

**DTE**

April 1, 2021

Ms. Caryn Owens
Cadillac District Office
EGLE AQD
120 West Chapin Street
Cadillac, MI 49601

Subject: SRN #B2796 ROP Minor Modification (Rule 216) for
DTE Electric Company – Belle River Power Plant
Section 3 of ROP No: MI-ROP-B2796-2015c
EU-ECONSILO-BR

Dear Ms. Owens,

DTE Electric Company (DTE) hereby submits a Rule 216(2) Minor Modification for ROP No. MI-ROP-B2796-2015c issued to Belle River Power Plant located at 4505 King Road, China Township, MI 48054.

Upon further review of flyash handling equipment onsite, it was discovered that an emission unit in the ROP, EU-ECONSILO-BR, was decommissioned in approximately 2002. This minor modification application is being submitted to remove EU-ECONSILO-BR and emission unit-specific permit conditions from the ROP in conjunction with the pending ROP renewal. M-001, C-001, & AI-001 forms are enclosed, along with a ROP Mark-Up.

Please note that this is a revised application originally submitted on March 29, 2021 as an operational flexibility change notification per Rule 215(1)(a) to EGLE AQD Warren District Office and US EPA Region 5 Air and Radiation Division. As advised by Ms. Julie Brunner of EGLE AQD, this application was changed to a minor modification (Rule 216(2)), so that it may be processed as part of the pending ROP renewal for MI-ROP-B2796-2015c (application submitted November 27, 2019).

Should you have any questions, please contact me at lisa.fishbeck@dteenergy.com or (313) 235-3389.

Sincerely,

Lisa R. Fishbeck

Lisa R. Fishbeck, CHMM
Senior Environmental Engineer, Emissions Quality
Environmental Management & Safety (EM&S)
DTE Energy Corporate Services, LLC

Enclosure: MI-ROP-B2796-2015c Minor Modification Application comprised of:
M-001: ROP Rule 216 Modification Application Form

C-001: ROP Application Certification Form
AI-001: Additional Information Form AI-EU-ECONSILO-BR
MI-ROP-B2796-2015c ROP Mark-Up – Section 3 – FG-ASH_HAND-BR

DTE

Cc: Ms. Joyce Zhu, EGLE AQD, Warren District, Supervisor
via email at zhuj@michigan.gov

Ms. Julie Brunner, EGLE AQD, Lansing District, Environmental Quality
Specialist via email at brunnerj1@michigan.gov

Mr. Robert Elmouchi, EGLE AQD, Warren District, Environmental Quality
Analyst via email at elmouchir@michigan.gov

Mr. Shamim Ahammod, EGLE AQD, Warren District, Environmental Engineer
via email at AhammodS@michigan.gov

Lezley Filzek, DTE, Fossil Generation, Plant Manager – Belle River Power
Plant via email at Lezley.Filzek@dteenergy.com

Jason Roggenbuck, DTE, EM&S, Senior Environmental Engineer – Belle River
Power Plant via email at Jason.Roggenbuck@dteenergy.com

Barry Marietta, DTE, EM&S, Manager – Emissions Quality
via email at Barry.Marietta@dteenergy.com

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

RENEWABLE OPERATING PERMIT M-001: RULE 215 CHANGE NOTIFICATION RULE 216 AMENDMENT/MODIFICATION APPLICATION

This information is required by Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment.

1. SRN B2796	2. ROP Number MI-ROP-B2796-2015c	3. County St. Clair
4. Stationary Source Name DTE Electric Company - Belle River Power Plant		
5. Location Address 4505 King Road		6. City China Township
7. Submittal Type - <i>The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.</i> <input type="checkbox"/> Rule 215(1) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 215(2) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 215(3) Notification of change. Complete Items 8 – 11 and 14 <input type="checkbox"/> Rule 215(5) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions. <input checked="" type="checkbox"/> Rule 216(2) Minor Modification. Complete Items 8 – 12 and 14 <input type="checkbox"/> Rule 216(3) Significant Modification. Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions. <input type="checkbox"/> Rule 216(4) State-Only Modification. Complete Items 8 – 12 and 14		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> 12/31/2002		9. Change in emissions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Description of Change - <i>Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).</i> EU-ECONSILO-BR was retired in approximately 2002. This resulted in a decrease in emissions from this EU (to 0 lbs). Permit conditions SC I(1), V(1), & VI(1) in FG-ASH_HAND-BR of Section 3 of MI-ROP-B2796-2015c are no longer applicable to this EU and should be removed from the permit. This EU should be removed from the Emission Unit Summary Table & Flexible Group Summary Table, and the Description of the FG should be revised.		
11. New Source Review Permit(s) to Install (PTI) associated with this application? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, enter the PTI Number(s) _____ - _____ - _____ - _____ - _____		
12. Compliance Status - <i>A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.</i> a. Is the change identified above in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No c. If the change includes a future applicable requirement(s), will timely compliance be achieved? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
13. Operator's Additional Information ID - <i>Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.</i> AI EU-ECONSILO-BR		
14. Contact Name Lisa Fishbeck	Telephone No. (313) 235-3389	E-mail Address lisa.fishbeck@dteenergy.com
15. This submittal also updates the ROP renewal application submitted on <u>10/19/2020</u> & <u>11/27/2019</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A <i>(If yes, a mark-up of the affected pages of the ROP must be attached.)</i>		

NOTE: A CERTIFICATION FORM (C-001) SIGNED BY A RESPONSIBLE OFFICIAL MUST ACCOMPANY ALL SUBMITTALS

For Assistance
Contact: 800-662-9278

www.michigan.gov/egle

EQP 5775 (Rev.04-2019)



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

RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.

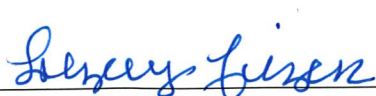
This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN B2796
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Stationary Source Name DTE Electric Company - Belle River Power Plant	
City China Township	County St. Clair

SUBMITTAL CERTIFICATION INFORMATION	
1. Type of Submittal <i>Check only one box.</i>	
<input type="checkbox"/> Initial Application (Rule 210)	<input checked="" type="checkbox"/> Notification / Administrative Amendment / Modification (Rules 215/216)
<input type="checkbox"/> Renewal (Rule 210)	<input type="checkbox"/> Other, describe on AI-001
2. If this ROP has more than one Section, list the Section(s) that this Certification applies to <u>3</u>	
3. Submittal Media <input checked="" type="checkbox"/> E-mail <input type="checkbox"/> FTP <input type="checkbox"/> Disk <input checked="" type="checkbox"/> Paper	
4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal.	
AI EU-ECONSILO-BR	

CONTACT INFORMATION	
Contact Name Lisa Fishbeck	Title Senior Environmental Engineer
Phone number 313-235-3389	E-mail address lisa.fishbeck@dteenergy.com

This form must be signed and dated by a Responsible Official.				
Responsible Official Name Lezley Filzek			Title Plant Manager, Fossil Generation - Belle River Power Plant	
Mailing address DTE Electric Company, 4505 King Road				
City China Township	State MI	ZIP Code 48054	County St. Clair	Country USA
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.				
 _____ Signature of Responsible Official			<u>4/1/2021</u> _____ Date	

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



RENEWABLE OPERATING PERMIT APPLICATION

AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: B2796

Section Number (if applicable): 3

1. Additional Information ID
AI-EU-ECONSILO-BR

Additional Information

2. Is This Information Confidential?

 Yes No

Enclosed is the ROP Mark-up for MI-ROP-B2796-2015c. Changes were made in: Part C) Emission Unit Summary Table C-3, Part D) Flexible Group Summary Table D-3, & Part D) Special Conditions I(1), V(1), & VI(1) of FG-ASH_HAND-BR (as well as the Description).

No other emission units, flexible groups, parts, or sections of the ROP are affected. Please note that EU-ECONSILO-BR is currently in Section 3 of the ROP. In the ROP renewal application submitted on November 27, 2019, Section 3 was requested to be moved up to Section 2 of the new ROP.

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

EFFECTIVE DATE: July 15, 2015
REVISION DATES: December 15, 2015, June 16, 2016, July 15, 2019

ISSUED TO

**DTE ELECTRIC COMPANY
ST. CLAIR/BELLE RIVER POWER PLANT**

State Registration Number (SRN) B2796

LOCATED AT

4901 Pointe Drive, St. Clair, Michigan 48054

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2796-2015c

Expiration Date: July 15, 2020

Administratively Complete ROP Renewal Application
Due Between January 15, 2019 and January 15, 2020

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-B2796-2015c

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

Joyce Zhu, Warren District Supervisor

Section 3 – Belle River Power Plant

ROP No: MI-ROP-B2796-2015c
Expiration Date: July 15, 2020
PTI No.: MI-PTI-B2796-2015c

SECTION 3 – BELLE RIVER POWER PLANT

LOCATED AT

4505 King Road
China Township, Michigan 48054

Section 3 – Belle River Power Plant

ROP No: MI-ROP-B2796-2015c
 Expiration Date: July 15, 2020
 PTI No.: MI-PTI-B2796-2015c

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 C-3

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-BOILER1-BR	Belle River Boiler No. 1. 697 MW nominally rated, dry bottom coal-fired boiler equipped with low NOx burners, over-fire air, dry cold-side ESP, DSI, and ACI. (PTI No. 18-14)	03-01-1984/ 09-05-2008/ 07-25-2014	FG-BOILERS-BR FG-DSI/ACI-BR FG-MATSPROJECT-BR
EU-BOILER2-BR	Belle River Boiler No. 2. 697 MW nominally rated, dry bottom coal-fired boiler equipped with low NOx burners, over-fire air, dry cold-side ESP, DSI, and ACI. (PTI No. 18-14)	01-01-1984/ 02-01-2002/ 12-29-2009/ 07-25-2014	FG-BOILERS-BR FG-DSI/ACI-BR FG-MATSPROJECT-BR
EU-NAUXBLR-BR	Belle River North Auxiliary Boiler. 205 mmBtu heat input boiler, fired by #2 fuel oil.	01-01-1984	FG-AUXBLRS-BR
EU-SAUXBLR-BR	Belle River South Auxiliary Boiler. 205 mmBtu heat input boiler, fired by #2 fuel oil.	01-01-1984	FG-AUXBLRS-BR
EU-ASHSILO#1-BR	Flyash handling activity in Flyash Silo #1 where emissions are limited by enclosures, water sprays, and direct venting into ESP's.	01-01-1984	FG-ASH_HAND-BR
EU-ASHSILO#2-BR	Flyash handling activity in Flyash Silo #2 where emissions are limited by enclosures, water sprays, and direct venting into ESP's.	01-01-1984	FG-ASH_HAND-BR
EU-ECONSILO-BR	Economizer ash collection and handling from both boilers where emissions are limited by enclosures, water sprays, or dust collectors.	01-01-1984	FG-ASH_HAND-BR
EU-TRANS_HS-BR	Coal handling activity in Transfer Houses, where emissions are limited by enclosures, sprays, or baghouse dust collectors.	10-17-1978	FG-COALHAND-BR
EU-COALSILOS-BR	Coal handling activity in Unit 1 & 2 Coal silos, where emissions are limited by enclosures, sprays, or baghouse dust collectors.	10-17-1978	FG-COALHAND-BR
EU-CASCADES-BR	Coal handling activity in Cascade Rooms, where emissions are limited by enclosures, sprays, or baghouse dust collectors.	10-17-1978	FG-COALHAND-BR
EU-PARTSCLN-BR	Cold solvent parts cleaners located at Belle River Power Plant.	08-01-1984	FG-COLDCLNR-BR
EU-FIREPUMP-BR	Rule 285(g) exempt, <300 BHp, emergency diesel engine for Fire Pump House.	1984	FG-EMERGENS-BR

Section 3 – Belle River Power Plant

ROP No: MI-ROP-B2796-2015c
 Expiration Date: July 15, 2020
 PTI No.: MI-PTI-B2796-2015c

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-BLR01-DSI_SILO1	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 1 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR
EU-BLR01-DSI_SILO2	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 1 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR
EU-BLR02-DSI_SILO1	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 2 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR
EU-BLR02-DSI_SILO2	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 2 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR
EU-BLR01-ACI_SILO	ACI sorbent delivered by enclosed dry bulk semi-trailer trucks and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 1 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR
EU-BLR02-ACI_SILO	ACI sorbent delivered by enclosed dry bulk semi-trailer trucks and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 2 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR

Section 3 – Belle River Power Plant

ROP No: MI-ROP-B2796-2015c
 Expiration Date: July 15, 2020
 PTI No.: MI-PTI-B2796-2015c

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 D-3

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-BOILERS-BR	Applicable requirements associated with Belle River Power Plant Boiler Nos. 1 and 2.	EU-BOILER1-BR EU-BOILER2-BR
FG-AUXBLRS-BR	Applicable requirements associated with the Belle River North and South Auxiliary Boilers.	EU-NAUXBLR-BR EU-SAUXBLR-BR
FG-ASH_HAND-BR	Emission units representing flyash collection and handling at Belle River Power Plant.	EU-ASH_SILO#1-BR EU-ASH_SILO#2-BR EU-ECONSILO-BR
FG-COALHAND-BR	Emission units representing coal handling at Belle River Power Plant.	EU-TRANS_HS-BR EU-COALSILOS-BR EU-CASCADES-BR
FG-COLDCLNR-BR	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv).	EU-PARTSCLN-BR
FG-EMERGENS-BR	Onsite, stationary, emergency engines exempt from Rule 201 pursuant to Rule 278 and Rule 285(g). Emergency engines are subject to 40 CFR 63 Subpart ZZZZ.	EU-FIREPUMP-BR
FG-DSI/ACI-BR	Installation of dry sorbent injection (DSI) and activated carbon injection (ACI) systems on Belle River Units 1 and 2. (PTI No. 18-14)	EU-BOILER1-BR, EU-BOILER2-BR
FG-ISLANDS-BR	DSI and ACI sorbents delivered and conveyed pneumatically to the appropriate storage silo. (PTI No. 18-14)	EU-BLR01-DSI_SILO1, EU-BLR01-DSI_SILO2, EU-BLR02-DSI_SILO1, EU-BLR02-DSI_SILO2, EU-BLR01-ACI_SILO, EU-BLR02-ACI_SILO,
FG-MATSPROJECT-BR	Hybrid Analysis recordkeeping and reporting used for MATS project. (PTI No. 18-14)	FG-DSI/ACI-BR, FG-ISLANDS-BR,

Section 3 – Belle River Power Plant

ROP No: MI-ROP-B2796-2015c
 Expiration Date: July 15, 2020
 PTI No.: MI-PTI-B2796-2015c

**FG-ASH_HAND-BR
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Emission units representing flyash collection and handling at Belle River Power Plant, including the flyash load-out facilities

Flyash collection from Boiler Nos. 1 and 2; handling in flyash silo #1 & #2; ~~collection of economizer ash & handling in economizer ash silo~~; and ash load-out facilities. Flyash silo #1 and #2 have dust collectors that vent to the ESPs.

Emission Unit:

EU-ASHSILO#1-BR Flyash collection from Boiler No. 1, handling in flyash silo #1, and loadout facilities where emissions are limited by enclosures and water sprays. Dust collector is directly vented into the ESPs.

EU-ASHSILO#2-BR Flyash collection from Boiler No. 2, handling in flyash silo #1, and loadout facilities where emissions are limited by enclosures and water sprays. Dust collector is directly vented into the ESPs.

~~EU-ECONSILO-BR Economizer ash collection and handling from both boilers where emissions are limited by enclosures, water sprays, or dust collectors.~~

POLLUTION CONTROL EQUIPMENT

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.10 pounds per 1000 pounds of exhaust gases, on a wet basis²	Instantaneous	Flyash Handling System	SC-V.1 & VI.1	R-336.1331

Commented [LRF1]: This emission limit only applies to EU-ECONSILO-BR. Since EU-ECONSILO-BR is decommissioned, this EL should be removed from the ROP.

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)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate the ash silos unless the respective dust collection system is installed and operating properly. (R 336.1910)

Section 3 – Belle River Power Plant

ROP No: MI-ROP-B2796-2015c
Expiration Date: July 15, 2020
PTI No.: MI-PTI-B2796-2015c

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 and record Reference Method 9 visible emissions readings of the economizer ash silo dust collector exhaust stack, at a minimum of once per calendar year, during maximum routine operating conditions. (R 336.1213(3))~~

Commented [LRF2]: This condition only applies to EU-ECONSILO-BR (to demonstrate compliance with SC(1)(1)). Since EU-ECONSILO-BR is decommissioned, this condition should be removed from the ROP.

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 visible emission observation during flyash loading of trucks and railroad cars from the silo, at least once every seven days during routine operating conditions. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall maintain a record of each required observation and corrective action. (R 336.1213(3))~~

Commented [LRF3]: This condition only applies to EU-ECONSILO-BR (to demonstrate compliance with SC(1)(1)). Since EU-ECONSILO-BR is decommissioned, this condition should be removed from the ROP.

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-BR

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

1. The permittee shall maintain and implement the approved fugitive flyash dust control program. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor. (R 336.1213(3))

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).