

Michigan Department Of Environmental Quality Air Quality Division

PHASE II ACID RAIN PERMIT Permit No. MI-AR-1732-2008

Permittee Detroit Edison – Marysville Power Plant

Address 301 Gratiot, Marysville, MI

SRN B2813 ORIS code 1732

Issue Date May 16, 2008

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-B2813-2008

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.

Permit No.: MI-AR-1732-2008

Issued: May 16, 2008

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.

Plant Name: Detroit Edison – Marysville Power Plant Permit No.: MI-AR-1732-2008 Page 3

Issued: May 16, 2008

Terms and Conditions:

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

		2008	2009	2010	2011	2012
	SO ₂ allowances	1637	1637	560	560	560
Unit 9	NO _x limit	Department approves a la from calenda unit's NOx e alternative or lb/mmBtu. I input less the Under the plemission rate to the Btu-wasame units have period of time limitations under 40 CF demonstrate forth in 40 CF plan, then the year with its limitation and In addition to comply with 76, including	of Environment NOx emission ar years 2008 missions shat ontemporane in addition, this an 202,500 mission and they each the compliant of the describer all other apply the duty to response to the describer all other all the duty to response to the describer all the duty to response to the describer all the duty to response to the duty to resp	ental Quality, as averaging part through 2012 and through 2012 and through 2012 and the entance with the entance of the entance with the entance with the entance with the entance of the entance with the entance	e State of Michair Quality Divolan for this upolan for this upolan for the the annual averable in the entire of the prior sentence o	vision nit, effective plan, this erage 0.38 nual heat age NOx nan or equal ate for the same ssion that for any ns shall be nce (as set nder the nce for that nission is unit shall CFR part

Plant Name: Detroit Edison – Marysville Power Plant Permit No.: MI-AR-1732-2008

Issued: May 16, 2008

Terms and Conditions: (continued)

		2008	2009	2010	2011	2012
Unit 10	SO ₂ allowances	1261	1261	432	432	432
	NO _x limit	Department approves a from calend unit's NOx e alternative of Ib/mmBtu. input less the Under the pemission rate to the Btu-we same units period of time limitations upday election under 40 CF demonstrate forth in 40 CF plan, then the year with its limitation and In addition to	of Environment NOx emission lar years 2008 emissions shad contemporane In addition, the nan 202,500 multiple of the unitation of the describe of the describ	ental Quality, as averaging a through 201 all not exceed eous emission is unit shall a mmBtu. If Btu-weighters in the plans all average Notes and average Notes all average Notes are designated in the deemed to entemporane to the designated to entemporane	ne State of Michair Quality Diplan for this uplan for this uplan for the annual averaged annual event for a year uplan complication of the prior sented the prior sented applicable empresentative the prior sented annual eraged	vision init, effective plan, this verage 0.38 inual heat rage NOx han or equal rate for the e same ission that for any ins shall be ence (as set under the ance for that mission
		76, including		eapply for a l	NOx complian	

Page 4

Plant Name: Detroit Edison – Marysville Power Plant Permit No.: MI-AR-1732-2008

Issued: May 16, 2008

Terms and Conditions: (continued)

		2008	2009	2011	2012	
	SO₂ allowances	1315	1315	450	450	450
Unit 11	NO _x limit	Department approves a from calend unit's NOx e alternative of Ib/mmBtu. input less the Under the pemission rate to the Btu-wisame units period of tin limitations of the early election under 40 Cl demonstrate forth in addition are under 40 Cl demonstrate forth in 40 Cl demonstrate forth in 40 Cl demonstrate forth in addition are under 40 Cl demonstrate forth in 40 Cl dem	t of Environment NOx emission lar years 2008 emissions shad contemporane In addition, the nan 344,500 n which will be added to the describe all other application of the describe all other application.	ental Quality, as averaging a through 201 all not exceed cous emission is unit shall nambtu. If Btu-weighters in the plants all average Notes and average Notes all average Notes all average Notes in the plants and everage	e State of Michael Air Quality Diplan for this upon the plan for this upon the annual average of the annual average of the annual average of the plan for the prior sent the prior sent to the p	vision nit, effective plan, this verage 0.38 nual heat rage NOx nan or equal ate for the e same ission that for any ns shall be ence (as set under the unce for that mission is unit shall CFR part

Page 5

Permit No.: MI-AR-1732-2008

Issued: May 16, 2008

Terms and Conditions: (continued)

		2008	2009	2010	2011	2012
	SO ₂ allowances	1061	1061	363	363	363
Unit 12	NO _x limit	Department approves a from calend unit's NOx e alternative of Ib/mmBtu. input less the Under the pemission rate to the Btu-w same units period of tin limitations of the early election under 40 Cl demonstrate forth in 40 Cl demonstrate forth in 40 Cl plan, then the year with its limitation are In addition to comply with 76, including	of Environment NOx emission ar years 2008 emissions shad contemporane In addition, the an 344,500 n and the for the unitate for unitate for unitate for unitate for unitate for unitate for the describe all other applications of the describe all other applications.	ental Quality, as averaging a through 201 all not exceed cous emission is unit shall nambtu. If Btu-weighters in the plants all average Notes all average n	de State of Mic Air Quality Di plan for this u 2. Under the parties annual averaged annual averaged, during the applicable em r 76.7, except assion limitation representative the prior sente the in compliance plan, the annual error annu	vision nit, effective plan, this verage 0.38 nual heat rage NOx nan or equal ate for the e same ission that for any ns shall be ence (as set under the ance for that mission is unit shall CFR part

Page 6

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 July 21, 2004 Phase II NOx Compliance Plan submitted July 21, 2004 Phase II NOx Averaging Plan submitted July 21, 2004 Permit No.: MI-AR-1732-2008

Issued: May 16, 2008

United States Environmental Protection Agency Acid Rain Program

OMB No. 2060-0258



Acid Rain Permit Application

For more information,	, see instructions	and refer to	40	CFR	72.30	and	72.31

This submission is: New

X Revised

Revision 1

STEP 1

Identify the source by plant name, State, and ORIS code.

MARYSVILLE POWER PLANT MI 1732
Plant Name State ORIS Code

STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a." For new units, enter the requested information in columns "e" and "d."

а	ь	С	d
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	New Units Commence Operation Date	New Units Monitor Certification Deadline
9	Yes		
10 .	Yes	-	
11	Yes		
12	Yes	-	
	Yes		,
	Yes		
	Yes		
	Yes		
-	Yes		·
	Yes		
	Yes	****	·

EPA Form 7610-16 (rev. 12-03)

Permit No.: MI-AR-1732-2008

Issued: May 16, 2008

Acid Rain - Page 2 MARYSVILLE POWER PLANT

Plant Name (from Step 1)

Revision 1

Page 8

STEP 3

Read the standard requirements **Permit 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 unit 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 unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another affected unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; 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 dióxide 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).

 (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, 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.

Permit No.: MI-AR-1732-2008

Issued: May 16, 2008

MARYSVILLE POWER PLANT Plant Name (from Step 1)

Acid Rain - Page 3

Page 9

Revision 1

STEP 3, Cont'd.

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 unit 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 unit 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 of representation, in accordance with 40 or 17.2.24, 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;

(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
- (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 Ráin Program.

Permit No.: MI-AR-1732-2008

Issued: May 16, 2008

MARYSVILLE POWER PLANT
Plant Name (from Step 1)

Acid Rain - Page 4

Revision 1

Step 3, Cont'd.

Liability, Cont'd.

(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. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative.

(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

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

(2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit 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.

STEP 4 Certification

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 RO	BERT A. RICHARD, DESIGNATED REPRES	ENTATIVE
Signature	Robert Wilal	Date Thre 9, 2004

EPA Form 7610-16 (rev. 12-03)

Permit No.: MI-AR-1732-2008

Issued: May 16, 2008

& EPA	United States Environmenta Acid Rain Pro	OMB No. 2060-0258				
		e II NO ation, see instruction is: New X	i	Page 1 of 2		
STEP 1 Indicate plant name, State, and ORIS code from NADB, if applicable	Plant Name	MARYSVII	LE POWER P	LANT	MI State	1732 ORIS Code
STEP 2	Identify each applicable. I bottom wall-f indicate the c	affected Group 1 ndicate boiler typ ired, "T" for tang compliance optio	and Group 2 bol e: "CB" for cell b entially fired, "V" n selected for eac	ler using the bol urner, "CY" for o for vertically fire th unit.	ler ID# from NA yclone, "DBW" ed, and"WB" fo	DB, if for dry r wet bottom.
	9 ID# T	ID# T	ID# T	12 ID# T	ID# Type	ID#
(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired bollers)					[]	
(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired bollsrs)						
(c) EPA-approved early election plan under 40 CFR 78.8 through 12/31/07 (also indicate above emission limit specified in plan	1 . []					
(d) Standard annual average emission limitation of 0.46 lb/mm8tu (for Phase II dry bottom wall-fired bollers)						
(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)				. 🛘	<u>.</u>	
(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)		_ [
(g) Standard annual average emission limitation of 0.85 lb/mmBtu (for cyclone boilers)						0
(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)						
(i) Standard annual average emission limitation of 0.84 lib/mm8tu (for wet bottom bollers)						
(j) NO. Averaging Plan (include NO _x Averaging form)	X	X	X	X		
(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)	•					. []
(I) Common stack pursuant to 4 CFR 75.17(a)(2)(i)(B) with NO _x Averaging (check the NO _x		X	X	X		

EPA Form 7610-28 (12-03)

Permit No.: MI-AR-1732-2008

Issued: May 16, 2008

Plan	nt Name (from Si	NO _x Co	mpliance - Page 2 Page 2 of 2			
STEP 2, cont'd.	9	_{ID#} 10	_{ID#} 11	_{ID#} 12	ID#	Revision 1
Тур	еТ	туре Т	Type T	_{Type} T	Туре	Туре
(m) EPA-approved common stack apportunent method pursuant to 40 CFR 75.17 (a)(2)(l)(C), (a)(2)(lii)(B), or (b)(2)						
(n) AEL (Include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)						
(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing						
(p) Repowering extension plan approved or under review	0					

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 liabile 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 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 any year prior to 2008 but may not submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the terminated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the terminated and year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase il 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 terminated emissions limitation for NO_x for Phase il units with Group 1 boilers under 40 CFR 76.7.

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 frue, 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	ROBERT A. RICHARD, DESIGNATED REP	RESENTATIVE
Signature	Rokeful he d	Thre 9, 2004

Issued: May 16, 2008

Page 13

United States Environmental Protection Agency Acid Rain Program OMB No. 2060-0258



Phase II NO_X Averaging Plan

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

 This submission
 New
 X
 Revised
 Page
 1
 of
 3

 Revision No.:
 2
 Date:
 2/7/03

STEP 1

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

		-	Revision No	.: 2 Date:	2/7/03
DETROIT EDISON Plant Name	State	ID#	(a) Emission Limitation	(b) Alt. Contem. Emission Limitation	(c) Annual Heat Input Limit
BELLE RIVER	MI	1	0.46	0.27	47,540,000
BELLE RIVER	MI	2	0.46	0.27	42,597,000
HARBOR BEACH	MI	1	0.46	0.87	2,259,000
MARYSVILLE	MI	9	0.40	0.38	202,500
MARYSVILLE	MI	10	0.40	0.38	202,500
MARYSVILLE	MI	11	0.40	0.38	344,500
MARYSVILLE	MI	12	0.40	0.38	344,500
MONROE	MI	1	0.68	0.51	39,094,000
MONROE	MI	2	0.68	0.51	50,700,000
MONROE	MI	3	0.68	0.51	54,404,000
MONROE	MI	4	0.68	0.51	54,418,000
RIVER ROUGE	MI	. 2	0.40	0.39	17,392,000
RIVER ROUGE	MI	3	0.46	0.83	19,201,000
ST CLAIR	MI	1	0.46	0.59	11,366,000
ST CLAIR	MI	2	0.46	0.68	10,469,000
(CONTINUED ON PA	4 <i>GE 3</i>)	-			

STEP 2

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

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6, or 76.7

$$\sum\nolimits_{i=1}^{n}(R_{i,i}xHI_{i})/\sum\nolimits_{i=1}^{n}HI_{i} \qquad \leq \qquad \sum\nolimits_{i=1}^{n}(R_{i,i}xHI_{i})/\sum\nolimits_{i=1}^{n}HI_{i}$$

Where

 $R_{f,i}$ = Alternate contemporaneous annual emission limitation for unit I, in lb/mmBtu, as specified in column (b) of Step 1

 R_{li} = Applicable emission limitation for unit I, in lb/mmBtu, as specified in column (a) of Step 1

n = Number of units in the averaging plan

Plant Name (from Step 1)

Permit No.: MI-AR-1732-2008

Issued: May 16, 2008

DETROIT EDISON POWER PLANTS

NOx Averaging Plan - Page 3

Page 3 of 3

Revision No.: 2 Date:

2/7/03

STEP 1

Continue the identification of units from Step 1, Page 1, here.

DETROIT EDISON Plant Name	State	ID#	(a) Emission	(b) Alt. Contem.	(c) Annual Heat
ST CLAIR	MI	3	Limitation 0.46	Emission Limitation 0.65	Input Limit
ST CLAIR	MI	4	0.46		11,782,000
ST CLAIR				0.59	9,425,000
	MI	6	0.40	0.46	16,877,000
ST CLAIR	MI	7	0.40	0.36	30,308,000
TRENTON CHANNEL	MI	16	0.40	0.49	3,955,500
TRENTON CHANNEL	MI	17	0.40	0.49	3,955,500
TRENTON CHANNEL	MI	18	0.40	0.49	1,959,000
TRENTON CHANNEL	MI	19	0.40	0.49	1,959,000
TRENTON CHANNEL	MI	9A	0.40	0.41	23,621,000
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