

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

EFFECTIVE DATE: December 1, 2011

ISSUED TO

**City of Grand Haven Board of Light and Power
J. B. Sims Generating Station**

State Registration Number (SRN): B1976

LOCATED AT

1231 North Third Street, Grand Haven, Michigan 49417

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B1976-2011

Expiration Date: December 1, 2016

Administratively Complete ROP Renewal Application
Due Between June 1, 2015 and June 1, 2016

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-B1976-2011

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 Environmental Quality

Heidi G. Hollenbach, Grand Rapids District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in federally enforceable Source-Wide PTI No. MI-PTI-B1976-2011 pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

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

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; “a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP.” The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
 - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner’s or operator’s expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
 - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

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

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR Part 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR Part 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

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

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

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-MTL_HNDLNG | Coal, lime, and ash material handling processes; particulate matter (PM) emissions are controlled by enclosures, bag houses, and dust suppression. | pre-1967/ April, 1983 | NA |
| EU-UNIT-3_BLR | 80 (gross) megawatt pulverized coal-fired boiler with oil and natural gas startup systems. Wet lime scrubber and four-field dry electrostatic precipitator; low-NOx burners and a Selective Non-Catalytic Reduction (SNCR) Urea system. | April, 1983/ 2004 and 2009 | NA |
| EU-PARTSCLEANER | A small cold cleaner used to clean parts. The unit has an air-to-vapor interface of less than 10 square feet. | pre-1979/ NA | FG-PARTSCLEANER |
| EU-RULE290 | Any current or future emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290. | NA/ NA | FG-RULE290 |

**EU-MTL_HNDLNG
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Material handling requirements for coal, lime and ash.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Enclosures, baghouses, and dust suppression.

I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period/ Operating Scenario | Equipment | Monitoring/ Testing Method | Underlying Applicable Requirements |
|--|--|---|--|---|---|
| 1. Particulate matter | 0.03 grain per dry standard cubic foot of exhaust gas ² | At all times, as verifiable through any requested stack testing | EU-MTL_HNDLNG (each vent) | SC VI.1 SC VI.2 SC VI.3 (Periodic monitoring and maintenance.) | R 336.1331(1)(c) |
| 2. Opacity - lime/limestone and ash handling and storage equipment | No visible emissions ² | At all times | EU-MTL_HNDLNG (lime/limestone and ash handling and storage equipment only) | SC VI.1 SC VI.2 SC VI.3 (Periodic monitoring and maintenance.) | R 336.1301(1)(c) |
| 3. Opacity - coal conveyor and coal elevators | No visible emissions ² | At all times | EU-MTL_HNDLNG (coal conveyor and coal elevators only) | SC VI.1 SC VI.2 SC VI.3 (Periodic monitoring and maintenance.) | R 336.1301(1)(c) |
| 4. Opacity - coal receiving hoppers | 5% opacity ² | Per 6-minute period | EU-MTL_HNDLNG (coal receiving hoppers only) | SC VI.1 SC VI.2 SC VI.3 (Periodic monitoring and maintenance.) | R 336.1301(1)(c) |

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Permittee shall not operate this facility unless a continuous program of fugitive dust control for all plant roadways and the plant yard specified in the permittee's "Fugitive Dust Control Plan", dated April 8, 2008, as updated, is maintained. **(R 336.1371)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. All coal handling and storage shall be totally enclosed or equipped with dust suppression or bag filter control equipment.² **(R 336.1201(3))**

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 record once-per-shift checks of alarm system for differential pressure across baghouse filters. **(R 336.1213(3))**
2. The permittee shall perform and record visual inspections for opacity at a minimum of 4 out of 7 days per calendar week. **(R 336.1213(3))**
3. The permittee shall implement the Environmental Inspection program outlined in Appendix 3, Section 3.1, Environmental Inspection. **(R 336.1213(3))**

See Appendix 3, Section 3.1, Environmental Inspection.

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))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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).

EU-UNIT-3_BLR
EMISSION UNIT CONDITIONS

DESCRIPTION

An 80 (gross) megawatt pulverized coal boiler with oil- and natural gas-fired startup systems and wet lime scrubber, electrostatic precipitator, low-NOx burners, and Selective Non-Catalytic Reduction (SNCR) emission controls.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Wet lime scrubber; four-field dry electrostatic precipitator; low-NOx burners; SNCR with Urea

I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period/ Operating Scenario | Equipment | Monitoring/ Testing Method | Underlying Applicable Requirements |
|-----------------------|---|---|------------------|--|---|
| 1. Particulate Matter | 0.03 pound per mmBtu heat input ² | At all times, as verifiable through required stack testing | EU-UNIT-3_BLR | SC V.1 SC VI. 14 through 22 (Stack test; CAM based on COMS; see Appendix 3.2) | 40 CFR Part 60, Subpart Da, Section 60.42a(a)(1) |
| 2. SO ₂ | 0.84 pound per mmBtu heat input when firing coal ² | Based on a 30-day rolling average of successive boiler operating days | EU-UNIT-3_BLR | SC VI.1 SC VI.2 (Continuous Emissions Monitoring System (CEMS); see Appendix 3.3) | R 336.1201(3) |
| 3. SO ₂ | 0.80 pound per mmBtu heat input when firing oil ² | Based on a 24-hour average | EU-UNIT-3_BLR | SC VI.1 SC VI.2 (Continuous Emissions Monitoring System (CEMS); see Appendices 3.3, 3.4 and 3.5) | 40 CFR Part 60, Subpart Da, Section 43a(b) |

| Pollutant | Limit | Time Period/ Operating Scenario | Equipment | Monitoring/ Testing Method | Underlying Applicable Requirements |
|--------------------|--|---|---------------|--|---|
| 4. SO ₂ | 10% of the potential combustion concentration, unless overall emission rate is less than 0.60 pound per mmBtu, in which case the emission rate shall not exceed 30% of the potential combustion concentration ² | Based on a 30-day rolling average of successive boiler operating days | EU-UNIT-3_BLR | SC VI.1 SC VI.2 (Continuous Emissions Monitoring System (CEMS); see Appendices 3.3, 3.4 and 3.5) | 40 CFR Part 60, Subpart Da, Section 43a(a) |
| 5. NO _x | 0.60 pound per mmBtu heat input ² | Based on a 30-day rolling average of successive boiler operating days | EU-UNIT-3_BLR | SC VI.2 SC VI.3 (Continuous Emissions Monitoring System (CEMS); see Appendices 3.3, 3.4 and 3.5) | 40 CFR Part 60, Subpart Da, Section 60.44a(a)(1) |
| 6. Opacity | 20% ² | Per 6-minute period, except for one 6-minute period per hour of not more than 27% | EU-UNIT-3_BLR | SC VI.4 (Continuous Opacity Monitoring System (COMS); see Appendices 3.2 and 3.5) | 40 CFR Part 60, Subpart Da, Section 60.42a(b) |

II. MATERIAL LIMIT(S)

| Material | Limit | Time Period/ Operating Scenario | Equipment | Monitoring/ Testing Method | Underlying Applicable Requirements |
|-------------------|--|---------------------------------------|---------------|---|--|
| 1. Sulfur-in-coal | 4.73%, based on a heating value of 10,700 Btu/pound ² | Based on a 24-hour average | EU-UNIT-3_BLR | SC VI.12 (Records of sulfur in fuel; see Appendix 3.7) | R 336.1201(3) |

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall not operate the boiler at a rate in excess of 785 mmBtu/hr, based on a 24-hour average.² (**R 336.1201(3), R 336.1205**)
- The permittee shall not charge more than 83 gallons per minute, based on an hourly averaging period, of ethylenediaminetetracetic acid (EDTA) to EU-UNIT-3_BLR.² (**R 336.1205**)

3. The permittee shall not burn EDTA cleaning solution in EU-UNIT-3_BLR unless the boiler, the wet lime scrubber, and the electrostatic precipitator are operating properly.² **(R 336.1331, R 336.1910)**
4. The permittee shall not burn any material in EU-UNIT-3_BLR other than coal, No. 2 fuel oil, natural gas, spent EDTA, and unspent EDTA.² **(R 336.1205)**
5. The permittee shall not burn EDTA cleaning solution from any other sources than EU-UNIT-3_BLR.² **(R 336.1205)**
6. The permittee shall not operate the boiler on coal fuel, including during startup and shutdown, unless the wet lime scrubber and electrostatic precipitator are installed and operating properly. **(R 336.1910)**
7. The particulate matter emission standards under Section 60.42a and nitrogen oxides emission standards under Section 60.44a apply at all times except during periods of startup, shutdown, or malfunction. **(40 CFR Part 60, Subpart Da Section 60.46a(c))**
8. The sulfur dioxide emission standards under Section 60.43a apply at all times except during periods of startup, shutdown, or when both emergency conditions exist and the procedures under Section 60.46a(d) are implemented. **(40 CFR Part 60, Subpart Da, Section 60.46a(c))**
9. The permittee shall implement the required operation and maintenance plan for the SNCR. The plan shall contain the following:
 - a. Operation and maintenance criteria for the SNCR and for the process and control device(s) monitoring equipment. This plan shall also include a standardized checklist to document the operation and maintenance of the equipment;
 - b. The work practice standards for the SNCR and monitoring equipment;
 - c. Procedures to be followed to minimize equipment or process malfunctions due to poor maintenance;
 - d. A systematic procedure for identifying process and monitoring equipment malfunctions and for implementing corrective actions to address such malfunctions; and,
 - e. Procedure(s) to be followed to minimize the ammonia slip during operation of the SNCR.² **(R 336.1225, R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Applicant shall not operate the electrostatic precipitator unless it is equipped with a silicon controlled rectifier. **(R 336.1330(1))**
2. Each automatic controller of the electrostatic precipitator shall be set at the optimum spark-limited mode to provide maximum particulate collection efficiency. **(R 336.1330(2))**
3. Each transformer-rectifier set of the electrostatic precipitator shall be capable of operating at the optimum spark-limited mode and shall meter and display the primary RMS voltage and amperage, the average secondary amperage, and the average spark rate. **(R 336.1330(2))**

V. TESTING/SAMPLING

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

1. Within five years of the most recent test of particulate emissions or more frequently upon the request of the AQD, verification of the particulate matter emission rate from EU-UNIT-3_BLR by testing, at permittee's expense and in accordance with Department requirements, is required. The test shall utilize Reference *Method 5B – Determination of Nonsulfuric Acid Particulate Matter from Stationary Sources*. **(R 336.2001, R 336.12003, R 336.12004)**
2. The permittee shall submit a complete test protocol to the AQD District Supervisor and the AQD Technical Program Unit for approval at least 30 days prior to the anticipated test date. **(R 336.1213(3))**

3. The permittee shall notify the AQD District Supervisor and the AQD Technical Program Unit no less than 7 days prior to the anticipated test date. **(R 336.2001(3))**
4. The permittee shall submit a complete test report of the test results to the AQD District Supervisor and AQD Technical Program Unit within 60 days following the last date of the test. **(R 336.2001(4))**

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. The permittee shall monitor and record Sulfur Dioxide emission rates from both the scrubber inlet and outlet. **(40 CFR Part 60, Subpart Da, Section 60.47a(b)(1))**
2. The permittee shall monitor and record Oxygen or Carbon Dioxide concentration. **(40 CFR Part 60, Subpart Da, Section 60.47a(d))**
3. The permittee shall monitor and record Nitrogen Oxide emission rates. **(40 CFR Part 60, Subpart Da, Section 60.47a(c))**
4. The permittee shall monitor and record Opacity. **(40 CFR Part 60, Subpart Da, Section 60.47a(a))**

See Appendix 3, Sections 3.2 through 3.5

5. The permittee shall monitor and record fuel burning rates (mmBtu/hr). **(40 CFR Part 60, Appendix B)**
6. The permittee shall monitor and record gross electric generation (kilowatt-hours). **(R 336.1213(3))**
7. The permittee shall monitor and record steam production (pounds per hour). **(R 336.1213(3))**
8. Operation and maintenance of the electrostatic precipitator and flue gas desulfurization units shall be consistent with permittee's procedures entitled "Precipitator Operation," and associated log sheets, "Electrostatic Precipitator Maintenance," and "Flue Gas Desulfurization (FGD) Operations" as approvable by the AQD District Supervisor. Records of these operations and procedures shall be maintained. **(R 336.1213(3))**
9. The permittee shall implement the "Malfunction Abatement Plan; A/B Scrubber Modules" dated October 12, 2002. **(R 336.1910, R 336.1213(3))**

See Appendix 3.6

10. The permittee shall monitor and record the flue gas desulfurization scrubber liquor pH. **(R 336.1213(3))**
11. The permittee shall monitor and record flue gas desulfurization scrubber module differential pressure. **(R 336.1213(3))**
12. The permittee shall monitor and keep records of Sulfur in fuel. **(R 336.1213(3))**

See Appendix 3.7

13. The permittee shall monitor and record, in a satisfactory manner, the flow rate of EDTA boiler cleaning solution to EU-UNIT-3_BLR in gallons per minute, based on an hourly period.² **(R 336.1205)**
14. The permittee shall utilize COMS-recorded opacity as an indicator of the proper functioning of the electrostatic precipitators. The appropriate range of opacity defining proper functioning of the electrostatic precipitators is 0-20% opacity. **(40 CFR 64.6(c)(1)(i and ii))**

15. The permittee shall continuously record opacity; six-minute average values shall be based on 24 or more equally spaced instantaneous opacity measurements per six-minute period. **(40 CFR 64.6(c)(1)(iii))**
16. The permittee shall complete daily zero and calibration tests; conduct necessary preventative maintenance; and demonstrate adequate performance through an annual monitor audit. **(40 CFR 64.6(c)(1)(iii))**
17. An excursion will occur if opacity in excess of 20% is recorded for a duration exceeding two hours. **(40 CFR 64.6(c)(2))**
18. The permittee shall conduct all required monitoring per the CAM Plan and otherwise satisfy the requirements specified in 40 CFR 64.7 through 40 CFR 64.9. **(40 CFR 64.6(c)(3), 40 CFR 64.7(a))**
19. The permittee shall properly maintain the monitoring systems, including maintaining necessary parts for routine repairs of the monitoring equipment. **(40 CFR 64.7(b))**
20. 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 permittee 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 permittee 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))**
21. Upon detecting an excursion or exceedance, the permittee 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 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.) In response to an excursion, the permittee shall implement Opacity Control and Minimization procedures as contained in the CAM Plan for Particulate Matter from EU-Unit-3_BLR. **(40 CFR 64.7(d))**
22. The permittee shall promptly notify AQD for the need to modify the CAM Plan if it is found to be inadequate, and shall submit a proposed modification to the ROP if necessary. **(40 CFR 64.7(e))**
23. The permittee shall maintain information pursuant to 40 CFR 52.21(r)(6)(i) for 10 years after the resumption of normal operation of EU-UNIT-3_BLR following the modifications of 2004.² **(40 CFR 52.21(r)(6)(i))**

See Appendix 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. 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. In accordance with 40 CFR Parts 60.7(c) and (d) an excess emissions report (EER) and summary report shall be submitted in an acceptable format to the AQD District Supervisor within 30 days following the end of each calendar quarter for all continuous monitoring equipment. The EER shall include each occurrence of all excursions and the magnitudes of the excess emissions of the specified permit limit, the cause of the excess emissions, if known, periods of monitoring system downtime, any corrective action taken and the total operating time of the source(s). If no exceedances or monitoring system downtime occurred during the reporting period, the permittee shall report that fact. **(40 CFR 60.7, R 336.1213(3))**
5. Each semiannual report of monitoring deviations shall include summary information on the number, duration, and cause of exceedances/excursions in the reporting period; and the corrective actions taken in response. If there were no excursions/exceedances in the reporting period, then this report shall include a statement that there were no excursions/exceedances. **(40 CFR 64.9(a)(2)(i), R 336.1213(3)(c))**
6. Each semiannual report of monitoring deviations shall include summary information on monitor downtime in the reporting period. 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), R 336.1213(3)(c))**
7. Each semiannual report of monitoring deviations shall include a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period, if appropriate. If a QIP has been completed, the report shall include documentation that the QIP has been implemented, and a discussions pertaining to whether the QIP implementation has reduced the likelihood of excursions or exceedances. **(40 CFR 64.9)**
8. The permittee shall submit a complete test report of stack test results to the AQD District Supervisor and AQD Technical Program Unit within 60 days following the last date of the test. **(R 336.2001(4))**
9. The permittee shall notify the AQD District Supervisor of the time EDTA boiler tube cleaning solution will be burned in EU-UNIT-3_BLR at least 10 days prior to the actual burning.² **(R 336.1205)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

| Stack & Vent ID | Maximum Exhaust Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|-----------------|-------------------------------------|------------------------------------|------------------------------------|
| 1. SV-UNIT-3 | 102 ² | 360 ² | R 336.1201(3) |

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-1825-2011 is hereby incorporated into this ROP as Appendix 9. **(R 336.1299(2)(a))**
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 Rule 299(2)(a) and 40 CFR Part 72.9(c)(1)(i). **(R 336.1213)(10)**
3. The permittee shall comply with the CAIR SO₂ Trading Program provisions of 40 CFR Part 97.201 through 40 CFR Part 97.288 as adopted and modified by R 336.1420 and as outlined in any complete CAIR SO₂ permit issued by the AQD. The CAIR SO₂ Permit No. MI-SO₂-1825-2011 is hereby incorporated into this ROP as Appendix 10. **(R 336.1420)**

4. The permittee shall hold allowances for compliance deductions in the source's compliance account of the allowance transfer deadline in an amount not less than the total SO₂ emissions for the control period from the source pursuant to 40 CFR Part 97.254. **(40 CFR Part 97.254)**
5. The permittee shall comply with the CAIR NO_x Annual Trading Program provisions of 40 CFR Part 97-101 through 40 CFR Part 97-188 as adopted and modified by R 336.1802a, R 336.1803, R 336.1821 and R 336.1830 through R 336.1834 and as outlined in any complete CAIR NO_x Annual Permit issued by the AQD. The CAIR NO_x Annual Permit No. MI-NOA-1825-2011 hereby incorporated into the ROP as Appendix 11. **(R 336.1821)**
6. The permittee shall hold allowances for compliance deductions in the source's compliance account of the allowance transfer deadline in an amount not less than the total NO_x emissions for the control period from the source pursuant to 40 CFR Part 97.154. **(40 CFR Part 97.154)**
7. The permittee shall comply with the CAIR Ozone NO_x Trading Program provisions of 40 CFR, Part 97.301 through 40 CFR, 97.388 as adopted and modified by R 336.1802a, R 336.1803 and R 336.1821 through R 336.1826 and as outlined in any complete CAIR Ozone NO_x Permit issued by the AQD. The CAIR Ozone NO_x Permit No. MI-NOO-1825-2011 is hereby incorporated into this ROP as Appendix 12. **(R 336.1821)**
8. The permittee shall hold allowances for compliance deductions in the source's compliance account of the allowance transfer deadline in an amount not less than the total NO_x emissions for the control period from the source pursuant to 40 CFR Part 97.354. **(40 CFR Part 97.354)**
9. The permittee shall comply with all applicable provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Da, as they apply to EU-UNIT-3_BLR. **(40 CFR Part 60, Subparts A and Da)**

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-PARTSCLEANERS | Multiple new, individual cleaning units that are subject to the same applicable requirements. | EU-PARTSCLEANERS |
| FG-RULE290 | Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290. | EU-RULE290 |

FG-PARTSCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(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-PARTSCLEANERS

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(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(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(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. 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))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FG-RULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.

Emission Unit: EU-RULE290 and any future emission unit that meets the requirements of this flexible group.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(i))**
2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(a)(ii))**
 - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**
 - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(B))**
 - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(C))**
 - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(a)(ii)(D))**
3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: **(R 336.1290(a)(iii))**
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than

or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**

- b. The visible emissions from the emission unit are not more than five percent opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**
- c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**
 - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
 - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**
 - e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**

3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. 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

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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. Abbreviations and Acronyms

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

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

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

Appendix 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. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EU-MTL_HNDLNG and EU-UNIT-3_BLR.

3.1 Environmental Inspection

To ensure proper operation of the equipment, a routine inspection for visible emissions shall be performed at a minimum of four out of seven days per calendar week. This inspection will include a check of the following equipment and areas:

- Coal and ash handling vents, transport systems, storage and work areas
- Other areas (parking lots, roads, etc.)

Observations of the differential pressure alarm system for the material handling dust collectors shall be made on a per-shift basis. Weekly observations shall be made of lime system dust collector differential pressures.

A record will be made of all checks, and abnormal conditions will trigger initiation of control/abatement/repair actions.

3.2 Continuous Opacity Monitoring Systems

The Continuous Opacity Monitoring System (COMS) performance specifications defined in 40 CFR Part 60, Appendix B, are adopted.

Cycling time for opacity: complete a minimum of one cycle of sampling/analysis for each successive 10-second period and one cycle of data recording for each successive 6-minute period. **(R 336.2152)**

Zero and Drift: The COMS must be subject to the manufacturer's zero and span check at least once daily. **(R 336.2153)**

Location: The location of the COMS or the monitoring devices must be such that representative measurement of emissions or process parameters are obtained. **(R 336.2155)**

Alternative Systems: AQD may approve the use of an alternative monitoring system if one is available that meets COMS objectives and if, because of physical limitations or other reasons, COMS cannot be installed or give accurate measurements. **(R 336.2159)**

Monitoring and reporting requirements shall not apply during any period of monitoring system malfunction if it can be demonstrated to the satisfaction of AQD that: the cause of the malfunction could not have been avoided by any reasonable action and necessary repairs are being made as expeditiously as practicable. **(R 336.2190)**

3.3 Continuous Emission Monitoring Systems (SO₂/ CO₂)

The Continuous Emissions Monitoring Systems (CEMS) performance specifications defined in 40 CFR Part 75, Appendix B, are adopted. The Certified SO₂ and CO₂ monitors will be used to determine sulfur dioxide emissions. The data reduction procedures defined in R 336.2175 will be used to determine SO₂ lbs/mmBtu.

3.4 Continuous Emissions Monitoring System (Title IV; Gas Flow, SO₂, CO₂, NO_x)

The CEMS performance specifications defined in 40 CFR Part 75, Appendix B, are adopted.

Methods of measurement, frequency of measurement and recordkeeping methods for CEMS required under 40 CFR 75 are outlined in the most recent version of the Acid Rain Program - J.B. Sims Generating Station Monitoring Plan, originally dated January, 1995.

Data Reporting: AQD may approve alternative data reporting or reduction procedures if it can be demonstrated that such procedures are at least as accurate as the procedures identified in R 336.2175.

3.5 Emission and Fuel Monitoring; 40 CFR Part 60, Subpart Da

Each owner or operator shall install, calibrate, maintain and operate continuous monitoring systems for measuring the opacity, sulfur dioxide, nitrogen oxides and either oxygen or carbon dioxide.

The continuous monitoring systems are operated and data recorded during all periods of operation of the affected facility including periods of startup, shutdown, malfunction or emergency conditions, except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments.

The owner or operator shall obtain emission data for at least 18 hours in at least 22 out of 30 successive boiler operating days. If this minimum data requirement can't be met with a continuous monitoring system, the owner or operator shall supplement emission data with other monitoring systems approved by the Administrator or the reference methods as described later in this section.

The 1-hour averages required under § 60.13(h) are expressed in ng/J (lbs/mmBtu) heat input and used to calculate the average emission rates under § 60.46a (Compliance Provisions). At least two data points must be used to calculate the 1-hour averages.

When it becomes necessary to supplement continuous monitoring system data to meet the minimum data requirements, the owner or operator shall use the reference methods and procedures as specified in this paragraph. Acceptable alternative methods and procedures are given in § 60.60.47a(j) .

1. Method 6 shall be used to determine SO₂ concentration at the same location as the SO₂ monitor.
2. Method 7 shall be used to determine NO_x concentration at the same location as the NO_x monitor.
3. The emission rate correction factor, integrated bag sampling and analysis procedure of Method 3B shall be used to determine O₂ or CO₂ concentration at the same location as the SO₂ monitor.
4. The procedures in Method 19 shall be used to compute each 1-hour average concentration in ng/J (lb/mmBTU) heat input.

The owner or operator shall use the following methods and procedures to conduct monitoring system performance evaluations and calibration checks. Acceptable alternative methods and procedures are given in § 60.60.47a(j) .

1. Methods 6, 7 and 3B, as applicable, shall be used determine O₂, SO₂ and NO_x concentrations.
2. SO₂ or NO_x, as applicable, shall be used for preparing calibration gas mixtures under Performance Specification 2 of Appendix B of 40 CFR Part 60.
3. For affected facilities burning only fossil fuel, the span value for a COMS measuring opacity is between 60 - 80%, and for a CEMS measuring, NO_x is determined as follows:

| Fossil Fuel | Span value for NO _x (ppm) |
|------------------|--------------------------------------|
| Gas..... | 500 |
| Liquid..... | 500 |
| Solid..... | 1,000 |
| Combination..... | 500(x+y)+1000z* |

where:

- x is the fraction of total heat input derived from gaseous fossil fuel.
- y is the fraction of total heat input derived from liquid fossil fuel.
- z is the fraction of total heat input derived from solid fossil fuel.
- * - all span values computed are rounded to the nearest 500 ppm.

4. For affected facilities burning fossil fuel, alone or in combination with a non-fossil fuel, the span value of the SO₂ CEMS at the inlet of SO₂ control device is 125% of the maximum hourly potential emissions of the fuel fired, and the outlet of the SO₂ control device is 50% of the maximum hourly potential emissions of the fuel fired.

3.6 Malfunction Abatement Plan; A/B Scrubber Modules

Purpose

To prevent, detect, and correct malfunctions or equipment failures resulting in emissions at or exceeding .60 pounds SO₂ per mmbtu with a removal efficiency less than 90% for a 30-day rolling average.

Procedure

- The Lead Shift Operator shall notify (via e-mail) the Operations Supervisor, or another staff member upon his absence, any time the majority (13) of hourly SO₂ readings for the day on the daily log exceed 0.59.
- The Plant Preventative Maintenance Work Order System by Microwest, Inc. shall include 2 separate work orders for modules A/B inspections on a bi-monthly frequency. Monitoring of operating parameters will determine the degree if any preventative maintenance requirements.
- The Maintenance Supervisor (MS) along with the Lead Maintenance Repairperson (LMR) shall be responsible for the inspection, repair and cleaning of the appropriate scrubber module requiring attention so as not to exceed specified emission requirements.
- Inspection points include the following (and may be expanded on as required per inspection):
 - Reheater cleanliness and integrity
 - Mist eliminator (chevrons) alignment (2 levels) and integrity
 - All associated wash nozzles integrity and spray capability
 - Absorber slurry headers and spray nozzles (40) integrity and pluggage at both elevation levels
 - Flue gas duct discharge for excessive buildup
 - Awning cleanliness and integrity
 - Quench nozzle integrity and pluggage
 - Distribution baffle cleanliness and integrity
 - Scoop tube cleanliness
 - Overflow lines cleared
 - Module floor cleanliness and integrity
 - Module rubber conditions
 - Recirc pump suction line and strainer cleanliness and integrity
 - Recirc pump general conditions in regards to gland leakage, vibration, and overall condition
 - Other inspections as appropriate
- The module under inspection should be tested with water and visually verified for adequate spraying characteristics.
- Parts used for replacement as identified on our Maintenance Inventory list should be reordered on a timely basis, but no individual parts need be kept in inventory as a condition of this plan.
 - Operating variables that should be monitored by appropriate responsible employees include:
 - Daily SO₂ emission rates (Lead Shift Operators(LSO))
 - Daily SO₂ removal efficiency percentages (LSO)
 - 30 day rolling averages of both emissions and efficiencies (Instrument Supv)
 - Daily ID fan amps (LSO)
 - Scrubber Differential Pressure (Scrubber Operator(SO))
- Parameter values requiring supervisory reporting action to prevent malfunctions are at the appropriate instrument panels located in the plant and scrubber control rooms:
 - DailySO₂ emission- .6#permmbtu or higher
 - DailySO₂ efficiency-<90% when above .59
 - ID fan amps> 82 amps with dampers wide open
 - Scrubber differential- above 8"H₂O
- In the event of a malfunction resulting in noncompliance the following will occur under the responsibility of the Operations supervisor:
 - Load will be reduced and stabilized to a level that creates a corresponding emission level of .59 or less

In addition:

- The spare module should be inspected, cleaned (if necessary) and expeditiously placed in service along with the malfunctioning module.

- Once the emission parameters are acceptable the malfunctioning module should be removed from service to allow for inspection and cleaning.
 - Daily monitoring data should be submitted to the Production Superintendent by the Operations Supervisor and Instrument Supervisor to assess status and plan accordingly for further actions if required.
 - Notification to the Michigan Department of Environmental Quality, Air Quality officer of any malfunction resulting in emissions exceeding any applicable emission limitations and requiring immediate reporting shall be done by either the Production Superintendent, the Environmental Supervisor, or their representative as soon as possible but no later than 2 business days from when the event exceeded the standard for more than one hour after discovery.
 - It is the responsibility of the person discovering the emission violation to report it to the Production Superintendent or his representative immediately.
- This Malfunction Abatement Plan shall be included in and reviewed annually as part of the Production Superintendent's "Gray Book" of Procedures and Practices. Updates to the Plan shall be submitted to the Air Quality Division.

Issued by:

Dan Bush
Production Supt
10-12-02

3.7 Fuel Sulfur Monitoring

Maintain a complete record of fuel oil specifications and/or a fuel analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for American Society for Testing and Materials (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.

Coal quality parameters specified in request for purchase packages shall be compliant with the Operational Parameters contained in EU-UNIT-3_BLR.

A proximate analysis (including moisture, ash, volatile, fixed carbon, calorific value, and percent by weight sulfur content) of each delivery of coal shall be completed and records maintained for at least five years. When Unit 3 is operable, daily coal grab samples shall be composited into "weekly" samples. One such composite "weekly" sample per month shall be subject to a proximate analysis and records maintained for at least five years.

Appendix 4. Recordkeeping

In addition to the specific recordkeeping requirements detailed in Part A or for the appropriate emission units, all information in this Appendix shall be maintained pursuant to 40 CFR 52.21 (r)(6)(i) for 10 years after the EU-UNIT-3_BLR resume normal operation (i.e., through 2018.)

1. Project Description: Upgrade the generating station to accommodate predicted future growth of 22.5%. The project consists of the following:
 - a. Existing burners will be upgraded to allow a higher heat input (from 710 to 785 MMBTU/hr) and will be 2nd generation low-NOx burners.
 - b. It may be necessary to perform minor changes to the existing wet flue gas desulfurization scrubber and ESP control equipment to meet the future actual emissions.
 - c. The existing steam turbine may be upgraded to allow for higher electrical output.
 - d. Other equipment may be upgraded to allow for increased steam production.

- i. New blade design for the High Pressure-Intermediate Pressure steam turbine.
- ii. The electrical generator will be evaluated.
- iii. Insulation upgrades may be made to allow for more output capacity.
- iv. All cooling capacity equipment for the generator, exciter and transformers may be upgraded during inspection and normal repairs in 2006.
- v. The coal pulverizers will be upgraded to reduce the size of the coal and to achieve maximum heat output.
- vi. Coal feeders controls will be replaced to further improve fuel feed accuracy.
- vii. Induced draft fans may be enlarged to support the higher heat input fuel requirements.
- viii. The electrical generator Step Up and Main Auxiliary transformers cooling systems may be enlarged to accommodate increased air and oil cooling capacity.
- ix. Condensate pumps may be replaced to allow for the increase in steam flow.
- x. Circulating water pump impeller sizing may be increased to accommodate a 5-10% increase in flow.
- xi. The flue gas desulfurization system may be reviewed to investigate increased use of lime to accomplish greater reduction in sulfur dioxide emissions. Engineering changes may also be investigated pending the performance of lime feed analysis.
- xii. Electrical relaying, controls and infrastructure such as piping, duct sizing, electrical breakers and conductor capability all require some level of evaluation and minor changes.

2. Applicability Test Description: Actual to projected actual applicability test as described in the table below was used to demonstrate that PSD does not apply to these modifications at the time of Permit to Install application. All information in this Appendix shall be maintained pursuant to 40 CFR 52.21 (r)(6)(i) for 10 years after the EU-UNIT-3_BLR resumes normal operation (i.e., through 2018.)

3.

| Emission Unit/Flexible Group ID | Pollutant | Baseline Actual Emissions (tpy) | Projected Actual Emissions (tpy) | Excluded Emissions (tpy) | Reason for Exclusion |
|---------------------------------|-----------|---------------------------------|----------------------------------|--------------------------|--|
| EU-UNIT-3_BLR | PM-10 | 60.32 | 85.97 | 76.59 | The project was accommodated based on highest emission factor from baseline period maximum heat input and permit limit minus non-excludable heat input during boiler operating life (achieved over 1999 operating year) and the fugitive and point source emissions from coal, ash, lime and gypsum operations, applied to projected operating schedule (8760 hrs/yr). The projected emission increases of 9.38 tpy < significant level of 15 tpy. |

3.

| Emission Unit/Flexible Group ID | Pollutant | Baseline Actual Emissions (tpy) | Projected Actual Emissions (tpy) | Excluded Emissions (tpy) | Reason for Exclusion |
|---------------------------------|-----------------|---------------------------------|----------------------------------|--------------------------|---|
| EU-UNIT-3_BLR | PM | 116.91 | 150.38 | 140.7 | The project was accommodated based on average emission factor from baseline period maximum heat input and permit limit minus non-excludable heat input during boiler operating life (achieved over Nov.1999 to Oct, 2001 operating years) and the fugitive and point source emissions from coal, ash, lime and gypsum operations, applied to projected operating schedule (8760 hrs/yr). The projected emission increase of 9.68 tpy < significant level of 25 tpy. |
| EU-UNIT-3_BLR | SO ₂ | 684.12 | 868.01 | 832.14 | The project was accommodated based on highest emission factor from CEM data (30-day rolling average) during boiler operating life (achieved over 2001 operating year), applied to projected operating schedule (8760 hrs/yr). The projected emission increase of 35.87 tpy < significant level of 40 tpy. |
| EU-UNIT-3_BLR | NO _x | 784.66 | 992.18 | 960.0 | The project was accommodated based on highest emission factor from CEM data (30-day rolling average) during boiler operating life (achieved over 1999 operating year), applied to projected operating schedule (8760 hrs/yr). The projected emission increase of 32.18 tpy < significant level of 40tpy. |

4. Netting Calculations and Discussion: NA

Appendix 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No. MI-ROP-B1976-2006b. This includes any PTIs that were incorporated into the Source-Wide PTI No MI-PTI-B1976-2006b through amendments or modifications and any PTI that remained off-permit until this ROP renewal.

| Permit to Install Number | Description of Equipment | Corresponding Emission Unit(s) or Flexible Group(s) |
|--------------------------|--|---|
| 39-09 | Addition of SNCR to EU-Unit-3_BLR | EU-Unit-3_BLR |
| MI-PTI-B1976-2006 | Source-Wide PTI of applicable conditions corresponding to MI-ROP-B1976-2006 | All EU and FG in MI-ROP-B1976-2006 |
| MI-PTI-B1976-2006a | Source-Wide PTI of applicable conditions corresponding to MI-ROP-B1976-2006a | All EU and FG in MI-ROP-B1976-2006a |
| MI-PTI-B1976-2006b | Source-Wide PTI of applicable conditions corresponding to MI-ROP-B1976-2006b | All EU and FG in MI-ROP-B1976-2006b |

Appendix 7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Requirement Tables and Appendices 3 and 8 (Monitoring and Reporting, respectively). Additionally, the permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EU-UNIT-3_BLR. Alternative calculations must be approved by the AQD District Supervisor.

- Compliance is determined by calculating the arithmetic average of all hourly emission rates for SO₂ and NO_x for 30 successive boiler operating days, except for data obtained during startup, shutdown, malfunction (NO_x only), or emergency conditions (SO₂ only). Compliance with the percent reduction requirement for SO₂ is determined based on the average inlet and average outlet SO₂ emission rates for the 30 successive boiler operating days.
- If an owner or operator has not obtained the minimum quantity of emission data as required under § 60.47a (Emission Monitoring), compliance of the affected facility with the SO₂ and NO_x emission requirements for the day on which the 30 day period ends may be determined by the Administrator by following the applicable procedures in section 7 of Method 19.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

The permittee shall use approved formats and procedures for the NSPS reporting requirements referenced in EU-UNIT-3_BLR. For other reporting requirements, specific reporting requirement formats and procedures are detailed in Part A or the appropriate Requirement Tables.

Standards of Performance for New Sources (NSPS) reporting requirements include, but are not necessarily limited to, the following:

Notification requirements per Section 60.7 of 40 CFR Part 60, Subpart A:

- 60.7(a)(1) Notification of the date of construction or reconstruction of an affected facility is commenced, postmarked no later than 30 days after such date.
- 60.7(a)(2) Notification of the date of anticipated date of the initial startup of an affected facility, postmarked not more than 60 nor less than 30 days prior to such date.
- 60.7(a)(3) Notification of the actual date of initial startup of an affected facility, postmarked within 15 days after such date.
- 60.7(a)(4) Notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in Section 60.14(e). This notice shall be postmarked 60 days (or as soon as practicable) before the change is commenced.

Notifications of reconstruction activities per Section 60.15 of 40 CFR Part 60, Subpart A; and

- 60.15(d) If an owner or operator of an existing facility proposes to replace components and the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, notification of the proposed replacements, postmarked 60 days (or as soon as practicable) before the construction of the replacements is commenced.

Reporting requirements per Section 60.49a of 40 CFR Part 60, Subpart Da.

- 60.49a(a) For SO₂, NO_x, and PM, the performance test data from the initial performance test and from performance evaluation of the continuous monitors (including the transmissometer) are submitted to the Administrator.
- 60.49a(b) For SO₂ and NO_x, the following information is reported to the Administrator for each 24-hour period: (1) Calendar date, (2) The average SO₂ and NO_x emission rates (ng/J or lb/million Btu) for each 30 successive boiler operating days, ending with the last 30-day period in the quarter; reasons for non-compliance with the emission standards; and, description of corrective actions taken, (3) Percent reduction of the potential combustion concentration of SO₂ for each 30 successive boiler operating days, ending with the last 30-day period in the quarter; reasons for non-compliance with the standard; and, description of corrective actions taken, (4) Identification of the boiler operating days for which pollutant or diluent data have not been obtained by an approved method for at least 18 hours of operation of the facility; justification for not obtaining sufficient data; and description of corrective actions taken, (5) Identification of the times when emissions data have been excluded from the calculation of average emission rates because of startup, shutdown, malfunction (NO_x only), emergency conditions (SO₂ only), or other reasons, and justification for excluding data for reasons other than startup, shutdown, malfunction, or emergency conditions, (6) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted, (7) Identification of times when hourly averages have been obtained based on manual sampling methods, (8) Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system, (9) Description of any modifications to the continuous monitoring system which could affect the ability of the continuous monitoring system to comply with Performance Specifications 2 or 3.
- 60.49a(c) If the minimum quantity of emission data as required by § 60.47a is not obtained for any 30 successive boiler operating days, the following information obtained under the requirements of § 60.46a(h) is reported to the Administrator for that 30-day period: (1) The number of hourly averages available for outlet emission rates (no) and inlet emission rates (ni) as

applicable, (2) The standard deviation of hourly averages for outlet emission rates (so) and inlet emission rates (si) as applicable, (3) The lower confidence limit for the mean outlet emission rate (Eo*) and the upper confidence limit for the mean inlet emission rate (Ei*) as applicable, (4) The applicable potential combustion concentration, (5) The ratio of the upper confidence limit for the mean outlet emission rate (Eo*) and the allowable emission rate (Estd) as applicable.

- 60.49a(d) If any standard under \geq 60.43a are exceeded during emergency conditions because of control system malfunction, the owner or operator shall submit a signed statement saying: 1) Indicating if emergency conditions existed and requirements under \geq 60.46a(d) were met during each period, and 2) Listing the time periods the emergency condition existed, electrical output and demand on the owner or operator's electric utility system and the affected facility, amount of power purchased from interconnected utility companies during the emergency period, percent reduction in emissions achieved, atmospheric emission rate (ng/J) of the pollutant discharged, and actions taken to correct control system malfunction.
- 60.49a(e) If fuel pretreatment credit toward SO₂ emission standard under \geq 60.43a is claimed, the owner or operator of the affected facility shall submit a signed statement: (1) Indicating what percentage cleaning credit was taken for the calendar quarter, and whether the credit was determined in accordance with the provisions of \geq 60.48a and Method 19 of 40 CFR Part Appendix A, and (2) listing the quantity, heat content, and date each pretreated fuel shipment was received during the previous quarter, the name and location of fuel pretreatment facility, and the total quantity and total heat content of all fuels received at the affected facility during the previous quarter.
- 60.49a(f) For any periods for which opacity, SO₂ or NO_x emissions data are not available, the owner or operator of the affected facility shall submit a signed statement indicating if any changes were made in the operation of the emission control system during the period of data unavailability. Operations of the control system and affected facility during periods of data unavailability are to be compared with operation of the control system and affected facility before and following the period of data unavailability.
- 60.49a(g) The owner or operator of the affected facility shall submit a signed statement indicating whether: (1) the required continuous monitoring system calibration, span, and drift checks or other periodic audits have or have not been performed as specified, (2) the data used to show compliance was or wasn't obtained in accordance with approved methods and procedures of this part and is representative of plant performance, (3) the minimum data requirements have or have not been met or the minimum data requirements have not been met for errors that were unavoidable, and (4) compliance with the standards has or has not been achieved during the reporting period.
- 60.49a(h) Excess emission for opacity are defined as all 6-minute periods during which the average opacity exceeds the applicable opacity standards under \geq 60.42a(b). Opacity levels in excess of the applicable opacity standard and the date of excesses are to be submitted to the Administrator each calendar quarter.
- 60.49a(i) The owner or operator of an affected facility shall submit the written reports required under this section and Subpart A to the Administrator for every calendar quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.

Appendix 9. Acid Rain Permit



Michigan Department Of Environmental Quality
Air Quality Division

PHASE II ACID RAIN PERMIT Permit No. MI-AR-1825-2011

| | |
|------------|---|
| Permittee | Grand Haven BLP – J.B. Sims Generating Station |
| Address | 1231 North Third Street, Grand Haven, Michigan |
| SRN | B1976 |
| ORIS code | 1825 |
| Issue Date | December 1, 2011 |
| 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-B1976-2011 |

The Acid Rain Permit Contents

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

References to statutory and regulatory authorities, and with comments, notes, and justification that apply to the source in general;
2. Terms and conditions including:

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

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

Any applicable nitrogen oxides compliance plan. Unless they are coal fired utility units regulated pursuant to sections 404, 405, or 409 of the Clean Air Act, new units are not subject to the acid rain nitrogen oxides requirements [40 CFR 76.1(a)].
3. The permit application that this source submitted, as corrected by the AQD. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the application.

Statement of Basis

Statutory and Regulatory Authorities.

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

For further information contact:

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

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

Terms and Conditions:

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

| | | 2011 | 2012 | 2013 | 2014 | 2015 |
|--------|----------------------------|---|------|------|------|------|
| Unit 3 | SO ₂ allowances | 1487 | 1487 | 1487 | 1487 | 1487 |
| | NOx Limit | <p>NOx limit Pursuant to 40 CFR 76.8(d)(2), the State of Michigan Department of Environmental Quality, Air Quality Division approves a NOx early election compliance plan for this unit. The compliance plan is effective for calendar year 2011 through calendar year 2015. Under the compliance plan, this unit's annual average NOx emission rate for each year, determined in accordance with 40 CFR Part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.5(a)(2) of 0.46 lb/mmBtu for dry bottom wall-fired boilers.</p> <p>In addition to the described NOx compliance plan, this unit shall comply with all other applicable requirements of 40 CFR Part 76, including the duty to reapply for a NOx compliance plan and requirements covering excess emissions.</p> | | | | |

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 15, 2011
 Phase II NOx Compliance Plan submitted March 17, 2011*

Grand Haven Board of Light & Power J. B. Sims
Generating Station

Acid Rain - Page 2

Facility (Source) Name (from STEP 1)

Permit Requirements

STEP 3

Read the standard requirements.

- (1) The designated representative of each affected source and each affected unit at the source shall:
 - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

Grand Haven Board of Light & Power J. B. Sims
Generating Station

Acid Rain - Page 3

Facility (Source) Name (from STEP 1)

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;

Grand Haven Board of Light & Power J. B. Sims
Generating Station

Acid Rain - Page 4

Facility (Source) Name (from STEP 1)

STEP 3, Cont'd.

Recordkeeping and Reporting Requirements, Cont'd.

- (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

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

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating

Grand Haven Board of Light & Power J. B. Sims
Generating Station

Acid Rain - Page 5

Facility (Source) Name (from STEP 1)

Effect on Other Authorities, Cont'd.

STEP 3, Cont'd.

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

(2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

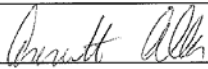
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

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

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

| | |
|---|--------------|
| Name: Annette Allen | |
| Signature  | Date 3/21/11 |



United States
 Environmental Protection Agency
 Acid Rain Program

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

Phase II NO_x Compliance Plan

For more information, see instructions and refer to 40 CFR 76.9

Page **1** of **2**

This submission is: New Revised

STEP 1
 Indicate plant name, State,
 and ORIS code from NADB,
 if applicable

| | | |
|------------------------------|-------|-----------|
| J.B. Sims Generating Station | MI | 1825 |
| Plant Name | State | ORIS Code |

STEP 2

Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable. Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.

| | | | | | |
|-------------|------|------|------|------|------|
| ID# 3 | ID# | ID# | ID# | ID# | ID# |
| Type DBW | Type | Type | Type | Type | Type |

(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(d) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)

| | | | | | |
|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(g) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(j) NO_x Averaging Plan (include NO_x Averaging form)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(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)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(l) 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)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

| | |
|-------------------------------------|--|
| J.B. Sims Generating Station | NO _x Compliance - Page 2 Page [2] of [2] |
| Plant Name (from Step 1) | |

STEP 2, cont'd.

| | | | | | |
|----------|------|------|------|------|------|
| ID# 3 | ID# | ID# | ID# | ID# | ID# |
| Type DBW | Type | Type | Type | Type | Type |

(m) EPA-approved common stack apportionment method pursuant to 40 CFR 76.17(a)(2)(i)(C), (a)(2)(ii)(B), or (b)(2)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(n) AEL (include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

(p) Repowering extension plan approved or under review

| | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|

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 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 may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new 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, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers 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 boilers 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 imprisonment.

| | |
|-------------------------------------|----------------|
| Name Annette Allen, General Manager | |
| Signature | Date 3/16/2011 |

Appendix 10. CAIR Sulfur Dioxide Budget Permit



Michigan Department Of Environmental Quality
 Air Quality Division

**CAIR Sulfur Dioxide Budget Permit
 Permit No. MI-SO2-1825-2011**

Permittee Grand Haven BLP – J.B. Sims Generating Station
 Address 1231 North Third Street, Grand Haven, Michigan
 SRN B1976
 ORIS code 1825
 Issue Date December 1, 2011
 Expiration This permit shall expire when the facility’s Renewable
 Operating Permit (ROP) expires in accordance with 40 CFR
 97.221(b).
 ROP No. MI-ROP-B1976-2011

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

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

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

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

Units covered under this permit

| AQD Unit ID | Unit Type | | | |
|---------------|---|--|---|--------------------------------|
| EU-Unit-3_BLR | <input checked="" type="checkbox"/> Stationary Boiler | <input type="checkbox"/> Combined Cycle System | <input type="checkbox"/> Combustion Turbine | <input type="checkbox"/> Other |

Permit Application:

CAIR SO2 Annual Permit application submitted March 15, 2011

Standard requirements

a. Permit requirements.

1. The CAIR designated representative of each CAIR SO₂ source required to have a ROP and each CAIR SO₂ unit required to have a ROP at the source shall:
 - i. Submit to the permitting authority a complete CAIR permit application under § 97.222 in accordance with the deadlines specified in § 97.221; and
 - ii. Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.
2. The owners and operators of each CAIR SO₂ source required to have a ROP and each CAIR SO₂ unit required to have a ROP at the source shall have a CAIR permit issued by the permitting authority under Subpart CCC of 40 CFR Part 97 for the source and operate the source and the unit in compliance with such CAIR permit.

b. Monitoring, Reporting, and Recordkeeping Requirements.

1. The owners and operators, and the CAIR designated representative, of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of Subpart HHH of 40 CFR Part 97.
2. The emissions measurements recorded and reported in accordance with Subpart HHH of 40 CFR Part 97 shall be used to determine compliance by each CAIR SO₂ source with the CAIR SO₂ emissions limitation under paragraph (c) of this permit.

c. Sulfur Dioxide Emission Requirements.

1. As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall hold, in the source's compliance account, a tonnage equivalent in CAIR SO₂ allowances available for compliance deductions for the control period, as determined in accordance with § 97.254(a) and (b), not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO₂ units at the source, as determined in accordance with Subpart HHH of 40 CFR Part 97.
2. A CAIR SO₂ unit shall be subject to the requirements under paragraph (c)(1) of this section for the control period starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under § 97.270(b)(1),(2), or (5) and for each control period thereafter.
3. A CAIR SO₂ allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this section, for a control period in a calendar year before the year for which the CAIR SO₂ allowance was allocated.
4. CAIR SO₂ allowances shall be held in, deducted from, or transferred into or among CAIR SO₂ Allowance Tracking System accounts in accordance with Subparts FFF, GGG, and III of 40 CFR Part 97.
5. A CAIR SO₂ allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO₂ Trading Program. No provision of the CAIR SO₂ Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.205 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
6. A CAIR SO₂ allowance does not constitute a property right.

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

d. Excess emissions requirements.

If a CAIR SO₂ source emits sulfur dioxide during any control period in excess of the CAIR SO₂ emissions limitation, then:

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

e. Recordkeeping and Reporting Requirements.

1. Unless otherwise provided, the owners and operators of the CAIR SO₂ source and each CAIR SO₂ unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the permitting authority or the Administrator.
 - i. The certificate of representation under § 97.213 for the CAIR designated representative for the source and each CAIR SO₂ unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.213 changing the CAIR designated representative.
 - ii. All emissions monitoring information, in accordance with Subpart HHH of 40 CFR Part 97, provided that to the extent that Subpart HHH of 40 CFR Part 97 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - iii. Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR SO₂ Trading Program.
 - iv. Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR SO₂ Trading Program or to demonstrate compliance with the requirements of the CAIR SO₂ Trading Program.
2. The CAIR designated representative of a CAIR SO₂ source and each CAIR SO₂ unit at the source shall submit the reports required under the CAIR SO₂ Trading Program, including those under Subpart HHH of 40 CFR Part 97.

f. Liability.

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

g. Effect On Other Authorities.

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

Appendix 11. CAIR Annual Nitrogen Oxide Budget Permit



Michigan Department Of Environmental Quality
 Air Quality Division

**CAIR Annual Nitrogen Oxide Budget Permit
 Permit No. MI-NOA-1825-2011**

Permittee Grand Haven BLP – J.B. Sims Generating Station
 Address 1231 North Third Street, Grand Haven, Michigan
 SRN B1976
 ORIS code 1825
 Issue Date December 1, 2011
 Expiration This permit shall expire when the facility’s Renewable Operating Permit expires in accordance with Air Pollution Control Rule 336.1821.
 ROP No. MI-ROP-B1976-2011

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

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

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

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

Units covered under this permit

| AQD Unit ID | Unit Type | | | |
|---------------|---------------------|--|---|--------------------------------|
| EU-Unit-3-BLR | X Stationary Boiler | <input type="checkbox"/> Combined Cycle System | <input type="checkbox"/> Combustion Turbine | <input type="checkbox"/> Other |

Permit Application:

CAIR NOx Annual Permit application submitted March 15, 2011

Standard Requirements

a. Permit Requirements.

1. The CAIR designated representative of each CAIR NO_x source required to have a Renewable Operating Permit (ROP) and each CAIR NO_x unit required to have a ROP at the source shall:
 - i. Submit to the Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) a complete CAIR permit application under R 336.1821(3) in accordance with the deadlines specified in 40 CFR 97.121; and
 - ii. Submit in a timely manner any supplemental information that the MDEQ-AQD determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.
2. The owners and operators of each CAIR NO_x source required to have a ROP and each CAIR NO_x unit required to have a ROP at the source shall have a CAIR permit issued by the MDEQ-AQD under Subpart CC of 40 CFR Part 97 for the source and operate the source and the unit in compliance with such CAIR permit.

b. Monitoring, Reporting, and Recordkeeping Requirements.

1. The owners and operators, and the CAIR designated representative, of each CAIR NO_x source and each CAIR NO_x unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of Subpart HH of 40 CFR Part 97.
2. The emissions measurements recorded and reported in accordance with Subpart HH of 40 CFR Part 97 shall be used to determine compliance by each CAIR NO_x source with the CAIR NO_x emissions limitation under paragraph (c) of this permit.

c. Nitrogen Oxides Emission Requirements.

1. As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall hold, in the source's compliance account, CAIR NO_x allowances available for compliance deductions for the control period under 40 CFR 97.154(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_x units at the source, as determined in accordance with Subpart HH of 40 CFR Part 97.
2. A CAIR NO_x unit shall be subject to the requirements under paragraph (c)(1) for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.170(b)(1), (2), or (5) and for each control period thereafter.
3. A CAIR NO_x allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this section, for a control period in a calendar year before the year for which the CAIR NO_x allowance was allocated.
4. CAIR NO_x allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Allowance Tracking System accounts in accordance with Subparts EE, FF, GG, or II of 40 CFR Part 97.
5. A CAIR NO_x Ozone Season allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_x Ozone Season Trading Program. No provision of the CAIR NO_x Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.105 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
6. A CAIR NO_x allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_x Annual Trading Program. No provision of the CAIR NO_x Annual Trading Program, the CAIR permit

application, the CAIR permit, or an exemption under 40 CFR 97.105 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

7. A CAIR NO_x allowance does not constitute a property right.
8. Upon recordation by the Administrator under Subpart EE, FF, GG, or II of 40 CFR Part 97, every allocation, transfer, or deduction of a CAIR NO_x allowance to or from a CAIR NO_x source's compliance account is incorporated automatically in any CAIR permit of the source.

d. Excess Emissions Requirements.

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

1. The owners and operators of the source and each CAIR NO_x unit at the source shall surrender the CAIR NO_x allowances required for deduction under 40 CFR 97.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
2. Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, the Clean Air Act, and applicable State rules.

e. Recordkeeping and Reporting Requirements.

1. Unless otherwise provided, the owners and operators of the CAIR NO_x source and each CAIR NO_x unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the MDEQ-AQD or the Administrator.
 - i. The certificate of representation under § 97.113 for the CAIR designated representative for the source and each CAIR NO_x unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.113 changing the CAIR designated representative.
 - ii. All emissions monitoring information, in accordance with Subpart HH of 40 CFR Part 97.
 - iii. Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Annual Trading Program.
 - iv. Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO_x Annual Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Annual Trading Program.
2. The CAIR designated representative of a CAIR NO_x source and each CAIR NO_x unit at the source shall submit the reports required under the CAIR NO_x Annual Trading Program, including those under Subpart HH of 40 CFR Part 97.

f. Liability.

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

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

g. Effect on Other Authorities.

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

Appendix 12. CAIR Ozone Nitrogen Oxide Budget Permit



Michigan Department Of Environmental Quality
 Air Quality Division

**CAIR Ozone Nitrogen Oxide Budget Permit
 Permit No. MI-NOO-1825-2011**

Permittee Grand Haven BLP – J.B. Sims Generating Station
 Address 1231 North Third Street, Grand Haven, Michigan
 SRN B1976
 ORIS code 1825
 Issue Date December 1, 2011
 Expiration This permit shall expire when the facility’s Renewable
 Operating Permit expires in accordance with Air Pollution
 Control Rule 336.1821.
 ROP No. MI-ROP-B1976-2011

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

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

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

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

Units covered under this permit

| AQD Unit ID | Unit Type | | | |
|---------------|---------------------|--|---|--------------------------------|
| EU-Unit-3-BLR | X Stationary Boiler | <input type="checkbox"/> Combined Cycle System | <input type="checkbox"/> Combustion Turbine | <input type="checkbox"/> Other |

Permit Application:

CAIR NOx Ozone Season Permit application submitted March 15, 2011

Standard Requirements

a. Permit Requirements.

1. The CAIR designated representative of each CAIR NO_x source required to have a Renewable Operating Permit (ROP) and each CAIR NO_x unit required to have a ROP at the source shall:
 - i. Submit to the Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) a complete CAIR permit application under R 336.1821(3) in accordance with the deadlines specified in 40 CFR 97.321; and
 - ii. Submit in a timely manner any supplemental information that the MDEQ-AQD determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.
2. The owners and operators of each CAIR NO_x source required to have a ROP and each CAIR NO_x unit required to have a ROP at the source shall have a CAIR permit issued by the MDEQ-AQD under Subpart CCCC of 40 CFR Part 97 for the source and operate the source and the unit in compliance with such CAIR permit.

b. Monitoring, Reporting, and Recordkeeping Requirements.

1. The owners and operators, and the CAIR designated representative, of each CAIR NO_x source and each CAIR NO_x unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of Subpart HHHH of 40 CFR Part 97.
2. The emissions measurements recorded and reported in accordance with Subpart HHHH of 40 CFR Part 97 shall be used to determine compliance by each CAIR NO_x source with the CAIR NO_x emissions limitation under paragraph (c) of this permit.

c. Nitrogen Oxides Emission Requirements.

1. As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall hold, in the source's compliance account, CAIR NO_x allowances available for compliance deductions for the control period under 40 CFR 97.354(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_x units at the source, as determined in accordance with Subpart HHHH of 40 CFR Part 97.
2. A CAIR NO_x unit shall be subject to the requirements under paragraph (c)(1) for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.370(b)(1), (2), (3) or (7) and for each control period thereafter.
3. A CAIR NO_x allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this permit, for a control period in a calendar year before the year for which the CAIR NO_x allowance was allocated.
4. CAIR NO_x allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Allowance Tracking System accounts in accordance with Subparts EEEE, FFFF, GGGG, or IIII of 40 CFR Part 97.
5. A CAIR NO_x Ozone Season allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_x Ozone Season Trading Program. No provision of the CAIR NO_x Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.305 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
6. A CAIR NO_x allowance does not constitute a property right.

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

d. Excess Emissions Requirements.

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

1. The owners and operators of the source and each CAIR NO_x unit at the source shall surrender the CAIR NO_x allowances required for deduction under 40 CFR 97.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
2. Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, the Clean Air Act, and applicable State rules.

e. Recordkeeping and Reporting Requirements.

1. Unless otherwise provided, the owners and operators of the CAIR NO_x source and each CAIR NO_x unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the MDEQ-AQD or the Administrator.
 - i. The certificate of representation under § 97.313 for the CAIR designated representative for the source and each CAIR NO_x unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.313 changing the CAIR designated representative.
 - ii. All emissions monitoring information, in accordance with Subpart HHHH of 40 CFR Part 97.
 - iii. Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Ozone Trading Program.
 - iv. Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO_x Ozone Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Ozone Trading Program.
2. The CAIR designated representative of a CAIR NO_x source and each CAIR NO_x unit at the source shall submit the reports required under the CAIR NO_x Ozone Trading Program, including those under Subpart HHHH of 40 CFR Part 97.

f. Liability.

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

g. Effect on Other Authorities.

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