

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

EFFECTIVE DATE: November 12, 2019

ISSUED TO

**DTE ENERGY COMPANY
DTE Gas Company - Alpena Compressor Station**

State Registration Number (SRN): N5935

LOCATED AT

8512 East Arnold Lake Road, Harrison, Michigan 48625

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N5935-2019

Expiration Date: November 12, 2024

Administratively Complete ROP Renewal Application Due Between
May 12, 2023 and May 12, 2024

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Rule 210(1) of the administrative rules promulgated under Act 451, 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.

Michigan Department of Environment, Great Lakes, and Energy

Chris Hare, Bay City District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

In accordance with Rule 213(2)(a), all underlying applicable requirements will be identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined or subsumed, or is 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 a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: **(R 336.1213(1)(d))**
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
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. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in Subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:" **(R 336.1301(1))**
 - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
 - b. A limit specified by an applicable federal new source performance standard.

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

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

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

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(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(10))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

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

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

Stratospheric Ozone Protection

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

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR 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. **(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. **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE. **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. **(R 336.1201(4))**

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 SPECIAL 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
EUWHITESUPERIOR	White-Superior 2000 HP, Spark Ignition, 4 stroke, lean burn, non-emergency, natural gas-fired existing reciprocating internal combustion engine (RICE) located at a non-remote area source of Hazardous Air Pollutant (HAP) emissions. The engine is subject to 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT).	01/01/1975	NA
EUEMERGEN	An emergency stationary rich burn RICE rated at 259 HP (150 KW), located at an area source of HAP emissions firing natural gas and operated in a non-certified manner. This emission unit is subject to 40 CFR Part 60, Subpart JJJJ - New Source Performance Standard for Stationary Spark Ignition Internal Combustion Engines (ICE).	05/01/2016	NA

**EUWHITESUPERIOR
 EMISSION UNIT CONDITIONS**

DESCRIPTION

White-Superior 2000 HP, Spark Ignition, 4 stroke, lean burn, non-emergency, natural gas-fired existing reciprocating internal combustion engine (RICE) located at a non-remote area source of Hazardous Air Pollutant (HAP) emissions. The engine is subject to 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT).

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Catalytic Oxidizer

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. CO	47 ppmvd @ 15% O ₂ -Or- At least 93% reduction	4-hour rolling average	EUWHITESUPERIOR	SC IV.1, V.1, and VI.3	40 CFR 63.6603(a), 40 CFR 63.6640(a), Table 6 item 14

II. MATERIAL LIMIT(S)

1. The permittee shall only fire sweet natural gas in the reciprocating compressor engine at this facility. **(R 336.1213(3), R 336.1301(1))**

III. PROCESS/OPERATIONAL RESTRICTION

1. If the source changes from an area to a major source of HAPs, the permittee shall have three years to comply with the newly applicable 40 CFR Part 63, Subpart ZZZZ regulations. **(40 CFR 63.6595(b)(2))**
2. At all times, the permittee must be in compliance with all applicable emission and operating limitations except during periods of startup, shutdown, and malfunction and as allowed in SC III.7. **(40 CFR 63.6605(a))**
3. The permittee shall not operate a stationary RICE that does not use an oxidation catalyst to reduce CO emissions unless a petition which establishes operating limitations has been approved by the EPA Administrator as provided in 40 CFR 63.6620(f). If a petition is made, the required information in 40 CFR 63.6620(g) and (h) must be included. **(40 CFR 63.6603(a), 40 CFR 63.6620(f)-(h), 40 CFR Part 63, Subpart ZZZZ Table 2d item 9)**
4. The permittee shall operate and maintain the stationary RICE and associated air pollution control equipment and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by this standard have been achieved. **(40 CFR 63.6605(b))**
5. If permittee elects to install a continuous parameter monitoring system (CPMS) to monitor the inlet temperature into the catalyst, the CPMS must be installed, operated, and maintained according to the following requirements:
 - a. The permittee shall prepare a site-specific monitoring plan according to SC VI.1.

- b. The CPMS must collect data at least once every 15 minutes except for as specified in SC VI.2. The temperature sensor must have a minimum tolerance of 2.8° C (5° F) or 1 percent of the measurement range, whichever is larger.
- c. The permittee shall conduct an accuracy audit in accordance with the site-specific monitoring plan of the thermocouple at least once every calendar year.
- d. The permittee shall maintain spare parts for the CPMS that are not readily available from the supplier.

As specified in 40 CFR 63.8(f)(4), the permittee may request approval of monitoring system quality assurance and quality control procedure alternatives to those specified in this condition and SC VI.1. **(40 CFR 63.8(e), 40 CFR 63.6625(b), 40 CFR 63.6645(a)(2), 40 CFR Part 63, Subpart ZZZZ Table 5 item 13)**

6. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes after which time compliance is demonstrated by the inlet temperature specified in SC IV.1. **(40 CFR 63.6625(h))**
7. For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. For the purposes of this condition, engine rebuilding means to overhaul an engine or to otherwise perform extensive service on the engine (or on a portion of the engine or engine system). For the purpose of this condition, perform extensive service means to disassemble the engine (or portion of the engine or engine system), inspect and/or replace many of the parts, and reassemble the engine (or portion of the engine or engine system) in such a manner that significantly increases the service life of the resultant engine. **(40 CFR 63.6640(d), 40 CFR 94.11(a))**
8. The permittee shall not operate EUWHITESUPERIOR unless an oxidation catalyst is installed, maintained, and operated in a satisfactory manner. **(40 CFR 63.6603(a), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ Table 2d item 9)**

IV. DESIGN/EQUIPMENT PARAMETER

1. The permittee shall either collect the catalyst inlet temperature data according to SC III.5, reduce these data to 4-hour rolling averages, and maintain the 4-hour rolling averages within greater than or equal to 450°F and less than or equal to 1350°F, or immediately shut down the engine if the catalyst inlet temperature exceeds 1350°F. **(40 CFR Part 63, Subpart ZZZZ Table 6 item 14(a)(ii) & (iii), 40 CFR 63.6625(b), 40 CFR 63.6603(a), 40 CFR 63.6640(a), 40 CFR 63.6635)**
2. The permittee shall either install a continuous parameter monitoring system (CPMS) to continuously monitor and record the catalyst inlet temperature according to SC III.5, or install equipment to automatically shut down the engine if the catalyst inlet temperature exceeds 1350°F. **(40 CFR 63.6625(b), 40 CFR 63.6635, 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ Table 5 item 13(a)(ii))**

V. TESTING/SAMPLING

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

1. The permittee shall annually verify the catalyst system efficiency from EUWHITESUPERIOR, by testing at owner's expense, in accordance with 40 CFR 63.6640(c). The compliance demonstration shall be conducted according to the following requirements:
 - a. The compliance demonstration must consist of at least one test run.
 - b. Each test run must be at least 15 minutes duration, except that a test conducted using the method in Appendix A of 40 CFR Part 63, Subpart ZZZZ must consist of at least one measurement cycle and include at least two minutes of test data phase measurement.
 - c. CO emissions must be measured using one of the CO measurement methods specified in Table 4 of 40 CFR Part 63, Subpart ZZZZ.
 - d. Measurements of O₂ must be made using one of the O₂ measurement methods specified in Table 4 of Subpart ZZZZ. Measurements to determine O₂ concentration must be made at the same time as the measurements for CO emissions.
 - e. If demonstrating compliance with the CO percent reduction requirement, CO and O₂ concentrations shall be measured simultaneously at the inlet and outlet of the control device.

The permittee shall determine compliance with the percent reduction requirement using the equation in 40 CFR 63.6620(e). **(40 CFR 63.6595(c), 40 CFR 63.6620(a) & (e), 40 CFR 63.6640(c), 40 CFR 63.6645(a)(2), 40 CFR Part 63, Subpart ZZZZ Table 4, item 13, 40 CFR 63.7(b), 40 CFR 63.7(c), 40 CFR 63.9(g))**

2. No less than 60 days prior to testing, a complete test plan shall be submitted to the USEPA Administrator and the AQD. The final plan must be approved by the AQD prior to testing. Verification of CO reduction includes the submission of a complete report of the test results to the AQD within 60 days following the last day of the test. **(40 CFR 63.6595(c), 40 CFR 63.6603(a), 40 CFR 63.6620, 40 CFR 63.6630, 40 CFR 63.6645(g), 40 CFR 63.10(d)(2))**
3. The permittee does not need to start an engine that is subject to performance testing but is not operating solely to conduct the performance test. The performance test must be conducted when the engine is started again. **(40 CFR 63.6620(b))**
4. If the catalyst is changed, the permittee shall reestablish the values of the system pressure drop and inlet catalyst temperature measured during the initial performance test. When the values of the system pressure drop and inlet catalyst temperature are reestablished, the permittee shall conduct a performance test to demonstrate that EUWHITESUPERIOR meets the required emission limitation. **(40 CFR 60.6640(b))**
5. If the results of the annual compliance demonstration show that the emissions exceed the levels specified in SC I.1, EUWHITESUPERIOR shall be shut down as soon as safely possible, and appropriate corrective action shall be taken. EUWHITESUPERIOR shall be retested within 7 days of being restarted and the emissions must meet the levels specified in SC I.1. If the retest shows that the emissions continue to exceed the specified levels, EUWHITESUPERIOR must again be shut down as soon as safely possible, and EUWHITESUPERIOR may not operate, except for purposes of startup and testing, until the owner or operator demonstrates through testing that the emissions do not exceed the levels specified in SC I.1. **(40 CFR 63.6640(c)(7))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.6660, 40 CFR 63.10(b)(1))**

1. If the permittee elects to install a CPMS, the permittee shall prepare a site-specific monitoring plan that addresses the monitoring system design, data collection, and the quality assurance and quality control elements outlined below, as well as the applicable requirements in 40 CFR 63.8(d): **(40 CFR 63.6625(b)(1)(i)-(v))**
 - a. The performance criteria and design specifications for the monitoring system equipment, including the sample interface, detector signal analyzer, and data acquisition calculations;
 - b. Sampling interface location such that the monitoring system will provide representative measurements;
 - c. Equipment performance evaluations, system accuracy audits, or other audit procedures.
2. The permittee shall monitor and record the catalyst inlet temperature at all times that EUWHITESUPERIOR is operating, except during monitor malfunctions, associated repairs, performance evaluations, and required quality assurance or control activities. **(40 CFR 63.6635(b))**
3. If the permittee opts to reduce the catalyst inlet temperature to a 4-hour rolling average, the permittee shall keep in a satisfactory manner, records of the 4-hour rolling average for the catalyst inlet temperature as required by SC IV.1. **(40 CFR 63.6655(d), 40 CFR 63.6660, 40 CFR Part 63, Subpart ZZZZ Table 6 item 14(a)(ii))**
4. The permittee shall not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. All valid data collected during all other periods must be used. **(40 CFR 63.6635(c))**
5. The permittee shall keep the following records: **(40 CFR 63.6655(a))**
 - a. A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart ZZZZ, and the documentation supporting any notification;
 - b. Records of the occurrence and duration of each malfunction of EUWHITESUPERIOR, the air pollution control and monitoring equipment;
 - c. Records of performance tests and performance evaluations;

- d. Records of all required maintenance performed on the air pollution control and monitoring equipment;
 - e. Records of actions taken during periods of malfunction to minimize emissions including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal manner of operation.
6. For the CPMS, the permittee shall keep the following records:
- a. Each period during which the catalyst inlet thermocouple was malfunctioning or inoperative (including out-of-control periods); **(40 CFR 63.10(b)(2)(vi))**
 - b. All required measurements needed to demonstrate compliance with the catalyst inlet temperature range between 450-1350°F; **(40 CFR 63.10(b)(2)(vii)(C))**
 - c. All results of performance tests and annual thermocouple verification; **(40 CFR 63.10(b)(2)(viii))**
 - d. All measurements as may be necessary to determine the conditions of performance tests and performance evaluations; **(40 CFR 63.10(b)(2)(ix))**
 - e. All adjustments and maintenance performed on the CMS, such as replacement of the thermocouple. **(40 CFR 63.10(b)(2)(xi))**
 - f. Previous versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3) shall be maintained for a minimum of 5 years from the date of any change; **(40 CFR 63.6655(b)(2))**
 - g. Requests for alternatives to the relative accuracy test as required in 40 CFR 63.8(f)(6)(i), if applicable. **(40 CFR 63.6655(b)(3))**

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 as specified in 40 CFR 63.6650 and 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), 40 CFR 63.6645(a)(2), 40 CFR 63.6650(b)(5), 40 CFR 63.9(h))**
- 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), 40 CFR 63.6645(a)(2), 40 CFR Part 63.6650(b)(5), 40 CFR 63.9(h))**
- 4. Semi-annual and annual reports referenced in SC VII.2 and 3 shall identify all deviations during the reporting period from any applicable emission limitation or operating limitation and all periods during which the CPMS or CEMS was out of control as defined in 40 CFR 63.8(c)(7). If there were no deviations from any applicable emission limitations or operating limitations or no periods that the CPMS or CEMS was out of control, the report shall contain a statement that there were no deviations and no periods during which the CPMS or CEMS was out of control during the reporting period. Marking the no deviations box on the annual and semi-annual certification form shall satisfy this condition. **(40 CFR 63.6640(b), 40 CFR 63.8(c)(7), 40 CFR 63.6650, 40 CFR Part 63, Subpart ZZZZ Table 7 item 3)**
- 5. If there was a malfunction during the reporting period, the compliance reports referenced in SC VII.2 & 3 must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of the actions taken to minimize the emissions in accordance with SC III.4, including actions taken to correct a malfunction. **(40 CFR 63.6650(c) & (d))**
- 6. For each deviation from an emission or operating limitation occurring where a CMS is being used to comply with the emission and operating limitations, the following information must be included with the compliance reports referenced in SC VII.2 and 3: **(40 CFR 63.6650(d) & (e), 40 CFR 63.10(c))**
 - a. The date and time that each malfunction started and stopped;
 - b. The date, time and duration that the CPMS was inoperative, except for low-level and high-level checks;
 - c. The date, time and duration that the CPMS was out of control (as defined in 40 CFR 63.8(c)(7)) and the corrective actions taken;
 - d. The date and time that each deviation started and stopped and whether each deviation occurred during a period of malfunction or during another period;

- e. A summary of the total duration of the deviations during the reporting period and the percent of the total duration during the total source operating time of that reporting period;
- f. A breakdown of the total duration of deviations due to control equipment problems, process problems, other known causes and any unknown causes;
- g. A summary of the total duration of CPMS downtime during the reporting period, and the total duration of CPMS downtime as a percent of the total operating time of EUWHITESUPERIOR at which the CPMS downtime occurred during that reporting period;
- h. An identification of each parameter monitored and whether CO or formaldehyde was monitored;
- i. A brief description of the stationary RICE;
- j. A brief description of the CPMS;
- k. The date of the latest CPMS certification or audit;
- l. A description of any changes in the CPMS, processes or controls since the last reporting period.

See Appendix 8

VIII. STACK/VENT RESTRICTION

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-05	NA	NA	NA

IX. OTHER REQUIREMENT(S)

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

**EUEMERGEN
 EMISSION UNIT CONDITIONS**

DESCRIPTION

An emergency stationary rich burn RICE rated at 259 HP (150 KW), located at an area source of HAP emissions firing natural gas and operated in a non-certified manner. This emission unit is subject to 40 CFR Part 60, Subpart JJJJ - New Source Performance Standard for Stationary Spark Ignition Internal Combustion Engines (ICE).

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Catalyst

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	2.0 g/hp-hr	Per horsepower hour, per engine	EUEMERGEN	SC III.2 and V.1	40 CFR 60.4233(e) 40 CFR 60.4243(b), 40 CFR Part 60, Subpart JJJJ Table 1
2. CO	4.0 g/hp-hr	Per horsepower hour, per engine	EUEMERGEN	SC III.2 and V.1	40 CFR 60.4233(e), 40 CFR 60.4243(b), 40 CFR Part 60, Subpart JJJJ Table 1
3. VOC ^a	1.0 g/hp-hr	Per horsepower hour, per engine	EUEMERGEN	SC III.2 and V.1	40 CFR 60.4233(e), 40 CFR 60.4243(b), 40 CFR Part 60, Subpart JJJJ Table 1

^a Footnote d from 40 CFR Part 60, Subpart JJJJ Table 1: For purposes of this subpart, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. There is no time limit on the operation of EUEMERGEN in emergency situations. **(40 CFR 60.4243(d)(1))**
2. The permittee must operate and maintain EUEMERGEN over the entire life of the engine and, to the extent practicable, maintain and operate the engine in a manner consistent with pollution control practices for minimizing emissions. **(40 CFR 60.4234, 40 CFR 60.4243(b)(2)(i))**

3. EUEMERGEN may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. **(40 CFR 60.4243(d)(2))**
4. The permittee may operate EUEMERGEN up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing in SC III.3. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity except as provided per 40 CFR 60.4243(d)(3)(i). **(40 CFR 60.4243(d)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a non-resettable hour meter on EUEMERGEN. **(40 CFR 60.4237(b))**

V. TESTING/SAMPLING

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

1. The permittee shall conduct an initial performance test to demonstrate compliance with the emission limits in SC I.1 through I.3 according to the requirements in 40 CFR 60.4244. Subsequent performance testing is not required unless EUEMERGEN is rebuilt or undergoes major repair or maintenance. **(40 CFR 60.4243(b)(2), 40 CFR 60.4243(f), 40 CFR 60.4244, 40 CFR Part 60, Subpart JJJJ Table 2, 40 CFR 94.11(a))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep a maintenance plan and records of maintenance conducted on EUEMERGEN. **(40 CFR 60.4243(b)(2)(i), 40 CFR 60.4245(a)(2))**
2. The permittee shall monitor and record the hours of operation of EUEMERGEN on a yearly basis and document how many hours are spent for emergency operation, including what classified the operation as an emergency, and how many hours are spent for nonemergency situations. **(40 CFR 60.4245(b))**
3. The permittee shall maintain records of all notifications submitted and all documentation supporting any notifications. **(40 CFR 60.4245(a)(1))**
4. The permittee shall maintain documentation that EUEMERGEN meets the emission limits in SC I.1 through 3. **(40 CFR 60.4245(a)(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)

1. The permittee shall comply with all applicable provisions of the Standards of Performance for New Stationary Sources, as specified in 40 CFR Part 60, Subpart A and Subpart JJJJ, for Stationary Spark Ignition Internal Combustion Engines. **(40 CFR Part 60, Subparts A and JJJJ)**

D. FLEXIBLE GROUP SPECIAL CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

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. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

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

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

At the time of permit issuance, no Permits to Install have been issued to this facility. The following table lists any ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N5935-2014. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-N5935-2014.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201500177/ January 8, 2016	Removal of EUEMERGEN conditions. Existing EUEMERGEN is subject to ZZZZ. The ZZZZ generator is being removed and replaced by a generator subject to JJJJ.	EUEMERGEN
NA	201500190/ April 5, 2016	Removal of NSCR requirements from EUWHITESUPERIOR. Testing was completed on the engine, and it was determined that the engine did not meet the definition of a rich burn engine. An NSCR was not the correct control device, so it was replaced with an oxidation catalyst. The AQD is not delegated the regulatory authority for this area source MACT; therefore, the special conditions changes for the RICE Area Source MACT contained in EUWHITESUPERIOR were modified as requested by the DTE Energy. The special conditions were not reviewed by the AQD.	EUWHITESUPERIOR

Appendix 7. Emission Calculations

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

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

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