### SUPPLEMENT TO PERMIT NO. 16-01

## Detroit Edison Detroit, Michigan

## February 14, 2001

## GENERAL CONDITIONS

- 1. Rule 201(1) The process or process equipment covered by this permit shall not be reconstructed, relocated, altered, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule.
- 2. Rule 201(4) If the installation, reconstruction, relocation, or alteration of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the person to whom this permit was issued, or the designated authorized agent, shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or alteration of the equipment allowed by this Permit to Install.
- 3. Rules 201(6)(b) If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and condition of this Permit to Install.
- 4. Rule 201(8) and Section 5510 of Act 451, P.A. 1994 The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules of the Clean Air Act.
- 5. Rule 219 The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b) and (c) of R 336.1219. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality.
- 6. Rule 901 Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.
- 7. Rule 912 The owner or operator of a source, process, or process equipment shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant in excess of standards for more than one hour, or of any air contaminant in excess of standards for more than two hours, as required in this rule, to the District Supervisor, Air Quality Division. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the District Supervisor within 10 days, with the information required in this rule.

- 8. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future applicable requirements which may be promulgated under Part 55 of Act 451, P.A. 1994 of the Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, P.A. 1994, and the rules promulgated thereunder.
- 11. Rule 301 Except as provided in subrules (2), and (3), or unless the special conditions of this Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303.
  - a) A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a special condition of this permit to install.
- 12. Rule 370 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 R 336.1370(2).
- 13. Rule 285 Except as allowed by Rule 285 (a), (b), and (c), applicant shall not substitute any fuels, coatings, nor raw materials for those described in the application and allowed by this permit, nor make changes to the process or process equipment described in the application, without prior notification to and approval by the Air Quality Division.
- 14. The Department may require the applicant to conduct acceptable performance tests, at the applicant's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001.

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# SPECIAL CONDITIONS February 14, 2001 (22 special conditions)

- For purposes of this permit to install, all requirements for notifications or submittal of records to or approvals by the District Supervisor, Air Quality Division should be submitted to the Director of Compliance and Enforcement, Air Quality Management Division, Wayne County, Department of Environment unless you are otherwise notified in writing by the Air Quality Division. At no time shall notifications or submittals to or approvals by both agencies be required pursuant to this permit.
- 2. The following tables identify the Emission Unit and Flexible Group designations for Detroit Edison equipment covered by this Permit to Install. (R 336.1201(3))

Emission Unit	Emission Unit Description
EUWINTER1	Portable boiler with the capability of firing natural gas and
	distillate oil, and with a maximum heat input capacity of not
	more than 80.0 million British thermal units per hour.
EUWINTER2	Portable boiler with the capability of firing natural gas and
	distillate oil, and with a maximum heat input capacity of not
	more than 80.0 million British thermal units per hour.
EUSUMMER1	Portable boiler with the capability of firing natural gas and
	distillate oil, and with a maximum heat input capacity of not
	more than 15.0 million British thermal units per hour.
EUSUMMEREXEMPT	Collection of portable boilers with a combined maximum heat
	input capacity of not more than 15.0 million British thermal
	units per hour; each portable boiler with the capability of firing
	natural gas and distillate oil and with a maximum heat input
	capacity of less than 10 million British thermal units per hour.

Flexible Group	Emission Units Composing Flexible Group
FGWINTER	EUWINTER1, EUWINTER2
FGSUMMER	EUSUMMER1, EUSUMMEREXEMPT

- 3. The carbon monoxide emission rate from FGWINTER shall not exceed 0.10 pounds per million British thermal units heat input, nor 16 pounds per hour, nor 4.0 tons per year. The pounds per million British thermal units heat input limit shall be based on a 24-hour rolling average. The annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month. (R 336.1201(3), R 336.1205(3), 40 CFR 52.21 (d))
- 4. The carbon monoxide emission rate from FGSUMMER shall not exceed 0.10 pounds per million British thermal units heat input, nor 1.5 pounds per hour, nor 0.38 tons per year. The pounds per million British thermal units heat input limit shall be based on a 24-hour rolling average. The annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month. (R 336.1201(3), R 336.1205(3))

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- 5. The oxides of nitrogen emission rate, calculated as NO<sub>2</sub>, from FGWINTER shall not exceed 0.18 pounds per million British thermal units heat input, nor 29 pounds per hour, nor 7.2 tons per year. The pounds per million British thermal units heat input limit shall be based on a 24-hour rolling average. The annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month. (R 336.1201(3), R 336.1205(3), 40 CFR 52.21 (c) and (d))
- 6. The oxides of nitrogen emission rate, calculated as NO<sub>2</sub>, from FGSUMMER shall not exceed 0.18 pounds per million British thermal units heat input, nor 2.7 pounds per hour, nor 0.68 tons per year. The pounds per million British thermal units heat input limit shall be based on a 24-hour rolling average. The annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month. (R 336.1201(3), R 336.1205(3))
- 7. The sulfur dioxide emission rate from FGWINTER shall not exceed 0.061 pounds per million British thermal units heat input, nor 9.8 pounds per hour, nor 2.5 tons per year. The pounds per million British thermal units heat input limit shall be based on a 24-hour rolling average. The annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month. (R 336.1201(3), R 336.1205(3), 40 CFR 52.21 (c) and (d))
- 8. The sulfur dioxide emission rate from FGSUMMER shall not exceed 0.061 pounds per million British thermal units heat input, nor 0.92 pounds per hour, nor 0.23 tons per year. The pounds per million British thermal units heat input limit shall be based on a 24-hour rolling average. The annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month. (R 336.1201(3), R 336.1205(3))
- 9. The visible emissions from each of the following emission units shall not exceed a 6-minute average of 20 percent opacity, except for one 6-minute period per hour of not more than 27 percent opacity. The opacity of visible emissions shall be determined in accordance with federal Standards of Performance for New Stationary Sources, 40 CFR 60.45c(a)(7). (R 336.1301(1)(b), federal Standards of Performance for New Stationary Sources, 40 CFR 60.45c(a)(7). (0.43c(c))
  - a) EUWINTER1
  - b) EUWINTER2
- 10. Applicant shall combust only natural gas or distillate oil in FGWINTER. (R 336.1201(3))
- 11. Applicant shall combust only natural gas or distillate oil in FGSUMMER. (R 336.1201(3))
- 12. Applicant shall not exceed a heat input to FGWINTER of 160.0 million British thermal units per hour, nor 80.0 billion British thermal units per 12-month rolling time period. The 12-month rolling time period limit shall be determined at the end of each calendar month. (R 336.1205(3), R 336.1225, R 336.1227(2), 40 CFR 52.21 (c) and (d))

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- Applicant shall not exceed a heat input to FGSUMMER of 15.0 million British thermal units per hour, nor 7.50 billion British thermal units per 12-month rolling time period. The 12-month rolling time period shall be determined at the end of each calendar month. (R 336.1205(3), R 336.1225, R 336.1227(2))
- 14. Neither the sulfur content of the distillate oil combusted in FGWINTER nor the sulfur content of the distillate oil combusted in FGSUMMER shall exceed 0.05 percent by weight. Applicant shall maintain a complete record of distillate oil specifications and/or fuel analyses demonstrating the sulfur content of each shipment of distillate oil as received by methods acceptable to the District Supervisor, Air Quality Division. Applicant shall ensure that records are kept on file for the preceding five years and made available to the Division upon request. (R 336.1205(3), R 336.1402, Rule 6010 of the Wayne County Air Quality Management Administrative Rules, 40 CFR 52.21 (c) and (d))
- 15. Applicant shall not operate FGWINTER and FGSUMMER on the same calendar day at 100 Renaissance Center, Detroit, Michigan. (R 336.1225)
- 16. The exhaust gases from FGWINTER shall be discharged unobstructed vertically upwards to the ambient air from two stacks, each with a maximum diameter of 39 inches and each with an exit point not less than 28 feet 9 inches above ground level. (R 336.1225, 40 CFR 52.21 (c) and (d))
- 17. The exhaust gases from FGSUMMER shall be discharged unobstructed vertically upwards to the ambient air from at least one stack, but not more than two stacks, each with a maximum diameter of 12 inches and each with an exit point not less than 25 feet 0 inches above ground level. (R 336.1225, 40 CFR 52.21 (c) and (d))
- 18. Applicant shall maintain the following records for each calendar day that either FGWINTER or FGSUMMER is on site at 100 Renaissance Center, Detroit, Michigan:
  - a) The hours of operation for each emission unit and each flexible group on site at 100 Renaissance Center, Detroit, Michigan.
  - b) The amount of natural gas combusted in each emission unit and each flexible group on site at 100 Renaissance Center, Detroit, Michigan.
  - c) The amount of distillate oil combusted in each emission unit and each flexible group on site at 100 Renaissance Center, Detroit, Michigan.
  - d) The total heat input to each emission unit and each flexible group on site at 100 Renaissance Center, Detroit, Michigan.
  - e) The maximum heat input capacity of each emission unit and each flexible group on site at 100 Renaissance Center, Detroit, Michigan.

Applicant shall maintain these records for a period of at least five years and make these records available to the Division upon request. (R 336.1201(3), R 336.1205(3), R 336.1225, federal Standards of Performance for New Stationary Sources, 40 CFR 60.48c(g))

19. Applicant shall notify the District Supervisor, Air Quality Division no later than three calendar days after the date FGWINTER or FGSUMMER is brought on site at 100 Renaissance Center, Detroit, Michigan. (R 336.1201(3))

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- 20. Applicant shall notify the District Supervisor, Air Quality Division no later than three calendar days after the date FGWINTER or FGSUMMER is removed from 100 Renaissance Center, Detroit, Michigan. (R 336.1201(3))
- 21. A written notification of the actual date of initial startup is required for EUWINTER1 and EUWINTER2 and EUSUMMER1 to comply with the federal Standards for New Stationary Sources, as specified in 40 CFR, Part 60, Subparts A and Dc. This notification shall be submitted to the District Supervisor, Air Quality Division within 15 days after the startup date.
- 22. Applicant shall not operate EUWINTER1, EUWINTER2, or EUSUMMER1 unless all the applicable standards, compliance and performance test methods and procedures, emission monitoring, and reporting and recordkeeping requirements of the federal Standards of Performance for New Stationary Sources, 40 CFR, Part 60, Subparts A and Dc are met for the emission unit.