-1, or an alternative format acceptable to the AQD Permit Section Supervisor. The requirement to calculate and keep records shall end ten years after EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4, EU-WFGD-QP1, EU-WFGD-QP2, EU-WFGD-QP3, and EU-WFGD-QP4 complete the modification as approved by the AQD Permit Section Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2902(2)(c), 40 CFR Part 51, Appendix S)
- 2. The permittee shall calculate and keep records of PM2.5 emissions from EU-CASCADES, EU-TRANSFERHS, EU-DUMPERHS, EU-COALUNLOAD, EU-CRUSHERHS, EU-PETCOKE, EU-LIMESTONE, EU-

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GYPSUMHAND, and EU-HYDRATEDLIME in tons per calendar year. The recordkeeping period shall begin on the first day of the month during which EU-CASCADES, EU-TRANSFERHS, EU-DUMPERHS, EU-COALUNLOAD, EU-CRUSHERHS, EU-PETCOKE, EU-LIMESTONE, EU-GYPSUMHAND, and EU-HYDRATEDLIME commence operation (after the modification) and continue for consecutive calendar months. The calculations and records shall be kept in the format described in Appendix 4-1, or an alternative format acceptable to the AQD Permit Section Supervisor. The requirement to calculate and keep records shall end ten years after EU-CASCADES, EU-TRANSFERHS, EU-DUMPERHS, EU-COALUNLOAD, EU-CRUSHERHS, EU-PETCOKE, EU-LIMESTONE, EU-GYPSUMHAND, and EU-HYDRATEDLIME completes the modification or installation as approved by the AQD Permit Section Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2902(2)(c), 40 CFR Part 51, Appendix S)

See Appendix 4-1

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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))
- 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 records of PM2.5 and SO₂ emissions from FG-ProjectPC1-4 in tons per calendar year to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of each calendar year identified in FG-ProjectPC1-4, SC VI.2 and SC VI.3. In addition, the records shall identify the following:
 - a. Exceedances of the yearly actual emission of PM2.5 and SO₂ above the baseline actual emissions (BAE) by a significant amount, and
 - b. Identify if the year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test used for FG-ProjectPC1-4.

The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to FG-ProjectPC1-4, SC VI.2 and SC VI.3, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (**R** 336.2902(2)(c), 40 CFR Part 51, Appendix S)

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

FG-COALBLRCAM FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group consists of emission units that use a control device to achieve compliance with a federally enforceable emission limitation or standard for PM10, lead, and HF through Presumptively Acceptable Monitoring (PAM) and are subject to 40 CFR Part 64 CAM because pre-controlled emissions are greater than 100 tons.

Emission Unit: EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4

POLLUTION CONTROL EQUIPMENT

Low-NOx burners, overfire air, REF sorbent system, selective catalytic reduction (SCR), dry wire electrostatic precipitators (ESP), and wet flue gas desulfurization (FGD).

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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 five years. (R 336.1213(3)(b)(ii))

NA

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. Permittee shall utilize PM CEMS as an indicator of compliance with the PM10 and lead emission rate limits in Tables EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4. The indicator of a CAM excursion for PM10 and lead's emission rate (lbs./TBtu) shall be defined as the 24 hour rolling average updated at the end of each boiler operating hour, exceeding 0.011 lbs. PM / mmBtu, as measured by PM CEMS and recorded by the DAHS, except for monitoring system malfunctions, system repairs, and QA activities. The monitor shall be calibrated quarterly. (40 CFR 64.6(c)(1)(i) and (ii), 40 CFR 64.6(c)(2), 40 CFR 64.7(c))
- 2. Permittee shall utilize SO2 CEMS as an indicator of compliance with the SC I.17 hydrogen fluoride emission rate limits (lbs./TBtu) in Tables EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4. The indicator of a CAM excursion shall be defined as the 30-boiler operating day, rolling arithmetic average updated at the end of each boiler operating day, exceeding 0.107 lbs./mmBtu, as measured by SO2 CEMS and recorded by the DAHS,

except for monitoring system malfunctions, system repairs, and QA activities. The monitor shall be calibrated daily. (40 CFR 64.6(c)(1)(i) and (ii), 40 CFR 64.6(c)(2), 40 CFR 64.7(c))

- 3. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). (40 CFR 64.7(d))
- 4. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 64.6(c)(3), 40 CFR 64.7(c))
- 5. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. (40 CFR 64.7(b))
- 6. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. (40 CFR 64.9(b)(1))
- 7.

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. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. (40 CFR 64.9(a)(2)(i))
- 5. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. (40 CFR 64.9(a)(2)(ii))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)
- 2. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. (40 CFR 64.7(e))

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).

FG-AUXBOILERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for existing Boilers and Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD which qualify as "limited use" units. "Limited use boilers or process heaters" as defined in 40 CFR 63.7575 burn any amount of solid, liquid, or gaseous fuels and have a federally enforceable average annual capacity factor of no more than 10 percent.

Emission Units: EU-NORTHAUX, EU-SOUTHAUX

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	33.3 pph per boiler ²	Test protocol will specify averaging time	EU-NORTHAUX, EU-SOUTHAUX	SC VI.2, SC VI.4	R 336.2804, 40 CFR 52.21(d)
2. SO2	0.33 pph per boiler ²	Test protocol will specify averaging time	EU-NORTHAUX, EU-SOUTHAUX	SC VI.2, SC VI.3, SC VI.4	R 336.1401, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirement
1. % Sulfur in diesel fuel	15 ppm ²	Sampling Protocol	FG-AUXBOILERS	SC VI.3	R 336.1401, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)
2. Diesel Oil	10 % annual capacity factor on oil ^{2, a, b}	Calendar Year	Each boiler: EU-NORTHAUX, EU-SOUTHAUX	SC VI.4	40 CFR 63.7555(a)(3)

^{a -} This limit is to satisfy the federally enforceable capacity factor limit associated with the limited use designation under **40 CFR 63.7555**.

• Annual capacity factor means the ratio between the actual heat input to a boiler or process heater from the fuels burned during a calendar year to the potential heat input to the boiler or process heater had it been operated for 8,760 hours during a year at the maximum steady state design heat input capacity. (40 CFR 63.7575)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not burn any fuel in the two auxiliary boilers other than diesel oil without prior notification to and approval by the AQD.² (R 336.1201(3))
- 2. 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))
- 3. Limited-use boilers and process heaters must complete a tune-up every 5 years (no more than 61 months after the previous tune-up) as specified in 40 CFR 63.7515(d) and 63.7540(a)(10). If the boiler is not operating on the required date for tune-up, the tune-up must be conducted within 30 calendar days of startup. They are not subject to the emission limits in Tables 1 and 2 or 11 through 13 to this subpart, the annual tune-up, or the energy assessment requirements in Table 3 to this subpart, or the operating limits in Table 4 to this subpart. (40 CFR 63.7500(c), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(13))
- 4. The permittee shall conduct tune up of the boilers as specified in the following: (40 CFR 63.7540(a)(10)(i through vi), 40 CFR 63,7540(a)(12))
 - a. 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 the tune up or may delay the burner inspection until the next unit shutdown but each burner must be inspected at least once every 5 years (no more than 61 months after the previous tune-up).
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern.
 - c. 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 unit shutdown).
 - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOx requirement to which the unit is subject.
 - e. 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.
 - Maintain on-site and submit, if requested by the Administrator, a report containing the following information: f.
 - i 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;
 - ii. A description of any corrective actions taken as a part of the tune-up.

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))

NA

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 complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1401, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))

- 2. The permittee shall record the monthly fuel oil usage rates in gallons.² (R 336.1401, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d), 40 CFR 63.7525(k))
- 3. The permittee shall maintain a record of the analysis of the fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil.² (R 336.1401, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
- 4. The permittee shall monitor and record in a satisfactory manner, the monthly hours of operation for each auxiliary boiler in FG-AUXBOILERS. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request.² (R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
- 5. The permittee shall monitor and record, in a satisfactory manner, the actual heat input of fuel burned in each auxiliary boiler in FG-AUXBOILERS on a calendar year basis. **(40 CFR 63.7555)**
- For each calendar year, the permittee shall calculate the annual capacity factor for each auxiliary boiler in FG-AUXBOILERS, which is the ratio between the actual heat input from fuel burned to the potential heat input to the boiler or process heater had it been operated for 8,760 hours during a year at the maximum steady state design heat input capacity. (40 CFR 63.7555, 40 CFR 63.7575)
- 7. The permittee must keep records below. (40 CFR 63.7555(a))
 - a. A copy of each notification and report that is submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that permittee submitted, according to the requirements in 40 CFR Part 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 Part 63.10(b)(2)(viii). (40 CFR 63.7555(a)(2))
 - c. For units in the limited use subcategory, the permittee must keep a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent and fuel use records for the days the boiler or process heater was operating. **(40 CFR 63.7555(a)(3))**
- 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))
- 9. 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))
- 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. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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 and in Subpart A of 40 CFR Part 63. (40 CFR 63.7495(d))
- 5. If the permittee has switched fuels or made a physical change to the boiler 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 in accordance with 40 CFR 63.745(h)(1) through (3). **(40 CFR 63.7545(a), 40 CFR 63.7545(h), 40 CFR 63.9(h))**
- 6. The permittee must submit boiler tune-up compliance reports. The first compliance report shall cover the period January 31, 2016 through December of the year in which the compliance tune-up was completed and must be postmarked or submitted no later than March 15th of the reporting year that immediately follows the year in which the tune-up was completed. Subsequent compliance reports must be postmarked or submitted by March 15th of the year following the compliance tune-up and must cover the applicable period starting from January 1 of the year following the previous tune-up to December 31 (of the latest tune-up year). Compliance reports must be submitted using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to the state and EPA Region 5. At the discretion of the Administrator, the permittee must submit these reports in the format specified by the Administrator. (40 CFR 63.7550(b), 40 CFR 63.10(a)(5), 40 CFR 63.7550(h)(3))
- 7. The permittee must include the following information in the compliance report per 40 CFR 63.7550(c)(1):
 - a. Company and Facility name and address. (40 CFR 63.7550(c)(5)(i))
 - b. Process unit information, emissions limitations, and operating parameter limitations. (40 CFR 63.7550(c)(5)(ii))
 - c. Date of report and beginning and ending dates of the reporting period. (40 CFR 63.7550(c)(5)(iii))
 - d. The total operating time during the reporting period. (40 CFR 63.7550(c)(5)(iv))
 - Include the date of the most recent tune-up for each unit subject to only the requirement to conduct a 5-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.5.I. Include the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv))
 - f. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.7550(c)(5)(xvii))**

See Appendix 8-1

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. SV015-003	108 ²	231 ²	R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)

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 this subpart 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))
- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters as specified in 40 CFR Part 63, Subparts A and DDDDD (Boiler MACT). (R 336.1213(3), 40 CFR Part 63, Subparts, A and DDDDD)

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).

FG-WFGD-QP1&2 **FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Two 252 hp diesel fuel-fired FGD quench pumps and two 350-gallon elevated storage tanks for diesel fuel with Quench Pump 1 servicing the Unit 3 stack and Quench Pump 2 servicing the Unit 4 stack.

Emission Units: EU-WFGD-QP1, EU-WFGD-QP2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Opacity	20 percent ²	6-minute average except one 6-minute average per hour of not more than 27 percent	EU-WFGD-QP1, EU-WFGD-QP2	SC III.1	R 336.1301(1)(c), R 336.2810, 40 CFR 52.21(j)
2.	PM	0.40 g/hp-hr ²	Test protocol will specify averaging time	EU-WFGD-QP1, EU-WFGD-QP2	SC III.1, 40 CFR 60.4211(c)	R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4205(c)
3.	PM10	0.40 g/hp-hr ²	Test protocol will specify averaging time	EU-WFGD-QP1, EU-WFGD-QP2	SC III.1	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j)
4.	PM2.5	0.40 g/hp-hr ²	Test protocol will specify averaging time	EU-WFGD-QP1, EU-WFGD-QP2	SC III.1	R 336.2902(2)(c), 40 CFR Part 51, Appendix S
5.	NMHC + NOx	7.80 g/hp-hr ²	Test protocol will specify averaging time	EU-WFGD-QP1, EU-WFGD-QP2	SC III.1, 40 CFR 60.4211(c)	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j), 40 CFR 60.4205(c)
6.	CO	2.60 g/hp-hr ²	Test protocol will specify averaging time	EU-WFGD-QP1, EU-WFGD-QP2	SC III.1, 40 CFR 60.4211(c)	R 336.2804, R 336.2810, 40 CFR 52.21(d) and (j), 40 CFR 60.4205(c)

II. MATERIAL LIMIT(S)

1. The permittee shall only burn diesel fuel with a maximum sulfur content of 15 ppm in FG-WFGD-QP1&2.2 (R 336.1205(1)(a) and (1)(b), R 336.1401, R 336.2803, R 336.2804, R 336.2810, R 336.2902(2)(c), 40 CFR Part 51, Appendix S, 40 CFR 52.21(c), (d), and (j), 40 CFR 60.4207)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall operate and maintain FG-WFGD-QP1&2 according to the manufacturer's written instructions or procedures that are approved by the manufacturer to ensure compliance with the applicable emission standards in 40 CFR 60.4205(c).² (R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4205(c), 40 CFR 60.4206, 40 CFR 60.4211)
- 2. The permittee shall not operate each engine in FG-WFGD-QP1&2 for more than 30 minutes per hour, nor a total of 200 hours at full load equivalent rate per 12-month rolling time period as determined at the end of each calendar month.2 (R 336.2804, R 336.2810, 40 CFR 52.21(d), 40 CFR 52.21(j))
- 3. NSPS, Subpart III allows emergency engines to operate up to 100 hours per year for maintenance checks and readiness testing. The permittee may petition for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. (40 CFR 60.4211(f)(2))
- 4. The permittee shall not change or revise the operating instructions, procedures or settings for FG-WFGD-QP1&2 unless permitted by the manufacturer in writing.² (40 CFR 60.4211)
- 5. If the permittee does not install, configure, operate, and maintain EU-WFGD-QP1 and EU-WFGD-QP2 and their respective control device according to the manufacturer's emission-related written instructions, or change emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:
 - a. Must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - b. In addition, if the permittee does not install and configure the engine and control device according to the manufacturer's emission-related written instructions or change the emission-related settings in a way that is not permitted by the manufacturer, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each engine in FG-WFGD-QP1&2 with a non-resettable hour meter to track the number of minutes and hours the engine operates.² (R 336.2804, R 336.2810, 40 CFR 52.21(d), 40 CFR 52.21(j), 40 CFR 60.4209(a))

V. TESTING/SAMPLING

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

NA

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 in a satisfactory manner, the hours of operation of FG-WFGD-QP1&2. The record shall include the time and duration of operation, and the reason the engine was in operation. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2804, R 336.2810, 40 CFR 52.21(d), 40 CFR 52.21(j), 40 CFR 60.4214(b))
- 2. The permittee shall keep records, in a satisfactory manner, of the fuel supplier certification and/or analysis including the sulfur content in ppm for each delivery of the diesel fuel oil.² (R 336.1401, R 336.2803, R 336.2804, R 336.2810, R 336.2902(2)(c), 40 CFR Part 51, Appendix S, 40 CFR 52.21(c), (d), and (j))

VII. REPORTING

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

See Appendix 8-1

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. SV-WFGD-QP1	6 ²	34 ²	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)
2. SV-WFGD-QP2	6 ²	34 2	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

- The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and IIII, as they apply to FG-WFGD-QP1&2.² (40 CFR Part 60, Subparts A and IIII)
- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines. The permittee shall meet the requirements of 40 CFR Part 63 Subpart ZZZZ by meeting the requirements of 40 CFR Part 60 Subpart IIII.² (40 CFR Part 63, Subparts A and ZZZZ, 40 CFR 63.6590(c)(7))

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).

FG-WFGD-QP3&4 **FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Two 252 hp diesel fuel-fired FGD quench pumps and two 350-gallon elevated storage tanks for diesel fuel with Quench Pump 3 servicing the Unit 1 stack and Quench Pump 4 servicing the Unit 2 stack.

Emission Units: EU-WFGD-QP3, EU-WFGD-QP4

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Opacity	20 percent ²	6-minute average except one 6-minute average per hour of not more than 27 percent	EU-WFGD-QP3, EU-WFGD-QP4	SC III.1	R 336.1301(1)(c), R 336.2810, 40 CFR 52.21(j)
2.	РМ	0.15 g/hp-hr ²	Test protocol will specify averaging time	EU-WFGD-QP3, EU-WFGD-QP4	SC III.1, 40 CFR 60.4211(c)	R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4205(c)
3.	PM10	0.15 g/hp-hr ²	Test protocol will specify averaging time	EU-WFGD-QP3, EU-WFGD-QP4	SC III.1	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j)
4.	PM2.5	0.15 g/hp-hr ²	Test protocol will specify averaging time	EU-WFGD-QP3, EU-WFGD-QP4	SC III.1	R 336.2902(2)(c), 40 CFR Part 51, Appendix S
5.	NMHC + NOx	3.00 g/hp-hr ²	Test protocol will specify averaging time	EU-WFGD-QP3, EU-WFGD-QP4	SC III.1, 40 CFR 60.4211(c)	R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c), (d), and (j), 40 CFR 60.4205(c)
6.	со	2.60 g/hp-hr ²	Test protocol will specify averaging time	EU-WFGD-QP3, EU-WFGD-QP4	SC III.1, 40 CFR 60.4211(c)	R 336.2804, R 336.2810, 40 CFR 52.21(d) and (j), 40 CFR 60.4205(c)

II. MATERIAL LIMIT(S)

1. The permittee shall only burn diesel fuel with a maximum sulfur content of 15 ppm in FG-WFGD-QP3&4.2 (R 336.1205(1)(a) and (1)(b), R 336.1401, R 336.2803, R 336.2804, R 336.2810, R 336.2902(2)(c), 40 CFR Part 51, Appendix S, 40 CFR 52.21(c), (d), and (j), 40 CFR 60.4207)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall operate and maintain each engine in FG-WFGD-QP3&4 according to the manufacturer's written instructions or procedures that are approved by the manufacturer to ensure compliance with the applicable emission standards in 40 CFR 60.4205(c).² (R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4205(c), 40 CFR 60.4206, 40 CFR 60.4211)
- 2. The permittee shall not operate each engine in FG-WFGD-QP3&4 for more than 30 minutes per hour, nor a total of 200 hours at full load equivalent rate per 12-month rolling time period as determined at the end of each calendar month.2 (R 336.2804, R 336.2810, 40 CFR 52.21(d), 40 CFR 52.21(j))
- 3. NSPS, Subpart III allows emergency engines to operate up to 100 hours per year for maintenance checks and readiness testing. The permittee may petition for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. (40 CFR 60.4211(f)(2))
- 4. The permittee shall not change or revise the operating instructions, procedures or settings for each engine in FG-WFGD-QP3&4 unless permitted by the manufacturer in writing.² (40 CFR 60.4211)
- 5. If the permittee does not install, configure, operate, and maintain EU-WFGD-QP1 and EU-WFGD-QP2 and their respective control device according to the manufacturer's emission-related written instructions, or change emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:
 - a. Must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - b. In addition, if the permittee does not install and configure the engine and control device according to the manufacturer's emission-related written instructions or change the emission-related settings in a way that is not permitted by the manufacturer, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each engine in FG-WFGD-QP3&4 with a non-resettable hour meter to track the number of minutes and hours the engine operates.² (R 336.2804, R 336.2810, 40 CFR 52.21(d), 40 CFR 52.21(j), 40 CFR 60.4209(a))

V. TESTING/SAMPLING

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

NA

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 in a satisfactory manner, the hours of operation of each engine in FG-WFGD-QP3&4. The record shall include the time and duration of operation, and the reason the engine was in operation. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2804, R 336.2810, 40 CFR 52.21(d), 40 CFR 52.21(j), 40 CFR 60.4214(b))
- 2. The permittee shall keep records, in a satisfactory manner, of the fuel supplier certification and/or analysis including the sulfur content in ppm for each delivery of the diesel fuel oil.² (R 336.1401, R 336.2803, R 336.2804, R 336.2810, R 336.2902(2)(c), 40 CFR Part 51, Appendix S, 40 CFR 52.21(c), (d), and (j))

VII. REPORTING

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

See Appendix 8-1

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. SV-WFGD-QP3	6 ²	34 2	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)
2. SV-WFGD-QP4	6 ²	34 2	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

- The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and IIII, as they apply to FG-WFGD-QP3&4.² (40 CFR Part 60, Subparts A and IIII)
- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines. The permittee shall meet the requirements of 40 CFR Part 63 Subpart ZZZZ by meeting the requirements of 40 CFR Part 60 Subpart IIII. ² (40 CFR Part 63, Subparts A and ZZZZ, 40 CFR 63.6590(c)(7))

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).

FG-PARTSCLNRS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EU-PARTSCLNRS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (**R 336.1213(2**))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (R 336.1611(2)(b), R 336.1707(3)(b))
- 2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(2)(h))
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285((2)r)(iv))
- 2. The cold cleaner shall be equipped with a device for draining cleaned parts. (R 336.1611(2)(b), R 336.1707(3)(b))
- 3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))
- 4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))
- 5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:

- a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (**R 336.1707(2)(a)**)
- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

- 1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))
- 2. The permittee shall maintain the following information on file for each cold cleaner: (R 336.1213(3))
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
- 3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))
- 4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

VII. <u>REPORTING</u>

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

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

- IX. OTHER REQUIREMENT(S)
- NA

FG-EMERGENS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Existing, emergency engines, subject to 40 CFR Part 63, Subpart ZZZZ (aka, RICE MACT). Engines are exempt from Michigan Rule 201 permit requirements pursuant to Rule 278 and Rule 285(2)(g).

Emission Unit: EU-FIREPUMP at 1-2 Screen house

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

The permittee shall meet fuel limits as applicable in 40 CFR 63.6604(b). The permittee must use non-road diesel fuel per 40 CFR 80.510(b): maximum sulfur content 15ppm, minimum cetane index 40 OR aromatic content of 35v%. Any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. (40 CFR 63.6604(b), 40 CFR 80.510(b))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Each emergency stationary RICE's annual operating hours are specified in 40 CFR 63.6640(f). Operating specifications include:
 - a. There is no time limit in emergency situations. (40 CFR 63.6640(f)(1))
 - b. Operate up to 100 hours per year for maintenance and testing. The permittee may petition for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2))**
 - c. Operate up to 50 hours per year in non-emergency situations (counted towards the 100 hours per year threshold). (40 CFR 63.6640(f)(3))
- 2. The permittee shall meet operating requirements specified per 40 CFR 63.6602. (40 CFR 63.6602, Table 2c-Line1)
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.3;
 - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first and replace as necessary;
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6602. The oil analysis program must be performed at same frequency as oil changes are required. Analysis program must test the parameters, perform follow up oil change, if specified, and keep records per 40 CFR 63.6625(i). (40 CFR 63.6625(i))

- 4. The permittee shall not operate FG-EMERGENS unless operation and maintenance is performed according to manufacturer's emission-related written instructions or the permittee's maintenance plan. To the extent practicable, the permittee's plan must provide for maintenance and operation of engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6625(e) and 63.6640(a))
- 5. The permittee shall minimize time spent at idle during startup and minimize engine's startup time to a period needed for safe loading of engine, not to exceed 30 minutes. (40 CFR 63.6625(h))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Emission unit shall be equipped with a non-resettable hour meter to track operating hours. (40 CFR 63.6625(f))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. If using oil analysis program, the permittee shall test for and record and maintain the Total Base Number, viscosity and percent water content every 500 hours or annually (whichever comes first) & maintain within acceptable limits in 40 CFR 63.6625(i). (40 CFR 63.6625(i))
- 2. The permittee shall record all maintenance conducted on emission units. (40 CFR 63.6655(e))
- 3. The permittee shall record the number of hours the engine operated from the non-resettable hour meter and document the hours spent for emergency, including what classified the operation as emergency and non-emergency operation. (40 CFR 63.6655(f))

VII. <u>REPORTING</u>

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

See Appendix 8-1

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 all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) as they apply to emission units subject to 40 CFR Part 63, Subpart ZZZZ. (R 336.1213(3), 40 CFR Part 63, Subparts A and ZZZZ)

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).

FG-MESBLDG FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two (2), Existing, 6.3 mmBtu/hr heating boilers, subject to 40 CFR Part 63, Subpart DDDDD (aka, Industrial Boiler MACT). Boilers are exempt from Michigan Rule 201 permit requirements pursuant to Rule 278 and Rule 282(2)(b).

Emission Units: EU-BLR1_MESB and EU-BLR2_MESB, at the MESB Building

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- Starting January 31, 2016, the permittee shall meet biennial tune-up requirements for FG-MESBLDG as required. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. If the unit is not operating on the required date for a tune-up, the permittee shall conduct the tune-up within 30 calendar days of startup. (40 CFR 63.7540(a)(11), 40 CFR 63.7540(a)(13))
- 2. The permittee shall conduct the one-time energy assessment for FG-MESBLDG in the timeframe no later than January 31, 2016 as required. **(40 CRF Part 63, Subpart DDDDD, Table 3)**
- 3. The permittee must demonstrate continuous compliance with the biennial tune-up requirement by completing the following: (40 CFR 63.7540(a)(10))
 - a. Inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown). 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))
 - b. 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))
 - c. 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).
 (40 CFR 63.7540(a)(10)(iii))
 - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available. (40 CFR 63.7540(a)(10)(iv))
 - e. 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))**
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))

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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 submit boiler tune-up compliance reports. The first compliance report shall cover the period January 31, 2016 through December of the year in which the tune up was completed and must be postmarked or submitted no later than March 15th of the reporting year that immediately follows the year in which the tune-up was completed. Subsequent compliance reports must be postmarked or submitted by March 15th of the year following the tune-up and must cover the applicable 2-year period starting from January 1 of the year following the previous tune-up to December 31 (of the latest tune-up year). Compliance reports must be submitted using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to the state and EPA Region 5. (40 CFR 63.7550(b), 40 CFR 63.10(a)(5), 40 CFR 63.7550(h)(3))
- 5. Maintain on-site and submit, if requested by the AQD, the most recent periodic report containing the information as listed below. (40 CFR 63.7540(a)(10)(vi))
 - a. 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))
 - b. A description of any corrective actions taken as a part of the tune-up. (40 CFR 63.7540(a)(10)(vi)(B))

See Appendix 8-1

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 all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters as they apply to emission units subject to 40 CFR Part 63, Subpart DDDDD. **(40 CFR Part 63, Subparts A and DDDDD)**

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).

FG-MATS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 63, Subpart UUUUU (a.k.a. Mercury and Air Toxics Standards or MATS) requirements for existing coalfired electric utility steam generating unit(s) (EGU) rated more than 25 megawatts electric (MWe) that serve(s) a generator producing electricity for sale and designed to burn coal that is not low rank virgin coal (calorific value of ≥ 8,300 Btu/pound).

Emission Units: EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4

POLLUTION CONTROL EQUIPMENT

Each unit has low-NOx burners, overfire air, Reduced Emission Fuel (REF) sorbent system, SO₃ and ammonia flue gas conditioning systems, selective catalytic reduction (SCR), dry wire electrostatic precipitators (ESP), and wet flue gas desulfurization (FGD)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable
		Coonano		l coung motriou	Requirements
1. Filterable PM	0.030	30-boiler operating day	EU-UNIT1,	SC VI.1,	40 CFR 63.9991,
	lb/MMBtu*	rolling arithmetic average	EU-UNIT2,	SC VI.2,	40 CFR Part 63,
		updated at the end of	EU-UNIT3,	SC VI.3,	Subpart UUUUU,
		each new boiler	EU-UNIT4	SC VI.7	Table 2.1.a
		operating day			
2. SO2	0.20 lb/MMBtu*	30-boiler operating day	EU-UNIT1,	SC VI.1,	40 CFR 63.9991,
		rolling arithmetic average	EU-UNIT2,	SC VI.2,	40 CFR Part 63,
		updated at the end of	EU-UNIT3,	SC VI.5,	Subpart UUUUU,
		each new boiler	EU-UNIT4	SC VI.9	Table 2.1.b
		operating day			
3. Mercury (Hg)	1.2 lb/TBtu*	30-boiler operating day	EU-UNIT1,	SC VI.1,	40 CFR 63.9991,
		rolling arithmetic average	EU-UNIT2,	SC VI.2,	40 CFR Part 63,
		updated at the end of	EU-UNIT3,	SC VI.4,	Subpart UUUUU,
		each new boiler	EU-UNIT4	SC VI.6,	Table 2.1.c
		operating day		SC VI.8	
*The emission limi	its apply at all tin	nes except during startup a	and shutdown		

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall conduct a tune-up of each emission unit of FG-MATS burners and combustion controls, as applicable, at least every 36 calendar months, or each 48 calendar months if neural network combustion optimization software is employed, as specified in 40 CFR 63.10021(e). (40 CFR 63.10000(e), 40 CFR 63.10006(i), 40 CFR 63.10021(e))
- 2. For the startup of any emission unit of FG-MATS which will comply using paragraph (1) of the definition of "startup" in 40 CFR 63.10042, the permittee must use clean fuels as defined in 40 CFR 63.10042 for ignition. Once the emission units of FG-MATS convert to firing coal, residual oil, or solid oil-derived fuel, the permittee must engage all of the applicable control technologies except the SCR. The permittee must start the SCR

systems appropriately to comply with relevant standards applicable during normal operation. The permittee must comply with all applicable emission limits at all times except for periods that meet the applicable definitions of startup and shutdown in 40 CFR Part 63, Subpart UUUUU. (40 CFR 63.10042, 40 CFR Part 63, Subpart UUUUU, Table 3)

- 3. During shutdown of any emission unit of FG-MATS while firing coal, residual oil, or solid oil-derived fuel, the permittee must vent emissions to the main stacks and operate all applicable control devices and continue to operate those control devices after the cessation of coal, residual oil, or solid oil-derived fuel being fed into the applicable emission units of FG-MATS and for as long as possible thereafter considering operational and safety concerns. In any case, the permittee must operate their controls when necessary to comply with other standards made applicable to the FG-MATS by a permit limit or a rule other than 40 CFR Part 63, Subpart UUUUU and that require operation of the control devices. If, in addition to the fuel used prior to initiation of shutdown, another fuel must be used to support the shutdown process, that additional fuel must be one or a combination of the clean fuels defined in 40 CFR 63.10042 and must be used to the maximum extent possible taking into account considerations such as not compromising boiler or control device integrity. (40 CFR 63.10042, 40 CFR Part 63, Subpart UUUUU, Table 3)
- The emission limits and operating limits in 40 CFR Part 63, Subpart UUUUU apply at all times except during periods of startup and shutdown; however, the applicable work practice requirements, which are specified in items 3 and 4 of Table 3 of 40 CFR Part 63, Subpart UUUUU must be met during periods of startup or shutdown. (40 CFR 63.10000(a), 40 CFR Part 63, Subpart UUUUU, Table 3)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall operate and maintain all associated air pollution control equipment and monitoring equipment necessary for compliance with 40 CFR Part 63, Subpart UUUUU in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.10000(b))

V. <u>TESTING/SAMPLING</u>

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

NA

VI. MONITORING/RECORDKEEPING

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

- During startup, as defined by paragraph (1) of the definition of "startup" in 40 CFR 63.10042, the permittee must operate all Continuous Monitoring Systems (CMS). Startup means either the first-ever firing of fuel in a boiler for the purpose of producing electricity, or the firing of fuel in a boiler after a shutdown event for any purpose. Startup ends when any of the steam from the boiler is used to generate electricity for sale over the grid or for any other purpose (including on site use). The permittee must comply with the applicable emission limits at all times except for startup and shutdown periods unless the permittee chooses to use just one set of sorbent traps to demonstrate compliance with the applicable Hg emission limit, then the permittee must comply with the applicable Hg emission limit at all times. The permittee must collect monitoring data during startup periods, as specified in 40 CFR 63.10020(a) and (b). The permittee must keep records during startup periods, as provided in 40 CFR 63.10032 and 40 CFR 63.10021(h). Any fraction of an hour in which startup occurs constitutes a full hour of startup. (40 CFR Part 63, Subpart UUUUU, Table 3)
- The permittee must operate all CMS during shutdown. The permittee must also collect appropriate data, and the permittee must calculate the pollutant emission rate for each hour of shutdown for those pollutants for which a CMS is used. The permittee must collect monitoring data during shutdown periods, as specified in 40 CFR 63.10020(a). The permittee must keep records during shutdown periods, as provided in 40 CFR 63.10021(h). Any fraction of an hour in which shutdown occurs constitutes a full hour of shutdown. (40 CFR Part 63, Subpart UUUUU, Table 3)

- 3. The permittee shall install, calibrate, maintain and operate a device to monitor and record the PM concentration of the exhaust gas from each emission unit on a continuous basis. The permittee shall install and operate the PM CEMS to meet the timelines, requirements and reporting detailed in Performance Specification 11 in 40 CFR Part 60, Appendix B and Procedure 2 in 40 CFR Part 60, Appendix F. (40 CFR 63.10010(i), 40 CFR Part 63, Subpart UUUUU, Table 5)
- 4. The permittee shall install, calibrate, maintain and operate a device to monitor and record the Hg concentration from each emission unit on a continuous basis. The permittee shall install and operate the Hg CEMS or sorbent trap monitoring system to meet the timelines, requirements and reporting detailed in Appendix A of 40 CFR Part 63, Subpart UUUUU. (40 CFR 63.10000(c)(1)(vi))
- 5. The permittee shall install, maintain, and operate devices to monitor and record the SO₂ concentration of the exhaust gas from each emission unit on a continuous basis. The permittee shall install and operate each CEMS to meet the timelines, requirements and reporting detailed in 40 CFR Part 75, Appendices A and B. (40 CFR 63.10000(c)(1)(v))
- 6. If required to convert measured pollutant concentrations to the units of the applicable mass per heat input emission limits or for routine operation of a sorbent trap monitoring system, the permittee shall install, calibrate, maintain and operate a device to monitor and record the oxygen (O_2) or carbon dioxide (CO_2) exhaust gas content, exhaust gas flow rate and/or moisture from each emission unit on a continuous basis. The monitor shall be operated in accordance with procedures outlined in 40 CFR Part 75, Appendices A and B. As an alternative to moisture monitoring, the permittee may elect to use appropriate fuel-specific default moisture values from 40 CFR 75.11(b) for coal-fired units or a default moisture value for non-coal-fired units as established via petition to the Administrator under 40 CFR 75.66. (40 CFR 63.10010(b)-(d), 40 CFR Part 63, Subpart UUUUU, Table 5)
- 7. If the permittee elects to use a PM CEMS, the permittee shall keep, in a satisfactory manner, hourly and 30-day rolling average PM emission rate records for each emission unit excluding periods of startup and shutdown. (40 CFR 63.10010, 40 CFR 63.10021, 40 CFR 63.10032(c), 40 CFR Part 63, Subpart UUUUU, Table 7)
- 8. For any emission unit not relying on the LEE provisions for Hg, the permittee shall keep, in a satisfactory manner, hourly and 30-day rolling average Hg emission rate records for each emission unit excluding periods of startup and shutdown. (40 CFR 63.10010, 40 CFR 63.10021, 40 CFR 63.10032(c), 40 CFR Part 63, Subpart UUUUU, Table 7)
- 9. The permittee shall keep, in a satisfactory manner, hourly and 30-day rolling average SO₂ emission rate records for each emission unit excluding periods of startup and shutdown. (40 CFR 63.10010, 40 CFR 63.10021, 40 CFR 63.10032(c), 40 CFR Part 63, Subpart UUUUU, Table 7)
- 10. The permittee must operate the required monitoring systems and collect data at all required intervals at all times that the affected EGU is operating, except for periods of monitoring system malfunctions or out-of-control periods (see 40 CFR 63.8(c)(7) of 40 CFR Part 63, Subpart A), and required monitoring system quality assurance or quality control activities, including, as applicable, calibration checks and required zero and span adjustments. The permittee is required to affect monitoring system repairs in response to monitoring system malfunctions and to return the monitoring system to operation as expeditiously as practicable. (40 CFR 63.10020(b))
- 11. The permittee may not use data recorded during startup or shutdown in calculations used to report emissions, except as otherwise provided in 40 CFR 63.10000(c)(1)(vi)(B) and 40 CFR 63.10005(a)(2)(iii). In addition, data recorded during monitoring system malfunctions or monitoring system out-of-control periods, repairs associated with monitoring system malfunctions or monitoring system out-of-control periods or required monitoring system quality assurance or control activities may not be used in calculations used to report emissions or operating levels. The permittee must use all of the quality-assured data collected during all other periods in assessing the operation of the control device and associated control system. (40 CFR 63.10020(c))
- 12. Failure to collect required data is a deviation from the monitoring requirements except for periods of monitoring system malfunctions or monitoring system out-of-control periods, repairs associated with monitoring system malfunctions or monitoring system out-of-control periods and required monitoring system quality assurance or

quality control activities including, as applicable, calibration checks and required zero and span adjustments. (40 CFR 63.10020(d))

- 13. If the permittee uses CEMS to measure SO₂, PM, HCI, HF, or Hg emissions (or sorbent trap monitoring system), except as otherwise provided in 40 CFR 63.10020(c), the permittee must demonstrate continuous compliance by using all quality-assured hourly data recorded by the CEMS (or sorbent trap monitoring system) and other required monitoring systems to calculate the arithmetic average emissions rate in units of the standard on a continuous 30-boiler operating day rolling average basis, updated at the end of each new boiler operating day. Use Equation 8 in 40 CFR 63.10021(b) to determine the 30-boiler operating day rolling average. (40 CFR 63.10021(a) and (b))
- 14. If the permittee uses PM CPMS data to measure compliance with an operating limit in Table 4, the permittee must record the PM CPMS output data for all periods when the process is operating and PM CPMS is not out-of-control. The permittee must demonstrate continuous compliance by using all quality-assured hourly data collected by the PM CPMS for all operating data to calculate the arithmetic average emissions rate in units of the operating limit on a continuous 30-boiler operating day rolling average basis, updated at the end of each new boiler operating day. Use Equation 9 in 40 CFR 63.10021(c) to determine the 30-boiler operating day rolling average. (40 CFR 63.10021(a) and (c))
- 15. The permittee must keep the following records:
 - A copy of each notification and report that has been submitted to comply with 40 CFR Part 63, Subpart UUUUU, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that has been submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). (40 CFR 63.10032(a)(1))
 - b. Records of performance stack tests, fuel analyses, or other compliance demonstrations and performance evaluations, as required in 40 CFR 63.10(b)(2)(viii). (40 CFR 63.10032(a)(2))
 - c. For each CEMS, the permittee must keep the following records:
 - i. Records described in 40 CFR 63.10(b)(2)(vi) through (xi). (40 CFR 63.10032(b)(1))
 - ii. Previous (i.e., superseded) versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3). (40 CFR 63.10032(b)(2))
 - iii. Request for alternatives to relative accuracy test for CEMS as required in 40 CFR 63.8(f)(6)(i). (40 CFR 63.10032(b)(3))
 - iv. The date and time that each deviation started and stopped and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period. **(40 CFR 63.10032(b)(4))**
 - v. If the permittee continuously monitors Hg and/or HCl and/or HF emissions, the permittee must also keep the records required under Appendix A and/or Appendix B of 40 CFR Part 63, Subpart UUUUU. (40 CFR 63.10032(a))
 - d. For each emission unit subject to an emission limit, the permittee shall keep the monthly fuel use by each emission unit, including the type(s) of fuel and amount(s) used. (40 CFR 63.10032(d)(1))
 - e. Regarding startup periods or shutdown periods:
 - i. If the permittee chooses to rely on paragraph (1) of the definition of "startup" in 40 CFR 63.10042 for the emission unit(s), the permittee shall keep records of the occurrence and duration of each startup or shutdown. **(40 CFR 63.10032(f)(1))**
 - ii. The type(s) and amount(s) of fuel used during each startup or shutdown. (40 CFR 63.10032(i))
 - f. The occurrence and duration of each malfunction of an operation (i.e., process equipment) or the air pollution control and monitoring equipment. (40 CFR 63.10032(g))
 - g. Actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.10000(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (40 CFR 63.10032(h))

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- 16. The permittee shall keep all records in a form suitable and readily available for expeditious review and for at least 5 years after the date of each occurrence, corrective action, report, or record. The records must be kept onsite for at least 2 years and may be kept offsite for the remaining 3 years. (40 CFR 63.10(b)(1), 40 CFR 63.10033)
- 17. The permittee shall maintain on site and submit, if requested by the Administrator, an annual report of periodic performance tune-ups containing the information required by 40 CFR 63.10021(e)(8). The reports shall be in a format acceptable to the Administrator. If requested by the AQD District Supervisor, the permittee shall also submit an annual report with the results of the performance tune-ups. (40 CFR 63.10021(e)(8))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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. Semiannual reporting of the information required in 40 CFR 63.10031(c)(1) through (9), (d), and (e) as applicable. The report shall be postmarked or received by the Administrator by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. The report shall include the following:
 - a. The information required by the Continuous Monitoring Summary Report located in 40 CFR 63.10(e)(3)(vi). (40 CFR 63.10031(c)(1))
 - b. The total fuel use by each affected source subject to an emission limit, for each calendar month within the semiannual reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by EPA or the basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure. (40 CFR 63.10031(c)(2))
 - c. Indicate whether any emission unit in FGMATS burned new types of fuel during the reporting period. If new types of fuel were burned, include the date of the performance test where that fuel was in use. (40 CFR 63.10031(c)(3))
 - d. Include the date of the most recent tune-up for each emission unit. The date of the tune-up is the date the tune-up provisions specified in 40 CFR 63.10021(e)(6) and (7) were completed. (40 CFR 63.10031(c)(4))
 - e. A summary of the results of the annual performance tests and documentation of any operating limits that were reestablished during the test, if applicable. (40 CFR 63.10031(c)(7))
 - f. If there are no deviations from any emission limitation (emission limit and operating limit) that applies to FG-MATS and there are no deviations from the requirements for work practice standards in Table 3 to 40 CFR Part 63, Subpart UUUUU that apply to FG-MATS, the report shall include a statement that there were no deviations from the emission limitations and work practice standards during the reporting period. If there were no periods during which the CMSs, including continuous emissions monitoring system, and operating parameter monitoring systems, were out-of-control as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMSs were out-of-control during the reporting period. (40 CFR Part 63, Subpart UUUUU, Table 8)
 - g. If there is a deviation from any emission limitation (emission limit and operating limit) or work practice standard during the reporting period, the report must contain a brief description of the deviation, the duration of the deviation, the cause of the deviation, and the information in 40 CFR 63.10031(d). If there were periods during which the CMS's, including continuous emissions monitoring systems and continuous parameter monitoring systems, were out-of-control, as specified in 40 CFR 63.8(c)(7), the report must contain the

information in 40 CFR 63.10031(e). (40 CFR 63.10031(c)(1) through (9), (d), and (e), 40 CFR 63.10031(a), 40 CFR 63.10031(c)(9), 40 CFR Part 63, Subpart UUUUU, Table 8)

- h. If the affected source submits a compliance report pursuant to Table 8 in 40 CFR Part 63, Subpart UUUUU, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any emission limit, operating limit, or work practice requirement in 40 CFR Part 63, Subpart UUUUU, submission of the compliance report satisfies any obligation to report the same deviations in the semiannual monitoring report required by SC VII.2. (40 CFR 63.10031(e))
- 5. The permittee must submit any of the following applicable notifications by the dates specified within the specific citation: 40 CFR 63.7(b) and (c) Notification of performance test and Quality assurance program; 40 CFR 63.8(e) Performance evaluation of continuous monitoring systems; 40 CFR 63.8(f)(4) Request to use alternative monitoring methods; 40 CFR 63.8(f)(6) Alternative to the relative accuracy test; 40 CFR 63.9(b) Initial notifications; 40 CFR 63.9(c) Request for extension of compliance; 40 CFR 63.9(d) Notification that source is subject to special compliance requirements; 40 CFR 63.9(e) Notification of performance test, which shall be submitted at least 30 days before the performance test is scheduled to begin; 40 CFR 63.9(f) Notification of opacity and visible emission observations; 40 CFR 63.9(g) Additional notification requirements for sources with continuous monitoring systems; and 40 CFR 63.9(h) Notification of compliance status. (40 CFR 63.10030(a))
- 6. On or after July 1, 2020, within 60 days after the date of completing each performance test, the permittee must submit the performance test reports required by this subpart to EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/index.html). Only data collected using those test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. At the discretion of the AQD, the permittee must also submit these reports, one to the Technical Programs Unit Supervisor and one to the AQD District Supervisor, in a format approved by the AQD. (40 CFR 63.10031(f))
- 7. On or after July 1, 2020, within 60 days after the date of completing each CEMS (SO₂, PM, HCl, HF, and Hg) performance evaluation test, as defined in 40 CFR 63.2, the permittee must submit the relative accuracy test audit (RATA) data (or, for PM CEMS, RCA and RRA data) required by this subpart to EPA's WebFIRE database by using CEDRI that is accessed through EPA's CDX (www.epa.gov/cdx). The RATA data shall be submitted in file format generated through use of EPA's Electronic Reporting the Tool (ERT) (http://www.epa.gov/ttn/chief/ert/index.html). Only RATA data compounds listed on the ERT Web site are subject to this requirement. At the discretion of the AQD, the permittee must also submit these RATA reports to the AQD District Supervisor in a format approved by the AQD. Owners or operators shall submit calibration error testing, drift checks, and other information required in the performance evaluation as described in 40 CFR 63.2 and as required in this chapter. (40 CFR 63.10031(f)(1))
- 8. On or after July 1, 2020, for a PM CEMS, within 60 days after the reporting periods ending on March 31st, June 30th, September 30th, and December 31st, the permittee must submit quarterly reports to EPA's WebFIRE database by using the CEDRI that is accessed through EPA's CDX (www.epa.gov/cdx). The permittee must use the appropriate electronic reporting form in CEDRI or provide an alternate electronic file consistent with EPA's reporting form output format. For each reporting period, the quarterly reports must include all of the calculated 30-boiler operating day rolling average values derived from the CEMS. (40 CFR 63.10031(f)(2))
- Reports for a SO₂ CEMS, a Hg CEMS or sorbent trap monitoring system, a HCI or HF CEMS, and any supporting monitors for such systems (such as a diluent or moisture monitor) shall be submitted using the ECMPS Client Tool, as provided for in 40 CFR Part 63, Subpart UUUUU, Appendices A and B and 40 CFR 63.10021(f). (40 CFR 63.10031(f)(3))
- 10. On or after July 1, 2020, the permittee must submit all reports required by 40 CFR 63.10031 (c) and (d) electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). The permittee must use the appropriate electronic reporting form in CEDRI or provide an alternate electronic file consistent with EPA's reporting form output format. If requested by the AQD, the permittee

must also submit these reports, to the AQD District Supervisor in a format approved by the AQD. (40 CFR 63.10031(f)(4))

- 11. Prior to July 1, 2020, all reports subject to electronic submittal in SC VII.6, VII.7, VII.8 and VII.10 shall be submitted to the EPA at the frequency specified in those paragraphs in electronic portable document format (PDF) using the ECMPS Client Tool. Each PDF version of a submitted report must include sufficient information to assess compliance and to demonstrate that the testing was done properly. The data elements listed at 40 CFR 63.10031(f)(6)(i)-(xii) must be entered into the ECMPS Client Tool at the time of submission of each PDF file. (40 CFR 63.10031(f)(6))
- 12. If requested by the Administrator, the permittee must submit the monitoring plan (or relevant portion of the plan) at least 60 days before the initial performance evaluation of a particular CMS, except where the CMS has already undergone a performance evaluation that meets the requirements of 40 CFR 63.10010 (e.g., if the CMS was previously certified under another program). (40 CFR 63.10000(d)(3))

See Appendix 8-1

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. For each emission unit or emissions averaging group complying with an emission limit as specified in Table 2 of 40 CFR Part 63, Subpart UUUUU, the permittee may request to switch from a mass per heat input to a mass per gross output limit (or vice versa).
 - a. The permittee may switch from a mass per heat input to a mass per gross output limit (or vice-versa), provided that:
 - i. The permittee submits a request that identifies for each emission unit or emissions averaging group involved in the proposed switch both the current and proposed emission limit. (40 CFR 63.10030(e)(7)(iii)(A)(1))
 - ii. The request arrives to the Administrator at least 30 calendar days prior to the date that the switch is proposed to occur. (40 CFR 63.10030(e)(7)(iii)(A)(2))
 - iii. The request demonstrates through performance stack test results completed within 30 days prior to the submission, compliance for each emission unit or emissions averaging group with both the mass per heat input and mass per gross output limits. (40 CFR 63.10030(e)(7)(iii)(A)(3))
 - iv. The permittee revises and submits all other applicable plans, e.g., monitoring and emissions averaging, with the request. (40 CFR 63.10030(e)(7)(iii)(A)(4))
 - v. The permittee maintains records of all information regarding the choice of emission limits. (40 CFR 63.10030(e)(7)(iii)(A)(5))
 - b. The permittee may begin to use the revised emission limits starting in the next reporting period, after receipt of written acknowledgement from the Administrator of the switch. (40 CFR 63.10030(e)(7)(iii)(B))
 - c. From the submission of the request until start of the next reporting period after receipt of written acknowledgement from the Administrator of the switch, the permittee shall demonstrate compliance with both the mass per heat input and mass per gross output emission limits for each pollutant for each emission unit or emissions averaging group. (40 CFR 63.10030(e)(7)(iii)(C))
- 2. The permittee may switch from paragraph (1) of the definition of "startup" in 40 CFR 63.10042 to paragraph (2) of the definition of "startup" (or vice-versa), provided that:

- a. The permittee submits a request that identifies for each emission unit or emissions averaging group involved in the proposed switch both the current definition of "startup" relied on and the proposed definition the permittee plans to rely on. (40 CFR 63.10030(e)(8)(iii)(A))
- b. The request arrives to the Administrator at least 30 calendar days prior to the date that the switch is proposed to occur. (40 CFR 63.10030(e)(8)(iii)(B))
- c. The permittee revises and submits all other applicable plans, e.g., monitoring and emissions averaging, with the submission. (40 CFR 63.10030(e)(8)(iii)(C))
- d. The permittee maintains records of all information regarding the choice of the definition of "startup". (40 CFR 63.10030(e)(8)(iii)(D))
- e. The permittee begins to use the revised definition of "startup" in the next reporting period after receipt of written acknowledgement from the Administrator of the switch. (40 CFR 63.10030(e)(8)(iii)(E))
- 3. If using a CMS to demonstrate continuous compliance with an emission limit or operating limit, the permittee must develop a site-specific monitoring plan and submit this site-specific monitoring plan, if requested, at least 60 days before the initial performance evaluation (where applicable) of the CMS. This requirement also applies to the permittee if the permittee petitions the Administrator for alternative monitoring parameters under 40 CFR 63.8(f). This requirement to develop and submit a site-specific monitoring plan does not apply to affected sources with existing monitoring plans that apply to CEMS and CPMS prepared under Appendix B of 40 CFR Part 60 or 40 CFR Part 75, and that meet the requirements of 40 CFR 63.10010. Using the process described in 40 CFR 63.8(f)(4), the permittee may request approval of monitoring system quality assurance and quality control procedures alternative to those specified in this paragraph of this section and, if approved, include those in the site-specific monitoring plan. The monitoring plan must address the following provisions: (40 CFR 63.10000(d), 40 CFR 63.10010)
 - a. Installation of the CMS or sorbent trap monitoring system sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device). See 40 CFR 63.10010(a) for further details. For PM CPMS installations, follow the procedures in 40 CFR 63.10010(h).
 - b. Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems.
 - c. Schedule for conducting initial and periodic performance evaluations.
 - d. Performance evaluation procedures and acceptance criteria (e.g., calibrations), including the quality control program in accordance with the general requirements of 40 CFR 63.8(d).
 - e. On-going operation and maintenance procedures, in accordance with the general requirements of 40 CFR 63.8(c)(1)(ii), (c)(3), and (c)(4)(ii).
 - f. Conditions that define a CMS that is out of control consistent with 40 CFR 63.8(c)(7)(i) and for responding to out of control periods consistent with 40 CFR 63.8(c)(7)(ii) and (c)(8).
 - g. On-going recordkeeping and reporting procedures, in accordance with the general requirements of 40 CFR 63.10(c), (e)(1), and (e)(2)(i), or as specifically required under 40 CFR Part 63, Subpart UUUUU.
 - h. Alternatively, the requirements are considered to be met for a particular CMS or sorbent trap monitoring system if:
 - i. The CMS or sorbent trap monitoring system is installed, certified, maintained, operated, and qualityassured either according to 40 CFR Part 75, or Appendix A or B of 40 CFR Part 63, Subpart UUUUU; and
 - ii. The recordkeeping and reporting requirements of 40 CFR Part 75, or Appendix A or B of 40 CFR Part 63, Subpart UUUUU, which pertain to the CMS, are met.

- If any emission unit(s) cease(s) to operate in a manner that causes the unit(s) to meet the definition of an EGU subject to 40 CFR Part 63, Subpart UUUUU, the permittee must submit the notification in 40 CFR 63.10000(i)(2) no less than 30 days prior to when the EGU will cease complying with 40 CFR Part 63, Subpart UUUUU. (40 CFR 63.10000(i)(2), 40 CFR 63.10030(f))
- 5. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and UUUUU. **(40 CFR Part 63, Subparts A and UUUUU)**

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).

FG-NSPS4I FLEXIBLE GROUP CONDITIONS

DESCRIPTION

MI R336.1285(2) exempted diesel engines, model year 2008 or later, less than 25 Hp. Engines subject to 40 CFR Part 60, Subpart IIII as non-emergency stationary combustion ignition (CI) internal combustion engines (ICE) and meet 40 CFR Part 63 Subpart ZZZ requirements by meeting the requirements of 40 CFR Part 60 Subpart IIII.

Emission Unit: EU-NSPS4IEngines

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	РМ	0.40 g/KW-hr	At all times	Each unit	SC III.1	40 CFR 60.4201(a), 40 CFR 60.4204(b), 40 CFR 1039.102
2.	NOx + NMHC	7.5 g/KW-hr	At all times	Each unit	SC III.1	40 CFR 60.4201(a), 40 CFR 60.4204(b), 40 CFR 1039.102
3.	со	6.6 g/KW-hr	At all times	Each unit	SC III.1	40 CFR 60.4201(a), 40 CFR 60.4204(b), 40 CFR 1039.102

II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel, in each engine of FG-NSPS4I with the maximum sulfur content of 15 ppm (0.0015 percent) by weight. **(40 CFR 60.4207(b), 40 CFR 80.510(b))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall do all the following or else shall comply with the requirements of SC III.2:
 - a. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; and,
 - b. Change only those emission-related settings that are permitted by the manufacturer.

(40 CFR 60.4211(a))

2. If permittee does not install, configure, operate, and maintain the CI internal combustion engines and control devices according to the manufacturer's emission-related written instructions, or changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance as follows:

- a. The permittee must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and
- b. maintain and operate the CI internal combustion engines in a manner consistent with good air pollution control practice for minimizing emissions, and
- c. if the CI internal combustion engine and control device are not installed and configured according to the manufacturer's emission-related written instructions or changes the emission-related settings in a way that is not permitted by the manufacturer, the permittee shall conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.

(40 CFR 60.4211(g))

3. The permittee shall operate and maintain the stationary CI ICE that achieve the emission standards as required by 40 CFR 60.4204, over the entire life of the engine. (40 CFR 60.4206)

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 ICE is operated in a non-certified manner, the permittee shall conduct performance tests pursuant to 40 CFR 60.4212 according to the following:
 - a. The performance test must be conducted according to the in-use testing procedures in 40 CFR part 1039, subpart F.
 - b. Exhaust emissions from stationary CI internal combustion engines that are complying with the emission standards for new CI engines in 40 CFR part 1039 must not exceed the NTE standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e), except as specified in 40 CFR 1039.104(d). (40 CFR 60.4212(a) and (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. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. Verification of emission rates includes the submittal of 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), R336.2001(3), R 336.2001(4), R 336.2001(5))

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 maintain the following information on file for each engine under FG-NSPS4I: (R 336.1213(3))
 - a. A serial number, model number, or other unique identifier for each.
 - b. Location and brief description of process used for,
 - c. The date the unit was installed, manufactured or that it commenced operation, and date removed from site
- 2. The permittee shall keep, in a satisfactory manner, the following records for each engine:
 - a) For engines operated in a certified manner, the permittee shall keep engine certification documentation for each engine. (40 CFR 60.4211(c))
 - b) For engines operated in a non-certified manner, the permittee shall keep emissions results and records of a maintenance plan and maintenance activities for each engine. (40 CFR 60.4211(g))

VII. REPORTING

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

Section 1 DTE Electric Company – Monroe Power Plant Expiration Date:October 16, 2024 PTI No: MI-PTI-B2816-2019

- 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 a notification specifying any engine of FG-NSPS4I which is operated in a non-certified manner to the AQD District Supervisor, in writing, within 30 days of changing the manner of operation to non-certified. **(40 CFR Part 60.4214)**

See Appendix 8-1

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	ack & Vent ID Maximum Exhaust Dimensions (inches)		Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

- 3. The permittee shall comply with all applicable provisions of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines as they apply to emission units subject to 40 CFR Part 60, Subpart IIII. (R 336.1213(3), 40 CFR Part 60, Subparts A and IIII)
- 4. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines. (40 CFR Part 63, Subparts A and ZZZZ, 40 CFR 63.6590(c)(7))

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 the 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 1-1. Abbreviations and Acronyms

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

Common Acronyms			Pollutant / Measurement Abbreviations			
AOD	Air Quality Division	acfm	Actual cubic feet per minute			
BACT	Rest Available Control Technology	BTU	British Thermal Unit			
	Clean Air Act	°C	Degrees Celsius			
CAM	Compliance Assurance Monitoring		Carbon Monovide			
CEM	Continuous Emission Monitoring		Carbon Norioxide Equivalent			
	Code of Ecdoral Regulations	doof	Dry standard cubic foot			
		deem	Dry standard cubic root			
CON Department/	Michigan Department of Environment	v⊏	Dry standard cubic meter			
Department/	Creat Lakes, and al Energy	Г	Orgine Consistent			
	Great Lakes, and ar Energy	gr				
EU		HAP	Hazardous Air Poliutant			
FG	Flexible Group	Hg	Mercury			
GACS	Gallons of Applied Coating Solids	hr	Hour			
GC	General Condition	HP	Horsepower			
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide			
HVLP	High Volume Low Pressure*	kW	Kilowatt			
ID	Identification	lb	Pound			
IRSL	Initial Risk Screening Level	m	Meter			
ITSL	Initial Threshold Screening Level	mg	Milligram			
LAER	Lowest Achievable Emission Rate	mm	Millimeter			
MACT	Maximum Achievable Control Technology	MM	Million			
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts			
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds			
EGLE	Michigan Department of Environment,	NOx	Oxides of Nitrogen			
	Great Lakes, and Energy	ng	Nanogram			
MSDS	Material Safety Data Sheet	PM	Particulate Matter			
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10			
NAAQS	National Ambient Air Quality Standards		microns in diameter			
NESHAP	National Emission Standard for Hazardous	PM2.5	Particulate Matter equal to or less than 2.5			
	Air Pollutants		microns in diameter			
NSPS	New Source Performance Standards	pph	Pounds per hour			
NSR	New Source Review	ppm	Parts per million			
PS	Performance Specification	ppmv	Parts per million by volume			
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight			
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute			
PTI	Permit to Install	psig	Pounds per square inch gauge			
RACT	Reasonable Available Control Technology	scf	Standard cubic feet			
ROP	Renewable Operating Permit	sec	Seconds			
SC	Special Condition	SO ₂	Sulfur Dioxide			
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant			
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature			
SRN	State Registration Number	тнс	Total Hydrocarbons			
TEQ	Toxicity Equivalence Quotient	tov	Tons per vear			
USEPA/EPA	United States Environmental Protection	ua	Microgram			
	Agency	um	Micrometer or Micron			
VE	Visible Emissions	voc	Volatile Organic Compounds			
		vr	Year			

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

Appendix 2-1. Schedule of Compliance

The permittee certified in this ROP application that this stationary source is in compliance with all applicable requirements of this ROP except for the following: EU-LIMESTONE and EU-HYDRATEDLIME. As a result, the permittee was required to submit a Schedule of Compliance as defined in Rule 119(a), pursuant to Rule 210(2) and Rule 213(4).

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

The permittee has completed the Schedule of Compliance prior to the start of the public comment period. The permittee at this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is no longer required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3-1. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EU-UNIT1, EU-UNIT2, EU-UNIT3 and EU-UNIT4.

NOx, SO₂, CO, PM, CO₂/O₂, Mercury Monitoring Continuous Emission Monitoring and Continuous Emission Rate Monitoring System (CEMS/CERMS) Requirements

1. Within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating the CEMS/CERMS complies with the requirements of the corresponding Performance Specifications (PS) in the following table:

Pollutant	Applicable PS		
NOx/SO ₂	2		
CO	4		
CO ₂ /O ₂	3		
CERMS	6		
PM	11		
Mercury	12A*		
*Or other PS as approved by the AQD			

- 2. The span value shall be 2.0 times the lowest emission standard or as specified in the federal regulations.
- 3. The CEMS/CERMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 2, 3, 6, 11, and 12A (see No. 1 above) of Appendix B to 40 CFR Part 60 or 40 CFR Part 75, Appendices A and B, as applicable.
- 4. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CEMS/CERMS set forth in Appendix F of 40 CFR Part 60 or 40 CFR Part 75, Appendix B. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD in the format of the data assessment report (Figure 1, Appendix F of 40 CFR Part 60).

Appendix 4-1. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in FG-ProjectPC1-4. Alternative formats must be approved by the AQD District Supervisor.

Recordkeeping Provisions for a Nonattainment Source Using Actual-to-Projected-Actual Applicability Test

All information in this appendix shall be maintained pursuant to R 336.2902 and 40 CFR Part 51, Appendix S for ten years after the modification, and shall be made available to the Department upon request.

1. Project Description:

The project is to increase the capacity to use subbituminous coal and add petroleum coke to provide additional fuels for EU-UNIT1, EU-UNIT2, EU-UNIT3 and EU-UNIT4; installation of four (4) wet FGD quench pumps (EU-WFGD-QP1, EU-WFGD-QP2, EU-WFGD-QP3, and EU-WFGD-QP4); modifications to the fuel handling systems (EU-CASCADES, EU-TRANSFERHS, EU-DUMPERHS, EUCOALUNLOAD, and EU-CRUSHERHS); the installation of new material handling systems for limestone and gypsum (EU-LIMESTONE, EU-GYPSUMHAND, and EU-HYDRATEDLIME); and the installation of a new fuel handling system for petroleum coke (EU-PETCOKE).

2. Applicability Test Description:

Minor modifications are not subject to nonattainment. The actual-to-projected-actual hybrid applicability test as described in the table below was used to demonstrate that nonattainment does not apply to these modifications.

3. Emission Projections:

		E	Emissions (tpy	7)	
Emission Unit/Flexible Group ID	Pollutant	Baseline Actual Emissions (tpy)	Projected Actual Emissions (tpy)	Excluded Emissions (tpy)	Reason for Exclusion
FG-ProjectPC1-4	PM2.5	5,315	2,730	381	FG-ProjectPC1-4 was capable of accommodating emissions up to 381 tpy. There is no projected emissions increase, therefore the project is less than the significant level of 10 tpy.
FG-ProjectPC1-4	SO ₂	117,940	11,753	1,757	FG-ProjectPC1-4 was capable of accommodating emissions up to 1,757 tpy. There is no projected emissions increase, therefore the project is less than the significant level of 40 tpy.

Appendix 5-1. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

Appendix 6-1. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2816-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B2816-2009a is being reissued as Source-Wide PTI No. MI-PTI-B2816-2019.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201100075	Correction of typographical errors.	NA
27-13A	NA	Installation of pollution control equipment on Units 1 through 4, installation of quench pumps for each stack, upgrades to coal handling equipment, installation of limestone handling, gypsum handling, and pet coke handling systems, and installation of storage silos for hydrated lime.	EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4, EU-WFGD-QP1, EU-WFGD-QP2, EU-WFGD-QP3, EU-WFGD-QP4, EU-CASCADES, EU-TRANSFERHS, EU-DUMPERHS, EU-COALUNLOAD, EU-CRUSHERHS, EU-CRUSHERHS, EU-LIMESTONE, EU-LIMESTONE, EU-LIMESTONE, EU-HYDRATEDLIME
27-13B	NA	Limits usage of each auxiliary boiler to meet the "limited-use boiler or process boiler" to meet the definition under 40 CFR 63.7575	EU-NORTHAUX, EU-SOUTHAUX, FGAUXBOILERS
27-13C	201900017*	Incorporating the conditions of EPA Consent Decree EPA-5-2018-113(a)-MI- 07 for Units 1 through 4.	EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4
178-08	NA	A flyash storage and transfer facility	EU-FlyAshStorage

Appendix 7-1. Emission Calculations

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

Appendix 8-1. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual 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

Specific reporting requirement formats and procedures are detailed 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 9-1. Acid Rain Permit

Michigan Department of Environment, Great Lakes, and Energy Air Quality Division

PHASE II ACID RAIN PERMIT Permit No. MI-AR-1733-2019

Permittee	Monroe Power Plant
Address	3500 Front Street, Monroe, MI
SRN	B2816
ORIS code	1733
Issue Date	October 16, 2019
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-B2816-2019

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 Environment, Great Lakes, and Energy, 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:

Mr. Brian Carley Environmental Quality Specialist Michigan Department of Environment, Great Lakes, and Energy Air Quality Division, Jackson District Office State Office Building, 4th Floor 301 East Louis B. Glick Highway Jackson, Michigan 49201-1556

Telephone: 517-416-4631 Facsimile: 517-780-7855

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 Allo	owance Allocation and Ni	trogen Oxides Require	ements for each affected
unit.			

ſ		2019	2020	2021	2022	2023
	SO ₂ allowances	23,882	23,882	23,882	23,882	23,882
Unit 1	NO _x limit	NOx limit Pur Department Quality Divis this unit, effe unit's NOx e alternative c Ib/mmBtu . I input less th Under the pl emission rat to the Btu-w same units h period of tim limitations u early electio under 40 CF demonstrate forth in 40 C plan, then th year with its limitation an In addition to comply with 76, including requirement	rsuant to 40 C of Environme sion approves ective from Ja missions sha ontemporane n addition, thi an 39,094,00 an, the actua e for the units eighted annua had they each e, in complian nder 40 CFR n units, the ap FR 76.7. If the es that the req FR 76.11(d)(1 is unit shall b alternative co d annual heat o the describe all other appl g the duty to re s covering ex	CFR 76.11, the ent, Great Lake a NOx emission ouary 1, 2019 Il not exceed ous emission is unit shall no 0 mmBtu . I Btu-weighter is in the plan s al average NO been operate nce with the a 76.5, 76.6, or oplicable emission designated r juirement of the 1)(ii)(A)) is more edeemed to ontemporaneous tinput limit.	e State of Mic ses, and Energi- sions averagin 9. Under the p the annual aver limitation of C of have an an d annual aver hall be less th Dx emission ra ed, during the applicable emi 76.7, except ssion limitation epresentative he prior sente et for a year u be in complia bus annual en iance plan, th ements of 40 C NOx compliance ns.	higan gy, Air g plan for olan, this rerage).10 nual heat rage NOx nan or equal ate for the same ission that for any ns shall be nce (as set nder the nce for that nission is unit shall CFR part ce plan and

Terms and Conditions: (continued)

		2019	2020	2021	2022	2023
	SO ₂ allowances	24,785	24,785	24,785	24,785	24,785
Unit 2	NO _x limit	NOx limit Pur Department Quality Divis this unit, effe unit's NOx e alternative c Ib/mmBtu . I input less that Under the pl emission rat to the Btu-way same units h period of tim limitations un early election under 40 CF demonstrate forth in 40 C plan, then th year with its limitation and In addition to comply with including the	rsuant to 40 C of Environme sion approves ective from Ja missions sha ontemporane n addition, thi an 50,700,00 an, the actua e for the units eighted annus nder 40 CFR n units, the ap rR 76.7. If the es that the req FR 76.11(d)(is unit shall b alternative co d annual heat o the describe all other apple e duty to rea	CFR 76.11, the ent, Great Lak a NOx emission ouary 1, 2019 Il not exceed ous emission is unit shall no 0 mmBtu . I Btu-weighter is in the plan s al average NO been operate nce with the a 76.5, 76.6, or oplicable emis designated r juirement of the 1)(ii)(A)) is me e deemed to ontemporaneous t input limit. ed NOx comp icable require apply for a N	e State of Mic es, and Energi- sions averagin 9. Under the p the annual aver limitation of C of have an an d annual aver hall be less th Dx emission ra- ed, during the applicable emi- 76.7, except ssion limitation epresentative he prior sente et for a year u be in complia bus annual en liance plan, the ements of 40 C IOx compliant	chigan gy, Air ng plan for plan, this rerage 0.10 nual heat rage NOx nan or equal ate for the same ission that for any ns shall be nce (as set nder the nce for that nission

Terms and Conditions: (continued)

SO2 allowances 23,200 23,200 23,200 23,200 23,200 23,200 23,200 NOx limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air			2019	2020	2021	2022	2023
NOx limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air		SO ₂ allowances	23,200	23,200	23,200	23,200	23,200
Unit 3 Unit 3 Unit 3 Unit 3 Unit 4 Unit 4 Unit 4 Unit 4 Unit 5 Unit 4 Unit 5 Unit 4 Unit 4 Unit 4 Unit 4 Unit 4 Unit 5 Unit 4 Unit 4	Unit 3	NO _x limit	NOx limit Pu Department Quality Divis this unit, effe unit's NOx e alternative of Ib/mmBtu . I input less th Under the p emission rat to the Btu-w same units I period of tim limitations u early electio under 40 CF demonstrate forth in 40 C plan, then th year with its limitation an In addition t comply with including th	rsuant to 40 C of Environme sion approves ective from Ja missions sha ontemporane n addition, thi an 54,404,00 an, the actua e for the units eighted annus nder 40 CFR n units, the application rfR 76.7. If the est hat the rec FR 76.11(d)(is unit shall b alternative co d annual heat o the describut all other application e duty to reat	CFR 76.11, the ent, Great Lak a NOx emission ouary 1, 2019 Il not exceed ous emission is unit shall no 0 mmBtu . I Btu-weighter is in the plan s al average NO been operate nce with the a 76.5, 76.6, or oplicable emis designated r juirement of the 1)(ii)(A)) is more e deemed to ontemporaneous t input limit. ed NOx complicable require apply for a N	e State of Mic es, and Energi- sions averagir 9. Under the p the annual aver limitation of (ot have an an d annual aver hall be less th Dx emission ra- ed, during the applicable emi- 76.7, except ssion limitation epresentative he prior sente et for a year u be in complia bus annual emi- liance plan, the ements of 40 (IOx compliant)	chigan gy, Air gy Air ng plan for blan, this rerage 0.10 nual heat rage NOx nan or equal ate for the same ission that for any ns shall be nce (as set nder the nce for that nission

Terms and Conditions: (continued)

-

		2019	2020	2021	2022	2023
	SO ₂ allowances	25,478	25,478	25,478	25,478	25,478
Unit 4	NO _x limit	NOx limit Pur Department Quality Divis this unit, effe unit's NOx e alternative of Ib/mmBtu . I input less th Under the pl emission rat to the Btu-w same units I period of tim limitations u early electio under 40 CF demonstrate forth in 40 C plan, then th year with its limitation an In addition t comply with including th requirement	rsuant to 40 C of Environme sion approves ective from Ja emissions sha ontemporane n addition, thi an 54,418,00 lan, the actua e for the units eighted annua had they each ne, in complian nder 40 CFR n units, the applies that the rec FR 76.7. If the est hat the rec FR 76.11(d)(his unit shall b alternative co d annual heat o the describe all other applies covering ex	CFR 76.11, the ent, Great Lake a NOx emission ous emission is unit shall no 0 mmBtu . I Btu-weighter is in the plan s al average NO been operate nce with the a 76.5, 76.6, or oplicable emission designated r juirement of the 1)(ii)(A)) is more e deemed to ontemporaneous tinput limit. ed NOx complicable require apply for a No cess emission	e State of Mic ees, and Energi- sions averagin 9. Under the p the annual aver limitation of (ot have an an d annual aver hall be less th Dx emission r ed, during the applicable emi- 76.7, except ssion limitation epresentative he prior sente et for a year u be in complia bus annual en liance plan, the ments of 40 (IO _X compliance ns.	chigan gy, Air ng plan for plan, this rerage 0.10 nual heat rage NOx nan or equal ate for the e same sission that for any ns shall be nce (as set nder the nce for that nission

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 March 11, 2014 Phase II NOx Compliance Plan submitted March 11, 2014 Phase II NOx Averaging Plan submitted March 11, 2014; revised June 10, 2019

Section 1 DTE Electric Company – Monroe Power Plant Expiration Date:October 16, 2024

ROP No: MI-ROP-B2816-2019 PTI No: MI-PTI-B2816-2019



United States Environmental Protection Agency Acid Rain Program

OMB No. 2060-0258 Approval expires 11/30/2012

Acid Rain Permit Application

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

This submission is: \sim new \sim revised $\sim X$ for Acid Rain permit renewal

STEP 1

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

STEP 2

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

Facility (Source) Name Monroe Power Plant	State MI	Plant Code 1733			
a	b				
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)				
1 ,		Yes			
2		Yes			
3		Yes			
4		Yes			
		Yes			
		Yes			
		Yes			
·		Yes			
		Yes			
·		Yes			
		Yes			
· · · ·		Yes			

Acid Rain - Page 2

Facility (Source) Name (from STEP 1) Monroe Power Plant

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;
- 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)

 (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).

Acid Rain - Page 3

Facility (Source) Name (from STEP 1) Monroe Power Plant

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;

Section 1 DTE Electric Company – Monroe Power Plant Expiration Date:October 16, 2024

Facility (Source) Name (from STEP 1) Monroe Power Plant	Acid Rain - Page 4
Recordkeeping and Reporting Requirements, Cont	<u>d.</u>
(ii) All emissions monitoring information, in accordar 75, provided that to the extent that 40 CFR part 75 period for recordkeeping, the 3-year period shall app (iii) Copies of all reports, compliance certifications, a and all records made or required under the Acid Rai (iv) Copies of all documents used to complete a application and any other submission under the Acid demonstrate compliance with the requirements of the Other and any other submission under the Acid demonstrate compliance with the requirements of the application and any other submission under the Acid demonstrate compliance with the requirements of the application and any other submission under the Acid demonstrate compliance with the requirements of the submission under the Acid demonstrate compliance with the requirements of the submission under the Acid demonstrate compliance with the requirements of the submission under the Acid demonstrate compliance with the requirements of the submission under the Acid demonstrate compliance with the requirements of the submission under the Acid demonstrate compliance with the requirements of the submission under the Acid demonstrate compliance with the requirements of the submission under the Acid demonstrate compliance with the requirements of the submission under the Acid demonstrate compliance with the requirements of the submission under the Acid demonstrate compliance with the requirements of the submission under the submission under the Acid demonstrate compliance with the requirements of the submission under the submissio	nce with 40 CFR part provides for a 3-year oly. nd other submissions n Program; and, an Acid Rain permit d Rain Program or to e 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

STEP 3, Cont'd.

(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 any the owner or the owner of the owner owner of the owner of the owner of the owner of the owner owner of the owner owner of the owner owner owner of the owner owner of the owner owner owner of the owner owner owner of the owner ow

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

	Acid Rain - Page 5 Facility (Source) Name (from STEP 1) Monroe Power Plant
	Effect on Other Authorities, Cont'd.
	to applicable National Ambient Air Quality Standards or State Implementation
STEP 3, Cont'd.	 (2) Limiting the number of allowances a source can hold; <i>provided</i>, 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 Franklin D. Warren, Vice President - Fossil Generation
	Signature Man Que Come Date 1-28-2014
ł	

EPA Form 7610-16 (Revised 12-2009)

Section 1 DTE Electric Company – Monroe Power Plant Expiration Date:October 16, 2024

SEPA	United State Environmen Acid Rain P	s tal Protection Ag rogram	OMB No. 2060-0258 Approval expires 11/30/2012					
	Phase	e II NO _x	Compli	ance P	lan	an		
	For more infor This submissio	nation, see instruction is:	ons and refer to 40	CFR 76.9	P:	age 1 of 2		
STEP 1 Indicate plant name, State, and ORIS code from NADB, if applicable	Plant Name N	IONROE POW	TER PLANT		State MI	ORIS Code 1733		
STEP 2	ldentify each a Indicate boiler tangentially fin selected for ea	ffected Group 1 an type: "CB" for cell ed, "V" for verticall cch unit.	d Group 2 boiler u I burner, "CY" for ly fired, and "WB"	sing the boiler ID# cyclone, "DBW" fo for wet bottom. In	from NADB, if a r dry bottom wal dicate the comp	pplicable. I-fired, "T" for lance option		
	ID# 1	ID# 2	(D# 3	ID# 4	ID#	ID#		
	Туре СВ	Туре СВ	Туре СВ	Туре СВ	Туре	Туре		
(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for <u>Phase I</u> dry bottom wall-fired bollers)					· · ·			
(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for <u>Phase l</u> tangentially fired boilers)								
(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)								
d) Standard annual average emission imitation of 0.46 lb/mmBtu (for <u>Phase</u> l dry bottom wall-fired boilers)								
(e) Standard annual average emission imitation of 0.40 lb/mmBtu (for P <u>hase</u> <u>I</u> tangentially fired bollers)								
(f) Standard annual average emission imitation of 0.68 lb/mmBtu (for cell purner bollers)								
(g) Standard annual average emission linitation of 0.86 lb/mmBtu (for cyclone bollers)								
(h) Standard annual average emission Imitation of 0.80 lb/mmBtu (for vertically fired bollers)								
(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom bollers)				, ,				
(j) NO _x Averaging Plan (include NO _x Averaging form)	x	X	x	x				
(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)								
(I) Common stack pursuant to 40 CFR 75.17(a)(2)(I)(B) with NO _x Averaging (check the NO _x Averaging Plan box and include NO _x Averaging form)						<u> </u>		
EPA Form 7610-28 (Revised 12-2009))							

					NO _x Co Page	ompliance - Page 2
STEP 2, cont'd.	Plant Name (from	I Step 1) MONRC ID# 2 Type CB	DE POWER PI	LANT ID# 4 Type CB	ID#	ID#
(m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17(a)(2)(I)(C), (a)(2)(III)(B), or (b)(2)						
(n) AEL (include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)						
(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing						
(p) Repowering extension plan approved or under review			· .			

STEP 3 Read the standard requirements and certification, enter the name of the designated representative, sign &

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii). Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR 76.7 The transition of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77. Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative on submit a new early election plan. The designated representative of the unit under an approved early election plan. The designated representative of the unit under an approved early election plan. The designated representative of the unit under an approved early election plan. The designated representative of the unit under an approved early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, which the terminat which the termination is to take effect. If an early election plan is terminate any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 bollers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 bollers under 40 CFR 76.7.

Certification

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 imprivance. fine or imprisonment.

Name Franklin D. Warren, Vice President - Fossil Generatio	n
signature Thomas Domas Domas	Date 1-28-2014



Acid Rain Program Acid Rain NO_X Averaging Plan

For more information, see instructions and refer to 40 CFR 76.11

Page 1

This submission is:
New X Revised

United States

Environmental Protection Agency

Page 1 of 2

OMB No. 2060-0258

Approval expires 11/30/2018

STEP 1

Identify the units participating in this averaging plan by plant name, State, and unit ID. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. in column (b), assign an alternative contemporaneous annual emissions limitation (ACEL) in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue to page 3 if necessary.

			(a) Emission	(a)	(c)
Plant Name	State	Unit ID#	Limitation	ACEL	Annual Heat Input Limit
Belle River 6034	МІ	1	0.46	0.27	47,540,000
Belle River 6034	МІ	2	0.46	0.27	42,597,000
MONROE 1733	MI	1	0.68	0.10	39,094,000
MONROE 1734	MI	2	0.68	0.10	50,700,000
MONROE 1735	MI	3	0.68	0.10	54,404,000
MONROE 1736	MI	4	0.68	0.10	54.418.000
River Rouge 1740	MI	3	0.46	0.54	19,201,000
ST CLAIR 1743	MI	1	0.46	0.50	11,366,000
ST CLAIR 1743	MI	2	0.46	0.50	10,469,000
ST CLAIR 1743	MI	3	0.46	0.50	11,782,000
ST CLAIR 1743	MI	6	0.40	0.25	16,877,000
ST CLAIR 1743	МІ	7	0.40	0.25	30,308,000
Trenton Channel 1745	МІ	9A	0.40	0.24	23,621,000



STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter. latter.

Section 1 DTE Electric Company – Monroe Power Plant Expiration Date:October 16, 2024

DTE Energy Electric Plant Name (from Step 1

NO_x Averaging - Page 2

STEP 3

Identify the first calendar year in which this plan will apply.

January 1, 2019

STEP 4

Special Provisions

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NOx under the plan only if the following requirements are met:

(i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and (a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,

(b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or

(ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.

(iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

Certification

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 Franklin D. Warren, Designated Representative					
signature Mangling Conten)	Date 6-6-19				

Appendix 10-1. Cross State Air Pollution Rule (CSAPR) Trading Program Title V Requirements

Description of CSAPR Monitoring Provisions

The CSAPR subject units, and the unit-specific monitoring provisions, at this source are identified in the following tables. These units are subject to the requirements for the CSAPR NO_X Annual Trading Program, CSAPR NO_X Ozone Season Group 2 Trading Program, and CSAPR SO₂ Group 1 Trading Program, which are included below as Sections I, II, and III, respectively.

Each unit will use one of the following as the monitoring methodology for each parameter as provided below and shall comply with the general monitoring, recordkeeping, reporting and other requirements in conditions 1 through 5 below and in paragraph (b) of Sections I, II, and III:

- Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B (for SO₂ monitoring) or 40 CFR Part 75, Subpart H (for NO_x monitoring)
- Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
- Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E
- Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19
- EPA-approved alternative monitoring system requirements pursuant to 40 CFR Part 75, Subpart E

Unit ID: 1	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B
NOx	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B (for SO ₂ monitoring) and 40 CFR Part 75, Subpart H (for NO _X monitoring)

Unit ID: 2	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B
NOx	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B (for SO ₂ monitoring) and 40 CFR Part 75, Subpart H (for NO _x monitoring)

Unit ID: 3	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B
NOx	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B (for SO ₂ monitoring) and 40 CFR Part 75, Subpart H (for NO _X monitoring)

Unit ID: 4	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B
NOx	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart H

Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR
	Part 75, Subpart B (for SO ₂ monitoring) and 40 CFR Part 75, Subpart H (for NO _x monitoring)

- 1. The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (CSAPR NO_X Annual Trading Program), 97.830 through 97.835 (CSAPR NO_X Ozone Season Group 2 Trading Program), and 97.630 through 97.635 (CSAPR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable CSAPR trading programs.
- 2. Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at http://www.epa.gov/airmarkets/emissions/monitoringplans.html.
- 3. Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR Part 75, Subpart E and 40 CFR 75.66 and 97.435 (CSAPR NO_X Annual Trading Program), 97.835 (CSAPR NO_X Ozone Season Group 2 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at http://www.epa.gov/airmarkets/emissions/petitions.html.
- 4. Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (CSAPR NO_X Annual Trading Program), 97.830 through 97.834 (CSAPR NO_X Ozone Season Group 2 Trading Program), and/or 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (CSAPR NO_X Annual Trading Program), 97.835 (CSAPR NO_X Ozone Season Group 2 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at http://www.epa.gov/airmarkets/emissions/petitions.html.
- 5. The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (CSAPR NO_X Annual Trading Program), 97.830 through 97.834 (CSAPR NO_X Ozone Season Group 2 Trading Program), and 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.

SECTION I: CSAPR NO_x Annual Trading Program requirements (40 CFR 97.406)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of CSAPR NO_X Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the CSAPR NO_X Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430
through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_x emissions requirements.

- (1) CSAPR NO_X Annual emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall hold, in the source's compliance account, CSAPR NOx Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_X Annual units at the source.
 - If total NO_x emissions during a control period in a given year from the CSAPR NO_x Annual units at a (ii). CSAPR NO_X Annual source are in excess of the CSAPR NO_X Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - The owners and operators of the source and each CSAPR NO_X Annual unit at the source shall (A). hold the CSAPR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and
 - (B). The owners and operators of the source and each CSAPR NO_X Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.
- (2) CSAPR NO_X Annual assurance provisions.
 - (i). If total NO_X emissions during a control period in a given year from all CSAPR NO_X Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_X emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying- (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NOx emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_X emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - The owners and operators shall hold the CSAPR NOx Annual allowances required under paragraph (ii). (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - Total NO_X emissions from all CSAPR NO_X Annual units at CSAPR NO_X Annual sources in the State (iii). and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NOx emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).
 - (iv). It shall not be a violation of 40 CFR Part 97, Subpart AAAAA or of the Clean Air Act if total NOx emissions from all CSAPR NO_X Annual units at CSAPR NO_X Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold CSAPR NO_X Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

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- (B). Each CSAPR NO_X Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.
- (3) Compliance periods.
 - (i). A CSAPR NO_X Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - (ii). A CSAPR NO_X Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
 - (i). A CSAPR NO_X Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_X Annual allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A CSAPR NO_X Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_X Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each CSAPR NO_X Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart AAAAA.
- (6) Limited authorization. A CSAPR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the CSAPR NO_x Annual Trading Program; and
 - Notwithstanding any other provision of 40 CFR Part 97, the Administrator has the authority to terminate (ii). or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A CSAPR NO_x Annual allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NOx Annual allowances in accordance with 40 CFR Part 97, Subpart AAAAA.
- (2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each CSAPR NOx Annual source and each CSAPR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - The certificate of representation under 40 CFR 97.416 for the designated representative for the source (i). and each CSAPR NO_X Annual 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart AAAAA.

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- (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Annual Trading Program.
- (2) The designated representative of a CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall make all submissions required under the CSAPR NOx Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

(f) Liability.

- (1) Any provision of the CSAPR NO_X Annual Trading Program that applies to a CSAPR NO_X Annual source or the designated representative of a CSAPR NO_x Annual source shall also apply to the owners and operators of such source and of the CSAPR NO_X Annual units at the source.
- (2) Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual unit or the designated representative of a CSAPR NOx Annual unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the CSAPR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NOx Annual source or CSAPR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION II: CSAPR NO_x Ozone Season Group 2 Trading Program Requirements (40 CFR 97.806)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.813 through 97.818.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each CSAPR NO_X Ozone Season Group 2 source and each CSAPR NO_X Ozone Season Group 2 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.830 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.831 (initial monitoring system certification and recertification procedures), 97.832 (monitoring system out-of-control periods), 97.833 (notifications concerning monitoring), 97.834 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.835 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.830 through 97.835 shall be used to calculate allocations of CSAPR NOx Ozone Season Group 2 allowances under 40 CFR 97.811(a)(2) and (b) and 97.812 and to determine compliance with the CSAPR NO_x Ozone Season Group 2 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.830 through 97.835 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_X emissions requirements.

- (1) CSAPR NO_X Ozone Season Group 2 emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NOx Ozone Season Group 2 source and each CSAPR NOx Ozone Season Group 2 unit at the source shall hold, in the source's compliance account, CSAPR NOx Ozone Season Group 2

allowances available for deduction for such control period under 40 CFR 97.824(a) in an amount not less than the tons of total NO_X emissions for such control period from all CSAPR NO_X Ozone Season Group 2 units at the source.

- (ii). If total NO_X emissions during a control period in a given year from the CSAPR NO_X Ozone Season Group 2 units at a CSAPR NO_X Ozone Season Group 2 source are in excess of the CSAPR NO_X Ozone Season Group 2 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall hold the CSAPR NO_x Ozone Season Group 2 allowances required for deduction under 40 CFR 97.824(d); and
 - (B). The owners and operators of the source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart EEEEE and the Clean Air Act.
- (2) CSAPR NO_X Ozone Season Group 2 assurance provisions.
 - (i). If total NO_x emissions during a control period in a given year from all CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Ozone Season Group 2 allowances available for deduction for such control period under 40 CFR 97.825(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.825(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and
 - (B). The amount by which total NO_x emissions from all CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - (ii). The owners and operators shall hold the CSAPR NO_X Ozone Season Group 2 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total NO_X emissions from all CSAPR NO_X Ozone Season Group 2 units at CSAPR NO_X Ozone Season Group 2 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_X emissions exceed the sum, for such control period, of the State NO_X Ozone Season trading budget under 40 CFR 97.810(a) and the state's variability limit under 40 CFR 97.810(b).
 - (iv). It shall not be a violation of 40 CFR Part 97, Subpart EEEEE or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state during a control period exceed the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold CSAPR NO_x Ozone Season Group 2 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each CSAPR NO_X Ozone Season Group 2 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day

of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart EEEEE and the Clean Air Act.

- (3) Compliance periods.
 - (i). A CSAPR NO_x Ozone Season Group 2 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.830(b) and for each control period thereafter.
 - (ii). A CSAPR NO_x Ozone Season Group 2 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.830(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
 - (i). A CSAPR NO_X Ozone Season Group 2 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_X Ozone Season Group 2 allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A CSAPR NO_x Ozone Season Group 2 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 2 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each CSAPR NO_X Ozone Season Group 2 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart EEEEE.
- (6) Limited authorization. A CSAPR NO_x Ozone Season Group 2 allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the CSAPR NO_X Ozone Season Group 2 Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR Part 97, Subpart EEEEE, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A CSAPR NO_X Ozone Season Group 2 allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_X Ozone Season Group 2 allowances in accordance with 40 CFR Part 97, Subpart EEEEE.
- (2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.830 through 97.835, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.806(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each CSAPR NO_x Ozone Season Group 2 source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.816 for the designated representative for the source and each CSAPR NO_X Ozone Season Group 2 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.816 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart EEEEE.

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- (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Ozone Season Group 2 Trading Program.
- (2) The designated representative of a CSAPR NO_X Ozone Season Group 2 source and each CSAPR NO_X Ozone Season Group 2 unit at the source shall make all submissions required under the CSAPR NO_x Ozone Season Group 2 Trading Program, except as provided in 40 CFR 97.818. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

(f) Liability.

- (1) Any provision of the CSAPR NO_x Ozone Season Group 2 Trading Program that applies to a CSAPR NO_x Ozone Season Group 2 source or the designated representative of a CSAPR NO_X Ozone Season Group 2 source shall also apply to the owners and operators of such source and of the CSAPR NO_X Ozone Season Group 2 units at the source.
- (2) Any provision of the CSAPR NO_x Ozone Season Group 2 Trading Program that applies to a CSAPR NO_x Ozone Season Group 2 unit or the designated representative of a CSAPR NOx Ozone Season Group 2 unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the CSAPR NO_X Ozone Season Group 2 Trading Program or exemption under 40 CFR 97.805 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NOx Ozone Season Group 2 source or CSAPR NOx Ozone Season Group 2 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION III: CSAPR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of CSAPR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the CSAPR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) SO₂ emissions requirements.

(1) CSAPR SO₂ Group 1 emissions limitation.

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- (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO2 Group 1 unit at the source shall hold, in the source's compliance account, CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all CSAPR SO₂ Group 1 units at the source.
- If total SO₂ emissions during a control period in a given year from the CSAPR SO₂ Group 1 units at a (ii). CSAPR SO₂ Group 1 source are in excess of the CSAPR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall hold the CSAPR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and
 - The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall (B). pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.
- (2) CSAPR SO₂ Group 1 assurance provisions.
 - (i). If total SO₂ emissions during a control period in a given year from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying-
 - The quotient of the amount by which the common designated representative's share of such SO₂ (A). emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and
 - (B). The amount by which total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - (ii). The owners and operators shall hold the CSAPR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
 - (iv). It shall not be a violation of 40 CFR Part 97, Subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - To the extent the owners and operators fail to hold CSAPR SO₂ Group 1 allowances for a control period (v). in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - The owners and operators shall pay any fine, penalty, or assessment or comply with any other (A). remedy imposed under the Clean Air Act; and
 - Each CSAPR SO₂ Group 1 allowance that the owners and operators fail to hold for such control (B). period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.

- (3) Compliance periods.
 - (i). A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
 - (ii). A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
 - (i). A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each CSAPR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart CCCCC.
- (6) Limited authorization. A CSAPR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the CSAPR SO₂ Group 1 Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR Part 97, Subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A CSAPR SO₂ Group 1 allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR SO₂ Group 1 allowances in accordance with 40 CFR Part 97, Subpart CCCCC.
- (2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each CSAPR SO₂ Group 1 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart CCCCC.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR SO₂ Group 1 Trading Program.
- (2) The designated representative of a CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall make all submissions required under the CSAPR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise

affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

(f) Liability.

- (1) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 source or the designated representative of a CSAPR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the CSAPR SO₂ Group 1 units at the source.
- (2) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 unit or the designated representative of a CSAPR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the CSAPR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR SO₂ Group 1 source or CSAPR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

Section 2 – DTE Electric Company – Monroe Peakers

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 a 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

- 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).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. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, 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 the following:" ² (**R 336.1301(1)**)
 - a. A 6-minute average of 20 % 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.

The grading of visible emissions shall be determined in accordance with Rule 303.

- 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).² (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(5)**)

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.² (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(10))
- 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(8))

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 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).
- 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 68.10(a):
 - a. June 21, 1999,
 - b. Three years after the date on which a regulated substance is first listed under 40 CFR 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, EGLE.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 of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, 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, EGLE, 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:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This 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.

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
EU-DIESEL11-1	Diesel Generator Peaking Unit DG 11-1 – 3,960 hp (2.75 MW), 2-cycle compression ignition internal combustion engine	10-24-1969	FG-PEAKERS
EU-DIESEL11-2	Diesel Generator Peaking Unit DG 11-2 – 3,960 hp (2.75 MW), 2-cycle compression ignition internal combustion engine	10-24-1969	FG-PEAKERS
EU-DIESEL11-3	Diesel Generator Peaking Unit DG 11-3 – 3,960 hp (2.75 MW), 2-cycle compression ignition internal combustion engine	10-24-1969	FG-PEAKERS
EU-DIESEL11-4	Diesel Generator Peaking Unit DG 11-4 – 3,960 hp (2.75 MW), 2-cycle compression ignition internal combustion engine	10-24-1969	FG-PEAKERS
EU-DIESEL11-5	Diesel Generator Peaking Unit DG 11-5 – 3,960 hp (2.75 MW), 2-cycle compression ignition internal combustion engine	10-24-1969	FG-PEAKERS

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
FG-PEAKERS	Five diesel fuel-fired generator peaking units that are limited use stationary reciprocating internal combustion engines.	EU-DIESEL11-1, EU-DIESEL11-2, EU-DIESEL11-3, EU-DIESEL11-4, EU-DIESEL11-5

FG-PEAKERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Five diesel fuel-fired generator peaking units that are limited use stationary reciprocating internal combustion engines.

Emission Units: EU-DIESEL11-1, EU-DIESEL11-2, EU-DIESEL11-3, EU-DIESEL11-4, EU-DIESEL11-5

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable
		Coontairio		l coung mourou	Requirements
1. NOx	90.2 pph per	Test protocol will specify	EU-DIESEL11-1,	SC V.1,	R 336.2804,
	unit ²	averaging time	EU-DIESEL11-2,	SC III.1,	40 CFR 52.21(d)
			EU-DIESEL11-3,	SC VI.2	
			EU-DIESEL11-4,		
			EU-DIESEL11-5		
2. SO2	0.043 pph per	Test protocol will specify	EU-DIESEL11-1,	SC VI.2	R 336.1401,
	unit ²	averaging time	EU-DIESEL11-2,	SC VI.3	R 336.2803,
			EU-DIESEL11-3,		R 336.2804,
			EU-DIESEL11-4,		40 CFR 52.21(c)
			EU-DIESEL11-5		and (d)

II. MATERIAL LIMIT(S)

1. The permittee shall only burn diesel fuel with a maximum sulfur content of 15 ppm in FG-PEAKERS.² (R 336.1401, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

The permittee shall not operate each diesel generator in FG-PEAKERS for more than 99.9 hours per 12-month rolling time period as determined at the end of each calendar month.² (R 336.2804, 40 CFR 52.21(d), 40 CFR 63.6600(c))

IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

 The permittee shall equip and maintain each diesel generator in FG-PEAKERS with a non-resettable hour meter to track the number of minutes and hours the engine operates.² (R 336.2804, 40 CFR 52.21(d), 40 CFR 63.6600(c))

V. TESTING/SAMPLING

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

- Upon request by the AQD, the permittee shall verify NO_x emission rates FG-PEAKERS by testing at owner's expense, in accordance with the Department requirements. 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)
- 2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. (**R 336.1213(3**))

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 record the monthly fuel usage rates in gallons.² (R 336.1401, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
- 2. The permittee shall maintain a record of the analysis of the fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil.² (R 336.1401, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
- The permittee shall monitor and record in a satisfactory manner, the hours of operation for each unit in FG-PEAKERS. The record shall include the time and duration of operation.² (R 336.2804, 40 CFR 52.21(d), 40 CFR 63.6600(c))

VII. <u>REPORTING</u>

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

See Appendix 8-2

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. SV-DIESEL11-1	32 ²	20 ²	R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)
2. SV-DIESEL11-2	32 ²	20 ²	R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)
3. SV-DIESEL11-3	32 ²	20 ²	R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)
4. SV-DIESEL11-4	32 ²	20 ²	R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)
5. SV-DIESEL11-5	32 ²	20 ²	R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines.² (40 CFR 63.6595, 40 CFR Part 63, Subparts A and ZZZZ)

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

E. NON-APPLICABLE REQUIREMENTS

At the time of the 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 1-2. Abbreviations and Acronyms

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

Common Acronyms			Pollutant / Measurement Abbreviations
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	СО	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/	Michigan Department of Environment,	°F	Degrees Fahrenheit
department	Great Lakes, and Energy	gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
EGLE	Michigan Department of Environment,	NOx	Oxides of Nitrogen
	Great Lakes, and Energy	ng	Nanogram
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10
NAAQS	National Ambient Air Quality Standards		microns in diameter
NESHAP	National Emission Standard for Hazardous	PM2.5	Particulate Matter equal to or less than 2.5
NEDE	Air Pollutants New Seurce Performance Standards	nnh	microns in diameter
	New Source Performance Standards	ppn	Potts per million
PS	Performance Specification	ppm	Parts per million by volume
	Prevention of Significant Deterioration	nnmw	Parts per million by weight
DTE	Permanent Total Enclosure	ppinw	Pounds per square inch absolute
PTI	Permit to Install	nsia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	Sec	Seconds
SC	Special Condition	SO2	Sulfur Dioxide
SCR	Selective Catalytic Reduction		Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ		tov	Tons per vear
	United States Environmental Protection	ua	Microgram
	Agency	um	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		vr	Year

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

Appendix 2-2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3-2. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4-2. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 5-2. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

Appendix 6-2. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2816-2009a. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No. MI-PTI-B2816-2009a is being reissued as Source-Wide PTI No. MI-PTI-B2816-2019.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
27-13B	NA	Five diesel fuel-fired generator peaking units.	FG-PEAKERS

Appendix 7-2. Emission Calculations

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

Appendix 8-2. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual 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

Specific reporting requirement formats and procedures are detailed 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.

Section 3 – Monroe Fuels Company, LLC

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 a 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

- 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)**)

Section 3 Monroe Fuels Company, LLC

- 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).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. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, 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 the following:" ² (**R 336.1301(1)**)
 - a. A 6-minute average of 20 % 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.

The grading of visible emissions shall be determined in accordance with Rule 303.

- 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).² (**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(5**))

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.² (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(10))
- 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(8))

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 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 68.10(a):
 - a. June 21, 1999,
 - b. Three years after the date on which a regulated substance is first listed under 40 CFR 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, EGLE.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 of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, 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, EGLE, 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:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This 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.
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	Installation Date/	Flexible Group ID
	Device(s))	Modification Date	
EU-REFHS&BL	This emission unit represents coal and sorbent handling activity in the Reduced Emission Fuel (REF) Transfer House and Refined Coal Plant Building including an 8,500-gallon Mersorb storage tank, a 750-ton S-Sorb solid storage silo, associated conveyors, and any trucking and unloading activities. Sorbent handling activity inside the Refined Coal Plant Building includes two pug mills, two day bins, and mixing operations. Coal and sorbent handling activity emissions are limited by enclosures, baghouse dust collectors, wet dust suppression methods, or bin vent filters.	06-13-2011	NA

EU-REFHS&BL EMISSION UNIT CONDITIONS

DESCRIPTION

This emission unit represents coal and sorbent handling activity in the Reduced Emission Fuel (REF) Transfer House and Refined Coal Plant Building including an 8,500-gallon Mersorb storage tank, a 750-ton S-Sorb solid storage silo, associated conveyors, and any trucking and unloading activities. Sorbent handling activity inside the Refined Coal Plant Building includes two pug mills, two day bins, conveying and mixing operations. Coal and sorbent handling activity emissions are limited by enclosures, baghouse dust collectors, wet dust suppression methods, or bin vent filters.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

REF Transfer house dust collector #1 (SV-REFDC01), Refined Coal Plant Building Transfer dust collector #2 (SV-REFDC02), storage silo with a bin vent filter (SV-REFBV), enclosures and dust suppressants

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Opacity	5 percent ²	Test protocol will specify averaging time	Each individual fabric filter and bin vent filter in EU-REFHS&BL	SC VI.1	R 336.1301(1)(c), 40 CFR 60.254(b)(1)
2. PM	0.004 gr / dscf of exhaust gases ²	Daily	Each individual fabric filter and bin vent filter in EU-REFHS&BL	SC III.2, SC VI.1	R 336.1205, R 336.1331(1)(c), 40 CFR 60.254(b)(2)
3. PM10	0.21 pph ²	Daily	Each individual fabric filter SV-REFDC01 and SV-REFDC02	SC III.2, SC VI.1	R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
4. PM2.5	0.21 pph ²	Daily	Each individual SC III.2, fabric filter SC VI.1 SV-REFDC01 and SV-REFDC02		R 336.1205
5. PM10	0.041 pph ²	Daily	SV-REFBV	SC III.2, SC VI.1	R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
6. PM2.5	0.041 pph ²	Daily	SV-REFBV	SC III.2, SC VI.1	R 336.1205

I. EMISSION LIMIT(S)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-REFHS&BL unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1371, R 336.1372, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d), Act 451 Section 324.5524)
- 2. The permittee shall not operate EU-REFHS&BL unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate any portion of EU-REFHS&BL unless the associated enclosures, fabric filters, and bin vent filter are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-REFHS&BL as required in SC III.2.² (R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))
- The permittee shall not operate EU-REFHS&BL unless the external conveyor hoods or enclosures are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EU-REFHS&BL as required in SC III.2.² (R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

 The permittee shall perform and document non-certified visible emissions observations as required in SC I.1 on a daily basis when EU-REFHS&BL is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the noncertified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c), 40 CFR 60.254)

VII. <u>REPORTING</u>

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

See Appendix 8-3

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 with an asterisk (*) indicating a non-vertical discharge:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-REFDC01*	14 x 20 ²	53 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
2. SV-REFDC02*	14 x 20 ²	40 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
3. SV-REFBV*	14 x 14 ²	64 ²	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

 The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Y, as they apply to EU-REFHS&BL.² (40 CFR Part 60, Subparts A and Y)

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This 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.

E. NON-APPLICABLE REQUIREMENTS

At the time of the 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 1-3. Abbreviations and Acronyms

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

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/	Michigan Department of Environment,	°F	Degrees Fahrenheit
department	Great Lakes, and Energy	gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
EGLE	Michigan Department of Environment,	NOx	Oxides of Nitrogen
	Great Lakes, and Energy	ng	Nanogram
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10
NAAQS	National Ambient Air Quality Standards		microns in diameter
NESHAP	National Emission Standard for Hazardous	PM2.5	Particulate Matter equal to or less than 2.5
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection	μg	Microgram
	Agency	μm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

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

Appendix 2-3. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3-3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4-3. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 5-3. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

Appendix 6-3. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2816-2009a. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No. MI-PTI-B2816-2009a is being reissued as Source-Wide PTI No. MI-PTI-B2816-2019.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
27-13B	NA	REF Transfer House and Refined Coal Plant Building	EU-REFHS&BL

Appendix 7-3. Emission Calculations

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

Appendix 8-3. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual 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

Specific reporting requirement formats and procedures are detailed 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.