



October 4, 2021

Ms. Caryn Owens
EGLE – AQD
120 West Chapin Street
Cadillac, MI 49601-2158

Subject: Application for ROP Minor Modification for DTE Electric Company – Blue Water Energy Center (SRN: B2796)

Dear Ms. Owens:

DTE Electric Company hereby submits a ROP minor modification application under Rule 216(2) to ROP No: MI-ROP-B2796-2015c for Blue Water Energy Center located at 4400 River Road in East China Township, Michigan. This ROP is currently in the renewal process. Blue Water Energy Center is in Section 5 of the current draft ROP. Enclosed are the M-001 and C-001 forms, as required. This minor modification change affects FGPROJECT of the Blue Water Energy Center section of the ROP.

This modification is being requested due to a recent Settlement Agreement between DTE Electric Company and the Sierra Club. The Settlement Agreement was finalized on August 9, 2021. Conditions 3-6 of the Settlement Agreement require DTE Electric Company to apply to permanently include certain requirements and limitations of the Settlement Agreement in a federally enforceable permit within 60 days of the date that the Settlement Agreement was signed.

DTE previously applied to remove Units 1 & 4 at St. Clair Power Plant from the ROP, thereby addressing Conditions 3 & 4 of the Settlement Agreement. To satisfy the remaining requirements of the Settlement Agreement, DTE proposes to add two conditions and one appendix to the Blue Water Energy Center section (draft section 5) of the ROP. Attached are an AI-001 form and the ROP mark-up with the proposed conditions and appendix. The ROP is currently under renewal. These minor modification changes are requested to be made to the ROP in concurrence with the issuance of the new permit and are summarized below.

- Add Special Conditions V.2. and VII.4. to FGPROJECT
- Add Appendix 9-5 BW

If you have questions, please contact me at barry.marietta@dteenergy.com or (810) 343-6391.

Sincerely,



Barry Marietta
Environmental Management & Safety
DTE Energy Corporate Services, LLC

Enclosures: MI-ROP-B2796-2015c Minor Modification Application comprised of:

1. M-001 – ROP Rule 216 Modification Application Form
2. C-001 – ROP Application Certification Form
3. AI-001 – Additional Information Form
4. MI-ROP-B2796-20XX Draft ROP Mark Up

Cc (electronic): Robert Elmouchi – EGLE AQD
Jason Roggenbuck – DTE
Michael Banks – DTE



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-B2796-20XX Section 5 (DRAFT)	3. County St. Clair
4. Stationary Source Name DTE Electric Company - Blue Water Energy Center		
5. Location Address 4400 River Road		6. City East 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> 8/9/2021		9. Change in emissions? <input type="checkbox"/> Yes <input checked="" 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> Add two special conditions (FGPROJECT V.2. and VII.4.) and appendix (9-5 BW) to Section 5 (DRAFT) of the ROP. There are no changes in emissions or pollutants.		
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 -ROPMARKUP
14. Contact Name Barry Marietta	Telephone No. (810) 343-6391	E-mail Address barry.marietta@dteenergy.com
15. This submittal also updates the ROP renewal application submitted on <u>10/19/2020 & 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



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
------------------------	-----------

Stationary Source Name DTE Electric Company - Blue Water Energy Center	
City East 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>Section 5 (DRAFT)</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 -ROPMARKUP	

CONTACT INFORMATION	
Contact Name Barry Marietta	Title Manager – Environmental Strategy
Phone number (810) 343-6391	E-mail address barry.marietta@dteenergy.com

This form must be signed and dated by a Responsible Official.				
Responsible Official Name Michael E. Banks			Title Plant Manager – Blue Water Energy Center	
Mailing address 4400 River Road				
City East 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			PLANT MANAGER DTE 9/30/2021 Date	



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): 5 (DRAFT)

1. Additional Information ID

AI-ROPMARKUP

Additional Information

2. Is This Information Confidential?

 Yes No

Enclosed is the ROP Mark-up for MI-ROP-B2796-20XX (DRAFT). Changes were made to Section 5 (DRAFT) by adding two conditions and one appendix. This ROP is currently under renewal. The changes are summarized below.

- Add Special Conditions V.2. and VII.4. to FGPROJECT
- Add Appendix 9-5 BW

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

EFFECTIVE DATE:

ISSUED TO

~~DTE Electric Company~~
~~St. Clair Power Plant,~~
~~Belle River Power Plant, and~~
~~Blue Water Energy Center~~
State Registration Number (SRN) B2796

Commented [LRF1]: Please lower case owner/facility names

LOCATED AT

4505 King Road,
China Township, Michigan 48054

Commented [LRF2]: DTE would like to change this address to BLRPP since STCPP will be retiring

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2796-204XX

Expiration Date: XXXX

Administratively Complete ROP Renewal Application
Due Between XXXX and XXXX

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-B2796-20XX

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

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Commented [LRF3]: I updated Section 5 in the Table of Contents for Blue Water Energy Center. Please add in the page #s and make sure it's linked up properly. Thank you.

Commented [LRF4]: Delete FG-EMERGENS-SC, since there is only 1 EU in this FG. Move to EU section as EU-FIREPUMP-SC

Commented [LRF5]: Add Section 6 to the Table of Contents for Blue Water Energy Center. See the Mark-Up for PTI 19-18.

Commented [LRF6]: Changed to Section 5

Commented [LRF7]: Changed to Section 4

Commented [LRF8]: Delete former Section 5. This will be combined into the new Section 3 for all Peakers.

Commented [LRF9]: Note former Section 4 now includes former Sections 2 and 5. Changed the section # of this new Section to 3 (which will include all 3 peakers) and renamed to "PEAKERS".

Commented [LRF10]: Deleted EMERGENS as a FG under Belle River Power Plant. Moved to EU-FIREPUMP-BR

Commented [LRF11]: Delete former Section 2. It will be combined into the new Section 3 for all Peakers.

Commented [LRF12]: DTE Requests that the 3 peakers (currently in Sections 2, 4, & 5) be combined into 1 section. This would eliminate 2 sections of the ROP completely and result in streamlining the general conditions, etc. Note that all 3 peakers have the same responsible official (RO).

Therefore, the new ROP sections should be as follows:
 Section 1 – St. Clair Power Plant
 Section 2 – Belle River Power Plant
 Section 3 – Peakers (Belle River, St. Clair, & Dean)
 Section 4 – Belle River Fuels Company, LLC
 Section 5 – St. Clair Fuels Company, LLC
 Section 6 – Blue Water Energy Center

ROP No: MI-ROP-B2796-20YY
Expiration Date: <DATE>
PTI No.: MI-PTI-B2796-20YY

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 are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/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.

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

SECTION 1 – ST. CLAIR POWER PLANT

LOCATED AT

4901 Pointe Drive
East China Township, Michigan 48054

Commented [LRF13]: The ROP currently lists the wrong city.

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Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX

Expiration Date: XX

PTI No.: MI-PTI-B2796-20XX

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))**

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX

Expiration Date: XX

PTI No.: MI-PTI-B2796-20XX

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 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.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))**

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Monitoring/Recordkeeping

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

Certification & Reporting

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

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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))**:
- 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.
 - 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))**
- The applicable requirements are included and are specifically identified in the ROP.
 - 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:
- 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))**
 - 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))**
 - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

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- 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

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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(8))**

Stratospheric Ozone Protection

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

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 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.² **(R 336.1201(1))**

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44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months 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.² **(R 336.1201(4))**

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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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.

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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-4 C-1

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 or Modification Date	Flexible Group ID
EU-BOILER1-SC	St. Clair Boiler No. 1. Nominally rated 150 MW coal fired boiler (ignition with natural gas). Also, fires #6 fuel oil, off specification used oil, or their blends as auxiliary fuel, and recovered paint solids. The boiler is equipped with low NOx burners, dry cold side electrostatic precipitators (ESP), overfire air, dry sorbent injection (DSI), and activated carbon injection (ACI). (PTI No. 18-14)	02-01-1951/ 01-04-2006/ 01-30-2012/ 07-25-2014	FG-BLR_GEN-SC FG-BLR1-4-SC FG-DSI/ACI-SC FG-MATSPROJECT-SC
EU-BOILER2-SC	St. Clair Boiler No. 2. Nominally rated 150 MW coal fired boiler (ignition with natural gas). Also, fires #6 fuel oil, off specification used oil, <u>and</u> /or their blends as auxiliary fuel, <u>and recovered paint solids</u> . The boiler is equipped with low NOx burners, dry cold-side electrostatic precipitators (ESP), overfire air, DSI, ACI. (PTI No. 18-14)	02-01-1951/ 01-04-2006/ 01-30-2012/ 07-25-2014	FG-BLR_GEN-SC FG- BLR1 <u>BLR2-43</u> -SC FG- DSI/ACI <u>---</u> MATS- _SC FG- MATSPROJECTNSR_DS <u>///ACI-SC</u>
EU-BOILER3-SC	St. Clair Boiler No. 3. Nominally rated 150 MW coal fired boiler (ignition with natural gas). Also, fires #6 fuel oil, off specification used oil, <u>and</u> /or their blends as auxiliary fuel, <u>and recovered paint solids</u> . The boiler is equipped with low NOx burners, dry cold-side electrostatic precipitators (ESP), overfire air, DSI, ACI. (PTI No. 18-14)	02-01-1951/ 06-20-2004/ 01-30-2012/ 07-25-2014	FG-BLR_GEN-SC FG-BLR 1 <u>2</u> -43-SC FG- DSI/ACI <u>---</u> MATS_SC FG- MATSPROJECTNSR_DS <u>///ACI-SC</u>

Commented [AS(14): AQD agreed with all name changes (red color) in this table and removing PTI number and boiler 1 and 2. I will make a note at TRN

Commented [LRF15]: DTE would like to leave the table number in (as it is in the current ROP). This ROP is so large, it is helpful having a table # to refer to.

Commented [LRF16]: Boiler 1 was retired on 3/27/2019, as communicated to US EPA and EGLE on 6/7/2019. A Retired Unit Exemption Form was submitted. Please remove from ROP.

Commented [AS(17R16): AQD agreed and will accept the deletion and make a note at TRN (technical review note)

Commented [AS(18): AQD agreed and will accept the deletion and make a note at TRN (technical review note)

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date or Modification Date	Flexible Group ID
EU-BOILER4-SC	St. Clair Boiler No. 4. Nominally rated 150-MW coal-fired boiler (ignition with natural gas). Also, fires #6 fuel oil, off specification used oil, or their blends as auxiliary fuel, and recovered paint solids. The boiler is equipped with low NOx burners, dry cold-side electrostatic precipitators, ESP, overfire air, DSI, ACI. (PTI No. 18-14)	02-01-1951/ 09-16-2004/ 1-30-2012/ 07-25-2014	FG-BLR_GEN-SC FG-BLRS1-4-SC FG-DSI/ACI-SC FG-MATSPROJECT-SC
EU-BOILER6-SC	St. Clair Boiler No. 6. Nominally rated 350 MW coal fired boiler (ignition with natural gas) and natural gas as a secondary fuel. The boiler is equipped with low NOx burners, dry cold-side ESP, overfire air, DSI, and ACI. Also, fires natural gas and #2 fuel oil for the primary air duct heaters. (PTI No. 18-14)	01-01-1959/ 02-23-2003/ 07-25-2014	FG-BLR_GEN-SC FG- DSI/ACI- MATS_SC FG- MATSPROJECTNSR- DS I/ACI-SC
EU-BOILER7-SC	St. Clair Boiler No. 7. Nominally rated 450 MW coal fired boiler (ignition with #2 fuel oil) and #2 fuel oil as a secondary fuel. The boiler is equipped with low NOx burners, dry cold-side ESP, overfire air, DSI, and ACI. Also, fires natural gas and #2 fuel oil for the primary air duct heaters. (PTI No. 18-14)	01-01-1967/ 04-11-2001/ 07-25-2014	FG- BLR_GEN-SC FG- DSI/ACI- MATS_SC FG- MATSPROJECTNSR- DS I/ACI-SC
EU-ASH_S_SILO-SC	Flyash handling activity at the South Flyash Silo, including ash load-out facilities, where emissions are limited by enclosures, sprays, or baghouse dust collectors.	02-01-1951/ 01-01-1959	FG-ASH_HAND-SC
EU-ASH_N_SILO-SC	Flyash handling activity at the North Flyash Silo, including ash load-out facilities, where emissions are limited by enclosures or sprays. BEU baghouse vents directly to Unit 6 ESP.	02-01-1951	FG-ASH_HAND-SC
EU-ASH_U6_VAC-SC	Flyash handling activity at Boiler No. 6 Flyash Hydrovac System, including Flyash load-out facilities, where emissions are limited by enclosures, sprays or baghouse dust collectors.	01-01-1959	FG-ASH_HAND-SC
EU-RAILCAR-SC	Rail car coal dumper house with baghouse control.	12-31-1989	NA
EU-BUNKER_HS-SC	Coal handling activity in the bunker houses, where emissions are limited by enclosures, sprays, or dust collectors.	06-19-1987	FG-COALHAND-SC
EU-TRANSFER_HS-SC	Coal handling activity in the transfer houses, where emissions are limited by enclosures, sprays, or dust collectors.	06-30-1997	FG-COALHAND-SC
EU-CRUSHER_HS-SC	Coal handling activity in the crusher house, where emissions are limited by enclosures, sprays, or dust collectors.	06-19-1987/ 06-30-1997	FG-COALHAND-SC

Commented [LRF19]: Boiler 4 was retired on 11/13/2017, as communicated to US EPA and EGLE on 6/7/2019. A Retired Unit Exemption Form was submitted. Please remove from ROP.

Commented [AS(20R19)]: AQD agreed and will accept the deletion and will make a note at TRN (technical review note)

Commented [LRF21]: Baghouse is not a EU. Remove "EU".

Commented [AS(22R21)]: AQD agreed and will accept the deletion and will make a note at TRN (technical review note)

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date or Modification Date	Flexible Group ID
EU-PARTSCLN-SC	Cold solvent parts cleaners located at St. Clair Power Plant.	09-30-1996	FG-COLDCLNR-SC
EU-FIREPUMP-SC	315 hp emergency diesel fire pump engine in #2 Screenhouse. Existing, emergency diesel engine. -Rule 285(2)(g) exempt, 300 BHp, emergency diesel engine.	06/12/1995	FG-EMERGENS-SC NA
EU-FULTON-SC	2.5 MM BTU/hr natural gas-fired boiler located at Fuel Supply Admin Building.	10/14/1998	NA
EU-STC12-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 St. Clair Units 1 & 2 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC; FG- MATSPROJECTNSR_DS ACI-SC
EU-STC12-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 St. Clair Units 1 & 2 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC; FG- MATSPROJECTNSR_DS ACI-SC
EU-STC34-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 St. Clair Units 3 & 4 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC; FG- MATSPROJECTNSR_DS ACI-SC
EU-STC34-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 St. Clair Units 3 & 4 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC; FG- MATSPROJECTNSR_DS ACI-SC
EU-STC06-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 St. Clair Unit 6 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC; FG- MATSPROJECTNSR_DS ACI-SC

Commented [LRF23]: There is only 1 EU in this FG. Please delete the FG and move this EU to the EU section.

Commented [AS(24R23)]: AQD agreed and will accept the deletion and make a note at TRN (technical review note)

Commented [LRF25]: This EU was dismantled in April 2018. A notification was made to MDEQ on 2/12/2019 (for an operational flexibility change per Rule 215(1)(1)). DTE requests this entire EU to be deleted from the ROP. Thank you.

Commented [AS(26R25)]: AQD agreed and will accept the deletion and make a note at TRN (technical review note)

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PTI No.: MI-PTI-B2796-20XX

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date or Modification Date	Flexible Group ID
EU-STC06-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 St. Clair Unit 6 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC ₇ FG- MATSPROJECTNSR_DS I/ACI-SC
EU-STC07-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 St. Clair Unit 7 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC ₇ FG- MATSPROJECTNSR_DS I/ACI-SC
EU-STC07-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 St. Clair Unit 7 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC ₇ FG- MATSPROJECTNSR_DS I/ACI-SC
EU-STC42-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 St. Clair Units 1 & 2 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC ₇ FG- MATSPROJECTNSR_DS I/ACI-SC
EU-STC34-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 St. Clair Units 3 & 4 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC ₇ FG- MATSPROJECTNSR_DS I/ACI-SC
EU-STC06-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 St. Clair Unit 6 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC ₇ FG- MATSPROJECTNSR_DS I/ACI-SC
EU-STC07-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 St. Clair Unit 7 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC ₇ FG- MATSPROJECTNSR_DS I/ACI-SC

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**EU-BOILER6-SC
 EMISSION UNIT CONDITIONS**

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DESCRIPTION

St. Clair Boiler No. 6. Nominally rated, 350 MW coal fired boiler. **See FG-BLR_GEN-SC for description.**

Flexible Group ID: FG-BLR_GEN-SC and FG-FG-MATS-SC

POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitators and Low-NOx burners.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.15 lb/1,000 lbs of exhaust gases on a wet basis, corrected to 50% excess air ²	Hourly	Boiler No. 6 EU-BOILER6-SC	SC V.1	R 336.1331(1)

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~~Test protocol will specify averaging time period.~~

Commented [AS(28): AQD accepted the equipment name change from Boiler No. 6 to EU-BOILER6-SC because it is consistent with the EU Summary Table and because it eliminates ambiguity.

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II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. #2 Fuel Oil	0.5% sulfur by weight ²	As-fired	EU-BOILER6-SC	SC VI.1	R 336.1401

Commented [AS(31): AQD accepted the equipment name change from Boiler No. 6 to EU-BOILER6-SC because it is consistent with the EU Summary Table and because it eliminates ambiguity.

Commented [AS(32R31): AQD agreed and will accept the deletion and make a note at TRN (technical review note)

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III. PROCESS/OPERATIONAL RESTRICTION(S)

~~1. The permittee shall not operate any of the boilers EU-BOILER6-SC unless the electrostatic precipitators and low-NOx burners are installed, maintained, and operated satisfactorily.² (R 336.1910)~~

Commented [AS(33): AQD is not accepting any changes in this condition because it came from PTI. AQD will **Reject it.** Per JB

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

Commented [AS(34R33): FROM PTI No. 133-11. **The permittee shall not operate any of the boilers unless the electrostatic precipitators and low-NOx burners are installed, maintained, and operated satisfactorily. (R 336.1910)**

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V. TESTING/SAMPLING

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

1. Once every three years, or more frequently upon the request of the AQD District Supervisor, the permittee shall verify and quantify particulate matter (PM) emission rates by testing at owner's expense in accordance with EGLE requirements. (R 336.2001, R 336.1213(3))

1. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. (R 336.1331, R 336.2001, R 336.2003, R 336.2004)

3. Within 180 days after commencement of trial operation, the permittee shall verify PM, PM10, and PM2.5 emission rates from EU-BOILER6-SC by testing at owner's expense, in accordance with Department requirements. The permittee must complete the test once every three years, thereafter for the next 10 years of operation after the EU-BOILER6-SC modification (NOTE: EU-BOILER6-SC was modified on December 22, 2009). Not less than 30 days prior to testing, the permittee shall submit a complete test plan to AQD. AQD must approve the final plan prior to testing. The permittee shall notify AQD no less than 7 days prior to the anticipated test date. Verification of emission rates includes submittal of a complete report of test results to AQD within 60 days following the last date of test. (R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.2001, R 336.2003, R 336.2004, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S))

1. The permittee shall verify Particulate Matter (PM) emission rates from EU-BOILER6-SC by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1331, R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

2. The permittee shall verify the Particulate Matter (PM) emission rates from EU-BOILER6-SC, at a minimum, every three to five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

VI. MONITORING/RECORDKEEPING

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

1. For sulfur content of fuel oil, the permittee shall maintain a complete record of fuel oil specifications and/or fuel analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by vendor at time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with percent sulfur limit in fuel oil. (R 336.1213(3))

2. The permittee shall calculate and keep records of PM, PM10 and PM2.5 emissions from EU-BOILER6-SC, in tons per calendar year. The annual recordkeeping period shall begin on the first day of the month during which REF refined coal combustion commences. The calculations and records shall be kept in the format described in Appendix 4.1-SC, or an

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Commented [LRF42]: This will be satisfied by 12/31/2019. DTE requests removal of this condition.

Commented [AS(43R42)]: This condition comes from PTI.

Commented [AS(44R42)]: AQD will accept this deletion and will make a note at technical review note.

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~~alternative format acceptable to the AQD Permit Section Supervisor. The requirement to conduct calculations and keep records shall end 10 calendar years (December 31, 2019) after REF refined coal combustion commences. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)~~

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)) (R 336.1213(4)(c))

~~4. The permittee shall submit records of the annual emission of PM, PM10, and PM2.5 from EU-BOILER6-SC, in tons per year on a calendar year basis, to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of each recordkeeping year thru 10 calendar years (December 31, 2019) identified in SC VI.2, if either of the following occur:~~

~~a. The yearly actual emission of PM, PM10, and/or PM2.5 exceed the baseline actual emissions (BAE) by a significant amount, and/or~~

~~b. The year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test.~~

~~The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to EU-BOILER6-SC Condition VI.2, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))~~

Commented [LRF45]: This will be satisfied by 12/31/2019. DTE requests removal of this condition.

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Commented [AS(47R45)]: AQD will accept this deletion and will make a note at technical review note.

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See Appendix 8-1 SC 4

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV002-060-SC	160 ²	425 ²	R 336.1201(3)

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IX. OTHER REQUIREMENT(S)

1. Any readings, measurements, calculations and records required by this permit and the Department's Rules for Air Pollution Control shall be rounded to the nearest significant digit specified; i.e., for a limit specified as 0.5, 0.54 shall be 0.5, and 0.55 shall be 0.6.² (R 336.1201(3))

~~The permittee shall maintain and implement the approved Startup/Shutdown and Mmalfunction Aabatment and preventative maintenance program (Program) Plan for the electrostatic precipitators. Alternate formats or revisions to the approved Program must be approved by the AQD District Supervisor.² (R 336.1911)~~

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Commented [LRF48]: For clarity, I referenced the actual plan name.

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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).

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**EU-BOILER7-SC
 EMISSION UNIT CONDITIONS**

DESCRIPTION

St. Clair Boiler No. 7. Nominally rated 450 MW coal fired boiler. [See FG-BLR_GEN-SC for description.](#)

Flexible Group ID: FG-BLR_GEN-SC and [FG-MATS-SC](#)

Commented [AS(50): We need to add Boiler MACT group name in here.

POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitators and Low-NOx burners.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.13 lb/1,000 lbs of exhaust gases on a wet basis, corrected to 50% excess air ²	Hourly	Boiler No. 7 EU-BOILER7-SC	SC V.1	R 336.1331(1)

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~~Test protocol will specify averaging time period.~~

Commented [AS(52): This language is not appropriate with the ROP.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. # 2 Fuel Oil	0.5% sulfur by weight ²	As-fired	EU-BOILER7-SC	SC VI.1	R 336.1401
2. Biodiesel	2,000,000 gallons per year²	Annual	EU-BOILER7-SC Boiler No. 7	SC VI.3	R 336.1205(3)
3. Biodiesel	0.05% sulfur by weight ²	As-fired	EU-BOILER7-SC Boiler No. 7	SC VI.1	R 336.1401

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Commented [LRF53]: Please delete II.2. and II.3. The Biodiesel project never commenced.

Commented [AS(54R53): AQD will accept this deletion and will make a note in technical review note.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate ~~any of the boilers~~ EU-BOILER7-SC unless the electrostatic precipitators and low-NOx burners are installed, maintained, and operated satisfactorily. ² (R 336.1910)

Commented [AS(55): AQD is not accepting any changes in this condition because it comes from PTI. **Reject it. Per discussion with Julie.**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

Commented [AS(56R55): FROM PTI No. 133-11)

V. TESTING/SAMPLING

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

~~1. Once every three years, or more frequently upon the request of the AQD District Supervisor, the permittee shall verify and quantify particulate matter emission rates by testing at owner's expense in accordance with department requirements.² (R 336.1201(3), R 336.2001)~~

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Commented [LRF57]: DTE requests to remove this condition, since EGLE added SCV4 below.

2.1 The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. Verification of emission

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rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (R 336.1331, R 336.2001, R 336.2003, R 336.2004)

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- 3-2. The permittee shall verify PM emission rates from EU-BOILER7-SC by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

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- 4-3. The permittee shall verify the PM emission rates from EU-BOILER7-SC, at a minimum, every ~~five~~ ~~three~~ years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

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Commented [LRF58]: EGLE added this condition. DTE suggests changing from 5 to 3 years and then removing V(1), as these are contradictory permit conditions.

- 5-4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

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~~1. Within 180 days after commencement of trial operation, the permittee shall verify PM, PM10, and PM2.5 emission rates from EU-BOILER7-SC by testing at owner's expense, in accordance with Department requirements. The permittee must complete the test once every three years, hereafter for the next 10 years of operation after the EU-BOILER7-SC modification (NOTE: EU-BOILER7-SC was modified on December 22, 2009). Not less than 30 days prior to testing, the permittee shall submit a complete test plan to AQD. AQD must approve the final plan prior to testing. The permittee shall notify AQD no less than 7 days prior to the anticipated test date. Verification of emission rates includes submittal of a complete report of test results to AQD within 60 days following the last date of test.² (R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.2001, R 336.2003, R 336.2004, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S))~~

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Commented [AS(61R60)]: AQD will accept this deletion and will make a note in technical review note.

Commented [AS(62)]: HOW DOES THE AQD KNOW NO ADDITIONAL MODIFICATIONS OCCURRED IN THE LAST TEN (10) YEARS. AND, IF A MODIFICATION OCCURRED, DOES THE 10-YEAR REQUIREMENT START OVER AGAIN?

~~2. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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VI. MONITORING/RECORDKEEPING

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

1. For Sulfur content of fuel oil, the permittee shall maintain a complete record of fuel oil specifications and/or fuel analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by vendor at time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with percent sulfur in fuel oil.² (R 336.1213(3))

~~3. The permittee shall calculate and keep records of PM, PM10 and PM2.5 emissions from EU-BOILER7-SC, in tons per calendar year. Annual recordkeeping period shall begin on the first day of the month during which REF refined coal combustion commences. Calculations and records shall be kept in the format described in Appendix 4.1-SC, or an alternative format acceptable to AQD Permit Section Supervisor. Requirement to calculate and keep records shall end 10 calendar years (December 31, 2019) after REF refined coal combustion commences. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.24)~~

Commented [LRF64]: This will be satisfied by 12/31/2019. DTE requests removal of this condition. This condition comes from PTI.

Commented [AS(65R64)]: AQD will accept this deletion and will make a note at technical review note.

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4. The permittee shall calculate and keep records of NO_x, SO₂, PM, PM10 and PM2.5 emissions from EU-BOILER7-SC, in tons per calendar year. Annual recordkeeping period shall begin on the first day of the month during which the permittee begins using biodiesel fuel in EU-BOILER7-SC. Calculations and records shall be kept in the format described in Appendix 4.2-SC, or an alternative format acceptable to AQD Permit Section Supervisor. Requirement to calculate and keep records shall end 10 calendar years after the use of biodiesel fuel in EU-BOILER7 commences. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)

5. The permittee shall monitor and record, in a satisfactory manner, the biodiesel usage from EU-BOILER7 on a monthly basis.² (R 336.1224, R 336.1225, 40 CFR 52.21)

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

6. The permittee shall submit records of the annual emission of PM, PM10, and PM2.5 from EU-BOILER7-SC, in tons per year on a calendar year basis, to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of each recordkeeping year thru 10 calendar years (December 31, 2019) identified in SC VI.2., if either of the following occur:

a. The yearly actual emission of PM, PM10, and/or PM2.5 exceed the baseline actual emissions (BAE) by a significant amount, and/or

b. The year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test.

The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to EU-BOILER7-SC Condition VI.2, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))

7. The permittee shall submit records of the annual emission of NO_x, SO₂, PM, PM10, and PM2.5 from EU-BOILER7-SC, in tons per year on a calendar year basis, to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of first calendar year identified in SC VI.3. Thereafter, the permittee shall submit records of the annual emission of NO_x, SO₂, PM, PM10, and PM2.5 from EU-BOILER7-SC, in tons per year on a calendar year basis, to both the AQD Permit Section Supervisor and AQD District Supervisor within 60 days following the end of each recordkeeping year identified in Special Condition VI.3, if either of the following occur:

a. The yearly actual emission of NO_x, SO₂, PM, PM10, and/or PM2.5 exceed the baseline actual emissions (BAE) by a significant amount, and/or

Commented [LRF66]: The Biodiesel project never commenced. Please delete. (Also, this condition would have been satisfied by 12/31/2019).

Commented [AS(67R66)]: AQD agreed and will accept this deletion because the biodiesel project was never commenced. TRN

Commented [LRF68]: Biodiesel project never commenced. Please delete.

Commented [AS(69R68)]: AQD accepted DTE request because the biodiesel project was never commenced.

Commented [AS(70)]: Submitting test results' condition need to be added per ROP Shell Template Number 4, Condition. PER JB.....

Commented [AS(71R70)]: It is already in V.2??

Commented [LRF72]: This will be satisfied by 12/31/2019. DTE requests removal of this condition.

Commented [AS(73R72)]: This condition came from PTI

Commented [AS(74R72)]: AQD agreed and will accept this deletion because this condition had been satisfied by 12/31/2019. Please make a note at technical review note.

Commented [LRF75]: Biodiesel project never commenced. Please delete.

Commented [AS(76R75)]: This condition came from PTI

Commented [AS(77R75)]: AQD accepted DTE request since biodiesel project was never installed. VI.3 specifies about biodiesel. Please make a note at technical review note.

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~~b. The year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test.~~

~~The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to EU-BOILER7-SC Condition VI.3, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))~~

See Appendix 8-1 SC

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV002-070-SC	192 ²	600 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

- Any readings, measurements, calculations and records required by this permit and the Department's Rules for Air Pollution Control shall be rounded to the nearest significant digit specified; i.e., for a limit specified as 0.5, 0.54 shall be 0.5, and 0.55 shall be 0.6.² (R 336.1201(3))
- The permittee shall maintain and implement the approved ~~Startup/Shutdown and Malfunction Abatement Plan and preventative maintenance program (Program)~~ for the electrostatic precipitators. Alternate formats or revisions to the approved Program must be approved by the AQD District Supervisor.² (R 336.1911)

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).

Commented [LRF78]: For clarity, I referenced the actual plan name.

Commented [AS(79R78): AQD will reject this change. AQD is not accepting any changes in this condition because this condition comes from PTI. **Per discussion with Julie Brunner**

Commented [AS(80R78): **Source:** PTI No. 133-11

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**EU-RAILCAR-SC
 EMISSION UNIT CONDITIONS**

Commented [AS(81)]: delete all part UAR 64 conditions because EU-RAILCAR-SC is not subject to CAM

DESCRIPTION

Rail car coal dumper house with baghouse control. Used for unloading coal delivered by railroad.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Baghouse

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	18.0 pounds <u>per</u> <u>hour</u> ²	Hourly	Rail car coal dumper house EU- RAILCAR-SC	SC <u>V.1.H.1</u>	R 336.1331(1)(b) & (c)

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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
2. Particulate Matter <u>(PM)</u>	1.3 tons <u>per month</u> ²	<u>Calendar Month</u> Monthly	<u>EU-RAILCAR-SC</u> Rail ear-coal dumper house	SC VI.3	R 336.1331(1)(b) & (c)
3. Particulate Matter <u>(PM)</u>	0.73 tons <u>per month</u> ²	<u>Monthly, Monthly;</u> based on a rolling 12-month average	<u>EU-RAILCAR-SC</u> Rail ear-coal dumper house	SC VI.3	R 336.1331(1)(b) & (c)
4. Particulate Matter <u>(PM)</u>	0.015 grains per actual cubic foot ²	<u>Test Protocol</u> <u>Hourly</u>	<u>EU-RAILCAR-SC</u> Rail ear-coal dumper house	SC VI.1 ²	R 336.1331(1)(b) & (c)

Test protocol will specify averaging time period.

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Commented [AS(84)]: AQD will accept this change and will make a note in technical review note (Summary table C)

Commented [AS(83)]: Per original permit

Commented [AS(86)]: AQD will accept this change and will make a note in technical review note (Summary table-C)

Commented [AS(85)]: TRN

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coal	220,000 tons <u>per month</u> ²	<u>Monthly</u> <u>Calendar</u> Month	<u>EU-RAILCAR-SC</u> Rail ear-coal dumper house	Section <u>SC</u> VI.1	R 336.1201(3)
2. Coal	121,333 tons <u>per month</u> ²	<u>On a 12-month rolling</u> average basis	<u>EU-RAILCAR-SC</u> Rail ear-coal dumper house	Section <u>SC</u> VI.1	R 336.1201(3)

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Commented [AS(89)]: AQD will accept this change and will make a note in technical review note (Summary table-C)

Commented [AS(88)]: PTI No. 56-89 Rev 1, SC 22, Applicant shall not unload more than 220,000 tons of coal in the rail car dumper house per month, nor more than an average of 121,333 tons per month on a 12-month rolling average basis.

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Commented [AS(91)]: Moved from Section III.1 per JB

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III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall not operate the rail car dumper house unless the baghouse dust collection system is installed and operating properly.² (R 336.1201(3), R 336.1910)
- The permittee shall not operate the rail car dumper house unless a gauge which measures the pressure drop across the baghouse dust collector is installed and operating properly.² (R 336.1201(3))

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IV. DESIGN/EQUIPMENT PARAMETER(S)

- NA
- The permittee shall not operate the rail car dumper house unless the baghouse dust collection system is installed and operating properly.² (R 336.1201(3), R 336.1910)
 - The permittee shall not operate the rail car dumper house unless a gauge which measures the pressure drop across the baghouse dust collector is installed and operating properly.² (R 336.1201(3))

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V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

(+) Upon request by the AQD District Supervisor, the permittee shall verify PM emission rates from EU-RAILCAR-SC by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

(+) 1. ~~The permittee shall conduct and keep a record of Method 9 certified visible emissions readings during maximum routine operating conditions from the rail car dumper house pollution control equipment stacks, at a minimum of once per calendar year. (R 336.1213(3))~~

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall calculate and record the following information:
 - a. Total tons of ~~unloaded~~ coal ~~unloaded~~ per month.
 - b. Average tons of ~~unloaded~~ coal ~~unloaded~~ per month based on a 12-month rolling average, as determined at the end of each month. (R 336.1213(3))

2. ~~The permittee shall perform and document non-certified visible emissions observations at least once every seven days on a daily basis when operating. If during the observation there are any visible emissions detected, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions in excess of 20% opacity observed, and any corrective actions taken shall be kept on file and made available to the Department upon request. (R 336.1213(3))~~

2. ~~The permittee shall conduct and record non-certified visible emission observations of each rail car dumper house pollution control equipment stack at least once every seven days during coal dumping activity. The permittee shall initiate corrective action upon observation of excessive visible emissions from the rail car dumper house and shall keep a record of each corrective action. (R 336.1213(3))~~

3. The permittee shall calculate and record the monthly and rolling 12-month average particulate emission rate from the rail car coal dumper house, as determined at the end of each month. (R 336.1213(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 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 8-1 SC

VIII. STACK/VENT RESTRICTION(S)

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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. SV022-143-SC	69 ²	72 ²	R 336.1201(3)
2. SV022-144-SC	69 ²	72 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approved MmalfunAebatement and Preventative Maintenance program-Plan for the baghouse dust collection system. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor.² (R 336.1911)

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).

Commented [AS(96): AQD will reject the change because this condition originates from PTI. Per Julie Brunner

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EU-FULTON-SC

EMISSION UNIT CONDITIONS

DESCRIPTION

~~An existing, heating boiler (EU-FULTON-SC), subject to 40 CFR 63, Subpart DDDDD (Industrial Boiler MACT) located at the Fuel Supply Admin Building. The boiler is exempt from Michigan Rule 201 permit requirements pursuant to Rule 278 and Rule 282(b). The boiler has a heat input capacity of less than 5 MM-BTU/hr.~~

~~Units designed to burn gas 1 subcategory include any boiler that burns only natural gas.~~

~~Flexible Group ID: NA~~

POLLUTION CONTROL EQUIPMENT

~~NA~~

I. EMISSION LIMIT(S)

~~NA~~

II. MATERIAL LIMIT(S)

~~NA~~

III. PROCESS/OPERATIONAL RESTRICTION(S)

- ~~1. The permittee must have a one-time energy assessment that includes each affected boiler by January 31, 2016, performed by a qualified energy assessor as required in Table 3 of 40 CFR 63, Subpart DDDDD. (40 CFR 63.7500(a), 40 CFR 63.7495(b), 40 CFR 63.7510(e), 40 CFR 63.7575)~~
- ~~2. The permittee must complete an initial tune-up of the boilers by following the procedures described in §63.7540(a)(10)(i) through (vi) no later than January 31, 2016. (40 CFR 63.7495(b), 40 CFR 63.7510(e))~~
- ~~3. To demonstrate continuous compliance, the permittee shall conduct a tune-up of the boilers every five years (within 61 months) as specified in § 63.7540(a)(10)(i) through (vi). If a boiler is not operating on the required date for tune-up, the tune-up must be conducted within 30 calendar days of startup. (40 CFR 63.7500(a), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(12) & (13))~~
- ~~4. The permittee, at all times, must operate and maintain the boilers in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may~~

Commented [LRF97]: This EU was dismantled in April 2018. A notification was made to MDEQ on 2/12/2019 (for an operational flexibility change per Rule 215(1)(1)). DTE requests this entire EU to be deleted from the ROP. Thank you.

Commented [AS(98R97): AQD agreed and I will delete this part. Here is a note, I already put in "technical review note":
EU-FULTON-SC
Per DTE requests, this entire **EU-FULTON-SC** has been deleted from the ROP. Because **EU-FULTON-SC** was dismantled in April 2018. A notification was made to MDEQ on 2/12/2019 (for an operational flexibility change per Rule 215(1)(1)).

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~~include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.7500)(a)(3))~~

~~5. The permittee must install a fuel meter or may share a fuel meter for each affected source. (R 336.1213(3))~~

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

~~1. A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report submitted according to the requirements in § 63.10(b)(2)(xiv). (40 CFR 63.7555(a))~~

~~2. The permittee shall keep records of compliance demonstrations. (R 336.1212(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 pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))~~

~~3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))~~

~~4. The permittee shall submit applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), as specified in 40 CFR 63.7545. (40 CFR 63.7545)(a))~~

~~5. The permittee must submit a signed statement in the Notification of Compliance Status report that contains the results of the initial compliance demonstration according to the requirements in 40 CFR 63.7545(e), indicating that an initial tune-up has been conducted and that the one-time energy assessment was completed and is an accurate depiction at the time of the assessment. The permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration before the close of business on the 60th day following the completion of the initial compliance demonstration. The Notification of Compliance Status report must contain all information specified in 40 CFR 63.7575(e)(1) and (8), as applicable. (40 CFR 63.7530(d), (e), & (f); 40 CFR 63.7545(e))~~

~~6. As specified in 40 CFR 63.7550(b)(1) through (4), the permittee must submit a 5-year compliance report based on a requirement to conduct a tune-up every 5 years. The first 5-year compliance report must cover the period beginning on the compliance date and ending 5 years after the compliance date. The first 5-year compliance report must be postmarked or submitted no later than March 15 after the 5-year period. Each subsequent 5-year~~

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~~compliance report must cover the 5-year periods from January 1 to December 31 and must be postmarked or submitted no later than March 15 following the 5-year period. (40 CFR 63.7550(b))~~

~~NOTE: In accordance with 40 CFR 63.9, the permittee may request, in writing, to change the deadline for the compliance reports. The deadline for the compliance reports is changed from January 31 to March 15 to coincide with the deadline for the ROP Certification Reports.~~

~~7. The permittee must maintain on-site and submit, if requested by the Administrator, a five-year report containing the following information associated with the performance of the compliance tune-ups:~~

~~a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;~~

~~b. A description of any corrective actions taken as a part of the tune-up. (40 CFR 63.7540(a)(10) & (12))~~

See Appendix 8-SC

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VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

~~1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters as they apply to emission units subject to Subpart DDDDD. (40 CFR Part 63, Subparts A and DDDDD)~~

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).~~

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**EU-FIREPUMP-SC
 EMISSION UNIT CONDITIONS**

DESCRIPTION **NOTE: COMPLETION OF THIS TABLE IS PENDING THE NEW TEMPLATE TABLE FOR CI RICE <500 bhp from Julie Brunner (per 5/12/2020 email to Bob).**

40 CFR Part 63, Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, compression ignition (C) RICE equal to or less than 500 brake hp. A RICE is existing if the date of installation is before June 12, 2006.

315 hp fire pump diesel engine located in #2 screenhouse. Existing, emergency engine, ≤ 500 HP, subject to 40 CFR 63 Subpart ZZZZ (RICE MACT). Existing engines are constructed before June 12, 2006. Exempt per Rule 285(2)(g).

Emission Unit Flexible Group ID: EU-FIREPUMP-SCNA
Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in each engine with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. **(40 63.6604(b), 40 CFR 80.510(b))**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Diesel Fuel	Maximum sulfur content of 15 ppm (0.0015%) AND either a Minimum cetane index of 40 OR a Maximum aromatic content of 35% by volume.	As-fired	EU-FIREPUMP-SC	Section VI.6.	40 CFR 63.6604(b) 40 CFR 80.510(b) 40 CFR 80.510(c) 40 CFR 80.2(x, nnn, ooo)

Note: Any existing diesel fuel purchased prior to January 1, 2015, may be used until depleted.

III. PROCESS/OPERATIONAL RESTRICTION(S)

Commented [AS(99)]: This unit has been updated per new Template.

Commented [AS(100R99)]: EU-FIREPUMP-SC has been moved to the emission unit section from Flexible group section.

Commented [ER(101)]: I MADE MULTIPLE CHANGES TO THE NEW ZZZZ TEMPLATE TEXT SO IT READS CORRECTLY FOR A SINGLE EMISSION UNIT. I ALSO RESTORED VI.5, 6 AND 7.

Commented [LRF102]: DTE was not made aware that EGLE was changing current permit conditions and UARs substantially. DTE will review this in detail during the 21-day comment period.

Commented [LRF103]: This EU used to be in Part D under a FG. Updated Rus to FG to align with Part C.

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1. The permittee must comply with the requirements in Item 1 of Table 2c of 40 CFR Part 63, Subpart ZZZZ which apply to each engine in EU-FIREPUMP-SC as specified in the following:

- a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2;
- b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the management practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. (40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c.1)

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC III.1. The oil analysis must be performed at the same frequency specified for changing the oil in SC III.1. (40 CFR 63.6625(i))

3. The permittee shall operate and maintain each engine in FGEU-FIREPUMP-SC (H) and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6605, 40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6.9)

4. For each engine in FGEU-FIREPUMP-SC (H), 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 the emission standards applicable to all times other than startup apply. (40 CFR 63.6625(h))

5. The permittee may operate each engine in FG(H)EU-FIREPUMP-SC for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year. (40 CFR 63.6640(f)(2))

6. Each engine in EU-FIREPUMP-SC may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in SC III.5. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (40 CFR 63.6640(f)(3))

1. _____ The engine must meet the following requirements.

2. _____ There is no operating time limit for operation in emergency situations. (40 CFR 63.6640(f)(1))

3. _____ The engine may be operated up to 100 hours per calendar year for maintenance and readiness testing. The permittee may petition the Administrator for additional maintenance and readiness testing hours, but a petition is not required if records are maintained indicating that maintenance and readiness testing beyond the 100 hours per calendar year are required. (40 CFR 63.6640(f)(2))

4. _____ The engine may be operated up to 50 hours per calendar year in non-emergency situations (counted towards the 100 hours per calendar year for maintenance and testing). The 50 hours may not be used for peak shaving or to

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~~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. (40 CFR 63.6640(f)(3))~~

~~2. The permittee shall meet the following operating requirements:~~

~~3. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.3;~~

~~4. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;~~

~~5. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (40 CFR 63.6602, Table 2c to Subpart ZZZZ of Part 63)~~

~~6. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC III.2.a. The oil analysis program must be performed at same frequency as oil changes are required per SC III.2.a. Analysis program must test the Total Base Number, viscosity, and percent water content. If the Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water (by volume) is greater than 0.5%, the oil must be changed within two (2) business days of receiving the analysis results, if the engine is in operation. If the engine is not in operation at the time that the results are received, the oil must be changed within two business days or before commencing operation, whichever is later. (40 CFR 63.6625(i))~~

~~7. The permittee shall not operate EU-FIREPUMP-SC unless operation and maintenance is performed according to manufacturer's emission-related written instructions or the permittee's maintenance plan. To the extent practicable, the permittee's plan must provide for maintenance and operation of engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6625(e), 40 CFR 63.6640(a))~~

~~8. The permittee shall minimize the engine's time spent at idle during startup and minimize engine's startup time to a period needed for safe loading of engine, not to exceed 30 minutes. (40 CFR 63.6625(h), Table 2c(1) of 40 CFR Part 63 Subpart ZZZZ)~~

~~9. The permittee shall operate and maintain EU-FIREPUMP-SC in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.6605(b))~~

IV. DESIGN/EQUIPMENT PARAMETER(S)

~~1. The permittee shall equip and maintain each engine in EU-FIREPUMP-SC with non-resettable hours meters to track the operating hours. (40 CFR 63.6625(f))~~

~~1. EU-FIREPUMP-SC shall be equipped with a non-resettable hour meter to track operating hours. (40 CFR 63.6625(f))~~

V. TESTING/SAMPLING

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

~~1. If using the oil analysis program, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (40 CFR 63.6625(i))~~

~~1. If using the oil analysis program for CI Engine(s), the permittee shall test for Total Base Number, viscosity, and percent water content and maintain within the acceptable limits as specified in SC III.3. (40 CFR 63.6625(i))~~

VI. MONITORING/RECORDKEEPING

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

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1. For ~~each engine in~~ EU-FIREPUMP-SC the permittee shall keep in a satisfactory manner the following:
 - a. ~~A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.~~
 - b. ~~Records of the occurrence and duration of each malfunction of operation or 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 or usual manner of operation.~~

~~The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 63.6655(a), 40 CFR 63.6660)~~
2. For ~~each engine in~~ EU-FIREPUMP-SC the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with the operation and maintenance of the engine according to the manufacturer's emission-related operation and maintenance instructions; or of a maintenance plan that provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(d), 40 CFR 63.6660, 40 CFR Part 63, Subpart ZZZZ, Table 6.9)**
3. For ~~each engine in~~ EU-FIREPUMP-SC the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**
4. The permittee shall monitor and record, the total hours of operation for ~~each engine in~~ EU-FIREPUMP-SC on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in EU-FIREPUMP-SC on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(f), 40 CFR 63.6660)**
5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EU-FIREPUMP-SC, demonstrating that the fuel meets the requirement of SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 80.510(b))**
6. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). **(40 CFR 63.6660(a))**
7. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.6660(b))**
 1. If using an oil analysis program, the permittee shall test for and record the Total Base Number, viscosity and percent water content every 500 hours, or annually, whichever comes first, and maintain within acceptable limits in ~~(§63.6625(i)).~~ **(40 CFR 63.6625(i))**
 2. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the engine was operated and maintained according to the maintenance plan. **(40 CFR 63.6655(e))**

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- 3. ~~The permittee shall record the number of hours the engine operated from the non-resettable hour meter and document the hours spent for emergency, including what classified the operation as emergency, and document the hours for non-emergency operation. (40 CFR 63.6655(f))~~
- 4. ~~The permittee must keep records of the occurrence and duration of each malfunction of operation of the engine. (40 CFR 63.6655(a)(2))~~
- 5. ~~The permittee shall keep in a satisfactory manner, records of action taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process to its normal or usual manner of operation. (40 CFR 63.6655(a)(5))~~
- 6. ~~To demonstrate compliance with the material limits for diesel fuel, the permittee shall maintain record of fuel oil specifications and/or fuel analysis for each delivery or storage tank of diesel fuel used for EU-FIREPUMP-SC. Records may include purchase records for ASTM specification fuel oil, safety data sheets (SDS), contracts, specifications, analyses provided by the vendor, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the material limits in diesel fuel. (40 CFR 63.6604(b))~~

VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. ~~The permittee shall submit to the AQD District Supervisor, a semiannual compliance report, as specified in 40 CFR 63.6650, which contains all deviations during the reporting period from the operating limitations specified in SC III.1. If there are no deviations from any applicable emission limitations or operating limitations, the report shall contain a statement that there were no deviations during the reporting period. The first report shall cover the period beginning on the applicable compliance date specified in 40 CFR 63.6595 and ending on June 30 (postmarked or delivered by July 31) or December 31 (postmarked or delivered by January 31), whichever date is the first date following the end of the first calendar half after the applicable compliance date. Each subsequent report must cover the semiannual period from January 1 through June 30, or from July 1 through December 31. The subsequent reports must be postmarked or delivered by July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period, except as allowed in 40 CFR 63.6650(b)(5). The compliance report must also contain the following information, as specified in 40 CFR 63.6650(c) and (d):~~
 - ~~Company name and address.~~
 - ~~Certification of the report by a responsible official.~~
 - ~~Date of report and beginning and ending dates of the reporting period.~~
 - ~~The number of malfunctions, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused the operating limitations specified in SC III.1 to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct a malfunction.~~
 - ~~The total operating time of the RICE at which the deviation occurred during the reporting period.~~
 - ~~The number, duration, and cause of deviations and the corrective action taken.~~

~~A copy of the compliance report shall be kept on file for a period of at least five years (at least two years at the site) and made available to the Department upon request. (40 CFR 63.6640(b), 40 CFR 63.6650(b), (c), and (d), 40 CFR 63.6660)~~

See Appendix 8-1 SC

Commented [LRF104]: DTE does not agree with EGLE's addition of this condition. 63.6650 requires submitted each report in Table 7 that applies to you. Table 7 of Subpart ZZZZ does not list reporting requirements for existing, emergency engines <500 hp. Semi-annual compliance reporting is NOT required for this EU and this condition should not be added.

Commented [LRF105]: There are no specific reporting requirements in Appendix 8 for this EU. Please delete reference here to that appendix.

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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:~~

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) as they apply to emission units subject to Subpart ZZZZ. **(R 336.1213(3), 40 CFR Part 63, Subparts A and ZZZZ)**

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).

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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.

FLEXIBLE GROUP SUMMARY TABLE D-1

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-BLRS1BLRS2-34-SC	Common particulate matter and used oil requirements for St. Clair Power Plant Boiler Nos. 1, 2 and 3 to 4	EU-BOILER1-SC EU-BOILER2-SC EU-BOILER3-SC EU-BOILER4-SC
FG-BLR_GEN-SC	Applicable requirements associated with St. Clair Power Plant Boiler Nos. 2, 3, 6, and 7; including requirements for low-NOx burner & CAM requirements the applicability (40 CFR Part 64) for particulate matter (PM) emission limits	EU-BOILER2-SC EU-BOILER3-SC EU-BOILER6-SC EU-BOILER7-SC
FG-ASH_HAND-SC	Emission units representing Flyash collection and handling at St. Clair Power Plant, including Flyash loadout facilities	EU-ASH_S_SILO-SC EU-ASH_N_SILO-SC EU-ASH_U6_VAC-SC
FG-COALHAND-SC	Emission units representing coal handling at St. Clair Power Plant	EU-BUNKER_HS-SC EU-TRANSFER_HS-SC EU-CRUSHER_HS-SC
FG-COLDCLNR-SC	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv).	EU-PARTSCLN-SC
FG-EMERGENS-SC	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-SC
FG-RPSPROJECT-SC	The project is to include recovered paint solids (RPS) as part of the fuel burned in Units 1, 2, 3, and 4. There are no equipment changes to accommodate the RPS. Based on the actual to projected actual applicability test, this project results in a minor modification with respect to major source review for both attainment area and nonattainment area regulations.	EU-BOILER1-SC EU-BOILER2-SC EU-BOILER3-SC EU-BOILER4-SC EU-ASH_S_SILO-SC

Commented [LRF106]: Change FG IDs because Boilers 1 & 4 are no longer a part of them.

Commented [AS(107R106)]: AQD will accept this change and will make a note in technical review note.

Commented [LRF108]: DTE requests to list out boiler #s, so it's clearer.

Commented [AS(109R108)]: AQD will accept this change and will make a note in technical review note.

Commented [LRF110]: Boilers 1 and 4 was been retired and are therefore requested to be removed from each FG they are listed under.

Commented [AS(111R110)]: AQD will accept this change and will make a note in technical review note.

Commented [LRF112]: Since there is only 1 EU in this FG, DTE would like this moved to the EU section.

Commented [AS(113R112)]: AQD will accept this change and will make a note in technical review note.

Commented [LRF114]: This FG is proposed to be deleted. See FG Section for more information.

Commented [AS(115R114)]: AQD agreed.

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Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-DSI/ACI-SC MATS-SC	Installation of dry sorbent injection (DSI) and activated carbon injection (ACI) systems on St. Clair Units 1, 2, 3, 4, 6, and 7. (PTI No. 18-14)	EU-BOILER1-SC, EU-BOILER2-SC EU-BOILER3-SC, EU-BOILER4-SC EU-BOILER6-SC, EU-BOILER7-SC
FG-ISLANDS-SC	DSI and ACI sorbents delivered and conveyed pneumatically to the appropriate storage silo. (PTI No. 18-14)	EU-STC42-DSI_SILO1, EU-STC42-DSI_SILO2, EU-STC34-DSI_SILO1, EU-STC34-DSI_SILO2, EU-STC06-DSI_SILO1, EU-STC06-DSI_SILO2, EU-STC07-DSI_SILO1, EU-STC07-DSI_SILO2 EU-STC42-ACI_SILO, EU-STC34-ACI_SILO, EU-STC06-ACI_SILO, EU-STC07-ACI_SILO
FG-MATSPROJECTNSR-DSI/ACI-SC	Hybrid Analysis recordkeeping and reporting used for MATS project. (PTI No. 18-14)	FG-DSI/ACI-SC, MATS-SC, FG-ISLANDS-SC

Commented [AS(116)]: Per dte's request, the flexible group name was changed from "FG-DSI/ACI-SC" TO "FG-MATS-SC."

Commented [AS(117)]: AQD will accept this change and will make a note in technical review note.

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FG-~~BLRS1~~BLRS2-34-SC
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Particulate matter and used oil requirements for St. Clair Power Plant Boiler Nos. ~~1, 2 and 3 through 4~~. For a description of Boiler Nos. ~~1, 2 and 3 through 4~~, see FG-BLR_GEN-SC.

Emission Units: ~~EU-BOILER1-SC, EU-BOILER2-SC, EU-BOILER3-SC, and EU-BOILER4-SC.~~

Commented [AS(119): EU-BOILER1-SC and EU-BOILER4-SC HAVE BEEN DECOMMISSIONED BY DTE AND THEREFORE HAVE BEEN REMOVED FROM THIS emission unit. MAKE A NOTE AT TECHNICAL NOTE REVIEW

POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitators and Low-NOx burners

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.17 lb/1,000 lbs of exhaust gases on a wet basis, corrected to 50% excess air ²	Test Protocol Hourly	Each Emission Unit in FG-BLRS2-3-SC Boiler Nos. 1-2-4 and 3	SC V.1	R 336.1331(1)

~~Test protocol will specify averaging time period.~~

Commented [AS(120): DTE added PM to define the abbreviation. NOTE: This is not necessary because PM is defined in the Appendix.

Commented [AS(121R120):

Commented [AS(122): St. Clair Nos. 1-4; 1778.24 tons/year, 405.99 lb/hr, St. Clair No. 6: 2687.11 tons/year, 613.50 lb/hr

Commented [AS(123R122): This calculation shows that potential emissions from each boiler exceed the major source threshold. Since the potential pre-control device emissions are greater than the major source threshold for particulate matter (100 tons per year), each of the boilers is subject to the CAM requirements of 40 CFR 64. Because electrostatic precipitators (ESPs) have control efficiencies greater than 99%, its post-control emissions may be less than 100% of the major source threshold for particulate matter. As a result, each of the boilers may be classified as an 'other pollutant specific emission unit' under CAM.

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Commented [AS(124): Bob agrees with adding "Each Emission Unit In," because it clarifies the applicability of the pollutant limit. Make a note at technical review note

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Commented [AS(125): AQD will reject proposed changes because policy and procedures prohibit changing text that originates in a PTI unless it is an initial condition that has been satisfied.

Commented [AS(126R125): 1.Source: 133-11A, III.1. The permittee shall not operate any of the boilers unless the electrostatic precipitators are installed, maintained, and operated satisfactorily. (R 336.1910)

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II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. # 6 Fuel Oil, Off-Specification Used Oil, or blends of the two oils	1.0% sulfur by wt. ²	As-fired	Each Emission Unit in FG-BLRS2-3-SC Boiler Nos. 1-42 and 3	SC VI.1	R 336.1401

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate ~~any of the any individual~~ boilers unless the ~~associated~~ electrostatic precipitators are installed, maintained, and operated satisfactorily.² (R 336.1910)

Commented [AS(125): AQD will reject proposed changes because policy and procedures prohibit changing text that originates in a PTI unless it is an initial condition that has been satisfied.

IV. DESIGN / EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. Once every three years, or more frequently upon the request of the AQD District Supervisor, the permittee shall verify and quantify particulate matter emission rates by testing at owner's expense in accordance with EGLE requirements.² (R 336.1201(3), R 336.2001)

Commented [AS(126R125): 1.Source: 133-11A, III.1. The permittee shall not operate any of the boilers unless the electrostatic precipitators are installed, maintained, and operated satisfactorily. (R 336.1910)

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~~2.~~ The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (R 336.1331, R 336.2001, R 336.2003, R 336.2004)

~~4.~~ Within 180 days after permit issuance, the permittee shall verify PM, PM10, and PM2.5 emission rates from each boiler in FG-BLRS1-4-SC by testing at owner's expense, in accordance with Department requirements. The permittee must complete the test once every three years, thereafter for the next 10 years of operation after FG-REFSC-FC modification (NOTE: FG-BLRS1-4-SC was modified on December 22, 2009). No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.2001, R 336.2003, R 336.2004, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S))

~~2.3.~~ The permittee shall verify Particulate Matter (PM) emission rates from FG-BLRS2-3-SC by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

1. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. For Sulfur content of fuel oil burned, the permittee shall maintain a complete record of fuel oil specifications and/or fuel analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil.² (R 336.1201(3))

~~2.~~ For Boiler Nos. 1 through 4, the permittee shall comply with the Off-Specification Used Oil Monitoring specified in Appendix 3-1.4-SC. (R 336.1213(3))

~~3.~~ The permittee shall keep individual usage records of fuel oil #6 and off-specification used oil. (R 336.1213(3))

~~4.~~ The permittee shall calculate and keep records of PM, PM10 & PM2.5 emissions from each boiler in FG-BLRS1-BLRS2-4-SC, in tons per calendar year. The annual recordkeeping period shall begin on the first day of the month during which REF refined coal combustion commences. The calculations and records shall be kept in the format described in Appendix 4-1-SC, or an alternative format acceptable to the AQD Permit Section Supervisor. The requirement to conduct calculations for records shall end 10 calendar years (December 31, 2019) after REF refined coal combustion commences. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205, R 336.1901, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)

VII. REPORTING

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Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
- 4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

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~~4. The permittee shall submit records of the annual emission of PM, PM10, and PM2.5 from each boiler in FG-BLRS12-4-SC, in tons per year on a calendar year basis, to both the AQD Permit Section Supervisor and AQD District Supervisor within 60 days following the end of each calendar year identified in SC VI.4. Thereafter, the permittee shall submit records of the annual emission of PM, PM10, and PM2.5 from each boiler in FG-BLRS12-4-SC, in tons per year on a calendar year basis to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of each recordkeeping year thru 10 calendar years (December 31, 2019) identified in SC VI.4 if either of the following occur:~~

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~~a. The yearly actual emission of PM, PM10, and/or PM2.5 exceed the baseline actual emissions (BAE) by a significant amount, and/or~~

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~~42. The year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test.~~

~~The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to each boiler in FG-BLRS12-4-SC Condition VI.4, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² **(R 336.1205, R-336.1901, R-336.2802 (4)(c), R-336.2902(2)(e), 40 CFR 51 (Appendix S), R-336.2818, 40 CFR 52.21(r)(6)(c)(iii))**~~

See Appendix 8-1 SC

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall maintain and implement the approved Startup/Shutdown and Malfunction Abatement and preventative maintenance program (Plan program) for the electrostatic precipitators. Alternate formats or revisions to the approved Program must be approved by the AQD District Supervisor.² **(R 336.1911)**

Commented [LRF138]: For clarity, I referenced the actual plan name.

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1The permittee shall maintain and implement the approved malfunction abatement and preventative maintenance program (Program) for the electrostatic precipitators. Alternate formats or revisions to the approved Program must be approved by the AQD District Supervisor. **(R 336.1911)**

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).

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX

FG-BLR_GEN-SC
FLEXIBLE GROUP CONDITIONS

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DESCRIPTION

Applicable requirements associated with St. Clair Power Plant Boiler Nos. ~~1, 2, 3~~ through 4, 6, and 7; including requirements for low-NO_x burners & CAM ~~rule applicability requirements (40 CFR Part 64)~~ for particulate matter emission limits.

Emission Units:

- ~~EU-BOILER1-SC~~ St. Clair Boiler No. 1. Nominally rated 150 MW coal fired boiler (ignition with natural gas) with ability to be fueled by recovered paint solids and equipped with electrostatic precipitators, low-NO_x burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). Also fires #6 fuel oil, off-specification used oil and their blends as auxiliary fuel.
- EU-BOILER2-SC St. Clair **Power Plant** Boiler No. 2. Nominally rated 150 MW coal fired boiler (ignition with natural gas) with ability to be fueled by recovered paint solids and equipped with electrostatic precipitators, low-NO_x burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). Also fires #6 fuel oil, off-specification used oil, and their blends as auxiliary fuel.
- EU-BOILER3-SC St. Clair **Power Plant** Boiler No. 3. Nominally rated 150 MW coal fired boiler (ignition with natural gas) with ability to be fueled by recovered paint solids and equipped with electrostatic precipitators, low-NO_x burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). Also fires #6 fuel oil, off-specification used oil, and their blends as auxiliary fuel.
- ~~EU-BOILER4-SC~~ St. Clair Boiler No. 4. Nominally rated 150 MW coal fired boiler (ignition with natural gas) with ability to be fueled by recovered paint solids and equipped with electrostatic precipitators, low-NO_x burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). Also fires #6 fuel oil, off-specification used oil, and their blends as auxiliary fuel.
- EU-BOILER6-SC St. Clair **Power Plant** Boiler No. 6. Nominally rated 350 MW coal fired boiler with electrostatic precipitators, low-NO_x burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). Natural gas as secondary fuel, ignition, and primary air duct heaters. Also fires #2 fuel oil for primary air duct heaters.
- EU-BOILER7-SC St. Clair **Power Plant** Boiler No. 7. Nominally rated 450 MW coal fired boiler with electrostatic precipitators, low-NO_x burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). #2 fuel oil for boiler ignition, primary air duct heaters and as auxiliary fuel into boiler. Also fires natural gas for primary air duct heaters.

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POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitators, Low-NO_x Burners, Overfire Air, Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. SO ₂ ^a	1.67 lbs per MMBTU ²	Monthly average ^b	FG-BLR_GEN-SC	SC VI.1	R 336.1401(3)

~~The SO₂ limit is a combined limit for St. Clair Power Plant Boiler Nos. 2, 3, 6, and 7, and is based on a 1% sulfur content of coal with a heat value of 12,000 BTU/lb.^a~~

~~The permittee may monitor the SO₂ emission rate on a monthly average using a CEMS certified under 40 CFR 60 or 75.^b~~

~~The SO₂ limit is a combined limit for St. Clair Power Plant Boiler Nos. 2, 3, 6, and 7, and is based on a 1% sulfur content of coal with a heat value of 12,000 BTU/lb.^a~~

~~The permittee may monitor the SO₂ emission rate on a monthly average using a CEMS certified under 40 CFR 60 or 75.^b~~

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PTE
 Control equipment
 Boiler 2, 3, 6, 7
 FG
 SO2
 VI.1, SO2 IT HAS cem CONTNOUS MONITIRNG SYSTEM STAFF REPORT

IT IS 3EXEMPT FROM CAM BECAUSE CEM

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II. MATERIAL LIMIT(S)

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate any of the individual boilers unless the associated electrostatic precipitators and low-NOx burners are installed, maintained, and operated satisfactorily.
2. The permittee shall maintain and operate the boilers in a satisfactory manner using efficient combustion practices. Satisfactory operation includes operating the boilers according to the procedures outlined in the Startup/Shutdown and Malfunction Abatement Plan for the electrostatic precipitators malfunction abatement/preventative maintenance plan and the Carbon Monoxide (CO) Minimization Protocol.

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

- 1. For EU-BOILER2-SC only, test records to verify and quantify CO emission rates and efficient combustion parameters shall be kept on file and made available to department upon request.
2. The permittee shall verify CO emission rates from EU-BOILER2-SC by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A.
3. The permittee shall verify CO emission rates from FG-BLR-GEN-SC by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A.
4. The permittee shall verify the CO emission rates from EU-BOILER2-SC, FG-BLR-GEN-SC, at a minimum, every five years from the date of the last test.
5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted.

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

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Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

- 1. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the SO2 emissions...
2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the gas flow, CO2, and NOx emissions...
3. The permittee shall develop a QA/QC program for the CEM systems...
4. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the opacity...
5. For Boiler Nos. 1 and 2 only, the permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period CO calculation records...
6. The permittee shall conduct monitoring and keep written records for all boilers...
The permittee shall utilize COMS-recorded opacity as an indicator of the emission unit's compliance...
The permittee shall operate the COMS during all required periods when the coal-fired boiler is operating...
1. Upon detecting CAM exceedances/excursion, the permittee shall restore operation of the emission unit...
4. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken...
9. The permittee shall perform an annual COMS audit using certified filters to ensure accurate opacity readings.

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Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

(40 CFR 64.6(c)(1)(iii))

~~5-7.~~ The permittee shall utilize COM-recorded opacity as an indicator of the proper operation of the electrostatic precipitator for each boiler. The indicator range of opacity defining proper function of the ESP is 20%. Six-minute average values shall be based on 36 or more equally spaced instantaneous opacity measurements per six-minute period. The COM shall be calibrated in accordance with 40 CFR Part 60, Subpart A. **(40 CFR 64.6(c)(1)(i) and (ii))**

~~8.~~ ~~8.~~ The opacity monitor shall continuously monitor the opacity of the visible emissions. The averaging period is hourly. The monitor shall be calibrated per Performance Specification 1 of 40 CFR Part 60, Appendix B and Manufacturer recommendations. **(40 CFR 64.6(c)(1)(iii))**

~~9.~~ ~~9.~~ An excursion is defined as “two or more consecutive, 1-hour block average opacity values greater than 20%. **(40 CFR 64.6(c)(2))**

~~10.~~ ~~10.~~ Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). The permittee shall return the process to its normal operation as expeditiously as practical and shall keep records of the probable cause and corresponding resolutions and excursions will be reported in excess emissions Reports. **(40 CFR 64.7(d))**

~~11.~~ ~~11.~~ Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**

~~12.~~ ~~12.~~ The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**

~~13.~~ ~~13.~~ The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

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VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX

5. For the continuous monitoring system for the measurement of opacity and SO₂, the permittee shall submit to the District Supervisor and Compliance Support Unit Supervisor, Air Quality Division and to the Chief of the Air Compliance Branch, U.S. Environmental Protection Agency, within 30 days of the end of the calendar quarter, a written report for each calendar quarter which shall include all of the following information:²

- a. Excess emissions, corrective action taken and the nature and cause of excess emissions, if known, as follows: For opacity measurements, the report shall consist of the magnitude, in actual percent opacity, of all 6-minute averages of opacity more than the applicable opacity standard for each hour of operation (all allowable exceptions are to be deducted prior to determining the excess averages of opacity). Average values shall be obtained by integration over the averaging period or by arithmetically averaging a minimum of 24 equally spaced, instantaneous opacity measurements per 6 minutes.²
- b. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of repairs or adjustments made.²
- c. If the monitoring system has not been inoperative, repaired, or adjusted, and if no excess emissions occurred, a statement attesting to this fact.² **(R 336.2170(1)(a), (b) & (c); Title I (Air Pollution Prevention and Control) of the Clean Air Act, Section 114(a), R 336.1213(3))**

6. The permittee shall submit to the Chief of the Air Compliance Branch, U.S. Environmental Protection Agency and the District Supervisor of the Air Quality Division, within 30 days of the end of the calendar quarter, a written report for each calendar quarter which shall include sulfur dioxide monthly emission rate averages.² **(R 336.1401, Clean Air Act Section 114(a))**

7. The permittee shall report sulfur dioxide (SO₂), nitrogen oxide (NO_x), and carbon dioxide (CO₂) emissions, volumetric flow, and opacity data in accordance with 40 CFR, Part 75 (Continuous Emission Monitoring).² **(40 CFR 75)**

8. Each semiannual report of monitoring and deviations shall include **Compliance Assurance Monitoring (CAM)** summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i), R 336.1213(3)(c))**

9. Each semiannual report of monitoring and deviations shall include **CAM** summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii), R 336.1213(3)(c)) (Include only if there is a monitor)**

~~10. Semiannually or more frequently report Compliance Assurance Monitoring (CAM) summary information on the number, duration, and cause of exceedances/excursions in the reporting period, and the corrective actions taken in response. If there were no exceedances/excursions in the reporting period, then this report shall include a statement that there were no exceedances/excursions. **(40 CFR 64.9(a)(2)(i), R 336.12013(3)(c))**~~

~~11. Semiannually or more frequently report Compliance Assurance Monitoring (CAM) summary information on the monitor downtime in the reporting period. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime.² **(40 CFR 64.9(a)(2)(ii), R 336.12013(3)(c))**~~

See Appendix 8-SC

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
SV002-060-SC	160 ²	425 ²	R 336.1201(3)

Commented [AS(182)]: AQD will not accept this change because this condition originates from PTI. These abbreviations are identified/defined in Appendix 1. 133-11A, VII.3, Permittee shall report sulfur dioxide, nitrogen oxide and carbon dioxide emissions, volumetric flow, and opacity data in accordance with 40 CFR, Part 75 (Continuous Emission Monitoring). **(40 CFR 75)**

Commented [LRF183]: This reporting condition needs to clarify this report is specific to CAM.

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Commented [AS(188)]: From PTI NO. 133-11A, page 10

Commented [AS(189R188)]: Per Julie Brunner, AQD deleted these two conditions since AQD used updated CAM template language instead of using PTI outdated conditions.

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Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
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Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SV002-070-SC	192 ²	600 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94, as outlined in a complete Phase II, Acid Rain Permit issued by the AQD. Phase II, Acid Rain Permit No. MI-AR-1743-2021 is hereby incorporated into this ROP as Appendix 9-1 SC. **(R 336.1902(1)(q))**
2. The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to R 336.1902(1)(q) and 40 CFR 72.9(c)(1)(i). **(R 336.1213(10))**
3. The permittee shall comply with the provisions of the Cross-State Air Pollution Rule SO₂ Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix 10-1 SC.
 - a. **CFR Part 97, Subpart CCCCC**
4. The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NO_x Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAA, and identified in Appendix 10-1 SC. (40 CFR Part 97, Subpart AAAAA)
5. The permittee shall comply with the provisions of the Cross State Air Pollution Rule NO_x Ozone Group 3 Trading Program, as specified in 40 CFR Part 97 Subpart GGGGG, and identified in Appendix 10-1 SC. **(40 CFR Part 97 Subpart GGGGG)**

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Commented [LRF191]: EGLE changed UAR. DTE to look into during 21-day review.

Commented [AS(192): On 6/22/2021, Shamim Updated this SC per Brian Carley updated notes on 5/5/2021.

6. The permittee shall comply with the NO_x standards which have been promulgated in a federal implementation plan under section 110(c) or required under Section 126 of the CAA.² **(R 336.1801(14))**

~~7. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.² **(40 CFR 64.7(e))** The permittee shall properly maintain the monitoring systems, including maintaining necessary parts for routine repairs of monitoring equipment. **(40 CFR 64.7(b))**~~

~~8. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**~~

- ~~9.7.~~ The permittee shall comply with applicable requirements of the federal National Emissions Standards for Hazardous Air Pollutants as set forth in 40 CFR 63, Subparts A and UUUUU (NESHAP for Coal and Oil-fired Electric Utility Steam Generating Units). The permittee shall comply with all notice requirements, emissions standards and continuous emissions monitoring, recordkeeping, and reporting requirements as required in 40 CFR 63, Subparts A and UUUUU. All emission and operating data shall be kept on file for a period of at least five years and made available to the AQD upon request. **(40 CFR 63 Subparts A and UUUUU)**

~~10.8.~~ The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

Commented [AS(193): Added by SK.

- ~~(4)9.~~ If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to,

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Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
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reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

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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).

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
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**FG-ASH_HAND-SC
 FLEXIBLE GROUP CONDITIONS**

Commented [AS(195)]: Verify the conditions with PTI. If any condition came from PTI, make sure there is footnote 2 and UAR201(3)

DESCRIPTION

Emission units representing Flyash collection and handling at St. Clair Power Plant, including the Flyash load-out facilities.

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Emission Units:

- EU-ASH_S_SILO-SC Flyash handling activity at the South Flyash Silo, including ash load-out facilities, where emissions are limited by enclosures, sprays, or baghouse dust collectors.
- EU-ASH_N_SILO-SC Flyash handling activity at the North Flyash Silo, including ash load-out facilities, where emissions are limited by enclosures or sprays. North Flyash Silo baghouse vents directly to Unit 6 ESPs.
- EU-ASH_U6_VAC-SC Flyash handling activity at Boiler No. 6 Flyash Hydrovac System, including Flyash load-out facilities, where emissions are limited by enclosures, sprays or dust collectors.

POLLUTION CONTROL EQUIPMENT

Enclosures, Sprays, or Dust Collectors

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I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.10 pound per 1000 pounds of exhaust gases, calculated on a wet basis ²	Instantaneous	Each Emission Unit in FG-ASH_HAND-SC	SC V.1 & SC VI.1	R 336.1331(1)(a)

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II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not transfer flyash from the storage silo to the trucks unless the transfer site is enclosed on at least three sides.² (R 336.1201(3))
2. The permittee shall vacuum sweep all paved roads, including the plant entrance, weather permitting on all days that flyash is hauled.² (R 336.1201(3))

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IV. DESIGN / EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the south or north flyash silo unless the respective bag filter dust collection system is installed and operating properly.² (R 336.1201(3))

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V. TESTING/SAMPLING

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

~~The permittee shall conduct and record a certified Reference Method 9 visible emissions readings of each ash handling system baghouse exhaust stack, at a minimum of once per calendar year, during maximum routine operating conditions. (R 336.1213(3))~~

5.1 Upon request by the AQD District Supervisor, the permittee shall verify PM emission rates from EU-ASH_HAND-SC by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

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 a non-certified visible emission observation of each ash handling system baghouse exhaust stack, at least once every 7 days during routine fly ash loading. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall keep a record of each required observation and corrective action. The permittee shall maintain a written record of each required corrective action. (R 336.1201(3))~~

2.1 The permittee shall perform and document non-certified visible emissions observations of each ash handling system baghouse exhaust stack, at least once every 7 days during routine fly ash loading on a daily basis when operating. If during the observation there are any visible emissions detected, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions in excess of 20% opacity observed, and any corrective actions taken shall be kept on file and made available to the Department upon request. (R 336.1213(3))

3.2 The permittee shall keep a record of the date of each flyash hauling and the date of each vacuum sweeping of all paved roads. (R 336.1201(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 pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part 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 8-1 SC

VIII. STACK/VENT RESTRICTION(S)

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ROP No: MI-ROP-B2796-20XX
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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. SV008-011-SC	16 X 10 ²	93.5 ²	R 336.1201(3)
2. SV008-012-SC	16 X 10 ²	93.5 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall maintain and implement the approved ~~Fugitive flyash dust C~~control program (Program). Alternate formats or revisions to the approved Program must be approved by the AQD District Supervisor.² (R 336.1201(3), Section 324.5524 of Act 451)
2. Any readings, measurements, calculations and records required by this permit Department's Rules for Air Pollution Control shall be rounded to the nearest significant digit specified; i.e., for a limit specified as 0.5, 0.54 shall be 0.5, and 0.55 shall be 0.6.² (R 336.1201(3))
- 2.3. The permittee shall implement and maintain an approved ~~M~~malfunction ~~A~~abatement and ~~P~~preventative ~~M~~maintenance program ~~[Plan]~~ for the baghouse dust collection system. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor.² (R 336.1911)

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).

Commented [AS(206)]: Per DTE requests, stack/vent id renamed to "SV008-011-SC" from "SV008-011". Please make a note at technical review note.

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 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX

**FG-COALHAND-SC
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Emission Units representing coal handling at the St. Clair Power Plant. Includes bunker houses, transfer houses, crusher house, and coal storage piles.

The following are among the emission points included: Bunker House 1/2-30DC105, Bunker House 3/4-30DC106, Bunker House 6-30DC107, Bunker House 7-30DC108, Crusher House 30DC201, Transfer House A-30DC202, Transfer House 3TH2-30DC03, Transfer House 3TH3-30DC04, Transfer House 3TH4-30DC05, Transfer House 3TH5-30DC06-6 & 30DC06-8 wet dust collector stack, Transfer House 3TH6-30DC07- & 30DC08, Transfer House TH1-30DC102 baghouse stacks and Transfer House 3TH1-30DC01 wet dust collector stack.

Emission Units:

- EU-BUNKR_HS-SC Coal handling activity in the bunker houses, where emissions are limited by enclosures, sprays, or baghouse dust collectors.
- EU-TRANSFER_HS-SC Coal handling activity in the transfer houses, where emissions are limited by enclosures, sprays, wet dust extraction units, or baghouse dust collectors.
- EU-CRUSHER_HS-SC Coal handling activity in the crusher house, where emissions are limited by enclosures, sprays, or baghouse dust collectors.

POLLUTION CONTROL EQUIPMENT

Enclosures, Sprays, Wet Dust Extraction Units, or Dust Collectors

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Particulate Matter	0.038 grains per dry standard cu ft. ²	Test Protocol Hourly	Each exhaust vent of FG-COALHAND-SC	SC V.1 & SC VI.1	R 336.1201(3)
<small>Test protocol will specify averaging time period.</small>					

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- Radial stackers shall be operated in a manner which will minimize the free fall distance of the material being handled.² (R 336.1201(3))
- The coal handling system pollution control equipment permittee shall be not operate the coal handling equipment unless the bag filters are installed and operating properly.² (R 336.1201(3), R 336.1910)
 The permittee shall implement and maintain an approved Malfunction/Abatement and Preventative Maintenance Plan for the baghouse dust collection system. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor.² (R 336.1201(3), R 336.1911)

Commented [AS(212)]: Per the pre-control PM PTE emission calculations provided by DTE (Lisa Fishbeck email on 6/11/2021 @ 12:22 p.m.) the attachments indicate that the total FG-ISLANDS-SC pre control PM PTE emissions are 90.0 tons per year. SGK AGREES.

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3. The permittee shall implement and maintain an approved Fugitive Dust Control Program for the coal storage piles. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor.
(R 336.1213(3))

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Commented [AS(229R228)]: Acceptable. Moved from Section IX. Update the UAR and see the JB's email.

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ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. All conveyor belting shall be totally enclosed to control particulate fallout either on public or company property or into the water.2 (R 336.1201(3))

NOTE: This condition refers to Phase I Coal Handling System consisting of Transfer House 3TH1 through 3TH5.

V. TESTING/SAMPLING

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

The permittee shall conduct and record a certified Method 9 visible emissions testing from the coal handling system pollution control equipment stacks, radial stackers drop points and coal storage piles at least once every 7 days during routine operating conditions. (R 336.1213(3))

- 2.1 Upon request by the AQD District Supervisor, the permittee shall verify PM emission rates from FG-COALHAND-SC by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

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

The permittee shall perform a non-certified visible emission observation of the coal handling system pollution control equipment exhaust stacks, radial stackers drop points and coal storage piles at least once every 7 days during routine operating conditions. The permittee shall initiate corrective action upon observation of excessive visible emissions and maintain a written record of each required observation and corrective action. (R 336.1213(3))

- 1. The permittee shall perform and document non-certified visible emissions observations on a daily basis when operating. If during the observation there are any visible emissions detected, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions in excess of 20% opacity observed, and any corrective actions taken shall be kept on file and made available to the Department upon request. (R 336.1213(3))

- 2. The permittee shall inspect conveyor belting enclosures to determine and record conditions, once per calendar year. NOTE: This condition refers to Phase I Coal Handling System consisting of Transfer House 3TH1 through 3TH5. (R 336.1213(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 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))

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See Appendix 8-1 SC

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approved **Malfunction Abatement and Preventative Maintenance program Plan** for the baghouse dust collection system. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor.² (R 336.1201(3), R 336.1911)

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Commented [LRF235]: Referenced actual plan for clarity.

Commented [AS(236R235): AQD will Reject this change because this condition came from PTI]

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Section 1 – St. Clair Power Plant

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~~2. The permittee shall implement and maintain an approved Fugitive Dust Control Program for the coal storage piles. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor. (R 336.1213(3))~~

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Commented [LRF238]: Referenced actual plan for clarity.

Commented [AS(239R238): Acceptable. Moved to Section III. Update the UAR and see the JB's email.

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).

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**FG-COLDCLNR-SC
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Units: EU-PARTSCLN-SC, Cold cleaners located at St. Clair Power Plant

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. **(R 336.1213(2))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. **(R 336.1611(2)(b), R 336.1707(3)(b))**
2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. **(R 336.1281(2)(h))**
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(2)(r)(iv))**
2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**
4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**

Commented [AS(240): Per the pre-control PM PTE emission calculations provided by DTE (Lisa Fishbeck email on 6/11/2021 @ 12:22 p.m.) the attachments indicate that the total FG-ISLANDS-SC pre control PM PTE emissions are 90.0 tons per year. SGK AGREES.

Commented [AS(241R240): EU-BUNKR_HS-SC, EU-TRANSFER_HS-SC, and EU-CRUSHER_HS-SC (in Section 1, FG-COAL_HAND-SC) do not have emission limitations or standards that subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because the units do not have potential pre-control emissions over the major source thresholds. Each unit is controlled by enclosures, sprays, or baghouse dust collectors. The pre-control emission rates were determined by a mass balance analysis provided by the permittee. The EU-BUNKR_HS-SC pre-control PM emissions are 2.1 tons per year. The EU-TRANSFER_HS-SC pre-control PM emissions are 22.4 tons per year. The EU-CRUSHER_HS-SC pre-control PM emissions are 16.1 tons per year.

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- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**
4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. **(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8-1 SC

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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~~FG_EMERGEN EU FIREPUMP-SC~~

FLEXIBLE GROUP EMISSION UNIT CONDITIONS

DESCRIPTION

~~315 hp fire pump diesel engine located in #2 screenhouse. Existing, exempt, emergency engines, ≤ 500 HP, subject to 40 CFR 63, Subpart ZZZZ (RICE MACT). Existing engines are engines constructed before June 12, 2006. Exempt per Rule 285(2)(g).~~

~~Flexible Group ID: NA~~

~~Emission Units: EU-FIREPUMP-SC at #2 Screen House~~

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Diesel Fuel	Maximum sulfur content of 15 ppm (0.0015%) AND either a Minimum cetane index of 40 OR a Maximum aromatic content of 35%	As-fired	EU-FIREPUMP-SC	Section VI.6.	40 CFR 63.6604(b) 40 CFR 80.510(b) 40 CFR 80.510(c) 40 CFR 80.2(x, nnn, ooo)

~~1. The permittee shall meet fuel limits specified in 40 CFR 63.6604(b). Beginning January 1, 2015, permittee must use nonroad diesel fuel in accordance with 40 CFR 80.510(b): use diesel fuel with a maximum sulfur content of 15 ppm, and either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. Any existing diesel fuel purchased prior to January 1, 2015 may be used until depleted. (40 CFR 63.6604(b), 40 CFR 80.510(b))~~

III. PROCESS/OPERATIONAL RESTRICTION(S)

~~1. In order for the engine to be considered an emergency stationary RICE, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year,~~

Commented [AS(242): This entire group moved to EU section from FG. This entire part will be deleted from FG part. See the EU section.

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Commented [LRF243]: Can both of these be deleted? 40 CFR 63.6604(a) References 40 CFR 80.501(b). Then when you go to 40 CFR 80.510(c),

Commented [LRF244]: Deleted text and inserted a table for the Material Limits to match the other FGs/EUs in this ROP.

Commented [LRF245]: No fuel >5 years old is onsite. No longer relevant. Delete that part of the condition as it's no longer relevant.

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as described in 40 CFR 63.6640(f)(1) through (3) is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) to (3), the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines. ~~The engine must meet the following requirements:~~

- ~~2. There is no operating time limit for operation in emergency situations. (40 CFR 63.6640(f)(1))~~
- ~~3. The engine may be Operate operated up to 100 hours per calendar year for maintenance and readiness testing. The permittee may petition the Administrator for additional maintenance and readiness testing hours, but a petition is not required if records are maintained indicating that maintenance and readiness testing beyond the 100 hours per calendar year are required. (40 CFR 63.6640(f)(2))~~
- ~~4. Operate The engine may be operated up to 50 hours per calendar year in non-emergency situations (counted towards the 100 hours per calendar year for maintenance and testing). The 50 hours may not 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. (40 CFR 63.6640(f)(3))~~
- ~~2. The permittee shall meet the following operating requirements specified per §63.6602:~~
- ~~3. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in Process/Operational Restriction SC III.3;~~
- ~~4. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;~~
- ~~5. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (40 CFR 63.6602, Table 2c to Subpart ZZZZ of Part 63)~~
- ~~6. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in §63.6602 SC III.2.a. The oil analysis program must be performed at same frequency as oil changes are required per SC III.2.a. Analysis program must test the parameters and keep records per §63.6625(i) Total Base Number, viscosity, and percent water content. If the Total Base Number is less than 30% percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% percent from the viscosity of the oil when new; or percent water (by volume) is greater than 0.5%, the oil must be changed within two (2) business days of receiving the analysis results, if the engine is in operation. If the engine is not in operation at the time that the results are received, the oil must be changed within two business days or before commencing operation, whichever is latter. (40 CFR 63.6625(i))~~
- ~~7. The permittee shall not operate EU-FIREPUMP-SC-FG-EMERGENS-SC unless operation and maintenance is performed according to manufacturer's emission-related written instructions or the permittee's maintenance plan. To the extent practicable, the permittee's plan must provide for maintenance and operation of engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6625(e), 40 CFR 63.6640(a))~~

The permittee shall minimize the engine's time spent at idle during startup and minimize engine's startup time to a period needed for safe loading of engine, not to exceed 30 minutes after which time the standards in SC III.2 are applicable. (40 CFR 63.6625(h), Table 2c(1) of 40 CFR Part 63 Subpart ZZZZ)

~~8. The permittee shall operate and maintain EU-FIREPUMP-SC the engines in FG-EMERGENS-SC in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.6605(b))~~

IV. DESIGN/EQUIPMENT PARAMETER(S)

~~1. EU-FIREPUMP-SC Emission unit shall be equipped with a non-resettable hour meter to track operating hours. (40 CFR 63.6625(f))~~

V. TESTING/SAMPLING

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

~~NA If using the oil analysis program for CI Engine(s), the permittee shall test for Total Base Number, viscosity, and percent water content and maintain within the acceptable limits as specified in SC III.3. (40 CFR 63.6625(i))~~

VI. MONITORING/RECORDKEEPING

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

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1. If using an oil analysis program, the permittee shall test for and record the Total Base Number, viscosity and percent water content every 500 hours, or annually, whichever comes first, and maintain within acceptable limits in (§63.6625(i)). ~~(40 CFR 63.6625(i))~~

2. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the engine was operated and maintained according to the maintenance plan. ~~(40 CFR 63.6655(e))~~

3. The permittee shall record the number of hours the engine operated from the non-resettable hour meter and document the hours spent for emergency, including what classified the operation as emergency, and document the hours for non-emergency operation. ~~(40 CFR 63.6655(f))~~

4. The permittee must keep records of the occurrence and duration of each malfunction of operation of the engine. ~~(40 CFR 63.6655(a)(2))~~

The permittee shall keep in a satisfactory manner, records of action taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process to its normal or usual manner of operation. ~~(40 CFR 63.6655(a)(5))~~

~~To demonstrate compliance with the material limits for diesel fuel, the permittee shall maintain record of fuel oil specifications and/or fuel analysis for each delivery or storage tank of diesel fuel used for EU-FIREPUMP-SC. Records may include purchase records for ASTM specification fuel oil, safety data sheets (SDS), contracts, specifications, analyses provided by the vendor, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the material limits in diesel fuel. (40 CFR 63.6604(b))~~

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)(e))~~

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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:

NA

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 comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) as they apply to emission units subject to Subpart ZZZZ. (R 336.1213(3), 40 CFR Part 63, Subparts A and ZZZZ)

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).

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~~FG-RPSPROJECT-SC~~

FLEXIBLE GROUP CONDITIONS

DESCRIPTION

~~Project includes recovered paint solids (RPS) as part of the fuel burned in Units 1, 2, 3, and 4. There are no equipment changes to accommodate the RPS. Based on the actual-to-projected-actual applicability test, this project results in a minor modification with respect to major source review for both attainment area and nonattainment area regulations.~~

~~Emission Units: EU-BOILER1-SC, EU-BOILER2-SC, EU-BOILER 3-SC, EU-BOILER4-SC, and EU-ASH_S_SILO-SC~~

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Recovered paint solids (RPS) burned	60 tons per day²	Calendar day	FG-RPSPROJECT-SC	SC-VI.1	R 336.1205(1)(a)(ii)
2. RPS burned	10,000 tons per year²	12-month rolling time period as determined at the end of each calendar month	FG-RPSPROJECT-SC	SC-VI.2	R 336.1205(1)(a)(ii)

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

~~Records shall be maintained on file for a period of five years. (R 336.1201(3))~~

NA

VI. MONITORING/RECORDKEEPING

~~Records shall be maintained on file for a period of five years. (R 336.1201(3))~~

~~1. The permittee shall monitor and record, in a satisfactory manner, the amount of RPS burned in FG-RPSPROJECT-SC for each calendar day, on a daily basis². (R 336.1205(1)(a)(ii))~~

~~2. The permittee shall monitor and record, in a satisfactory manner, the amount of RPS burned in FG-RPSPROJECT-SC for each calendar month and for the 12-month rolling time period ending that month, on a monthly basis². (R 336.1205(1)(a)(ii))~~

VII. REPORTING

Commented [LRF246]: DTE requests this FG be removed from the ROP. RPS have not been accepted at the facility for over 4 years (since 10/6/2015) and have not been burned for over 6 years (since December 2013).

Due to the MATS rules (UUUUU), RPS are no longer able to be burned without additional requirements and being categorized as a solid waste incinerator. DTE therefore will never burn RPS again. Thank you!

Commented [AS(247R246): AQD agreed and will delete this entire part.

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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 compliance 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. Due annually by March 15 for the previous calendar year. **(R 336.1213(4)(c))**~~

See Appendix 8-SC

VIII. STACK/VENT RESTRICTIONS

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 Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV002-010	160 ¹	599 ²	R 336.1225
2. SV002-020	160 ¹	599 ²	R 336.1225
3. SV002-030	160 ¹	599 ²	R 336.1225
4. SV002-040	160 ¹	599 ²	R 336.1225

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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FG-MATS-SC
FLEXIBLE GROUP CONDITIONS

Commented [AS(248)]: AQD added NEW FG-MATS-SC template and deleted the previous entire table. FG-DSI/ACI-SC renamed to FG-MATS-SC.

DESCRIPTION

40 CFR Part 63, Subpart UUUUU (Mercury and Air Toxics Standards or MATS) requirements for existing coal-fired electric utility steam generating unit(s) (EGU) rated more than 25 megawatts electric (MWe) that serve(s) a generator producing electricity for sale and designed to burn coal that is not low rank virgin coal (calorific value of $\geq 8,300$ Btu/pound).

Emission Units: EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, EU-BOILER7-SC

POLLUTION CONTROL EQUIPMENT

Each EGU is equipped with low NOx burners, overfire air, ESP, DSI, and ACI systems.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/Testing Method	Underlying Applicable Requirements
1. Filterable PM	0.30 lb/MWh ^{0.03 lb/mmBtu}	30-boiler operating day rolling arithmetic average updated at the end of each new boiler operating day	EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, EU-BOILER7-SC	SC VI.7	40 CFR 63.9991, 40 CFR Part 63, Subpart UUUUU, Table 2.1.a
2. Hydrogen chloride (HCl)	0.020 lb/MWh ^{0.002 lb/mmBtu}	Quarterly Stack Test	EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, EU-BOILER7-SC	SC V.1	40 CFR 63.9991, 40 CFR Part 63, Subpart UUUUU, Table 2.1.b
3. Mercury (Hg)	0.013 lb/GWh ^{1.2 lb/mmBtu}	30-boiler operating day rolling arithmetic average updated at the end of each new boiler operating day	EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, EU-BOILER7-SC	SC VI.8	40 CFR 63.9991, 40 CFR Part 63, Subpart UUUUU, Table 2.1.c

Commented [LRF249]: DTE spent a lot of time organizing UUUUU permit conditions. Why were these not incorporated into the ROP?

Commented [LRF250]: Per Andrew Fadanelli, use limits based on mmBtu, not MW or GW-hrs

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Commented [LRF251]: DTE requests to list the EL's as they are in the regulation (with both the lb/MMbtu or lb/MWhr limits). See DTE ROP Mark Up. Can discuss more during 21-day comment period if needed.

* The emission limits apply at all times except during startup and shutdown

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall conduct a tune-up of each emission unit of FGMATS burner(s) and combustion controls, as applicable, at least every 36 calendar months, or each 48 calendar months if neural network combustion optimization software is employed, as specified in 40 CFR 63.10021(e). **(40 CFR 63.10000(e), 40 CFR 63.10006(i), 40 CFR 63.10021(e))**
- For the startup of any emission unit of FGMATS which will comply using paragraph (1) of the definition of "startup" in 40 CFR 63.10042, the permittee must use clean fuels as defined in 40 CFR 63.10042 for ignition. Once the emission unit(s) of FGMATS convert(s) to firing coal, residual oil, or solid oil-derived fuel, the permittee must engage all the applicable control technologies except dry scrubber and SCR. The permittee must start the dry scrubber and SCR systems, if present, appropriately to comply with relevant standards applicable during normal operation. The permittee must comply

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with all applicable emission limits at all times except for periods that meet the applicable definitions of startup and shutdown in 40 CFR Part 63, Subpart UUUUU. **(40 CFR 63.10042, 40 CFR Part 63, Subpart UUUUU, Table 3)**

3. During shutdown of any emission unit of FGMATS while firing coal, residual oil, or solid oil-derived fuel, the permittee must vent emissions to the main stack(s) and operate all applicable control devices and continue to operate those control devices after the cessation of coal, residual oil, or solid oil-derived fuel being fed into the applicable emission unit(s) of FGMATS and for as long as possible thereafter considering operational and safety concerns. In any case, the permittee must operate their controls when necessary to comply with other standards made applicable to the FGMATS by a permit limit or a rule other than 40 CFR Part 63, Subpart UUUUU and that require operation of the control devices. If, in addition to the fuel used prior to initiation of shutdown, another fuel must be used to support the shutdown process, that additional fuel must be one or a combination of the clean fuels defined in 40 CFR 63.10042 and must be used to the maximum extent possible taking into account considerations such as not compromising boiler or control device integrity. **(40 CFR 63.10042, 40 CFR Part 63, Subpart UUUUU, Table 3)**
4. The permittee shall operate and maintain all associated air pollution control equipment and monitoring equipment necessary for compliance with 40 CFR Part 63, Subpart UUUUU in a manner consistent with safety and good air pollution control practices for minimizing emissions. **(40 CFR 63.10000(b))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain, and operate a device to monitor and record the PM concentration of the exhaust gas from each emission unit on a continuous basis. The permittee shall install and operate the PM CEMS to meet the timelines, requirements and reporting detailed in Appendix C of 40 CFR Part 63, Subpart UUUUU. **(40 CFR 63.10010(h)(7)(i), 40 CFR Part 63, Subpart UUUUU, Table 5)**
2. The permittee shall install, calibrate, maintain, and operate a device to monitor and record the Hg concentration from each emission unit on a continuous basis. The permittee shall install and operate the Hg CEMS or sorbent trap monitoring system to meet the timelines, requirements and reporting detailed in Appendix A of 40 CFR Part 63, Subpart UUUUU. **(40 CFR 63.10000(c)(1)(vi))**
3. If required to convert measured pollutant concentrations to the units of the applicable mass per gross output emission limit(s), the permittee shall install, calibrate, maintain, and operate a device to monitor and record the gross output from each emission unit on a continuous basis **(40 CFR 63.10010, 40 CFR Part 63, Subpart UUUUU, Table 5)**

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 verify the HCl emission rates from each emission unit by testing at owner's expense, in accordance with 40 CFR 63.10007 and Table 5 to 40 CFR Part 63, Subpart UUUUU. The permittee must complete the test once every calendar quarter and at least 45 days since the previous performance test if not a LEE for HCl. The permittee may skip performance testing in those quarters during which less than 168 boiler operating hours occur, except that a performance test must be conducted at least once every calendar year. **(40 CFR 63.10006(f), 40 CFR 63.10007, 40 CFR 63.10021(d)(1) and (2), 40 CFR Part 63, Subpart UUUUU, Table 5)**
2. Unless an alternate schedule has been approved by the AQD, no less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing, as applicable. **(40 CFR 63.7, 40 CFR 63.10007, 40 CFR 63.10030(a))**

VI. MONITORING/RECORDKEEPING

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

1. During startup, as defined by paragraph (1) of the definition of "startup" in 40 CFR 63.10042, the permittee must operate all Continuous Monitoring Systems (CMS). Startup means either the first-ever firing of fuel in a boiler for the purpose of producing electricity, or the firing of fuel in a boiler after a shutdown event for any purpose. Startup ends when any of the

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steam from the boiler is used to generate electricity for sale over the grid or for any other purpose (including on site use). The permittee must comply with the applicable emission limits at all times except for startup and shutdown periods unless the permittee chooses to use just one set of sorbent traps to demonstrate compliance with the applicable Hg emission limit, then the permittee must comply with the applicable Hg emission limit at all times. The permittee must collect monitoring data during startup periods, as specified in 40 CFR 63.10020(a) and (b). The permittee must keep records during startup periods, as provided in 40 CFR 63.10032 and 40 CFR 63.10021(h). Any fraction of an hour in which startup occurs constitutes a full hour of startup. **(40 CFR Part 63, Subpart UUUUU, Table 3.3)**

2. The permittee must operate all CMS during shutdown. The permittee must also collect appropriate data, and the permittee must calculate the pollutant emission rate for each hour of shutdown for those pollutants for which a CMS is used. The permittee must collect monitoring data during shutdown periods, as specified in 40 CFR 63.10020(a). The permittee must keep records during shutdown periods, as provided in 40 CFR 63.10032 and 40 CFR 63.10021(h). Any fraction of an hour in which shutdown occurs constitutes a full hour of shutdown. **(40 CFR Part 63, Subpart UUUUU, Table 3.4)**
3. If using a CMS to demonstrate continuous compliance, whether through quarterly testing and parametric monitoring or by CEMS or CPMS, with an emission limit or operating limit, the permittee must develop a site-specific monitoring plan and submit this site-specific monitoring plan, if requested, at least 60 days before the initial performance evaluation (where applicable) of the CMS. This requirement also applies to the permittee if the permittee petitions the Administrator for alternative monitoring parameters under 40 CFR 63.8(f). This requirement to develop and submit a site-specific monitoring plan does not apply to affected sources with existing monitoring plans that apply to CEMS and CPMS prepared under Appendix B of 40 CFR Part 60 or 40 CFR Part 75, and that meet the requirements of 40 CFR 63.10010. Using the process described in 40 CFR 63.8(f)(4), the permittee may request approval of monitoring system quality assurance and quality control procedures alternative to those specified in this paragraph of this section and, if approved, include those in the site-specific monitoring plan. The monitoring plan must address the following provisions:
(40 CFR 63.10000(d), 40 CFR 63.10010)
 - a. Installation of the CMS or sorbent trap monitoring system sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device). See 40 CFR 63.10010(a) for further details. For PM CPMS installations, follow the procedures in 40 CFR 63.10010(h).
 - b. Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems.
 - c. Schedule for conducting initial and periodic performance evaluations.
 - d. Performance evaluation procedures and acceptance criteria (e.g., calibrations), including the quality control program in accordance with the general requirements of 40 CFR 63.8(d).
 - e. On-going operation and maintenance procedures, in accordance with the general requirements of 40 CFR 63.8(c)(1)(ii), (c)(3), and (c)(4)(ii).
 - f. Conditions that define a CMS that is out of control consistent with 40 CFR 63.8(c)(7)(i) and for responding to out of control periods consistent with 40 CFR 63.8(c)(7)(ii) and (c)(8).
 - g. On-going recordkeeping and reporting procedures, in accordance with the general requirements of 40 CFR 63.10(c), (e)(1), and (e)(2)(i), or as specifically required under 40 CFR Part 63, Subpart UUUUU.
 - h. Alternatively, the requirements are considered to be met for a particular CMS or sorbent trap monitoring system if:
 - i. The CMS or sorbent trap monitoring system is installed, certified, maintained, operated, and quality-assured either according to 40 CFR Part 75, or Appendix A or B of 40 CFR Part 63, Subpart UUUUU; and
 - ii. The recordkeeping and reporting requirements of 40 CFR Part 75, or Appendix A or B of 40 CFR Part 63, Subpart UUUUU, which pertain to the CMS, are met.
4. If the permittee elects to use a PM CEMS or participate in an averaging plan for PM, total non-Hg HAP metals, or individual metals, the permittee shall keep, in a satisfactory manner, hourly (if applicable) and 30-day rolling average PM, total non-Hg HAP metals, or individual metals (as applicable) emission rate records for each emission unit excluding periods of startup and shutdown. **(40 CFR 63.10010, 40 CFR 63.10021, 40 CFR Part 63, Subpart UUUUU, Table 7)**

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5. For any emission unit not relying on the LEE provisions for Hg, the permittee shall keep, in a satisfactory manner, hourly (if applicable) and 30-day rolling average Hg emission rate records for each emission unit excluding periods of startup and shutdown. **(40 CFR 63.10010, 40 CFR 63.10021, 40 CFR Part 63, Subpart UUUUU, Table 7)**
6. The permittee must operate the monitoring system and collect data at all required intervals at all times that the affected EGU is operating, except for required monitoring system quality assurance or quality control activities, including, as applicable, calibration checks and required zero and span adjustments, and any scheduled maintenance as defined in the site-specific monitoring plan. The permittee is required to affect monitoring system repairs in response to monitoring system malfunctions and to return the monitoring system to operation as expeditiously as practicable. **(40 CFR 63.10020(b))**
7. The permittee may not use data recorded during startup or shutdown in calculations used to report emissions, except as otherwise provided in 40 CFR 63.10000(c)(1)(vi)(B) and 40 CFR 63.10005(a)(2)(iii). In addition, data recorded during monitoring system malfunctions or monitoring system out-of-control periods, repairs associated with monitoring system malfunctions or monitoring system out-of-control periods or required monitoring system quality assurance or control activities may not be used in calculations used to report emissions or operating levels. The permittee must use all of the quality-assured data collected during all other periods in assessing the operation of the control device and associated control system. **(40 CFR 63.10020(c))**
8. Failure to collect required quality-assured data during monitoring system malfunctions, monitoring system out-of-control periods, or repairs associated with monitoring system malfunctions or monitoring system out-of-control periods is a deviation from the monitoring requirements. Periods of monitoring system malfunctions or monitoring system out-of-control periods, repairs associated with monitoring system malfunctions or monitoring system out-of-control periods, and required monitoring system quality assurance or quality control activities excluding zero and span checks must be reported as time the monitor was inoperative (downtime) under 63.10(c). **(40 CFR 63.10020(d))**
9. If the permittee uses CEMS to measure SO₂, PM, HCl, HF, or Hg emissions (or sorbent trap monitoring system), except as otherwise provided in 40 CFR 63.10020(c), the permittee must demonstrate continuous compliance by using all quality-assured hourly data recorded by the CEMS (or sorbent trap monitoring system) and other required monitoring systems to calculate the arithmetic average emissions rate in units of the standard on a continuous 30-boiler operating day rolling average basis, updated at the end of each new boiler operating day. Use Equation 8 in 40 CFR 63.10021(b) to determine the 30-boiler operating day rolling average. **(40 CFR 63.10021(a) and (b))**
10. If the permittee uses PM CPMS data to measure compliance with an operating limit in Table 4 of 40 CFR Part 63, Subpart UUUUU, the permittee must record the PM CPMS output data for all periods when the process is operating and the PM CPMS is not out-of-control. The permittee must demonstrate continuous compliance by using all quality-assured hourly data collected by the PM CPMS for all operating data to calculate the arithmetic average emissions rate in units of the operating limit on a continuous 30-boiler operating day rolling average basis, updated at the end of each new boiler operating day. Use Equation 9 in 40 CFR 63.10021(c) to determine the 30-boiler operating day rolling average. **(40 CFR 63.10021(a) and (c))**
11. The permittee must keep the following records:
 - a. If the permittee is required to (or elects to) continuously monitor Hg and/or HCl and/or HF and/or PM emissions, or elects to use a PM CPMS, the permittee must keep the records required under Appendix A (Hg) and/or Appendix B (HCl and/or HF) and/or Appendix C (PM) and/or Appendix D (PM CPMS) to 40 CFR Part 63, Subpart UUUUU. If the permittee elects to conduct periodic (e.g., quarterly or annual) performance stack tests, then, for each test completed on or after January 1, 2024, the permittee must keep records of the applicable data elements under 40 CFR 63.7(g). The permittee must also keep records of all data elements and other information in Appendix E to 40 CFR Part 63, Subpart UUUUU that applies. **(40 CFR 63.10032(a))**
 - b. A copy of each notification and report that has been submitted to comply with 40 CFR Part 63, Subpart UUUUU, including all documentation supporting any Initial Notification or Notification of Compliance Status, semiannual compliance reports, or quarterly compliance reports that has been submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.10032(a)(1))**
 - c. Records of performance stack tests, fuel analyses, or other compliance demonstrations and performance evaluations, as required in 40 CFR 63.10(b)(2)(viii). **(40 CFR 63.10032(a)(2))**

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- d. For each CEMS and CPMS, the permittee must keep the following records:
- i. Records described in 40 CFR 63.10(b)(2)(vi) through (xi). **(40 CFR 63.10032(b)(1))**
 - ii. Previous (i.e., superseded) versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3). **(40 CFR 63.10032(b)(2))**
 - iii. Request for alternatives to relative accuracy test for CEMS as required in 40 CFR 63.8(f)(6)(i). **(40 CFR 63.10032(b)(3))**
 - iv. The date and time that each deviation started and stopped and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period. **(40 CFR 63.10032(b)(4))**
- e. Records required in Table 7 of 40 CFR Part 63, Subpart UUUUU including records of all monitoring data and calculated averages for applicable PM CPMS operating limits to show continuous compliance with each emission limit and operating limit that applies. **(40 CFR 63.10032(c))**
- f. For each emission unit subject to an emission limit:
- i. The permittee shall keep the monthly fuel use by each emission unit, including the type(s) of fuel and amount(s) used. **(40 CFR 63.10032(d)(1))**
 - ii. If the permittee combusts non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR 241.3(b)(1), the permittee must keep a record which documents how the secondary material meets each of the legitimacy criteria. If the permittee combusts a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(2), the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR 241.2. If the fuel received a non-waste determination pursuant to the petition process submitted under 40 CFR 241.3(c), the permittee must keep a record which documents how the fuel satisfies the requirements of the petition process. **(40 CFR 63.10032(d)(2))**
- g. Regarding startup periods or shutdown periods:
- i. If the permittee chooses to rely on paragraph (1) of the definition of "startup" in 40 CFR 63.10042 for the emission unit(s), the permittee shall keep records of the occurrence and duration of each startup or shutdown. **(40 CFR 63.10032(f)(1))**
 - ii. If the permittee chooses to rely on paragraph (2) of the definition of "startup" in 40 CFR 63.10042 for the emission unit(s), the permittee shall keep records of:
 - A. The determination of the maximum clean fuel capacity for each emission unit. **(40 CFR 63.10032(f)(2)(i))**
 - B. The determination of the maximum hourly clean fuel heat input and of the hourly clean fuel heat input for each emission unit. **(40 CFR 63.10032(f)(2)(ii))**
 - C. The information required in 40 CFR 63.10020(e). **(40 CFR 63.10032(f)(2)(iii))**
 - iii. The type(s) and amount(s) of fuel used during each startup or shutdown. **(40 CFR 63.10032(i))**
- h. The occurrence and duration of each malfunction of an operation (i.e., process equipment) or the air pollution control and monitoring equipment. **(40 CFR 63.10032(g))**
- i. Actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.10000(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.10032(h))**
- j. If the permittee elects to average emissions consistent with 40 CFR 63.10009, the permittee shall keep a copy of the emissions averaging implementation plan required in 40 CFR 63.10009(g), all calculations required under 40 CFR 63.10009, including daily records of heat input or steam generation, as applicable, and monitoring records consistent with 40 CFR 63.10022. **(40 CFR 63.10032(e))**
12. The permittee shall keep all records in a form suitable and readily available for expeditious review and for at least 5 years after the date of each occurrence, corrective action, report, or record. The records must be kept onsite for at least 2 years and may be kept offsite for the remaining 3 years. **(40 CFR 63.10(b)(1), 40 CFR 63.10033)**

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13. The permittee shall maintain on site and submit, if requested by the Administrator, an annual report of periodic performance tune-ups containing the information required by 40 CFR 63.10021(e)(8). The reports shall be in a format acceptable to the Administrator. If requested by the AQD District Supervisor, the permittee shall also submit an annual report with the results of the performance tune-ups. **(40 CFR 63.10021(e)(8))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit any performance test reports including RATA reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. The permittee shall meet the electronic reporting requirements of Appendix A of 40 CFR Part 63 Subpart UUUUU for each Hg CEMS. **(40 CFR 63.10031(a)(1), 40 CFR Part 63, Subpart UUUUU, Table 8.1)**
6. The permittee shall meet the electronic reporting requirements of Appendix C of 40 CFR Part 63, Subpart UUUUU for each PM CEMS. Electronic reporting of hourly PM emissions data shall begin with the later of the first operating hour on or after January 1, 2024; or the first operating hour after completion of the initial PM CEMS correlation test. These reports are due no later than 30 days after the end of each calendar quarter. **(40 CFR 63.10031(a)(3), 40 CFR Part 63, Subpart UUUUU, Table 8.3)**
7. Prior to January 1, 2024, the permittee shall submit semiannual reporting of the information required below. The report shall be postmarked or received by the Administrator by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. The final semiannual compliance report shall cover the period from July 1, 2023, through December 31, 2023. The report shall include the following: **(40 CFR 63.10031(b), 40 CFR Part 63, Subpart UUUUU, Table 8.9)**
 - a. The information required by the Continuous Monitoring Summary Report located in 40 CFR 63.10(e)(3)(vi). **(40 CFR 63.10031(c)(1))**
 - b. The total fuel use by each affected source subject to an emission limit, for each calendar month within the semiannual reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by EPA or the basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure. **(40 CFR 63.10031(c)(2))**
 - c. Indicate whether any emission unit in FGMATS burned new types of fuel during the reporting period. If new types of fuel were burned, include the date of the performance test where that fuel was in use. **(40 CFR 63.10031(c)(3))**
 - d. Include the date of the most recent tune-up for each emission unit. The date of the tune-up is the date the tune-up provisions specified in 40 CFR 63.10021(e)(6) and (7) were completed. **(40 CFR 63.10031(c)(4))**
 - e. If the permittee chooses to comply using paragraph (2) of the definition of "startup" in 40 CFR 63.10042 then for each instance of startup or shutdown:
 - i. Include the maximum clean fuel storage capacity and the maximum hourly heat input that can be provided for each clean fuel determined according to the requirements of 40 CFR 63.10032(f). **(40 CFR 63.10031(c)(5)(i))**
 - ii. Include the information required to be monitored, collected, or recorded according to the requirements of 40 CFR 63.10020(e). **(40 CFR 63.10031(c)(5)(ii))**
 - f. Report emergency bypass information annually from units with LEE status. **(40 CFR 63.10031(c)(6))**

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- g. A summary of the results of the annual performance tests and documentation of any operating limits that were reestablished during the test, if applicable. If the permittee is conducting stack tests once every 3 years to maintain LEE status, consistent with 40 CFR 63.10006(b), the report shall include the date of each stack test conducted during the previous 3 years, a comparison of emission level the permittee achieved in each stack test conducted during the previous 3 years to the 50 percent emission limit threshold required in 40 CFR 63.10005(h)(1)(i), and a statement as to whether there have been any operational changes since the last stack test that could increase emissions. **(40 CFR 63.10031(c)(7))**
 - h. A certification. **(40 CFR 63.10031(c)(8))**
 - i. If there is a deviation from any emission limit, work practice standard, or operating limit, the permittee must also submit a brief description of the deviation, the duration of the deviation, emissions point identification, and the cause of the deviation. **(40 CFR 63.10031(c)(9), 40 CFR Part 63, Subpart UUUUU, Table 8)**
 - j. If there is any process or control equipment malfunction(s) during the reporting period, the permittee must include the number, duration, and a brief description for each type of malfunction which occurred during the semiannual reporting period which caused or may have caused any applicable emission limitation to be exceeded. **(40 CFR 63.10031(c)(10))**
- 8. Prior to January 1, 2024, all reports and notifications shall be submitted to the EPA in the specified format and at the specified frequency, using the Emissions Collection and Monitoring Plan System (ECMPS) Client Tool. Each PDF version of a stack test report, CEMS RATA report, PM CEMS correlation test report, RRA report, and RCA report must include sufficient information to assess compliance and to demonstrate that the reference method testing was done properly. Note that EPA will continue to accept, as necessary, PDF reports that are being phased out at the end of 2023, if the submission deadlines for those reports extend beyond December 31, 2023. **(40 CFR 63.10031(f)(4) and (6))**
 - 9. Prior to January 1, 2024, for each performance stack test completed (including 30-boiler operating day Hg LEE demonstration tests and PM tests to establish operating limits for PM CPMS), the permittee must submit a PDF test report using the ECMPS Client Tool in accordance with 40 CFR Part 63.10031(f)(6), no later than 60 days after the date on which the testing is completed. **(40 CFR 63.10031(f), 40 CFR Part 63, Subpart UUUUU, Table 8.6)**
 - 10. Prior to January 1, 2024, for each RATA of an Hg, HCl, HF, or SO₂ monitoring system completed and for each PM CEMS correlation test, each relative response audit (RRA) and each response correlation audit (RCA) of a PM CEMS completed prior to that date, the permittee must submit a PDF test report in accordance with 40 CFR Part 63.10031(f)(6), no later than 60 days after the date on which the test is completed. **(40 CFR 63.10031(f)(1), 40 CFR Part 63, Subpart UUUUU, Table 8.7)**
 - 11. Prior to January 1, 2024, for each PM CEMS, an approved HAP metals CEMS, or a PM CPMS, the permittee must submit quarterly PDF reports in accordance with 40 CFR Part 63.10031(f)(6), which include all of the 30-boiler operating day rolling average emission rates derived from the CEMS data or the 30-boiler operating day rolling average responses derived from the PM CPMS data (as applicable). The quarterly reports are due within 60 days after the reporting periods ending on March 31st, June 30th, September 30th, and December 31st. Submission of these quarterly reports in PDF files shall end with the report that covers the fourth calendar quarter of 2023. **(40 CFR 63.10031(f)(2), 40 CFR Part 63, Subpart UUUUU, Table 8.8)**
 - 12. For PM CEMS correlation tests completed on or after November 9, 2020, but prior to January 1, 2024, the permittee shall submit the report, in a PDF file using the ECMPS Client Tool, no later than 60 days after the date on which the test is completed. **(40 CFR 63.10031(j), 40 CFR Part 63, Subpart UUUUU, Table 8.13)**
 - 13. Starting with the first calendar quarter of 2024, the permittee must use the ECMPS Client Tool to submit quarterly electronic compliance reports. Each quarterly compliance report shall include the applicable data elements in sections 2 through 13 of Appendix E of 40 CFR Part 63, Subpart UUUUU and submitted in XML format. For each stack test summarized in the compliance report, the permittee must also submit the applicable reference method information in sections 17 through 31 of Appendix E of 40 CFR Part 63, Subpart UUUUU. The compliance reports and associated Appendix E information must be submitted no later than 60 days after the end of each calendar quarter. The permittee

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shall include in the quarterly compliance reports the applicable data elements in section 13 of Appendix E of 40 CFR Part 63, Subpart UUUUU for any “deviation” (as defined in 40 CFR 63.10042 and elsewhere in 40 CFR Part 63, Subpart UUUUU) that occurred during the calendar quarter. If there were no deviations, the permittee must include a statement to that effect in the quarterly compliance report. **(40 CFR 63.10031(d), 40 CFR 63.10031(f)(4), 40 CFR 63.10031(g))**

14. If an affected source submits a semiannual compliance report pursuant to 40 CFR Part 63.10031(c) and (d), or two quarterly compliance reports covering the appropriate calendar half pursuant to 40 CFR Part 63.10031(g), along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the compliance report(s) includes all required information concerning deviations from any emission limit, operating limit, or work practice requirement in this subpart, submission of the compliance report(s) satisfies any obligation to report the same deviations in the semiannual monitoring report. Submission of the compliance report(s) does not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. **(40 CFR 63.10031(e))**
15. On or after January 1, 2024, for each performance stack test completed, the permittee shall submit the applicable reference method information required in sections 17 through 31 of Appendix E of 40 CFR Part 63, Subpart UUUUU along with the quarterly compliance report for the calendar quarter in which the test was completed. **(40 CFR 63.10031(f), 40 CFR Part 63, Subpart UUUUU, Table 8.6)**
16. On or after January 1, 2024, for each SO₂ or Hg RATA completed the permittee must submit the applicable reference method information in sections 17 through 31 of Appendix E of 40 CFR Part 63, Subpart UUUUU prior to or concurrent with the relevant quarterly emissions report. For HCl or HF RATAs, and for correlation tests, RRAs, and RCAs of PM CEMS that are completed on or after January 1, 2024, submit the Appendix E reference method information together with the summarized electronic test results, in accordance with section 11.4 of Appendix B of 40 CFR Part 63, Subpart UUUUU or section 7.2.4 of Appendix C of 40 CFR Part 63, Subpart UUUUU, as applicable. **(40 CFR 63.10031(f)(1), 40 CFR Part 63, Subpart UUUUU, Table 8.7)**
17. Beginning with the first calendar quarter of 2024, for each PM CEMS, an approved HAP metals CEMS, or a PM CPMS, the compliance averages shall no longer be reported separately, but shall be incorporated into the quarterly compliance reports. In addition to the compliance averages for PM CEMS, PM CPMS, and/or HAP metals CEMS, the quarterly compliance reports must also include the 30-boiler operating day rolling average emission rates for Hg, HCl, HF, and/or SO₂, if the permittee has elected to (or are required to) continuously monitor these pollutants. Further, if the EGU or common stack is in an averaging plan, the quarterly compliance reports must identify all of the EGUs or common stacks in the plan and must include all of the 30-group boiler operating day rolling weighted average emission rates (WAERs) for the averaging group. **(40 CFR 63.10031(f)(2), 40 CFR Part 63, Subpart UUUUU, Table 8.8)**
18. For PM CEMS correlation tests completed on or after January 1, 2024, the permittee must submit the test results electronically, according to section 7.2.4 of Appendix C of 40 CFR Part 63, Subpart UUUUU, together with the applicable reference method data in sections 17 through 31 of Appendix E of 40 CFR Part 63, Subpart UUUUU. The applicable data elements in 40 CFR Part 63.10031(f)(6)(i) through (xii) must be entered into ECMPS with the PDF report. **(40 CFR 63.10031(j), 40 CFR Part 63, Subpart UUUUU, Table 8.13)**
19. If the permittee elects to demonstrate compliance using a PM CPMS or an approved HAP metals CEMS, the permittee must submit quarterly reports of the QA/QC activities (e.g., calibration checks, performance audits), in a PDF file, beginning with a report for the first quarter of 2024, if the PM CPMS or HAP metals CEMS is used for the compliance demonstration in that quarter. Otherwise, submit a report for the first calendar quarter in which the PM CPMS or HAP metals CEMS is used to demonstrate compliance. These reports are due no later than 60 days after the end of each calendar quarter. The applicable data elements in 40 CFR Part 63.10031(f)(6)(i) through (xii) must be entered into ECMPS with the PDF report. **(40 CFR 63.10031(k), 40 CFR Part 63, Subpart UUUUU, Table 8.14)**
20. On and after January 1, 2024, the permittee shall report the tune-up date electronically in the quarterly compliance report, in accordance with 40 CFR 63.10031(g) and section 10.2 of Appendix E of 40 CFR Part 63, Subpart UUUUU. The tune-up report date is the date when tune-up requirements in 40 CFR 63.10021(e)(6) and (7) are completed. **(40 CFR 63.10021(e)(9))**

See Appendix 8

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VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. For each emission unit or emissions averaging group complying with an emission limit as specified in Table 2 of 40 CFR Part 63, Subpart UUUUU, the permittee may request to switch from a mass per heat input to a mass per gross output limit (or vice versa).
 - a. The permittee may switch from a mass per heat input to a mass per gross output limit (or vice-versa), provided that:
 - i. The permittee submits a request that identifies for each emission unit or emissions averaging group involved in the proposed switch both the current and proposed emission limit. **(40 CFR 63.10030(e)(7)(iii)(A)(1))**
 - ii. The request arrives to the Administrator at least 30 calendar days prior to the date that the switch is proposed to occur. **(40 CFR 63.10030(e)(7)(iii)(A)(2))**
 - iii. The request demonstrates through performance stack test results or valid CMS data, obtained within 45 days prior to the date of the submission, demonstrating that each EGU or EGU emissions averaging group is in compliance with both the mass per heat input limit and the mass per gross output limit. **(40 CFR 63.10030(e)(7)(iii)(A)(3))**
 - iv. The permittee revises and submits all other applicable plans, e.g., monitoring and emissions averaging, with the request. **(40 CFR 63.10030(e)(7)(iii)(A)(4))**
 - v. The permittee maintains records of all information regarding the choice of emission limits. **(40 CFR 63.10030(e)(7)(iii)(A)(5))**
 - b. The permittee may begin to use the revised emission limits starting in the next reporting period, after receipt of written acknowledgement from the Administrator of the switch. **(40 CFR 63.10030(e)(7)(iii)(B))**
 - c. From the submission of the request until start of the next reporting period after receipt of written acknowledgement from the Administrator of the switch, the permittee shall demonstrate compliance with both the mass per heat input and mass per gross output emission limits for each pollutant for each emission unit or emissions averaging group. **(40 CFR 63.10030(e)(7)(iii)(C))**
2. The permittee may switch from paragraph (1) of the definition of "startup" in 40 CFR 63.10042 to paragraph (2) of the definition of "startup" (or vice-versa), provided that:
 - a. The permittee submits a request that identifies for each emission unit or emissions averaging group involved in the proposed switch both the current definition of "startup" relied on and the proposed definition the permittee plans to rely on. **(40 CFR 63.10030(e)(8)(iii)(A))**
 - b. The request arrives to the Administrator at least 30 calendar days prior to the date that the switch is proposed to occur. **(40 CFR 63.10030(e)(8)(iii)(B))**
 - c. The permittee revises and submits all other applicable plans, e.g., monitoring and emissions averaging, with the submission. **(40 CFR 63.10030(e)(8)(iii)(C))**
 - d. The permittee maintains records of all information regarding the choice of the definition of "startup". **(40 CFR 63.10030(e)(8)(iii)(D))**
 - e. The permittee begins to use the revised definition of "startup" in the next reporting period after receipt of written acknowledgement from the Administrator of the switch. **(40 CFR 63.10030(e)(8)(iii)(E))**
3. If any emission unit(s) cease(s) to operate in a manner that causes the unit(s) to meet the definition of an EGU subject to 40 CFR Part 63, Subpart UUUUU, the permittee must submit the notification in 40 CFR 63.10000(i)(2) no less than 30 days prior to when the EGU will cease complying with 40 CFR Part 63, Subpart UUUUU. **(40 CFR 63.10000(i)(2), 40 CFR 63.10030(f))**

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4. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and UUUUU. **(40 CFR Part 63, Subparts A and UUUUU)**

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).

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**FG-ISLANDS-SC
 FLEXIBLE GROUP CONDITIONS**

Commented [AS(252): FG-ISLANDS-SC
 * not subject to CAM

DESCRIPTION

DSI and ACI sorbents delivered and conveyed pneumatically to the appropriate storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on each silo. ~~(PTI No. 18-14)~~

Commented [AS(253): ??

Emission Units:

~~DSI:~~ EU-STC42-DSI_SILO1, EU-STC42-DSI_SILO2, EU-STC34-DSI_SILO1, EU-STC34-DSI_SILO2, EU-STC06-DSI_SILO1, EU-STC06-DSI_SILO2, EU-STC07-DSI_SILO1, EU-STC07-DSI_SILO2

~~ACI:~~ EU-STC42-ACI_SILO, EU-STC34-ACI_SILO, EU-STC06-ACI_SILO, and EU-STC07-ACI_SILO.

POLLUTION CONTROL EQUIPMENT

Bin vent filters or dust collectors on each emission unit

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. <u>Visible emission</u> Opacity	7 percent <u>opacity</u> ²	Test Protocol will determine averaging time 6-minute average	Each individual bin vent filter or dust collector for FG-ISLANDS-SC	SC V.3	R 336.1301
2. PM	0.004 gr/dscf ²	Test Protocol will determine averaging time hourly	Each individual bin vent filter or dust collector for FG-ISLANDS-SC	SC V.1	R 336.1331
3. PM10	<u>0.034 pph²</u>	Test Protocol will determine averaging time Hourly	Each individual bin vent filter or dust collector for EU-STC42-DSI_SILO1, EU-STC42-DSI_SILO2, EU-STC34-DSI_SILO1, EU-STC34-DSI_SILO2, EU-STC06-DSI_SILO1, EU-STC06-DSI_SILO2, EU-STC07-DSI_SILO1, EU-STC07-DSI_SILO2	SC V.2	R 336.2803, R 336.2804
4. PM10	0.068 pph ²	Test Protocol will determine averaging time Hourly	Each individual bin vent filter or dust collector for EU-STC42-ACI_SILO, EU-STC34-ACI_SILO, EU-STC06-ACI_SILO, EU-STC07-ACI_SILO	SC V.2	R 336.2803, R 336.2804

Commented [AS(254): If Pre-controlled PM emission is more than 100 tons per year and use control equipment then subject to CAM

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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
5. PM2.5	0.017 pph ²	Hourly Test Protocol will determine averaging time	Each individual bin vent filter or dust collector for included in FG-ISLANDS-SC	SC V.2	R 336.2803, R 336.2804

Commented [LRF255]: DTE requests this SC I.5. be moved to under SC I.2. so all of the FG-ISLANDS-SC Els are grouped together. Thank you!

Commented [AS(256R255)]: ok

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall not operate FG-ISLANDS-SC unless a Fugitive Dust Control Program for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1371, R 336.1372, R 336.2803, R 336.2804, 40 CFR 60.672)
- The permittee shall not operate FG-ISLANDS-SC unless a Malfunction Abatement and Preventative Maintenance Plan for DSI/ACI (MAP), as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804)
- The permittee shall not operate FG-ISLANDS-SC for more than 12 hours per day, as determined on a daily basis.² (R 336.2803, R 336.2804)

Commented [LRF257]: Added exact name of Plan for clarity.

Commented [AS(258R257)]: This condition originates from PTI No. 18-14. AQD will reject this change.

Commented [LRF259]: Added exact name of Plan for clarity.

Commented [AS(260R259)]: This condition originates from PTI No. 18-14. AQD will reject this change.

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate any portion of FG-ISLANDS-SC unless the associated enclosures or fabric filters are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for FG-ISLANDS-SC as required in SC III.2.² (R 336.1910, R 336.1911, R 336.2803, R 336.2804)

V. TESTING/SAMPLING

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

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- The permittee shall verify the PM emission rates from each emission unit of FG-ISLANDS-SC or a representative emission unit by testing at owner's expense, in accordance with Department requirements, as requested by the AQD District Supervisor. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The final plan must be approved by the AQD prior to testing. Verification of

Commented [AS(261)]: FROM PTI No. 18-14

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emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.1301, R 336.1331, R 336.2001, R 336.2003, R 336.2004, R 336.2801)

- The permittee shall verify the PM10 and PM2.5 emission rates from each emission unit of FG-ISLANDS-SC or a representative emission unit by testing at owner's expense, in accordance with Department requirements, as requested by the AQD District Supervisor. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.2001, R 336.2003, R 336.2004, R 336.2801, R 336.2803, R 336.2804)
- The permittee shall verify PM, and PM10/PM2.5 emission rates from FG-ISLANDS-SC or a representative emission unit by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

~~4. The permittee shall verify the PM, and PM10/PM2.5 emission rates from each emission unit of FG-ISLANDS-SC or a representative emission unit, at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

5.4. Annually, the permittee shall conduct a Reference Method 9 visible emissions readings of each emission unit of FG-ISLANDS-SC, at a minimum of once per calendar year, during maximum routine operating conditions.² (R 336.1301, R 336.1910, R 336.1911)

6.5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (R 336.1213(3))

See Appendix 5-1 SC

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall perform and document non-certified visible emissions (VE) observations as required in Emission Limit SC I.1 on a daily basis when FG-ISLANDS-SC is operating. If during the observation there are any visible emissions detected from an emission point, an EPA Method 9 certified visible emissions VE observation shall be performed. Records of the non-certified visible emissions VE observations, EPA Method 9 observations that are performed, the reason for any visible emissions observed, and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1910, R 336.1911)

2. The permittee shall monitor and record, the hours of operation for FG-ISLANDS-SC on a daily basis.² (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1602, R 336.1702, R 336.1901, R 336.1910, R 336.2802, 40 CFR 52.21)

Commented [ER(262)]: No change from current active ROP.

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Commented [AS(264)]: From existing ROP

Commented [ER(265)]: No change from current active ROP.

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Commented [LRF268R267]: DTE does not agree with this addition of new, routine stack testing every 5 years. DTE requests EGLE delete this new condition.

Commented [ER(269)]: No change from current active ROP EXCEPT WAS PARAGRAPH 3 IN CURRENT ACTIVE ROP.

Commented [ER(270)]: AQD added this condition from current ROP template text.

Commented [AS(271)]: This condition originates from PTI No. 18-14. AQD will reject this change.

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VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. ~~Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of FG-ISLANDS-SC authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of FG-ISLANDS-SC.² **(R 336.1201(7)(a))**~~

Commented [LRF272]: Notification was submitted to MDEQ. Therefore, this has been satisfied. Please delete.
Commented [AS(273R272): AQD agreed.

See Appendix 8-1 SC

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 Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
15. SV-STC12-DSI_SILO1*	15.6 x 15.6 ²	80.5 ²	R 336.2803, R 336.2804
26. SV-STC12-DSI_SILO2*	15.6 x 15.6 ²	80.5 ²	
37. SV-STC34-DSI_SILO1*	15.6 x 15.6 ²	80.5 ²	
48. SV-STC34-DSI_SILO2*	15.6 x 15.6 ²	80.5 ²	
59. SV-STC06-DSI_SILO1*	15.6 x 15.6 ²	80.5 ²	
64. SV-STC06-DSI_SILO2*	15.6 x 15.6 ²	80.5 ²	
74. SV-STC07-DSI_SILO1*	15.6 x 15.6 ²	80.5 ²	
84. SV-STC07-DSI_SILO2*	15.6 x 15.6 ²	80.5 ²	
91. SV-STC12-ACI_SILO*	15.6 x 15.6 ²	57.7 ²	
106. SV-STC34-ACI_SILO*	15.6 x 15.6 ²	57.7 ²	
117. SV-STC06-ACI_SILO*	15.6 x 15.6 ²	57.7 ²	
128. SV-STC07-ACI_SILO*	15.6 x 15.6 ²	57.7 ²	

Commented [LRF274]: The numbering here was from the PTI, which included both BLRPP and STCPP FG-ISLANDS. I renumbered numerically, now that they are in separate sections by facility.
Commented [AS(275R274): ok

*Stack/Vents discharged non-vertically.

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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~~FG-MATSPROJECTNSR_DSI/ACI-SC~~
~~FLEXIBLE GROUP CONDITIONS~~

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DESCRIPTION

~~Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI) air quality control systems on the St. Clair Units 1, 2, 3, 4, 6, and 7 as part of the proposed MATS_cCompliance Project (the project). (PTI No. 18-14) the affected emission units commenced operation (on April 15, 2016) and shall continue for 5 years after the commencement of operation through April 15, 2021.~~

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~~Emission Unit: EU-BOILER1-SC, EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER4-SC, EU-BOILER6-SC, EU-BOILER7-SC, EU-STC12-DSI_SILO1, EU-STC12-DSI_SILO2, EU-STC34-DSI_SILO1, EU-STC34-DSI_SILO2, EU-STC06-DSI_SILO1, EU-STC06-DSI_SILO2, EU-STC07-DSI_SILO1, EU-STC07-DSI_SILO2, EU-STC12-ACI_SILO, EU-STC34-ACI_SILO, EU-STC06-ACI_SILO, and EU-STC07-ACI_SILO.~~

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POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

~~4. The permittee shall calculate and keep records of PM, PM_{2.5}, CO₂, and CO₂e emission rates from each emission unit of FG-MATSPROJECTNSR_DSI/ACI-SC, in tons per year on a calendar year basis. The recordkeeping period shall begin on the first day of the month during which each emission unit of FG-NSR_DSI/ACI/MATSPROJECT-SC and any of the affected emission units commenced operation (on April 15, 2016) and shall continue for 5 years after the commencement of operation through April 15, 2021. The calculations and records shall be kept in a format acceptable to the Department. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205, R 336.2802(4)(e), R 336.2818)~~

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Commented [LRF281]: 4/15/2021 has passed. This condition has been satisfied and can be deleted.

VII. REPORTING

~~4. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))~~

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- ~~2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))~~
- ~~3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))~~
- ~~4. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity.² (R 336.1201(7)(a))~~
- ~~45. The permittee shall submit records of PM, PM10, CO2, and CO2e emissions from FG-NSR-DSI/ACIMATSPROJECT-SC and FG-NSR-DSI/ACI-BR and FG-MATSPROJECT-BR in tons per calendar year to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of each calendar year identified in FG-NSR-DSI/ACIMATSPROJECT-SC and FG-NSR-DSI/ACI-BR-SC VI.1 from April 15, 2016 through April 15, 2021 and FG-MATSPROJECT-BR SC VI.1 if both of the following apply:

 - ~~a. The calendar year combined actual emissions of either PM, PM10, CO2, and CO2e exceed the combined baseline actual emissions (BAE) by a significant amount, and~~
 - ~~b. The calendar year combined actual emissions differ from the combined pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each emission unit included in the Hybrid Test used for FG-MATSPROJECTNSR-DSI/ACI-SC and FG-NSR-DSI/ACI-BR and FG-MATSPROJECT-BR.~~

The report shall contain the name, address, and telephone number of the facility; the annual emissions as calculated pursuant to FG-MATSPROJECTNSR-DSI/ACI-SC and FG-NSR-DSI/ACI-BR and FG-MATSPROJECT-BR; and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (R 336.2818)~~

See Appendix 8-1-SC

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

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APPENDICES

Appendix 1-1 SC. 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 2-1 SC. Schedule of Compliance

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
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~~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))~~

The following schedule is required by Civil Action No. 2:10-cv-13101 (ECF No. 282) filed on July 22, 2020. This schedule of compliance is only applicable to Emission Unit IDs: EU-BOILER2-SC, EU-BOILER3-SC, EU- BOILER6-SC, & EU-BOILER7-SC. The paragraph number below references the Paragraph in the consent decree. **(Civil Action No. 2:10-cv-13101)**

Compliance Date	Requirement	Paragraph
12/31/2022 ¹	Retrofit, refuel, or repower each unit	7
12/31/2021 ²	Notify Plaintiffs in writing which option (from Paragraph 7) is elected to be used for each unit	8
9/20/2020	Comply with the specified emission rates for each individual unit	9 & 24
7/22/2020	Continuously operate pollution controls	10
12/31/2020	Comply with the specified System-Wide Annual Tonnage Limitations for each calendar year	11
3/1/2022	Surrender, sell, bank, use, trade, or transfer NO _x and SO ₂ Allowances in accordance with Consent Decree, beginning in calendar year 2021	16, 19, 20, & 21
9/20/2020	Continuously operate each PM control device and use good air pollution control practices at all times each unit is in operation	23

~~¹If MISO notifies DTE in writing that DTE is constrained from injecting and delivering the full generation output of the Blue Water Energy Center to the grid, and this would cause DTE to be short of meeting its Planning Reserve Margin Requirement or cause grid reliability problems, the compliance deadline shall be 12/31/2023.~~

¹

~~²This compliance date is 365 days before the compliance date for Paragraph 7. Should the Paragraph 7 compliance date change to 12/31/2023 as stipulated above, the compliance date for Paragraph 8 shall be 12/31/2022.~~

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Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX

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2

Appendix 3-1 SC. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-BLR_GEN-SC and FG-~~BLRS4~~BLRS2-34-SC.

3-1.1-~~SC.1.~~SC Continuous Emission Monitoring Systems (SO₂)

The Continuous Emissions Monitoring Systems (CEMS) performance specifications defined in 40 CFR Part 75, Appendix B are adopted. The Certified SO₂ monitors will be used to determine sulfur dioxide emissions. The data reduction procedures defined in R 336.2175 will be used to convert SO₂ emission monitoring data in parts per million to pounds of SO₂/MMBtu. After the last day of each calendar month, the permittee shall generate and record from the CEMS data recording system a monthly average SO₂ emission rate (lbs. SO₂/MMBtu) from validated data reported for Part 75 for the previous month.

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3-1.1-~~SC.2.~~SC Continuous Emission Monitoring Systems (Title IV)

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

Methods of measurement, frequency of measurement and recordkeeping methods for CEMS required under 40 CFR 75 are outlined in the most recent version of the ~~Acid Rain Program – DTE Electric St. Clair Power Plant Monitoring Plan~~DTE CEMS QA/QC Plan.

Commented [LRF287]: Clarified actual plan name.

3-1-~~SC.3.~~SC Continuous Opacity Monitoring Systems

The permittee shall conduct an annual audit of the Continuous Opacity Monitoring System (COMS) The COMS performance specifications defined in 40 CFR Part 60, Appendix B are adopted. **(R 336.1213(3))**

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

Section 1 – St. Clair Power Plant

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

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

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

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

3-1-SC.4. Off-Specification Recycled Used Oil Monitoring

The permittee shall follow specific written procedures for receipt and off-loading of off-specification used oil from other DTE Energy facilities and outside vendors. This document, identified as St. Clair Plant Order 007, and any modifications, must be submitted to the District Supervisor.

The permittee shall obtain & maintain a complete record of the Off-Specification Used Oil fuel oil analysis for each batch delivery accepted into the facility.

The permittee shall not combust hazardous waste subject to Subpart H, 40 CFR 266. **(R 336.1213(3))**

Appendix 4-1 SC. Recordkeeping

~~4.1~~

Recordkeeping Provisions for PSD Source Using Hybrid Applicability Test

All information in this Appendix shall be maintained pursuant to R 336.2818 and 40 CFR 52.21 (r)(6)(i) for 10 years after the REF system becomes operational (December 31, 2019), and shall be made available to the Department upon request.

~~A. Project Description:~~

~~The project is to install new sorbent technology which uses REF sorbent solution as a fuel additive to reduce mercury, nitrogen oxides and sulfur dioxide emissions. These changes include installation of liquid storage tanks, solid storage silo, partially enclosed chutes, day bins, screw feeders and pug mills, existing partially enclosed and new conveyors and other material handling equipment so that coal can be treated with this sorbent material processed in FG-REFSC-FC and before being burned in EU-BOILER-6-SC, EU-BOILER-7-SC, and FG-BLRS-12-4-SC at Saint Clair Power Plant. In addition, these changes include installation of liquid storage tanks, solid storage silo, day bins, screw feeders and pug mills, existing and new conveyors and other material handling equipment so that coal can be treated with this sorbent material processed in FG-REF-BRFC and before being burned in FG-BOILERS-BR at Belle River Power Plant.~~

~~B. Applicability Test Description: Minor modifications are not subject to PSD. Actual to projected actual hybrid applicability test as described in the table below will be used to demonstrate that PSD does not apply to these modifications.~~

~~C. Emission Limitations: Saint Clair Power Plant~~

Commented [LRF288]: This recordkeeping requirement expires 12/31/2019. Please delete 4.1. This aligns with the changes made in FG-BLRS1-4-SC

Commented [AS(289R288)]: ATTN. Bob

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX

Expiration Date: XX

PTI No.: MI-PTI-B2796-20XX

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions*	Excluded Emissions	
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-12-4-SC	PM	470	537.03	60	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 60 TPY. The projected emission increase of 7.03 tpy is less than significant level of 22.5 tpy (90% of the significant level of 25 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-12-4-SC	PM10	314.9	358.94	40.18	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 40.18 TPY. The projected emission increase of 3.94 tpy is less than significant level of 13.5 tpy (90% of the significant level of 15 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC	PM2.5	136.3	156.26	17.4	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 17.4 TPY. The projected emission increase of 2.56 tpy is less than significant level of 9 tpy (90% of the significant level of 10 tpy).

*Projected actual emissions = projected actual emissions from the boilers + REF material handling, storage and conveyance operations

Combined Saint Clair and Belle River Power Plants

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions (tpy)	Projected Actual Emissions (tpy)*	Excluded Emissions (tpy)	
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM	680	767.66	72.3	It was capable of accommodating emissions up to 72.3 TPY. The projected emission increase of 15.36 tpy < significant level of 22.5 tpy (90% of the significant level of 25 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM-10	455.9	513.1	48.1	It was capable of accommodating emissions up to 48.1 TPY. The projected emission increase of 10.32 tpy < significant level of 13.5 tpy (90% of the significant level of 15 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM2.5	197.3	226.12	20.9	It was capable of accommodating emissions up to 20.9 TPY. The projected emission increase of 7.92 tpy < significant level of 9 tpy (90% of the significant level of 10 tpy).

*Projected actual emissions = projected actual emissions from the boilers + REF material handling, storage and conveyance operations

D. Netting Calculations and Discussion: NA

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 Expiration Date: XX
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4.2

Recordkeeping Provisions for PSD Source Using Actual-to-Actual Applicability Test

Commented [LRF290]: Delete Appendix 4.2, as the biodiesel project for Unit 7 never commenced. This aligns with the changes made in EU-BOILER7-SC.
Commented [AS(291R290): Attn. Bob

All information in this Appendix shall be maintained pursuant to R-336.2818 and 40 CFR 52.21 (r)(6)(i) for 10 years after the use of biodiesel fuel in Unit 7 becomes operational and shall be provided for the first year and all the years made available to the Department upon request.

A. Project Description:

The project involves the replacement of distillate oil used in Unit 7 with biodiesel fuel. The distillate (No. 2) oil currently being used in Unit 7 is used for boiler startup and for heating the primary air duct heaters for Unit 7. Biodiesel fuel is comparable to distillate oil for combustion purposes and has lower emissions of SO₂, CO, PM, PM-10, PM-2.5, VOC, and slightly larger NO_x emissions. The use of biodiesel will assist the permittee in achieving compliance with the requirements of Michigan's requirements for utility Renewable Portfolio Standards (RPS).

B. Applicability Test Description: Minor modifications are not subject to PSD. Actual to projected actual applicability test as described in the table below will be used to demonstrate that PSD does not apply to these modifications.

C. Emission Limitations: Saint Clair Power Plant

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions*	Excluded Emissions	
EU-BOILER-7-SC	PM	297	278.2	0	NA
EU-BOILER-7-SC	PM10	199	188.5	0	NA
EU-BOILER-7-SC	PM2.5	86.4	81.4	0	NA
EU-BOILER-7-SC	NO _x	2,527	2,186.9	0	NA
EU-BOILER-7-SC	SO ₂	16,030	13,598	0	NA

*Projected actual emissions = projected actual emissions from the boiler

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D. Netting Calculations and Discussion: NA

4.3

Project Emissions for FG-MATSPROJECTNSR_DSI/ACI-SC

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Commented [LRF293]: EGLE to insert generic ROP language here (now that recordkeeping for FG-NSR_DSI/ACI-SC has been removed).

All information in this Appendix shall be maintained pursuant to R-336.2818(3) for 5 years after the emission units identified in Table C resume normal operation.

A. Project Description

DTE Energy is proposing to install Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI) air quality control systems on the Belle River Units 1 and 2, and on the St. Clair Units 1, 2, 3, 4, 6, and 7 as part of the proposed MATS Compliance Project (the project). The use of DSI to control acid gas emissions is also expected to reduce PM, PM10, PM2.5, and NO_x emissions from these units. However, the reaction products from the use of DSI will include carbon dioxide (CO₂) which is a greenhouse gas (GHG) and a regulated pollutant under the Michigan New Source Review (NSR) program.

Commented [LRF294]: Please leave Units 1 and 4 in Appendix 4.3, as they were part of the baseline.
Commented [AS(295R294): Attn. Bob

B. Applicability Test Description

DTE Energy has demonstrated that the proposed project will not cause a significant emissions increase to the source using the Hybrid Test. The Combined St. Clair and Belle River Project Emissions Change equals the Combined St. Clair

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~~and Belle River Projected Actual Emissions (PAE) minus the existing units Combined Baseline Actual Emissions (BAE) plus new units Potential Emissions, as described in R 336.2802(4)(e). Existing emission units are included in FG-DSI/ACI-MATS-SC and FG-DSI/ACI-MATS-BR, and new emissions units are included in FG-ISLANDS-SC and FG-ISLANDS-BR.~~

C. Emissions Table

Pollutant	FG-DSI/ACI-MATS-SC, FG-DSI/ACI-MATS-BR and Effected Emission Units			FG-ISLANDS-SC, FG-ISLANDS-BR
	Combined Baseline Actual Emissions (tpy)	Combined Projected Actual Emissions (tpy)	Combined Excluded Emissions (tpy)	Combined Potential Emissions (tpy)
PM	735.1	739.1	0	9.7
PM10	1,362.7	1,364.7	1.0	8.8
CO2	16,189,473.3	16,237,089.0	47,615.7	0
CO2e	16,312,916.3	16,360,532.0	47,615.7	0

D. Netting Calculations and Discussion:

NA

Appendix 5-1 SC. Testing Procedures

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

Appendix 6-1 SC. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-20~~XX15~~. 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.

~~Source Wide PTI No MI-PTI-B2796-2015c is being reissued as Source Wide PTI No. MI-PTI-B2796-20XX.~~

~~{For a PTI that does not have an associated ROP revision application or an ROP revision application that does not have an associated PTI, enter NA in the appropriate column in the table below.}~~

~~The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B2796-2020.~~

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
18-14	201500074/ December 15, 2015	Incorporate PTI No. 18-14 into Sections 1 (St. Clair Power Plant) and 3 (Belle River Power Plant). This PTI is for installation of air emission control	FG-MATS-SC FG-ISLANDS-SC FG-NSR_DSI/ACI-SC

Commented [LRF296]: This Appendix is set up differently than the one in Appendix 6-2-BR (which divides out ROP mods from PTIs). Can EGLE please make consistent?

Commented [LRF297]: This list is not up to date for all ROP mods since 2015 ROP was issued. Please let me know if you would like help in updating this table.

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
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Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
		systems, Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI), on Belle River Units 1 and 2, and on St. Clair Units 1, 2, 3, 4, 6, and 7 as part of the proposed Mercury and Air Toxics Standards (MATS) in accordance with 40 CFR Part 63, Subpart UUUUU. Existing EGUs must comply with this subpart not later than April 16, 2015, unless they receive an extension (which DTE has received), then they must comply no later than April 16, 2016. DTE has received an extension and have also received a waiver to construct and have started construction.	
NA	201500129/ December 15, 2015	Application No. 201500129: The application is to remove EU-BURNHAM-SC from the flexible group FG-IBMACT-SC. The unit has received a determination from USEPA dated October 9, 2015 that the unit is not subject to Subpart DDDDD. The unit does not heat water, it heats glycol for space heating and therefore does not meet the definition of process heater under the Subpart DDDDD. FG-IBMACT-SC has been removed and emission unit conditions are now under EU-FULTON-SC. EU-BURNHAM-SC is exempt under Rule 336.1282(b)(i).	EU-IBMACT-SC
NA	201500148/ June 16, 2016	Reopening to update from CAIR to CSAPR.	FG-BLR_GEN-SC

Commented [LRF297]: This list is not up to date for all ROP mods since 2015 ROP was issued. Please let me know if you would like help in updating this table.

Source-Wide PTI No MI-PTI-B2796-20XX~~45e~~ is being reissued as Source-Wide PTI No. MI-PTI-B2796-20XX.

Appendix 7-1 SC. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 8-1 SC. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use 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.

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

Appendix 9-1 SC. Phase Two Acid Rain Permit

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EGLE

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

PHASE II ACID RAIN PERMIT
Permit No. MI-AR-1743-2021

Permittee	DTE Electric - St. Clair Power Plant
Address	4901 Pointe Drive, East China Township, MI
SRN	B2796
Plant Code	1743
Issue Date	DRAFT
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-B2796-20XX

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 federal Clean Air Act, new units are not allocated allowances in 40 CFR Part 73 and must obtain allowances by other means (Section 403(e) of the federal Clean Air Act);

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PTI No.: MI-PTI-

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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 federal 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.

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ROP No: MI-ROP-B2796-20XX

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PTI No.: MI-PTI-B2796-20XX

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 federal Clean Air Act, the Michigan Department of Environment, Great Lakes, and Energy, 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:

Mr. Brian Carley
Environmental Quality Specialist
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division, Jackson District Office
State Office Building, 4th Floor
301 East Louis B. Glick Highway
Jackson, Michigan 49201-1556
Telephone: 517-416-4631
Facsimile: 517-780-7855

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

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ROP No: MI-ROP-B2796-20XX
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Terms and Conditions:

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

		20XX	20XX	20XX	20XX	20XX
Unit 2	SO ₂ allowances	3,549	3,549	3,549	3,549	3,549
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective January 1, 2020. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.50 lb/mmBtu. In addition, this unit shall not have an annual heat input greater than 10,469,00 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

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ROP No: MI-ROP-B2796-20XX

Expiration Date: XX

PTI No.: MI-PTI-B2796-20XX

Terms and Conditions: (continued)

		20XX	20XX	20XX	20XX	20XX
Unit 3	SO ₂ allowances	3,530	3,530	3,530	3,530	3,530
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective January 1, 2020. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.50 lb/mmBtu. In addition, this unit shall not have an annual heat input greater than 11,782,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

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ROP No: MI-ROP-B2796-20XX

Expiration Date: XX

PTI No.: MI-PTI-B2796-20XX

Terms and Conditions: (continued)

		20XX	20XX	20XX	20XX	20XX
Unit 6	SO ₂ allowances	7,355	7,355	7,355	7,355	7,355
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective January 1, 2020. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.25 lb/mmBtu. In addition, this unit shall not have an annual heat input greater than 16,877,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX

Expiration Date: XX

PTI No.: MI-PTI-B2796-20XX

Terms and Conditions: (continued)

		20XX	20XX	20XX	20XX	20XX
Unit 7	SO ₂ allowances	13,482	13,482	13,482	13,482	13,482
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective January 1, 2020. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.25 lb/mmBtu. In addition, this unit shall not have an annual heat input less than 30,308,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

Comments, notes and justifications regarding permit decisions, and changes made to the permit application forms during the review process: None

Permit Application: (attached)

Acid Rain Permit Application submitted December 3, 2019
Phase II NO_x Compliance Plan submitted December 3, 2019
Phase II NO_x Averaging Plan submitted June 7, 2019

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX

Expiration Date: XX

PTI No.: MI-PTI-B2796-20XX

DTE Electric-St. Clair Power Plant
Facility (Source) Name (from STEP 1)

Acid Rain - Page 2

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 source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

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DTE Electric-St. Clair Power Plant
Facility (Source) Name (from STEP 1)

Acid Rain - Page 3

STEP 3, Cont'd.

Excess Emissions Requirements

- (1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

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

Section 1 – St. Clair Power Plant

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DTE Electric-St. Clair Power Plant
Facility (Source) Name (from STEP 1)

Acid Rain - Page 4

STEP 3, Cont'd.

Effect on Other Authorities

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

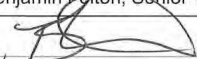
- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a source can hold; provided, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or
- (5) Interfering with or impeding 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	Benjamin Felton, Senior Vice President, Fossil Generation	
Signature		Date 11/12/19

Section 1 – St. Clair Power Plant

ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX



United States
 Environmental Protection Agency
 Acid Rain Program

OMB No. 2060-0258
 Approval expires 12/31/2021

Acid Rain NO_x Compliance Plan

For more information, see instructions and refer to 40 CFR 76.9
 This submission is: New Revised

Page 1 of 2

STEP 1
 Indicate plant name, State, and Plant code from the current Certificate of Representation covering the facility.

DTE Electric - St. Clair Power Plant	MI	1743
Plant Name	State	Plant Code

STEP 2

Identify each affected Group 1 and Group 2 boiler using the unit IDs from the current Certificate of Representation covering the facility. Also indicate the boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom, and select the compliance option for each unit by making an 'X' in the appropriate row and column.

	ID# 2	ID# 3	ID# 6	ID# 7	ID#	ID#
	DBW	DBW	T	T		
	Type	Type	Type	Type	Type	Type
(a) Standard annual average emission limitation of 0.60 lb/mmBtu (for Phase I dry bottom wall-fired boilers)						
(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)						
(c) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)						
(d) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)						
(e) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)						
(f) Standard annual average emission limitation of 0.88 lb/mmBtu (for cyclone boilers)						
(g) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)						
(h) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)						
(i) NO _x Averaging Plan (include NO _x Averaging form)	X	X	X	X		
(j) 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)						
(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(B) with NO _x Averaging (check the NO _x Averaging Plan box and include NO _x Averaging form)						
(l) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17(a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)						

EPA Form 7610-28 (Revised 8-2019)

Section 1 – St. Clair Power Plant

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DTE Electric - St. Clair Power Plant
Plant Name (from Step 1)

NO_x Compliance - Page 2
Page 2 of 2

STEP 3
Identify the first calendar year in which this plan will apply.

January 1, 2020

STEP 4
Read the special provisions and certification, enter the name of the designated representative, sign and date.


Special Provisions

General.

This source is subject to the standard requirements in 40 CFR 72.9. These requirements are listed in this source's Acid Rain Permit.

Certification

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

Name	Benjamin Felton, Senior Vice President, Fossil Generation	
Signature		Date
		11/12/19

Section 1 – St. Clair Power Plant

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Expiration Date: XX

PTI No.: MI-PTI-B2796-20XX



United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 12/31/2021

Acid Rain NO_x Averaging Plan

For more information, see instructions and refer to 40CFR 76.11 Page 1

This submission is: New Revised Page **1 of 2**

STEP 1

Identify the units participating in this averaging plan by plant name, State, and unit ID. 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 (ACEL) 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.

Plant Name	State	Unit ID#	(a) Emission Limitation	(b) ACEL	(c) Annual Heat Input Limit
Belle River 6034	MI	1	0.46	0.27	47,540,000
Belle River 6034	MI	2	0.46	0.27	42,597,000
MONROE 1733	MI	1	0.68	0.10	39,094,000
MONROE 1734	MI	2	0.68	0.10	50,700,000
MONROE 1735	MI	3	0.68	0.10	54,404,000
MONROE 1736	MI	4	0.68	0.10	54,418,000
River Rouge 1740	MI	3	0.46	0.54	19,201,000
ST CLAIR 1743	MI	2	0.46	0.50	10,469,000
ST CLAIR 1743	MI	3	0.46	0.50	11,782,000
ST CLAIR 1743	MI	6	0.40	0.25	16,877,000
ST CLAIR 1743	MI	7	0.40	0.25	30,308,000
Trenton Channel 1745	MI	9A	0.40	0.24	23,621,000

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 Btu-weighted 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

0.21

$$\frac{\sum_{i=1}^n (R_{i1} \times HI_{i1})}{\sum_{i=1}^n HI_{i1}}$$

Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7

0.56

$$\frac{\sum_{i=1}^n [R_{i1} \times HI_{i1}]}{\sum_{i=1}^n HI_{i1}}$$

≤

Where,

- R_{i1} = Alternative contemporaneous annual emission limitation for unit i, in lb/mmBtu, as specified in column (b) of Step 1;
- R_i = Applicable emission limitation for unit i, in lb/mmBtu, as specified in column (a) of Step 1;
- HI_i = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;
- n = Number of units in the averaging plan

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DTE Electric Company
Plant Name (from Step 1)

NOx Averaging - Page 2

STEP 3

Identify the first calendar year in which this plan will apply.

January 1, 2020

STEP 4

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Special Provisions

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO_x under the plan only if the following requirements are met:

- (i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and
 - (a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,
 - (b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or
 - (ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.
 - (iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

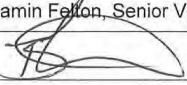
The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

Certification

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

Name Benjamin Felton, Senior Vice President, Fossil Generation	
Signature 	Date 11/12/19

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Appendix 10-1 SC: Cross State Air Pollution Rule (CSAPR) Trading Program Title V Requirements

Commented [AS(298)]: On 6/22/2021, Shamim updated St. Clair CSAPR by replacing text with new text provided by Brian Carley on May 5, 2021

Description of CSAPR Monitoring Provisions

The CSAPR subject units, and the unit-specific monitoring provisions, at this source are identified in the following tables. These units are subject to the requirements for the CSAPR NO_x Annual Trading Program, CSAPR NO_x Ozone Season Group 3 Trading Program, and CSAPR SO₂ Group 1 Trading Program, which are included below as Sections I, II, and III, respectively.

Each unit will use one of the following as the monitoring methodology for each parameter as provided below and shall comply with the general monitoring, recordkeeping, reporting and other requirements in conditions 1 through 5 below and in paragraph (b) of Sections I, II, and III:

- Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B (for SO₂ monitoring) or 40 CFR Part 75, Subpart H (for NO_x monitoring)
- Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
- Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E
- Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19
- EPA-approved alternative monitoring system requirements pursuant to 40 CFR Part 75, Subpart E

Unit ID: EU-BOILER2-SC	
Parameter	Monitoring Methodology
SO ₂	CEMS requirements pursuant to 40 CFR Part 75, Subpart B
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	CEMS requirements pursuant to 40 CFR Part 75, Subpart B or 40 CFR Part 75, Subpart H

Unit ID: EU-BOILER3-SC	
Parameter	Monitoring Methodology
SO ₂	CEMS requirements pursuant to 40 CFR Part 75, Subpart B
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	CEMS requirements pursuant to 40 CFR Part 75, Subpart B or 40 CFR Part 75, Subpart H

Unit ID: EU-BOILER6-SC	
Parameter	Monitoring Methodology
SO ₂	CEMS requirements pursuant to 40 CFR Part 75, Subpart B
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	CEMS requirements pursuant to 40 CFR Part 75, Subpart B or 40 CFR Part 75, Subpart H

Unit ID: EU-BOILER7-SC	
Parameter	Monitoring Methodology
SO ₂	CEMS requirements pursuant to 40 CFR Part 75, Subpart B
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	CEMS requirements pursuant to 40 CFR Part 75, Subpart B or 40 CFR Part 75, Subpart H

1. The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (CSAPR NO_x Annual Trading Program), 97.1030 through 97.1035 (CSAPR NO_x Ozone Season Group 3 Trading Program), and 97.630 through 97.635 (CSAPR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable CSAPR trading programs.

Section 1 – St. Clair Power Plant

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2. Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <https://www.epa.gov/airmarkets/monitoring-plans-part-75-sources>.
3. Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR Part 75, Subpart E and 40 CFR 75.66 and 97.435 (CSAPR NO_x Annual Trading Program), 97.1035 (CSAPR NO_x Ozone Season Group 3 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.
4. Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (CSAPR NO_x Annual Trading Program), 97.1030 through 97.1034 (CSAPR NO_x Ozone Season Group 3 Trading Program), and/or 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (CSAPR NO_x Annual Trading Program), 97.1035 (CSAPR NO_x Ozone Season Group 3 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.
5. The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (CSAPR NO_x Annual Trading Program), 97.1030 through 97.1034 (CSAPR NO_x Ozone Season Group 3 Trading Program), and 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.

SECTION I: CSAPR NO_x Annual Trading Program requirements (40 CFR 97.406)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of CSAPR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the CSAPR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_x emissions requirements.

- (1) CSAPR NO_x Annual emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall hold, in the

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source's compliance account, CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Annual units at the source.

- (ii). If total NO_x emissions during a control period in a given year from the CSAPR NO_x Annual units at a CSAPR NO_x Annual source are in excess of the CSAPR NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall hold the CSAPR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and
 - (B). The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.

(2) CSAPR NO_x Annual assurance provisions.

- (i). If total NO_x emissions during a control period in a given year from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
- (ii). The owners and operators shall hold the CSAPR NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).
- (iv). It shall not be a violation of 40 CFR Part 97, Subpart AAAAA or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
- (v). To the extent the owners and operators fail to hold CSAPR NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each CSAPR NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.

(3) Compliance periods.

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- (i). A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - (ii). A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
- (i). A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each CSAPR NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart AAAAA.
- (6) Limited authorization. A CSAPR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
- (i). Such authorization shall only be used in accordance with the CSAPR NO_x Annual Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR Part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A CSAPR NO_x Annual allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Annual allowances in accordance with 40 CFR Part 97, Subpart AAAAA.
- (2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i). The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each CSAPR NO_x Annual unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart AAAAA.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Annual Trading Program.
- (2) The designated representative of a CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall make all submissions required under the CSAPR NO_x Annual Trading Program, except as

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provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

(f) Liability.

- (1) Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual source or the designated representative of a CSAPR NO_x Annual source shall also apply to the owners and operators of such source and of the CSAPR NO_x Annual units at the source.
- (2) Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual unit or the designated representative of a CSAPR NO_x Annual unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the CSAPR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Annual source or CSAPR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION II: CSAPR NO_x Ozone Season Group 3 Trading Program Requirements (40 CFR 97.1006)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.1013 through 97.1018.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

~~(2)~~(1) The owners and operators, and the designated representative, of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.1030 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.1031 (initial monitoring system certification and recertification procedures), 97.1032 (monitoring system out-of-control periods), 97.1033 (notifications concerning monitoring), 97.1034 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.1035 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

~~(3)~~(2) The emissions data determined in accordance with 40 CFR 97.1030 through 97.1035 shall be used to calculate allocations of CSAPR NO_x Ozone Season Group 3 allowances under 40 CFR 97.1011(a)(2) and (b) and 97.1012 and to determine compliance with the CSAPR NO_x Ozone Season Group 3 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.1030 through 97.1035 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_x emissions requirements.

- (1) CSAPR NO_x Ozone Season Group 3 emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall hold, in the source's compliance account, CSAPR NO_x Ozone Season Group 3 allowances available for deduction for such control period under 40 CFR 97.1024(a) in an amount not

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less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Ozone Season Group 3 units at the source.

- (ii). If total NO_x emissions during a control period in a given year from the CSAPR NO_x Ozone Season Group 3 units at a CSAPR NO_x Ozone Season Group 3 source are in excess of the CSAPR NO_x Ozone Season Group 3 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall hold the CSAPR NO_x Ozone Season Group 3 allowances required for deduction under 40 CFR 97.1024(d); and
 - (B). The owners and operators of the source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart GGGGG and the Clean Air Act.
- (2) CSAPR NO_x Ozone Season Group 3 assurance provisions.
 - (i). If total NO_x emissions during a control period in a given year from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Ozone Season Group 3 allowances available for deduction for such control period under 40 CFR 97.1025(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.1025(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and
 - (B). The amount by which total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - (ii). The owners and operators shall hold the CSAPR NO_x Ozone Season Group 3 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season Group 3 trading budget under 40 CFR 97.1010(a) and the state's variability limit under 40 CFR 97.1010(b).
 - (iv). It shall not be a violation of 40 CFR Part 97, Subpart GGGGG or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold CSAPR NO_x Ozone Season Group 3 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

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- (B). Each CSAPR NO_x Ozone Season Group 3 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart GGGGG and the Clean Air Act.
- (3) Compliance periods.
- (i). A CSAPR NO_x Ozone Season Group 3 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.1030(b) and for each control period thereafter.
 - (ii). A CSAPR NO_x Ozone Season Group 3 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.1030(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
- (i). A CSAPR NO_x Ozone Season Group 3 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 3 allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A CSAPR NO_x Ozone Season Group 3 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 3 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each CSAPR NO_x Ozone Season Group 3 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart GGGGG.
- (6) Limited authorization. A CSAPR NO_x Ozone Season Group 3 allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
- (i). Such authorization shall only be used in accordance with the CSAPR NO_x Ozone Season Group 3 Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR Part 97, Subpart GGGGG, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A CSAPR NO_x Ozone Season Group 3 allowance does not constitute a property right.
- (d) Title V permit revision requirements.**
- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Ozone Season Group 3 allowances in accordance with 40 CFR Part 97, Subpart GGGGG.
 - (2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.1030 through 97.1035, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.1006(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).
- (e) Additional recordkeeping and reporting requirements.**
- (1) Unless otherwise provided, the owners and operators of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i). The certificate of representation under 40 CFR 97.1016 for the designated representative for the source and each CSAPR NO_x Ozone Season Group 3 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate

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of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.1016 changing the designated representative.

- (ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart GGGGG.
- (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Ozone Season Group 3 Trading Program.

- (2) The designated representative of a CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall make all submissions required under the CSAPR NO_x Ozone Season Group 3 Trading Program, except as provided in 40 CFR 97.1018. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

(f) Liability.

- (1) Any provision of the CSAPR NO_x Ozone Season Group 3 Trading Program that applies to a CSAPR NO_x Ozone Season Group 3 source or the designated representative of a CSAPR NO_x Ozone Season Group 3 source shall also apply to the owners and operators of such source and of the CSAPR NO_x Ozone Season Group 3 units at the source.
- (2) Any provision of the CSAPR NO_x Ozone Season Group 3 Trading Program that applies to a CSAPR NO_x Ozone Season Group 3 unit or the designated representative of a CSAPR NO_x Ozone Season Group 3 unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the CSAPR NO_x Ozone Season Group 3 Trading Program or exemption under 40 CFR 97.1005 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Ozone Season Group 3 source or CSAPR NO_x Ozone Season Group 3 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION III: CSAPR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of CSAPR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the CSAPR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630

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through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) SO₂ emissions requirements.

- (1) CSAPR SO₂ Group 1 emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all CSAPR SO₂ Group 1 units at the source.
 - (ii). If total SO₂ emissions during a control period in a given year from the CSAPR SO₂ Group 1 units at a CSAPR SO₂ Group 1 source are in excess of the CSAPR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall hold the CSAPR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and
 - (B). The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.
- (2) CSAPR SO₂ Group 1 assurance provisions.
 - (i). If total SO₂ emissions during a control period in a given year from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and
 - (B). The amount by which total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - (ii). The owners and operators shall hold the CSAPR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
 - (iv). It shall not be a violation of 40 CFR Part 97, Subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.

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- (v). To the extent the owners and operators fail to hold CSAPR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each CSAPR SO₂ Group 1 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.
- (3) Compliance periods.
 - (i). A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
 - (ii). A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
 - (i). A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each CSAPR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart CCCCC.
- (6) Limited authorization. A CSAPR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the CSAPR SO₂ Group 1 Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR Part 97, Subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A CSAPR SO₂ Group 1 allowance does not constitute a property right.

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(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR SO₂ Group 1 allowances in accordance with 40 CFR Part 97, Subpart CCCCC.
- (2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i). The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each CSAPR SO₂ Group 1 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart CCCCC.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR SO₂ Group 1 Trading Program.
- (2) The designated representative of a CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall make all submissions required under the CSAPR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

(f) Liability.

- (1) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 source or the designated representative of a CSAPR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the CSAPR SO₂ Group 1 units at the source.
- (2) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 unit or the designated representative of a CSAPR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the CSAPR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR SO₂ Group 1 source or CSAPR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

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Section 2 – Belle River Power Plant

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SECTION 2 – BELLE RIVER POWER PLANT

LOCATED AT
4505 King Road
China Township, Michigan 48054

Commented [LRF299]: St. Clair Peakers will be combined into Section 3 of the ROP. Therefore, Belle River Power Plant is now Section 2 of the ROP.

Commented [ER(300)]: PREVIOUSLY SECTION 3 IN MI-ROP-B2796-2015c

Commented [ER(301)]: CONTAINS THE UPDATED ACID RAIN AND CSAPR PERMITS FROM BRIAN CARLEY.

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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))**

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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 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.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))**

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Monitoring/Recordkeeping

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

Certification & Reporting

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

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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))**:
- 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.
 - 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))**
- The applicable requirements are included and are specifically identified in the ROP.
 - 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:
- 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))**
 - 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))**
 - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
 - 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:

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

Revisions

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

Reopenings

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

Renewals

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

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Stratospheric Ozone Protection

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

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
 - a. June 21, 1999,
 - b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
 - c. 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))**

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Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. ² (R 336.1201(1))
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. ² (R 336.1201(8), Section 5510 of Act 451)
- ~~43.47.~~ 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.² (R 336.1219)
- ~~44.48.~~ 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.² (R 336.1201(4))

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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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.

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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-2

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 Power Plant 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	03-01-1984/ 09-05-2008/ 07-25-2014	FG-BOILERS-BR ₁ FG-MATS-BR ₂ FG-NSR-DSI/ACI-BR
EU-BOILER2-BR	Belle River Power Plant 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	01-01-1984/ 02-01-2002/ 12-29-2009/ 07-25-2014	FG-BOILERS-BR ₁ FG-MATS-BR ₂ FG-NSR-DSI/ACI-BR
EU-NAUXBLR-BR	Belle River Power Plant North Auxiliary Boiler. 205 MMBtu heat input boiler, fired by diesel.	01-01-1984	FG-AUXBLRS-BR
EU-SAUXBLR-BR	Belle River Power Plant South Auxiliary Boiler. 205 MMBtu heat input boiler, fired by diesel.	01-01-1984	FG-AUXBLRS-BR
EU-ASHSILO#1-BR	Belle River Power Plant 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	Belle River Power Plant 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	Belle River Power Plant 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	Belle River Power Plant Coal handling activity in Transfer Houses, where emissions are limited by enclosures, sprays, wet ash extraction units, or baghouse dust collectors.	10-17-1978	FG-COALHAND-BR
EU-COALSILOS-BR	Belle River Power Plant Coal handling activity in Unit 1 & 2 Coal silos, where emissions are limited by enclosures, sprays, wet ash extraction units, or baghouse dust collectors.	10-17-1978	FG-COALHAND-BR
EU-CASCADES-BR	Belle River Power Plant Coal handling activity in Cascade Rooms, where emissions are limited by enclosures, sprays, wet ash extraction units, or baghouse dust collectors.	10-17-1978	FG-COALHAND-BR

Commented [ER(302): FG-DSI/ACI-BR CHANGED TO FG-MATS-BR.

FG-MATSPROJECT-BR CHANGED TO FG-NSR_DSI/ACI-BR.

Commented [ER(303): PTI 132-14
PTI 164-08
PTI 164-08B

Commented [ER(304): REFERENCE: PTI 18-14.

FG-DSI/ACI-BR CHANGED TO FG-MATS-BR.

FG-MATSPROJECT-BR CHANGED TO FG-NSR_DSI/ACI-BR.

Commented [ER(305): EU DESCRIPTION ADDED "POWER PLANT" AND CHANGED "#2 FUEL" TO "DIESEL".

BOTH CHANGES APPEAR ACCEPTABLE. Per conversation with Mark Mitchell, the terms #2 fuel oil and diesel are equivalent.

Commented [ER(306): EU DESCRIPTION ADDED "POWER PLANT" AND CHANGED "#2 FUEL" TO "DIESEL".

BOTH CHANGES APPEAR ACCEPTABLE. Per conversation with Mark Mitchell, the terms #2 fuel oil and diesel are equivalent.

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-PARTSCLN-BR	Belle River Power Plant cold solvent parts cleaners located at Belle River Power Plant.	08-01-1984	FG-COLDCLNR-BR
EU-FIREPUMP-BR	Belle River Power Plant Rule 285(2)(g) exempt, < 300 Bhp (280 hp), emergency diesel engine for Fire Pump House.	1984	NA
EU-BLR01- DSI_SILO1-BR	Belle River Power Plant 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	07-25-2014	FG-ISLANDS-BR; FG-NSR-DSI/ACI- BR
EU-BLR01- DSI_SILO2-BR	Belle River Power Plant 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	07-25-2014	FG-ISLANDS-BR; FG-NSR-DSI/ACI- BR
EU-BLR02- DSI_SILO1-BR	Belle River Power Plant 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	07-25-2014	FG-ISLANDS-BR; FG-NSR-DSI/ACI- BR
EU-BLR02- DSI_SILO2-BR	Belle River Power Plant 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	07-25-2014	FG-ISLANDS-BR; FG-NSR-DSI/ACI- BR
EU-BLR01- ACI_SILO-BR	Belle River Power Plant 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	07-25-2014	FG-ISLANDS-BR; FG-NSR-DSI/ACI- BR
EU-BLR02- ACI_SILO-BR	Belle River Power Plant 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	07-25-2014	FG-ISLANDS-BR; FG-NSR-DSI/ACI- BR

Commented [ER(307)]: ONLY ONE FIREPUMP IN THIS SECTION. THEREFORE, DTE HAS REQUESTED THE FLEXIBLE GROUP "FGEMERGENS-BR" BE MOVED FROM THE FLEXIBLE GROUP TABLE TO THE EMISSION UNIT TABLE AND THE NAME BE CHANGED TO "EU-FIREPUMP-BR."
THIS CHANGE REQUEST APPEARS ACCEPTABLE.

Commented [ER(308)]: REFERENCE PTI 18-14.

Commented [ER(309)]: REFERENCE PTI 18-14.
DTE CHANGED FG NAME FROM "FG-MATSPROJECT-BR" TO "FG-NSR-DSI/ACI-BR."

Commented [ER(310)]: REFERENCE PTI 18-14.
DTE CHANGED FG NAME FROM "FG-MATSPROJECT-BR" TO "FG-NSR-DSI/ACI-BR."

Commented [ER(311)]: REFERENCE PTI 18-14.
DTE CHANGED FG NAME FROM "FG-MATSPROJECT-BR" TO "FG-NSR-DSI/ACI-BR."

Commented [ER(312)]: REFERENCE PTI 18-14.
DTE CHANGED FG NAME FROM "FG-MATSPROJECT-BR" TO "FG-NSR-DSI/ACI-BR."

Commented [ER(313)]: REFERENCE PTI 18-14.
DTE CHANGED FG NAME FROM "FG-MATSPROJECT-BR" TO "FG-NSR-DSI/ACI-BR."

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EU-FIREPUMP-BR
EMISSION UNIT CONDITIONS

Commented [ER(314)]: THIS IS THE NEW ZZZZ MACT TABLE FOR CI RICE <500 HP.

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DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, compression ignition (CI) RICE equal to or less than 500 brake hp. A RICE is existing if the date of installation is before June 12, 2006. This emission unit was installed in 1984 and is rated at 280 hp.

An existing (installed in 1984), emergency compression ignition (CI) engine ≤ 300 HP (280 hp), subject to 40 CFR Part 63 Subpart ZZZZ (RICE MACT) located in the Fire Pump House. An existing engine is defined as constructed before June 12, 2006. Rule 285(2)(g) exempt.

Flexible Group ID: NA

Commented [LRF315]: DTE was not made aware that EGLE was changing current permit conditions and UARs substantially. DTE will review this in detail during the 21-day comment period.

Commented [LRF316]: This EU used to be in Part D under a FG. Updated Rus to FG to align with Part C.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

4-2. The permittee shall burn only diesel fuel in each engine with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. (40 63.6604(b), 40 CFR 80.510(b))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must comply with the requirements in Item 1 of Table 2c of 40 CFR Part 63, Subpart ZZZZ which apply EU-FIREPUMP-BR as specified in the following:

- a-d. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2;
- b-e. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- e-f. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the management practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. (40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c.1)

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC III.1. The oil analysis must be performed at the same frequency specified for changing the oil in SC III.1. (40 CFR 63.6625(i))

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3. The permittee shall operate and maintain EU-FIREPUMP-BR and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6605, 40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6.9)**
4. For EU-FIREPUMP-BR, 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 the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**
5. The permittee may operate EU-FIREPUMP-BR for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2))**
6. EU-FIREPUMP-BR may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in **SC III.5**. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. **(40 CFR 63.6640(f)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EU-FIREPUMP-BR with a non-resettable hours meters to track the operating hours. **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

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

- ~~4.2.~~ If using the oil analysis program, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. **(40 CFR 63.6625(i))**

VI. MONITORING/RECORDKEEPING

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

1. For EU-FIREPUMP-BR, the permittee shall keep in a satisfactory manner the following:
 - a-f. A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted,
 - b-g. Records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment,
 - e-h. Records of performance tests and performance evaluations,
 - d-i. Records of all required maintenance performed on the air pollution control and monitoring equipment,

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~~e.i.~~ 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 or usual manner of operation.

The permittee shall keep all records on file and make them available to the department upon request.

(40 CFR 63.6655(a), 40 CFR 63.6660)

2. For EU-FIREPUMP-BR, the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with the operation and maintenance of the engine according to the manufacturer's emission-related operation and maintenance instructions; or of a maintenance plan that provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(d), 40 CFR 63.6660, 40 CFR Part 63, Subpart ZZZZ, Table 6.9)**
3. For EU-FIREPUMP-BR, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**
4. The permittee shall monitor and record, the total hours of operation for EU-FIREPUMP-BR on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for EU-FIREPUMP-BR on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(f), 40 CFR 63.6660)**
5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EU-FIREPUMP-BR, demonstrating that the fuel meets the requirement of SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 80.510(b))**
6. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). **(40 CFR 63.6660(a))**
7. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.6660(b))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. ~~The permittee shall submit to the AQD District Supervisor, a semiannual compliance report, as specified in 40 CFR 63.6650, which contains all deviations during the reporting period from the operating limitations specified in SC III.1. If there are no deviations from any applicable emission limitations or operating limitations, the report shall contain a statement that there were no deviations during the reporting period. The first report shall cover the period beginning on the applicable compliance date specified in 40 CFR 63.6595 and ending on June 30 (postmarked or delivered by July 31) or December 31 (postmarked or delivered by January 31), whichever date is the first date following the end of the first calendar half after the applicable compliance date. Each subsequent report must cover the semiannual period from January 1 through June 30, or from July 1 through December 31. The subsequent reports must be postmarked or delivered by July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.~~

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~~except as allowed in 40 CFR 63.6650(b)(5). The compliance report must also contain the following information, as specified in 40 CFR 63.6650(c) and (d):~~

- ~~a. Company name and address.~~
- ~~b. Certification of the report by a responsible official.~~
- ~~c. Date of report and beginning and ending dates of the reporting period.~~
- ~~d. The number of malfunctions, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused the operating limitations specified in SC III.1 to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct a malfunction.~~
- ~~e. The total operating time of the RICE at which the deviation occurred during the reporting period.~~
- ~~f. The number, duration, and cause of deviations and the corrective action taken.~~

~~A copy of the compliance report shall be kept on file for a period of at least five years (at least two years at the site) and made available to the Department upon request. (40 CFR 63.6640(b), 40 CFR 63.6650(b), (c), and (d), 40 CFR 63.6660)~~

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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

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).

Commented [LRF317]: DTE does not agree with EGLE's addition of this condition. 63.6650 requires submitted each report in Table 7 that applies to you. Table 7 of Subpart ZZZZ does not list reporting requirements for existing, emergency engines <500 hp. Semi-annual compliance reporting is NOT required for this EU and this condition should not be added.

Commented [LRF318]: There are no specific reporting requirements in Appendix 8 for this EU. Please delete reference here to that appendix.

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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-2

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 Power Plant 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 at Belle River Power Plant that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv).	EU-PARTSCLN- BR
FG-MATS-BR	Installation of dry sorbent injection (DSI) and activated carbon injection (ACI) systems on Belle River Power Plant Boiler Nos. 1 and 2	EU-BOILER1-BR, EU-BOILER2-BR
FG-ISLANDS-BR	Belle River Power Plant DSI and ACI sorbents delivered and conveyed pneumatically to the appropriate storage silo.	EU-BLR01-DSI_SILO1-BR, EU-BLR01-DSI_SILO2-BR, EU-BLR02-DSI_SILO1-BR, EU-BLR02-DSI_SILO2-BR, EU-BLR01-ACI_SILO-BR, EU-BLR02-ACI_SILO- BR

Commented [ER(319): THE FG-EMERGENS-BR FGID WAS REMOVED BECAUSE IT CONTAINED ONLY ONE EMISSION UNIT, WHICH WAS EU-FIREPUMP-BR.

IN AGREEMENT WITH DTE, EU-FIREPUMP-BR WAS MOVED TO THE EMISSION UNIT PORTION OF THIS SECTION.

NOTE: THE EXISTING TABLE WAS REPLACED BY THE NEW MACT TABLE FOR CI RICE <500 HP.

Commented [LRF320]: EGLE to delete this row.
Commented [LRF321]: EGLE to delete this row

Commented [LRF322]: There is only 1 fire pump. DTE requests the fire pump to be moved from the FG section to the EU section.

Commented [ER(323R322): AGREED.

Commented [ER(325): REFERENCE PTI 18-14.

I AGREE WITH DTE IN CHANGING THE EMISSION UNITS REFERENCE FROM "UNITS" TO "BOILER NOS."

Commented [ER(324): PER DTE'S REQUEST, THE FLEXIBLE GROUP NAME WAS CHANGED FROM "FG-DSI/ACI-BR" TO "FG-MATS-BR."

Commented [ER(326): REFERENCE PTI 18-14.

I AGREE WITH ADDING THE SUFFIX OF "BR" TO CLARIFY WHICH POWER PLANT THESE EMISSION UNITS ARE LOCATED AT. THIS IS IMPORTANT FOR DTE WHEN PREPARING MAERS REPORTS.

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Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-NSR_DSI/ACI-BR	Belle River Power Plant Hybrid Analysis recordkeeping and reporting used for MATS project.	EU-BOILER1-BR, EU-BOILER2-BR, EU-BLR01-DSI_SILO1-BR, EU-BLR01-DSI_SILO2-BR, EU-BLR02-DSI_SILO1-BR, EU-BLR02-DSI_SILO2-BR, EU-BLR01-ACI_SILO-BR, EU-BLR02-ACI_SILO-BR,

Commented [ER(328):
REFERENCE PTI 18-14.

UNDER FLEXIBLE GROUP ID:
 DTE CHANGED THE FG ID FROM
 "FG-MATSPROJECT-BR" TO
 "FG-NSR_DSI/ACI-BR."

UNDER FLEXIBLE GROUP DESCRIPTION:
 DTE ADDED "BELL RIVER POWER PLANT" FOR CLARITY.

UNDER ASSOCIATED EMISSION UNIT IDs:
DTE REMOVED:
 FG-DSI/ACI-MATS_BR,
 FG-ISLANDS-BR,

DTE ADDED:
 EU-BOILER1-BR,
 EU-BOILER2-BR,
 EU-BLR01-DSI_SILO1-BR,
 EU-BLR01-DSI_SILO2-BR,
 EU-BLR02-DSI_SILO1-BR,
 EU-BLR02-DSI_SILO2-BR,
 EU-BLR01-ACI_SILO-BR,
 EU-BLR02-ACI_SILO-BR.

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 PTI No.: MI-PTI-B2796-20XX

**FG-BOILERS-BR
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Applicable requirements associated with Belle River Power Plant Boiler Nos. 1 and 2.

Emission Units:

EU-BOILER1-BR Belle River Boiler No. 1. 697 MW nominally rated, dry bottom coal-fired boiler (diesel for ignition) with electrostatic precipitators, low-NOx burners, overfire air, DSI and ACI
 EU-BOILER2-BR Belle River Boiler No. 2. 697 MW nominally rated, dry bottom coal-fired boiler (diesel for ignition) with electrostatic precipitators, low-NOx burners overfire air, DSI and ACI

POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitators, Low-NOx burners, overfired air, DSI (Dry Sorbent Injection) and ACI (Activated Carbon Injection)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.10 pound per MM-BTU heat input ²	Test Protocol will specify averaging time	EU-BOILER1-BR EU-BOILER2-BR	SC V.1	40 CFR Part 60, Subpart D; <u>[NOT EXEMPT FROM CAM BECAUSE NSPS IS NOT POST 1990. ALSO, IF SUBJECT TO UAR THAT IS NOT A POST 1990 MACT OR NSPS THEN IT IS NOT EXEMPT FROM CAM]</u> 40 CFR 60.42a(1)
2.3. Visible Emissions	20% opacity ^{2, a}	6-minute average	EU-BOILER1-BR EU-BOILER2-BR	SC VI.3	40 CFR Part 60, Subpart D; 40 CFR 60.42a(2)
3. SO ₂	1.2 pounds per MM-BTU ^{2, b}	Based upon any 3-hour average	EU-BOILER1-BR EU-BOILER2-BR	SC VI.1	40 CFR Part 60, Subpart D; 40 CFR 60.43a(2)
4. NO _x	0.70 pound per MM-BTU ^{2, b}	Based upon any 3-hour average	EU-BOILER1-BR EU-BOILER2-BR	SC VI.2	40 CFR Part 60, Subpart D; 40 CFR 60.44a(3)

^aExcept for one 6-minute period per hour of not more than 27%.²

^bExcess emissions for SO₂ and NO_x are defined as any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods, as measured by the continuous monitoring system) exceed the emission limit.² (40 CFR 60.45(g)(2) & (3))

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

2.1. The electrostatic precipitators shall be installed and operated in a satisfactory manner.² —(R 336.1910)

Commented [ER(330): PTI 132-14 NEEDS UPDATE/MODIFICATION]
 NOTE: NO PERMITTED LIMITS WILL CHANGE. THE PROPOSED PTI MODIFICATION IS NEEDED TO ELIMINATE POTENTIAL CIRCULAR REFERENCES OF PTI CONDITIONS CITING A SPECIAL CONDITION IN A ROP THAT WILL EXPIRE.

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Commented [ER(331):] DTE CHANGED CHANGED "#2 FUEL" TO "DIESEL" IN EACH EMISSION UNIT DESCRIPTION..

BOTH CHANGES APPEAR ACCEPTABLE.
 Per conversation with Mark Mitchell, the terms #2 fuel oil and diesel are equivalent.

Commented [ER(332):] THE FOOTNOTES AT THE BOTTOM OF THIS TABLE WERE MOVED OUTSIDE THE MERGED CELL FOR ADA COMPLIANCE BECAUSE TEXT READERS HAVE PROBLEMS WITH TEXT IN MERGED CELLS.

Commented [ER(333): CONTACTED ANNETTE SWITZER AND MARK MITCHELL, TO CORRECT THE PTI NO. 132-14 EMISSION LIMITS AND CONDITIONS.]
 NOTE: PER MARK MITCHELL, DTE WILL HAVE TO SUBMIT A REQUEST TO MODIFY AN EXISTING ROP TO MODIFY/REMOVE CIRCULAR REFERENCES TO ROP CONDITIONS. CONCLUSION PENDING FURTHER DISCUSSIONS.

Commented [ER(334): UPDATE: PER LISA FISHPERK (20201211)]
 FGBLR5BR AND FGBLRGENSC ARE NO LONGER SUBJECT TO CAM BECAUSE
 *INITIALLY THE COMS WERE NOT CERTIFIED
 *COMS ARE NOW CERTIFIED
 *EMAIL FROM LISA FISHPERK TO COME AROUND Friday, December 18, 2020. EMAIL WILL DOCUMENT WHY THESE TWO FLEXIBLE GROUPS ARE NO LONGER SUBJECT TO CAM

Commented [ER(335):] AQD CHANGED THE EQUIPMENT NAMES FROM "BOILER NO. 1" AND "BOILER NO. 2" TO THEIR PERMITTED NAMES OF "EU-BOILER1-BR" AND "EU-BOILER2-BR."

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BOTH CHANGES APPEAR ACCEPTABLE.

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2. The permittee shall maintain and operate EU-BOILER1-BR in a satisfactory manner using efficient combustion practices. Satisfactory operation includes operating EU-BOILER1-BR according to the procedures outlined in the malfunction abatement/preventative maintenance plan (SS&PM-MAP) specified in SC IX.11.83 and the Carbon Monoxide (CO) Minimization Protocol specified in SC IX.11.94.² (R 336.1910, R 336.1911, R 336.2804, R 336.2810(3), 40 CFR 52.21(d) and (j))
3. The permittee shall maintain and implement the approved Startup/ Shutdown and Preventative Maintenance, Malfunction Abatement Plan (SS & PM-MAP) for FG-BOILERS-BR and the electrostatic precipitators. Alternate formats or revisions to the approved Program must be approved by the AQD District Supervisor. If the Plan inadequately addresses an event, the permittee shall revise the Plan within 45 days of such an event and submit the revised Plan for approval of AQD District Supervisor. The alternate plan shall be deemed approved unless notified by the District Supervisor within 45 days of plan submittal.² (R 336.1201(3))
4. The permittee shall use and implement and maintain the AQD approved Carbon Monoxide Minimization Protocol describing reasonable measures to minimize carbon monoxide emissions. Alternate formats or revisions to the approved protocol must be approved by AQD District Supervisor. The alternate plan shall be deemed approved unless notified by the District Supervisor within 45 days of plan submittal.² (R 336.2804, R 336.2810(3), 40CFR52.21(d) & (j))

Commented [ER(340): REVIEW WITH JULIE BRUNNER I ACCEPTED ADDED TEXT THAT DID NOT AFFECT THE REGULATORY APPLICABILITY OF THE ORIGINAL PTI CONDITION.]

Commented [ER(341): REFERENCE TO MAP IN SC IX.11 WAS INCORRECT. THE CORRECT REFERENCE IS SC IX.8.]

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Commented [ER(342): REFERENCE TO MAP IN SC IX.12 WAS INCORRECT. THE CORRECT REFERENCE IS SC IX.9.]

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IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate EU-BOILER1-BR unless the upgraded low-NOx burner system is installed, maintained, and operated in a satisfactory manner.2 (R 336.1910)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

- 1. Once every three years or more frequently upon the request of the AQD District Supervisor, the permittee shall verify and quantify particulate matter (PM) emission rates from EU-BOILER1-BR and EU-BOILER2-BR by testing at owner's expense in accordance with EGLE requirements. (R 336.1201(3), R 336.1213(3))
2. Annually, the permittee shall verify and quantify carbon monoxide (CO) emission rates from EU-BOILER1_BR by testing at owner's expense in accordance with EGLE requirements. Testing must be completed at maximum and an intermediate load. Combustion parameters shall be monitored and recorded during test to determine efficient combustion practices.2 (R 336.2804, R 336.2810(3), 40 CFR 52.21(d) & (j))
3. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. AQD must approve the final plan prior to testing. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.2 (R 336.1331, R 336.2001, R 336.2003, R 336.2004, R 336.2804, R 336.2810(3), 40 CFR 52.21(d) & (j))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the SO2 emissions on a continuous basis and in accordance with the Emission and Fuel Monitoring section of 40 CFR 60 and/or 40 CFR 75.2 See Appendix 3-2-1 BR.1 and 3-2-2 BR.2. (40 CFR Part 60, Subpart D; 40 CFR 60 & 75, Appendix B)
2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the gas flow, CO2, and NOx emissions on a continuous basis and in accordance with the Emission and Fuel Monitoring section of Part 60 and/or 40 CFR 75.2 See Appendix 3-2 BR.2. (40 CFR Part 60, Subpart D; 40 CFR Part 60 & 40 CFR 75, Appendix B)
3. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the visible emissions on a continuous basis and in accordance with 40 CFR 60.2 See Appendix 3-3-2 BR.3. (R 336.1201, 40 CFR Part 60 Subpart D; 40 CFR 60.13; 40 CFR Part 60 Appendix B)
4. The permittee shall develop a QA/QC program for the CEM systems. At a minimum, include in each QA/QC program a written plan that describes in detail complete, step-by-step procedures and operations for the activities specified in Appendix B to 40 CFR 75.2 (40 CFR 75 Appendix B.1)
5. For each electrostatic precipitator, the permittee shall monitor the parameters specified in the malfunction abatement/preventative maintenance program.2 (R 336.1213(3), R 336.1910)

6. The permittee shall utilize COMS-recorded opacity as an indicator of the emission unit's compliance with the particulate matter emission limit. An excursion of the PM emission limit is defined as two consecutive 1-hour block average opacity values greater than 20%. This condition does not affect compliance with R 336.1301. (40 CFR 64.6(c)(1)(i & ii), c(2), s(3), and 64.7(c))

7. The permittee shall operate the COMS during all required periods when the associated coal-fired boiler is operating. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality

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The AQD agrees.

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Commented [RE347]: DOUBLE CHECK WITH JULIE BRUNNER AND CONFIRM MY UNDERSTANDING THAT WE DO NOT NEED TO USE THE NEW TEMPLATE TESTING CONDITIONS BECAUSE THIS TESTING REQUIREMENT ORIGINATES IN A PTI.

Commented [ER(348)]: Per Lisa Fishbeck (DTE), condition SC VI.13 was satisfied as of 12/31/2019. DTE proposes to delete this entire condition.

The AQD agrees.

Commented [ER(349)]: REFERENCE PTIs: 132-14 MOST CONDITIONS REFER TO CURRENT PERMIT (EITHER MOST RECENT PTI OR ROP) 164-08 MONITOR VOC, SO2, NOx, AND EITHER O2 OR CO2 164-08B 164-08C 261-01 412-76 412-76A

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assurance or control activities shall not be used for 40 CFR Part 64 compliance, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, in frequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 64.6(e)(3), 64.7(e))

8. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). CAM exceedances/excursions trigger initial inspections, corrective actions and recordkeeping of the probable cause and corresponding resolution. (40 CFR 64.7(d))

9. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. (40 CFR 64.9(b)(1))

10. The permittee shall perform an annual COMS audit using certified filters to ensure accurate opacity readings.² (40 CFR 64.6(e)(1)(iii))

11.6. The permittee shall keep, in a satisfactory manner, monthly and previous 12-month CO mass emission calculation records for EU-BOILER1-BR. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. After five years of operation of the low NOx burner permittee may submit a written request to change the CO emission calculation recordkeeping to the AQD District Supervisor for review and approval. The permittee may only change the CO emission calculation recordkeeping with the written approval of the AQD District Supervisor.² (R 336.2804, R 336.2810(3), 40 CFR 52.21(d) & (j))

7. The permittee shall conduct monitoring and keep written records for EU-BOILER1-BR and EU-BOILER2-BR in FG-BOILER-BR, as required in the approved Carbon Monoxide Minimization Protocol, to demonstrate that CO is being minimized on an ongoing basis. After five years of operation of the low NOx burner system, the permittee may submit a written request to change the monitoring and recordkeeping to the AQD District Supervisor for review and approval. The permittee may only change the monitoring and recordkeeping with the written approval of the AQD District Supervisor.² (R 336.1213(3), R 336.2804, R 336.2810(3), 40 CFR 52.21(d) & (j))

12.8. The permittee shall monitor and record the PM emission rates, in pound per MMBTU heat input, from EU-BOILER1-BR and EU-BOILER2-BR in FG-BOILER-BR, as required in FG-MATS-BR VI.3 and 9. (R 336.1213(3))

Commented [ER(360): NOTE: PER LISA FISHBECK (12-11-2020) DTE WILL BE SENDING A LETTER STATING THAT FG-BOILERS-BR and FG-BLR_GEN-SC ARE NO LONGER SUBJECT TO CAM BECAUSE THE COMS ARE NOW CERTIFIED. THE LETTER IS EXPECTED TO BE RECEIVED BY THE AQD AROUND 12-21-2020.

REVIEW CAM ASSERTIONS WITH SGK

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NOTE: UPON COMPARING WITH THE PTI, I RESTORED THIS CONDITION TO THE ORIGINAL TEXT, IN KEEPING WITH CURRENT POLICY.

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Commented [ER(363): This special condition was added by Robert Elmouchi per guidance from Sebastian Kallumkal. This condition is needed to demonstrate PM exempt status from CAM. In essence, the CEM required in FG-MATS-BR is a federal requirement, which exempts FG-BOILERS-BR PM emissions from CAM.

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VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. For the continuous monitoring system for the measurement of opacity, the permittee shall submit to the District Supervisor and Compliance Support Unit Supervisor, Air Quality Division and to the Chief of the Air Compliance Branch, U.S. Environmental Protection Agency, within 30 days of the end of the calendar quarter, a written report for each calendar quarter which shall include all of the following information:²
 - a. Excess emissions, corrective action taken and the nature and cause of excess emissions. For opacity measurements, the report shall consist of the magnitude, in actual percent opacity, of all 6-minute averages of opacity more than the applicable opacity standard for each hour of operation (all allowable exceptions are to be deducted prior to determining the excess averages of opacity). Average values shall be obtained by integration over the averaging period of by arithmetically averaging a minimum of 24 equally spaced, instantaneous opacity measurements per 6 minutes.²
 - b. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of repairs or adjustments made.²
 - c. If the monitoring system has not been inoperative, repaired, or adjusted, and if no excess emissions occurred, a statement attesting to this fact.² **(R 336.2170(1)(a), (b) & (c); Title I (Air Pollution Prevention and Control) of the Clean Air Act, Section 114(a))**
5. The permittee shall submit to the Chief of the Air Compliance Branch, U.S. Environmental Protection Agency and the District Supervisor of the Air Quality Division, within 30 days of the end of the calendar quarter, a written report for each calendar quarter, which shall include sulfur dioxide (SO₂) monthly emission rate averages.² **(Title I (Air Pollution Prevention and Control) of the Clean Air Act, Section 114(a)) (Rule 336.1213(3))**
6. The permittee shall report sulfur dioxide (SO₂), nitrogen oxide (NO_x) and carbon dioxide (CO₂) emissions, volumetric flow, and opacity data in accordance with 40 CFR Part 75 (Continuous Emission Monitoring).² **(40 CFR 75)**
7. ~~The~~ permittee shall submit quarterly Excess Emission and Monitoring System Performance (MPS) reports and operating information pursuant to 40 CFR 60, Subpart D, 30 days following the end of the quarter in which data were collected.² **See Appendix 8-2-B-BR, (40 CFR 60, Subpart D)**
8. ~~Semiannually, or more frequently, report Compliance Assurance Monitoring (CAM) summary information on the number, duration, and cause of exceedances/excursions in the reporting period, and the corrective actions taken in response. If there were no exceedances/excursions in the reporting period, then this report shall include a statement that there were no exceedances/excursions. (40 CFR 64.9(a)(2)(i), R 336.1213(3)(c))~~
9. ~~Semiannually or more frequently report CAM summary information on the monitor downtime in the reporting period. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. (40 CFR 64.9(a)(2)(ii), R 336.1213(3)(c))~~

See Appendix 8-2 BR

VIII. STACK/VENT RESTRICTION(S)

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The AQD agrees.

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Commented [ER(366): NOTE: LETTER FROM DTE PENDING. DOCUMENT WILL DEMONSTRATE THIS FLEXIBLE GROUP IS NOT SUBJECT TO CAM. REVIEW WITH SEBASTIAN KALLUMKAL

Commented [LRF367]: This condition will be satisfied as of 12/31/2019. DTE proposes to delete this entire condition.

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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-BOILER1-BR	306	660	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SV-BOILER2-BR	306	660	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94, as outlined in a complete Phase II, Acid Rain Permit issued by the AQD. Phase II, Acid Rain Permit No. ~~MI-AR-6034-2021-20XX~~ is hereby incorporated into this ROP as Appendix 9-2 BR. **(R 336.1902(1)(q))**
- ~~2. The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94 as outlined in a complete Phase II Acid Rain permit issued by the AQD. The Phase II Acid Rain Permit No. MI-AR-6034-2021 is hereby incorporated into this ROP as Appendix 9 BR. (R 336.1299(2)(a))~~
- ~~3.2. The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to R 336.1902(1)(q) and 40 CFR 72.9(c)(1)(i). (R 336.1213(10))~~
- ~~4. The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to R 336.1299(2)(d) and 40 CFR Part 72.9(c)(1)(i). (R 336.1299(2)(a), 40 CFR 72.9(e)(1)(i))~~
- ~~5. The permittee shall comply with the provisions of the Cross-State Air Pollution Rule SO₂ Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix 10-2 BR.~~
- ~~6.3. (40 CFR Part 97, Subpart CCCCC)~~
- ~~7. The permittee shall comply with the provisions of the Transport Rule SO₂ Group 1 Trading Program, as specified in 40 CFR, Part 97, Subpart CCCCC, as they apply to EU-BOILER1-BR and EU-BOILER2-BR. (40 CFR Part 97 Subpart CCCCC)~~
- ~~8. The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NO_x Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAA, and identified in Appendix 10-2 BR.~~
- ~~4. (40 CFR Part 97, Subpart AAAAA)~~
- ~~9. The permittee shall comply with the provisions of the Cross State Air Pollution Rule NO_x Ozone Group 3 Trading Program, as specified in 40 CFR Part 97 Subpart GGGGG, and identified in Appendix 10-2 BR. (40 CFR Part 97 Subpart GGGGG)~~
- ~~10. The permittee shall comply with the provisions of the Transport Rule NO_x Annual Trading Program, as specified in 40 CFR, Part 97, Subpart AAAAA, as they apply to EU-BOILER1-BR and EU-BOILER2-BR. (40 CFR Part 97 Subpart AAAAA)~~
- ~~5.~~
- ~~11. The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NO_x Ozone Season Group 2 Trading program, as specified in 40 CFR Part 97, Subpart EEEEE, and identified in Appendix 10 BR. (40 CFR Part 97, Subpart EEEEE)~~
- ~~12. The permittee shall comply with the provisions of the Transport Rule NO_x Ozone Program, as specified in 40 CFR, Part 97, Subpart BBBB, as they apply to EU-BOILER1-BR and EU-BOILER2-BR. (40 CFR Part 97 Subpart BBBB)~~
- ~~13.6. The permittee shall comply with the NO_x standards, which have been promulgated in a federal implementation plan under section 110(c) or required under section 126 of the CAA. (R 336.1801(14))~~

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EXAMPLE FOR PEAKERS TEXT

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~~14.7. As would apply to any other condition in this permit, nothing in this permit shall preclude the use, including exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.² (40 CFR 60.11(g))~~

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~~15. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.² (40 CFR 64.7(e))~~

~~16. The permittee shall properly maintain the monitoring system, including maintaining necessary parts for routine repairs of the monitoring equipment. (40 CFR 64.7(b))~~

~~17. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)~~

Commented [LRF372]: These EUs are no longer subject to CAM. Please delete these conditions, as agreed upon.

~~18.8. The permittee shall comply with applicable requirements of the federal National Emissions Standards for Hazardous Air Pollutants as set forth in 40 CFR 63, Subparts A and UUUUU (Coal- and Oil-Fired Electric Utility Steam Generating Units) for FG-BOILERS-BR. The permittee shall comply with all notice requirements, emissions standards and continuous emissions monitoring, recordkeeping, and reporting requirements as required in 40 CFR 63, Subparts A and UUUUU. All emission and operating data shall be kept on file for a period of at least five years and made available to the AQD upon request. (40 CFR 63 Subparts A and UUUUU)~~

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).

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ROP No: MI-ROP-B2796-20XX
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 PTI No.: MI-PTI-B2796-20XX

**FG-AUXBLRS-BR
 FLEXIBLE GROUP CONDITIONS**

Commented [ER(373)]: PTI 132-14 NEEDS UPDATE/MODIFICATION

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DESCRIPTION

Applicable requirements associated with the Belle River Power Plant North and South Auxiliary Boilers, which are subject to 40 CFR Part 63 Subpart DDDDD as limited use boilers.

Limited-use boilers means any boiler that burns any amount of solid, liquid, or gaseous fuels and has a federally enforceable average annual capacity factor of no more than 10 percent.

Emission Units:

EU-NAUXBLR-BR Belle River Power Plant North Auxiliary Boiler. 205 MM BTU heat input boiler, fired by diesel
 EU-SAUXBLR-BR Belle River Power Plant South Auxiliary Boiler. 205 MM BTU heat input boiler, fired by diesel

Commented [ER(374)]: REVIEW WITH JULIE BRUNNER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. SO ₂	0.51 pounds per million BTU of heat input ²	Instantaneous	FG-AUXBLRS-BR	VI.1 and VI.3	R 336.1201(3)

The SO₂ limit is based on a 0.5% sulfur content with a heat value of 18,000 BTU/lb for the liquid fuel oil.²

Commented [LRF375]: Please add this as a footnote in the table (as it currently is in the ROP)

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Commented [ER(376)]: CHANGE OF FUEL NAME APPEARS ACCEPTABLE. Per conversation with Mark Mitchell, the terms #2 fuel oil and diesel are equivalent. Furthermore, this limit does not appear to originate from a PTI.

Commented [ER(377)]: Should I change "No.2 fuel oil" to "Diesel"?

Commented [ER(378)]: NOTE: I DELETED THE INITIAL TUNE-UP SC BECAUSE THE CONDITION WAS SATISFIED ON SEPTEMBER AND NOVEMBER 2015.

REFERENCE TEXT:

1.The permittee must complete an initial tune-up of the boilers by following the procedures described in 40 CFR 63.7540(a)(10)(i) through (vi) no later than January 31, 2016. (40 CFR 63.7510(e))

Commented [AMH379]: Would like this included because the regulation does not consider a missed tune-up a deviation. NOTE: I DISAGREE WITH MS. HUNT'S INTERPRETATION, WITH IS SUPPORTED BY AN EMAIL RESPONSE FROM EPA REGION 5. NEVERTHELESS, I HAVE AGREED TO ADD THIS SPECIAL CONDITION.

Commented [ER(380)]: REVIEW WITH JULIE BRUNNER

I DISAGREE WITH ANN HUNT. REVIEW EPA EMAIL RESPONSE WITH JULIE BRUNNER.

Commented [LRF381]: Completed between September and November 2015. This condition has been satisfied and is therefore requested to be deleted.

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Commented [LRF382]: Please ignore this. DTE originally added this and then decided it is not necessary. (Could not undo due to protected EGLE file)

Commented [ER(383R382)]: Per DTE, I rejected the proposed change. Therefore, this special condition remains unaltered as compared to the current active ROP.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. diesel (Note A)	10 % annual capacity factor on oil (Note B)	Calendar Year	EU-NAUXBLR-BR EU-SAUXBLR-BR	VI.2 ¹	40 CFR 63.7555(d)(3)

Note A: This limit is to satisfy the Federally Enforceable capacity factor limit associated with the limited use designation under 40 CFR 63 Subpart DDDDD, § 63.7555(d)(3). The No. 2 fuel oil limit takes effect on January 1, 2016 to assure compliance with the MACT compliance date of January 31, 2016, -specified in 40 CFR 63.7495(b).

Note B: Annual capacity factor means the ratio between the actual heat input to a boiler from the fuels burned during a calendar year to the potential heat input to the boiler had it been operated for 8,760 hours during a year at the maximum steady state design heat input capacity. (40 CFR 63 Subpart 63.7575)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must meet the tune-up and Energy Assessment work practice standards for each applicable boiler at the source per the requirements of 40 CFR Part 63 Subpart DDDDD ((40 CFR 63.7500(a), 40 CFR 63.7515(d), 40 CFR 63.7540(13))

2. To demonstrate continuous compliance, the permittee must conduct a tune-up of the boilers every 5 years (within 61 months). If the boiler is not operating on the required date for tune-up, the tune-up must be conducted within 30 calendar days of startup. (40 CFR 63.7500(a), 40 CFR 63.7515(d), 40 CFR 63.7540(12) & (13))

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- 3. The permittee shall conduct tune up of the boilers as specified in the following:
 - a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next unit shutdown).
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern.
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next unit shutdown).
 - d. Optimize total emissions of CO.
 - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made. **(40 CFR 63.7540(a)(12))**
- 4. The permittee, at all times, must operate and maintain any affected source (as defined in § 63.7490) in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.7500(a)(3))**
- 5. The permittee must install a fuel meter or may share a fuel meter for each boiler. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall keep a record of the following on a monthly basis:
 - a. Total fuel usage
 - b. Sulfur content of fuel oil
 - c. Hours of operation for equipment
 - d. Heat value of fuel oil **(R 336.1213(3))**
- 2. The permittee shall calculate and record the annual capacity factor for EU-NAUXBLR-BR and EU-SAUXBLR-BR based on a calendar year basis. **(40 CFR 63.7575)**
- 3. The permittee must keep:
 - a. Fuel use records for the days the boiler was operating. **(40 CFR 63.7525(k))**
 - b. A copy of each notification and report that is submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that permittee submitted, according to the requirements in 40 CFR Part 63.10(b)(2)(xiv). (40 CFR 63.7555(a)(1))
 - c. For units in the limited use subcategory, the permittee must keep a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent and fuel use records for the days the boiler or process heater was operating. (40 CFR 63.7555(a)(3))

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Commented [LRF384]: Please ignore this. DTE originally added this and then decided it is not necessary. (Could not undo due to protected EGLE file)

Commented [ER(385R384)]: DELETED.

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Commented [ER(386)]: I REJECTED ADDING "records below" because it is not needed.

Commented [ER(387)]: I ACCEPTED THE ADDITION OF PARAGRAPHS a AND b.

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4. The permittee shall perform visible emissions observation of each auxiliary boiler at least once a day when the boilers are operating continuously for 24 hours or more. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall keep a written record of each required observation and corrective action. **(R 336.1213(3))**
5. The permittee shall maintain a complete record of fuel oil specifications and/or fuel analysis for each delivery, or storage tank, of fuel oil used for the auxiliary boilers. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. **(R 336.1213(3))**
6. The permittee shall keep a copy of each notification and report submitted to comply with 40 CFR 63 Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report submitted according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.7555(a))**
7. The permittee shall keep records of compliance demonstrations. **(R 336.1213(3))**
8. Records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). **(40 CFR 63.7560(a))**
9. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.7560(b))**
10. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee can keep the records off site for the remaining 3 years. **(40 CFR 63.7560(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), as specified in 40 CFR 63.7545. **(40 CFR 63.7545(a))**
- 4-5. If the permittee has switched fuels or made a physical change to the boiler and the fuel switch or physical change resulted in the applicability of a different subcategory, the permittee must provide notice of the date upon which the permittee switched fuels or made the physical change within 30 days of the switch/change. The notification must identify:
 - a. The name of the owner or operator of the affected source, as defined in §63.7490,
 - b. the location of the source, the boiler(s) and process heater(s) that have switched fuels, were physically changed, and the date of the notice.
 - c. The currently applicable subcategory under this subpart.
 - d. The date upon which the fuel switch or physical change occurred.
- 4-6. The permittee must submit boiler tune-up compliance reports. The first compliance report shall cover the period January 31, 2016 through December of the year in which the compliance tune-up was completed and must be postmarked or submitted no later than March 15th of the reporting year that immediately follows the year in which the

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Commented [ER(388)]: I ACCEPTED THE ADDITION OF SC 8, 9, AND 10.

Commented [ER(389)]: I DO NOT OBJECT TO THE PROPOSED SPECIAL CONDITIONS.

Commented [ER(390)]: I ACCEPTED THE ADDITION OF THIS CONDITON FROM DTE. **NEED UAR!!!**

Commented [ER(391)]: **REVIEW WITH JULIE BRUNNER**

I do not object to adding this special condition.

Commented [ER(392)]: **NEEDS UA !!!**

Commented [AMH393]: NOCs are only required for the initial tune ups on these two aux boilers. The NOCs was submitted for the aux boilers on 1-15-16

Commented [ER(394)]: **REVIEW WITH JULIE BRUNNER**

PER ANN HUNT, THE REQUIRED INITIAL COMPLIANCE DEMONSTRATION WAS COMPLETED AND NOTIFICATION OF COMPLIANCE STATUS REPORT WAS SUBMITTED ON 1-15-2016.

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tune-up was completed. Subsequent compliance reports must be postmarked or submitted by March 15th of the year following the compliance tune-up and must cover the applicable period starting from January 1 of the year following the previous tune-up to December 31 (of the latest tune-up year). Note: For units that only require periodic tune-ups, missing a tune-up is not considered a deviation. Compliance reports must be submitted using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to the state and EPA Region 5. At the discretion of the Administrator, the permittee must submit these reports in the format specified by the Administrator. **(40 CFR 63.7550(b), 40 CFR 63.10(a)(5), 40 CFR 63.7550(h)(3), 40 CFR 63.7550(c))**

NOTE: In accordance with 40 CFR 63.9, the permittee may request, in writing, to change the deadline for the compliance reports. The deadline for the compliance reports is changed from January 31 to March 15 to coincide with the deadline for the ROP Certification Reports.

Commented [AMH395]: This change is requested to duplicate the reporting in the Monroe Power Plant ROP aux boiler section. This allows the flexibility for a tune up to be performed earlier than five years and to be reported during the annual reporting period that immediately follows the tune up rather than waiting until the end of a fixed five-year cycle.

Commented [ER(396R395): REVIEW WITH JULIE BRUNNER]

~~6.7.~~ The permittee must include the following information in the compliance report per 40 CFR 63.7550(c)(1):

- a. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**
- b. Process unit information, emissions limitations, and operating parameter limitations. **(40 CFR 63.7550(c)(5)(ii))**
- c. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**
- d. The total operating time during the reporting period. **(40 CFR 63.7550(c)(5)(iv))**
- e. Include the date of the most recent tune-up for each unit subject to only the requirement to conduct a 5-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.5.I. Include the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**
- f. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.7550(c)(5)(xvii))**

Commented [ER(397): I DO NOT OBJECT TO ADDING THIS SPECIAL CONDITION.]

~~7.8.~~ The permittee must maintain on-site and submit, if requested by the Administrator, a ~~5-year~~ report containing the following information associated with performance to the compliance tune-ups:

- a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler;
- b. A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10) & (12))**

See Appendix 8-2 BR

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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:

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters as specified in 40 CFR Part 63, Subparts A and DDDDD (Boiler MACT). **(R 336.1213(3), 40 CFR 63 Subparts, A and DDDDD)**

Commented [ER(398): I ACCEPTED the deletion of the 2016 deadline because it has passed and is no longer applicable.]

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).

I REJECTED "Missed work practice standards are not considered deviations unless they occur during the startup or shut down of the unit." BECAUSE I COULD NOT FIND MATCHING TEXT IN 40 CFR 63.7550(c).

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ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX

**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 FG-BOILERS-BR ESPs (electrostatic precipitators).

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

NA

I. EMISSION LIMIT(S)

NA

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	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

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

- ~~1. The permittee shall not operate the ash silos unless the respective dust collection system is installed and operating properly. (R 336.1910)~~

Commented [ER(399): ASK DTE IF THIS FG IS SUBJECT TO CAM.

Commented [ER(400): ASK IAF IF THE "ESP's" ARE THE SAME AS THE BOILER ESP's

Commented [ER(401): DELETED. EU-ECONSILO-BR
 Economizer ash collection and handling from both boilers where emissions are limited by enclosures, water sprays, or dust collectors.

 BECAUSE DTE SUBMITTED A R 216(2) NOTIFICATION ON 20210401, STATING THAT EU-ECONSILO-BR WAS DECOMMISSIONED IN 2002.

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Commented [ER(402): NOTE: IT APPEARED ACCEPTABLE TO DELETE THE PM EMISSION LIMIT BECAUSE

 1) The PM limit applied only to EU-ECONSILO-BR, which has been decommissioned.

 2) EU-ASHSILO#1-BR and EU-ASHSILO#2-BR VENT DIRECTLY TO FG-BOILERS-BR's ESPs. THEREFORE, THE EMISSIONS FROM THIS FG ARE CONTROLLED BY FG-BOILERS-BR's ESPs, AND are not subject to CAM because there is no emission limit.

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V. TESTING/SAMPLING

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

NA

1. Upon request by the AQD District Supervisor, the permittee shall verify PM emission rates from FG-ASH-HAND-BR by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

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

NA

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))

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 8-2 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:

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall maintain and implement the approved Fugitive 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).

Commented [ER(403)]: PER JULIE BRUNNER, R 336.1213(3) IS NOT A CORRECT UAR, THEREFORE THE AQD IS REMOVING THIS CONDITION TEXT, "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))"

ADD TESTING UPON REQUEST CONDITION PREVIOUSLY PROVIDED BY JULIE BRUNNER FOR SSCP. ADDED ON 20201208-1019

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Commented [ER(404)]: PER DTE'S MINOR MOD APPLICATION THE VI.1 REQUIREMENT TO CONDUCT VES WAS DELETED BECAUSE THE ECON SILO WAS THE ONLY SILO THAT VENTED DIRECTLY TO AMBIENT AIR. THE REMAINING TWO SILO EMISSIONS ARE CONTROLLED BY FG-BOILERS-BR'S ESPs.

UPDATE: (20210811) Per 4/9/2021 email and meeting with DTE & Julie Brunner, this condition should remain in the ROP. EGLE does not accept DTE's proposed removal of this condition in the ROP mod. DTE agrees with AQD's determination to keep this special condition.

Commented [ER(405)]: FIND BR PTI TO DETERMINE IF THIS CONDITION ORIGINATES IN A PTI.

IF THIS CONDITION ORIGINATES FROM A PTI THEN ADD A FOOTNOTE 2, AND CHANGE UAR TO 201(3).

Commented [ER(406R405)]: THIS SC DOES NOT APPEAR TO ORIGINATE IN A PTI.

AS OF 20210806-1130, SC VI.1 IS BEING RETAINED PER EMAIL FROM LISA FISHBECK ON 4/9/2021 7:52 p.m., DESPITE THE INDICATION TO REMOVE THIS CONDITION PER THE R215 NOTICE OF CHANGE FROM DTE DATED March 29, 2021.

Commented [ER(407)]: Per email from Lisa Fishbeck on April 9, 2021 @ 7:52 p.m. this condition shall be retained as it appears in the ROP.

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Commented [LRF408]: There are no specific requirements in 8-2 BR to this FG. DTE proposes deleting.

Section 2 – Belle River Power Plant

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²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX

**FG-COALHAND-BR
 FLEXIBLE GROUP CONDITIONS**

Commented [ER(409): NEED TO FIND PTI ASSOCIATED WITH THIS FG

Commented [ER(410): ASK DTE IF THIS FG IS SUBJECT TO CAM.

Commented [ER(411): THE DESCRIPTION WAS UPDATED TO REFLECT THE CURRENT EMISSION CONTROL DEVICES.

DESCRIPTION

Emission units representing coal handling at Belle River Power Plant.

Includes transfer houses, coal silos, cascades rooms, and coal storage piles.

The following are among the emission points included: Cascades Room 3DC102, Cascades Room 3DC103, Cascades Room Wet Dust Extraction Unit 3DC114, Cascades Room 3DC115, Cascade Wet Dust Extraction Unit 3DC115, Transfer House 3TH7-3DC009, Transfer House 3TH7-3DC010, Transfer House 3TH7-3DC014, Transfer House 3TH8-3DC011, Transfer House 3TH9-3DC013, Transfer House 3TH9-3DC015, Boiler No. 1 Coal Silo Wet Dust Extraction Unit 3DC111, Boiler No. 1 Coal Silo Wet Dust Extraction Unit 3DC112, Boiler No. 2 Coal Silo 3DC108, and Boiler No. 2 Coal Silos Wet Dust Extraction Unit 3DC113.

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Commented [ER(412): REVIEW WITH JULIE BRUNNER

Emission Units:

- EU-TRANS_HS-BR Coal handling activity in Transfer Houses, where emissions are limited by enclosures, sprays, or baghouse dust collectors
- EU-COALSILOS-BR Coal handling activity in Unit 1 & 2 Coal Silos, where emissions are limited by enclosures, sprays, wet dust extraction units, or baghouse dust collectors
- EU-CASCADES-BR Coal handling activity in Cascade Rooms, where emissions are limited by enclosures, sprays, wet dust extraction units, or baghouse dust collectors

POLLUTION CONTROL EQUIPMENT

Enclosures, Sprays, Wet Dust Extraction Units or Dust Collectors

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Commented [ER(413): I ACCEPTED THE "EQUIPMENT" TEXT CHANGE REQUEST, BY DTE / LISA FISHBECK, FROM "Coal Handling System" TO "Each emission point in FG-COALHAND-BR" BECAUSE IT IS A MORE RESTRICTIVE EMISSION LIMIT, AS COMPARED TO THE AVERAGE EMISSION RATE FROM ALL THREE EMISSION UNITS IN THIS FLEXIBLE GROUP

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Commented [ER(417): PER DTE'S REQUEST, THE FUGITIVE DUST CONTROL PROGRAM WAS MOVED FROM IX TO III.

NOTE: THE FUGITIVE DUST CONTROL PROGRAM DID NOT ORIGINATE IN A PTI, THEREFORE I DELETED THE EXISTING TEXT AND INSERTED NEW TEMPLATE TEXT FROM JULIE BRUNNER IN III.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.038 grains per dry standard cu.ft. of exhaust gases ²	hourly	Each emission unit exhaust vent in of FG-COALHAND-BR	SC V.1	R 336.1331(1)(c)

2. Visible emissions from the coal handling system shall not exceed 20% opacity except as specified in Rule 301.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- Stackers, reclaimers, and dust suppression equipment shall be operated in a manner which will minimize the fugitive particulate emissions.² (R 336.1201(3))

The coal handling system Pollution Control Equipment shall be installed and operated properly. (R 336.1910)

The permittee shall not operate the facility unless the fugitive emissions control plan for all plant roadways, the plant yard, all material storage piles, and all material handling operations has been submitted, and is implemented and maintained. The permittee shall submit any amendments to the plan to the AQD District

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Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the plan, or amended plan shall be considered approved. **(R 336.1371, R 336.1372, Act 451, Section 324.5524)**

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IV. DESIGN/EQUIPMENT PARAMETER(S)

1. All conveyor belting shall be totally enclosed to control particulate fallout either on public or company property or into the water.² (R 336.1201(3))

V. TESTING/SAMPLING

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

1. Upon request by the AQD District Supervisor, the permittee shall verify PM emission rates from FG-ASH HAND-BR by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

NA

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VI. MONITORING/RECORDKEEPING

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

1. The permittee shall perform and document non-certified visible emissions observations on a daily basis when operating. If during the observation there are any visible emissions detected, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions in excess of 20% opacity observed, and any corrective actions taken shall be kept on file and made available to the Department upon request.² (R 336.1304(1)(c), R 336.1213(3))

2. The permittee shall inspect all conveyor belting enclosures to determine and record conditions, once per calendar year. (R 336.1213(3))

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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))
- 2.3 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 8-2 BR

Commented [LRF419]: There are no FG specific requirements here. Please delete reference to this Appendix.

VIII. STACKVENT 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:

NA

IX. OTHER REQUIREMENT(S)

NA

Commented [ER(420)]: PER DTE'S REQUEST, THE FUGITIVE DUST CONTROL PROGRAM WAS MOVED FROM IX TO III.

NOTE: THE FUGITIVE DUST CONTROL PROGRAM DID NOT ORIGINATE IN A PTI, THEREFORE I DELETED THE EXISTING TEXT AND INSERTED NEW TEMPLATE TEXT FROM JULIE BRUNNER IN III.3.

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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).

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FG-COLDCLNR-BR
FLEXIBLE GROUP CONDITIONS

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DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EU-PARTSCLN-SC, Cold cleaners located at Belle River Power Plant

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. **(R 336.1213(2))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. **(R 336.1611(2)(b), R 336.1707(3)(b))**
2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. **(R 336.1281(2)(h))**
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(2)(r)(iv))**
2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**
4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**

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- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**
4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. **(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix [8-2 BR](#)

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VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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~~FG-EMERGENS~~ ~~EU-FIREPUMP-BR~~
EMISSION UNIT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

~~An eExisting (installed in 1984), exempt, emergency compression ignition (CI) engines, ≤ 5300 HP (280 hp), subject to 40 CFR Part 63, Subpart ZZZZ (RICE-MACT) located in the Fire Pump House. An eExisting engine is defined as s are engines constructed before June 12, 2006, Rule 285(2)(g) exempt.~~

Emission Units: ~~EU-FIREPUMP-BR~~ located at the Fire Pump House.
 Flexible Group: ~~NA~~

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
	Maximum sulfur content of 15 ppm (0.0015%)				40 CFR 63.6604(b) 40 CFR 80.510(b) 40 CFR 80.510(c)
1. Diesel Fuel	AND either a Minimum cetane index of 40 OR a Maximum aromatic content of 35%	As-fired	EU-FIREPUMP-BR	Section VI.6.	40 CFR 80.2(x, nnn, ooo)

~~The permittee shall meet fuel limits specified in 40 CFR 63.6604(b). Beginning January 1, 2015, permittee must use nonroad diesel fuel in accordance with 40 CFR 80.510(b): use diesel fuel with a maximum sulfur content of 15 ppm, and either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. Any existing diesel fuel purchased prior to January 1, 2015 may be used until depleted. (40 CFR 63.6604(b), 40 CFR 80.510(b))~~

III. PROCESS/OPERATIONAL RESTRICTION(S)

~~In order for the engine to be considered an emergency stationary RICE, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 63.6640(f)(1) through (3) is prohibited. If you do not operate the engine~~

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Commented [LRF426]: No fuel >5 years old is onsite. Please delete this part of the condition.

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~~according to the requirements in paragraphs (f)(1) to (3), the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines. The engine must meet the following requirements:~~

~~There is no operating time limit for operation in emergency situations. (40 CFR 63.6640(f)(1))~~

~~Operate The engine may be operated up to 100 hours per calendar year for maintenance and readiness testing. The permittee may petition the Administrator for additional maintenance and readiness testing hours, but a petition is not required if records are maintained indicating that maintenance and readiness testing beyond the 100 hours per calendar year are required. (40 CFR 63.6640(f)(2))~~

~~Operate The engine may be operated up to 50 hours per calendar year in non-emergency situations (counted towards the 100 hours per calendar year for maintenance and readiness testing). The 50 hours may not 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. (40 CFR 63.6640(f)(3))~~

~~The permittee shall meet the following operating requirements specified per §63.6602, applicable to each emission unit:~~

~~Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in Process/Operational Restriction SC III.3;~~

~~Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and replace as necessary; and~~

~~Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (40 CFR 63.6602, Table 2c(1) of to 40 CFR Part 63 Subpart ZZZZ of Part 63)~~

~~The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in §63.6602 SC III.2.a. The oil analysis program must be performed at same frequency as oil changes are required per SC III.2.a. Analysis program must test the Total Base Number, viscosity, and percent water content. If the Total Base Number is less than 30% percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% percent from the viscosity of the oil when new; or percent water (by volume) is greater than 0.5%, the oil must be changed within two (2) business days of receiving the analysis results, if the engine is in operation. If the engine is not in operation at the time that the results are received, the oil must be changed within two (2) business days or before commencing operation, whichever is latter, parameters and keep records per §63.6625(i). (40 CFR 63.6625(i))~~

~~The permittee shall not operate emission unit's subject to Subpart ZZZZEU-FIREPUMP-BR unless operation and maintenance is performed according to manufacturer's emission-related written instructions or the permittee's maintenance~~

~~plan. To the extent practicable, the permittee's plan must provide for maintenance and operation of engine in a~~

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~~manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6625(e), 40 CFR 63.6640(a))~~

~~The permittee shall minimize the engine's time spent at idle during startup and minimize engine's startup time to a period needed for safe loading of engine, not to exceed 30 minutes after which the standards in SC III.2 are applicable. (40 CFR 63.6625(h), Table 2c(1) of 40 CFR Part 63 Subpart ZZZZ)~~

~~The permittee shall operate and maintain the engines in EU-FIREPUMP-BR in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40CFR 63.6605(b))~~

IV. DESIGN/EQUIPMENT PARAMETER(S)

~~Emission unit shall be equipped with a non-resettable hour meter to track operating hours. (40 CFR 63.6625(f))~~

V. TESTING/SAMPLING

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

~~If using the oil analysis program for CI Engine(s), the permittee shall test for Total Base Number, viscosity, and percent water content and maintain within the acceptable limits as specified in SC III.3 (40 CFR 63.6625(i))NA~~

VI. MONITORING/RECORDKEEPING

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

~~If using an oil analysis program, the permittee shall test for and record and maintain the Total Base Number, viscosity and percent water content every 500 hours or annually, whichever comes first, and maintain within acceptable limits in (40 CFR 63.6625(i). (40 CFR 63.6625(i))~~

~~The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the engine was operated and maintained according to the maintenance plan. (40 CFR 63.6655(e))~~

~~The permittee shall record the number of hours the engine operated from the non-resettable hour meter and document the hours spent for emergency, including what classified the operation as emergency, and document the hours for non-emergency operation. (40 CFR 63.6655(f))~~

~~The permittee must keep records of the occurrence and duration of each malfunction of operation of each engine. (40 CFR 63.6655(a)(2))~~

~~The permittee shall keep in a satisfactory manner, records of action taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process to its normal or usual manner of operation. (40 CFR 63.6655(a)(5))~~

~~To demonstrate compliance with the material limits for diesel fuel, the permittee shall maintain record of fuel oil specifications and/or fuel analysis for each delivery or storage tank of diesel fuel used for EU-FIREPUMP-BR. Records may include purchase records for ASTM specification fuel oil, safety data sheets (SDS), contracts,~~

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~~specifications, analyses provided by the vendor, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the material limits in diesel fuel. (40 CFR 63.6604(b))~~

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))~~

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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:

NA

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

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IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) as they apply to emission units subject to Subpart ZZZZ. (R 336.1213(3), 40 CFR Part 63, Subparts A and ZZZZ)

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).

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FG-DSI/ACI/MATS-BR

FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 63, Subpart UUUUU (Mercury and Air Toxics Standards or MATS) requirements for existing coal-fired electric utility steam generating unit(s) (EGU) rated more than 25 megawatts electric (MWe) that serve(s) a generator producing electricity for sale and designed to burn coal that is not low rank virgin coal (calorific value of $\geq 8,300$ Btu/pound).

Emission Unit: EU-BOILER1-BR, EU-BOILER2-BR

POLLUTION CONTROL EQUIPMENT

Each EGU is equipped with low NOx burners, overfire air, ESP, DSI, and ACI systems

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Filterable PM	0.03 lb/mmBtu 0.30 lb/MWh*2	30-boiler operating day rolling arithmetic average updated at the end of each new boiler operating day	EU-BOILER1-BR, EU-BOILER2-BR	SC VI.47, SC VI.9, SC VI.10	40 CFR 63.9991, 40 CFR Part 63, Subpart UUUUU, Table 2.1.a
2. Hydrogen chloride (HCl)	0.002 lb/mmBtu 0.020 lb/MWh*2	Quarterly Stack Test	EU-BOILER1-BR, EU-BOILER2-BR	SC V.1, SC VI.9	40 CFR 63.9991, 40 CFR Part 63, Subpart UUUUU, Table 2.1.b
3. Mercury (Hg)	1.2 lb/mmBtu 0.043 lb/GWh*2	30-boiler operating day rolling arithmetic average updated at the end of each new boiler operating day	EU-BOILER1-BR, EU-BOILER2-BR	SC VI.5.8, SC VI.9	40 CFR 63.9991, 40 CFR Part 63, Subpart UUUUU, Table 2.1.c

* The emission limits apply at all times except during startup and shutdown

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall conduct a tune-up of each emission unit of FGMATS burner(s) and combustion controls, as applicable, at least every 36 calendar months, or each 48 calendar months if neural network combustion optimization software is employed, as specified in 40 CFR 63.10021(e). (40 CFR 63.10000(e), 40 CFR 63.10006(i), 40 CFR 63.10021(e))
- For the startup of any emission unit of FGMATS which will comply using paragraph (1) of the definition of "startup" in 40 CFR 63.10042, the permittee must use clean fuels as defined in 40 CFR 63.10042 for ignition. Once the emission unit(s) of FGMATS convert(s) to firing coal, residual oil, or solid oil-derived fuel, the permittee must engage all the applicable control technologies except dry scrubber and SCR. The permittee must start the dry scrubber and SCR systems, if present, appropriately to comply with relevant standards applicable during normal operation. The permittee must comply

Commented [IAF427]: Many of the changes are to simply make this table's MATS conditions consistent with the MATS template ONLY as needed for the equipment configuration at Belle River Power Plant (BLRPP).

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USE DTE PREFERRED FG NAME

Commented [ER(429): FG NAME CHANGE: DTE REQUESTED THIS FLEXIBLE GROUP NAME BE CHANGED FROM: FG-DIS/ACI-BR TO: FG-MATS-BR.

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Commented [LRF433]: DTE spent a lot of time organizing this FG. Why were DTE's suggestions for UUUUU compliance not accepted?

Commented [LRF434]: Per Andrew Fadanelli, use limits based on mmBtu, not MW or GW-hrs

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with all applicable emission limits at all times except for periods that meet the applicable definitions of startup and shutdown in 40 CFR Part 63, Subpart UUUUU. (40 CFR 63.10042, 40 CFR Part 63, Subpart UUUUU, Table 3)

2. During shutdown of any emission unit of FGMATS while firing coal, residual oil, or solid oil-derived fuel, the permittee must vent emissions to the main stack(s) and operate all applicable control devices and continue to operate those control devices after the cessation of coal, residual oil, or solid oil-derived fuel being fed into the applicable emission unit(s) of FGMATS and for as long as possible thereafter considering operational and safety concerns. In any case, the permittee must operate their controls when necessary to comply with other standards made applicable to the FGMATS by a permit limit or a rule other than 40 CFR Part 63, Subpart UUUUU and that require operation of the control devices. If, in addition to the fuel used prior to initiation of shutdown, another fuel must be used to support the shutdown process, that additional fuel must be one or a combination of the clean fuels defined in 40 CFR 63.10042 and must be used to the maximum extent possible taking into account considerations such as not compromising boiler or control device integrity. (40 CFR 63.10042, 40 CFR Part 63, Subpart UUUUU, Table 3)
3. The permittee shall operate and maintain all associated air pollution control equipment and monitoring equipment necessary for compliance with 40 CFR Part 63, Subpart UUUUU in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.10000(b))

IV. DESIGN/EQUIPMENT PARAMETER(S)

4. The permittee shall install, calibrate, maintain, and operate a device to monitor and record the PM concentration of the exhaust gas from each emission unit on a continuous basis. The permittee shall install and operate the PM CEMS to meet the timelines, requirements and reporting detailed in Appendix C of 40 CFR Part 63, Subpart UUUUU. (40 CFR 63.10010(h)(7)(i), 40 CFR Part 63, Subpart UUUUU, Table 5)
5. The permittee shall install, calibrate, maintain, and operate a device to monitor and record the Hg concentration from each emission unit on a continuous basis. The permittee shall install and operate the Hg CEMS or sorbent trap monitoring system to meet the timelines, requirements and reporting detailed in Appendix A of 40 CFR Part 63, Subpart UUUUU. (40 CFR 63.10000(c)(1)(vi))
6. If required to convert measured pollutant concentrations to the units of the applicable mass per gross output emission limit(s), the permittee shall install, calibrate, maintain, and operate a device to monitor and record the gross output from each emission unit on a continuous basis (40 CFR 63.10010, 40 CFR Part 63, Subpart UUUUU, Table 5)

V. TESTING/SAMPLING

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

3. The permittee shall verify the HCl emission rates from each emission unit by testing at owner's expense, in accordance with 40 CFR 63.10007 and Table 5 to 40 CFR Part 63, Subpart UUUUU. The permittee must complete the test once every calendar quarter and at least 45 days since the previous performance test if not a LEE for HCl. The permittee may skip performance testing in those quarters during which less than 168 boiler operating hours occur, except that a performance test must be conducted at least once every calendar year. (40 CFR 63.10006(f), 40 CFR 63.10007, 40 CFR 63.10021(d)(1) and (2), 40 CFR Part 63, Subpart UUUUU, Table 5)
4. Unless an alternate schedule has been approved by the AQD, no less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing, as applicable. (40 CFR 63.7, 40 CFR 63.10007, 40 CFR 63.10030(a))

VI. MONITORING/RECORDKEEPING

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

1. During startup, as defined by paragraph (1) of the definition of "startup" in 40 CFR 63.10042, the permittee must operate all Continuous Monitoring Systems (CMS). Startup means either the first-ever firing of fuel in a boiler for the purpose of producing electricity, or the firing of fuel in a boiler after a shutdown event for any purpose. Startup ends when any of the

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steam from the boiler is used to generate electricity for sale over the grid or for any other purpose (including on site use). The permittee must comply with the applicable emission limits at all times except for startup and shutdown periods unless the permittee chooses to use just one set of sorbent traps to demonstrate compliance with the applicable Hg emission limit, then the permittee must comply with the applicable Hg emission limit at all times. The permittee must collect monitoring data during startup periods, as specified in 40 CFR 63.10020(a) and (b). The permittee must keep records during startup periods, as provided in 40 CFR 63.10032 and 40 CFR 63.10021(h). Any fraction of an hour in which startup occurs constitutes a full hour of startup. (40 CFR Part 63, Subpart UUUUU, Table 3.3)

2. The permittee must operate all CMS during shutdown. The permittee must also collect appropriate data, and the permittee must calculate the pollutant emission rate for each hour of shutdown for those pollutants for which a CMS is used. The permittee must collect monitoring data during shutdown periods, as specified in 40 CFR 63.10020(a). The permittee must keep records during shutdown periods, as provided in 40 CFR 63.10032 and 40 CFR 63.10021(h). Any fraction of an hour in which shutdown occurs constitutes a full hour of shutdown. (40 CFR Part 63, Subpart UUUUU, Table 3.4)

3. If using a CMS to demonstrate continuous compliance, whether through quarterly testing and parametric monitoring or by CEMS or CPMS, with an emission limit or operating limit, the permittee must develop a site-specific monitoring plan and submit this site-specific monitoring plan, if requested, at least 60 days before the initial performance evaluation (where applicable) of the CMS. This requirement also applies to the permittee if the permittee petitions the Administrator for alternative monitoring parameters under 40 CFR 63.8(f). This requirement to develop and submit a site-specific monitoring plan does not apply to affected sources with existing monitoring plans that apply to CEMS and CPMS prepared under Appendix B of 40 CFR Part 60 or 40 CFR Part 75, and that meet the requirements of 40 CFR 63.10010. Using the process described in 40 CFR 63.8(f)(4), the permittee may request approval of monitoring system quality assurance and quality control procedures alternative to those specified in this paragraph of this section and, if approved, include those in the site-specific monitoring plan. The monitoring plan must address the following provisions: (40 CFR 63.10000(d), 40 CFR 63.10010)

a. Installation of the CMS or sorbent trap monitoring system sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device). See 40 CFR 63.10010(a) for further details. For PM CPMS installations, follow the procedures in 40 CFR 63.10010(h).

b. Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems.

c. Schedule for conducting initial and periodic performance evaluations.

d. Performance evaluation procedures and acceptance criteria (e.g., calibrations), including the quality control program in accordance with the general requirements of 40 CFR 63.8(d).

e. On-going operation and maintenance procedures, in accordance with the general requirements of 40 CFR 63.8(c)(1)(ii), (c)(3), and (c)(4)(ii).

f. Conditions that define a CMS that is out of control consistent with 40 CFR 63.8(c)(7)(i) and for responding to out of control periods consistent with 40 CFR 63.8(c)(7)(ii) and (c)(8).

g. On-going recordkeeping and reporting procedures, in accordance with the general requirements of 40 CFR 63.10(c), (e)(1), and (e)(2)(i), or as specifically required under 40 CFR Part 63, Subpart UUUUU.

h. Alternatively, the requirements are considered to be met for a particular CMS or sorbent trap monitoring system if:

i. The CMS or sorbent trap monitoring system is installed, certified, maintained, operated, and quality-assured either according to 40 CFR Part 75, or Appendix A or B of 40 CFR Part 63, Subpart UUUUU; and

ii. The recordkeeping and reporting requirements of 40 CFR Part 75, or Appendix A or B of 40 CFR Part 63, Subpart UUUUU, which pertain to the CMS, are met.

4. If the permittee elects to use a PM CEMS or participate in an averaging plan for PM, total non-Hg HAP metals, or individual metals, the permittee shall keep, in a satisfactory manner, hourly (if applicable) and 30-day rolling average PM, total non-Hg HAP metals, or individual metals (as applicable) emission rate records for each emission unit excluding periods of startup and shutdown. (40 CFR 63.10010, 40 CFR 63.10021, 40 CFR Part 63, Subpart UUUUU, Table 7)

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5. For any emission unit not relying on the LEE provisions for Hg, the permittee shall keep, in a satisfactory manner, hourly (if applicable) and 30-day rolling average Hg emission rate records for each emission unit excluding periods of startup and shutdown. (40 CFR 63.10010, 40 CFR 63.10021, 40 CFR Part 63, Subpart UUUUU, Table 7)
6. The permittee must operate the monitoring system and collect data at all required intervals at all times that the affected EGU is operating, except for required monitoring system quality assurance or quality control activities, including, as applicable, calibration checks and required zero and span adjustments, and any scheduled maintenance as defined in the site-specific monitoring plan. The permittee is required to affect monitoring system repairs in response to monitoring system malfunctions and to return the monitoring system to operation as expeditiously as practicable. (40 CFR 63.10020(b))
7. The permittee may not use data recorded during startup or shutdown in calculations used to report emissions, except as otherwise provided in 40 CFR 63.10000(c)(1)(vi)(B) and 40 CFR 63.10005(a)(2)(iii). In addition, data recorded during monitoring system malfunctions or monitoring system out-of-control periods, repairs associated with monitoring system malfunctions or monitoring system out-of-control periods or required monitoring system quality assurance or control activities may not be used in calculations used to report emissions or operating levels. The permittee must use all of the quality-assured data collected during all other periods in assessing the operation of the control device and associated control system. (40 CFR 63.10020(c))
8. Failure to collect required quality-assured data during monitoring system malfunctions, monitoring system out-of-control periods, or repairs associated with monitoring system malfunctions or monitoring system out-of-control periods is a deviation from the monitoring requirements. Periods of monitoring system malfunctions or monitoring system out-of-control periods, repairs associated with monitoring system malfunctions or monitoring system out-of-control periods, and required monitoring system quality assurance or quality control activities excluding zero and span checks must be reported as time the monitor was inoperative (downtime) under 63.10(c). (40 CFR 63.10020(d))
9. If the permittee uses CEMS to measure SO₂, PM, HCl, HF, or Hg emissions (or sorbent trap monitoring system), except as otherwise provided in 40 CFR 63.10020(c), the permittee must demonstrate continuous compliance by using all quality-assured hourly data recorded by the CEMS (or sorbent trap monitoring system) and other required monitoring systems to calculate the arithmetic average emissions rate in units of the standard on a continuous 30-boiler operating day rolling average basis, updated at the end of each new boiler operating day. Use Equation 8 in 40 CFR 63.10021(b) to determine the 30-boiler operating day rolling average. (40 CFR 63.10021(a) and (b))
10. If the permittee uses PM CPMS data to measure compliance with an operating limit in Table 4 of 40 CFR Part 63, Subpart UUUUU, the permittee must record the PM CPMS output data for all periods when the process is operating and the PM CPMS is not out-of-control. The permittee must demonstrate continuous compliance by using all quality-assured hourly data collected by the PM CPMS for all operating data to calculate the arithmetic average emissions rate in units of the operating limit on a continuous 30-boiler operating day rolling average basis, updated at the end of each new boiler operating day. Use Equation 9 in 40 CFR 63.10021(c) to determine the 30-boiler operating day rolling average. (40 CFR 63.10021(a) and (c))
11. The permittee must keep the following records:
 - a. If the permittee is required to (or elects to) continuously monitor Hg and/or HCl and/or HF and/or PM emissions, or elects to use a PM CPMS, the permittee must keep the records required under Appendix A (Hg) and/or Appendix B (HCl and/or HF) and/or Appendix C (PM) and/or Appendix D (PM CPMS) to 40 CFR Part 63, Subpart UUUUU. If the permittee elects to conduct periodic (e.g., quarterly or annual) performance stack tests, then, for each test completed on or after January 1, 2024, the permittee must keep records of the applicable data elements under 40 CFR 63.7(g). The permittee must also keep records of all data elements and other information in Appendix E to 40 CFR Part 63, Subpart UUUUU that applies. (40 CFR 63.10032(a))
 - b. A copy of each notification and report that has been submitted to comply with 40 CFR Part 63, Subpart UUUUU, including all documentation supporting any Initial Notification or Notification of Compliance Status, semiannual compliance reports, or quarterly compliance reports that has been submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). (40 CFR 63.10032(a)(1))
 - c. Records of performance stack tests, fuel analyses, or other compliance demonstrations and performance evaluations, as required in 40 CFR 63.10(b)(2)(viii). (40 CFR 63.10032(a)(2))

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- d. For each CEMS and CPMS, the permittee must keep the following records:
- i. Records described in 40 CFR 63.10(b)(2)(vi) through (xi). (40 CFR 63.10032(b)(1))
 - ii. Previous (i.e., superseded) versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3). (40 CFR 63.10032(b)(2))
 - iii. Request for alternatives to relative accuracy test for CEMS as required in 40 CFR 63.8(f)(6)(i). (40 CFR 63.10032(b)(3))
 - iv. The date and time that each deviation started and stopped and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period. (40 CFR 63.10032(b)(4))
- e. Records required in Table 7 of 40 CFR Part 63, Subpart UUUUU including records of all monitoring data and calculated averages for applicable PM CPMS operating limits to show continuous compliance with each emission limit and operating limit that applies. (40 CFR 63.10032(c))
- f. For each emission unit subject to an emission limit:
- i. The permittee shall keep the monthly fuel use by each emission unit, including the type(s) of fuel and amount(s) used. (40 CFR 63.10032(d)(1))
 - ii. If the permittee combusts non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR 241.3(b)(1), the permittee must keep a record which documents how the secondary material meets each of the legitimacy criteria. If the permittee combusts a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(2), the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR 241.2. If the fuel received a non-waste determination pursuant to the petition process submitted under 40 CFR 241.3(c), the permittee must keep a record which documents how the fuel satisfies the requirements of the petition process. (40 CFR 63.10032(d)(2))
- g. Regarding startup periods or shutdown periods:
- i. If the permittee chooses to rely on paragraph (1) of the definition of "startup" in 40 CFR 63.10042 for the emission unit(s), the permittee shall keep records of the occurrence and duration of each startup or shutdown. (40 CFR 63.10032(f)(1))
 - ii. If the permittee chooses to rely on paragraph (2) of the definition of "startup" in 40 CFR 63.10042 for the emission unit(s), the permittee shall keep records of:
 - A. The determination of the maximum clean fuel capacity for each emission unit. (40 CFR 63.10032(f)(2)(i))
 - B. The determination of the maximum hourly clean fuel heat input and of the hourly clean fuel heat input for each emission unit. (40 CFR 63.10032(f)(2)(ii))
 - C. The information required in 40 CFR 63.10020(e). (40 CFR 63.10032(f)(2)(iii))
 - iii. The type(s) and amount(s) of fuel used during each startup or shutdown. (40 CFR 63.10032(i))
- h. The occurrence and duration of each malfunction of an operation (i.e., process equipment) or the air pollution control and monitoring equipment. (40 CFR 63.10032(g))
- i. Actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.10000(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (40 CFR 63.10032(h))
- j. If the permittee elects to average emissions consistent with 40 CFR 63.10009, the permittee shall keep a copy of the emissions averaging implementation plan required in 40 CFR 63.10009(g), all calculations required under 40 CFR 63.10009, including daily records of heat input or steam generation, as applicable, and monitoring records consistent with 40 CFR 63.10022. (40 CFR 63.10032(e))
12. The permittee shall keep all records in a form suitable and readily available for expeditious review and for at least 5 years after the date of each occurrence, corrective action, report, or record. The records must be kept onsite for at least 2 years and may be kept offsite for the remaining 3 years. (40 CFR 63.10(b)(1), 40 CFR 63.10033)

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13. The permittee shall maintain on site and submit, if requested by the Administrator, an annual report of periodic performance tune-ups containing the information required by 40 CFR 63.10021(e)(8). The reports shall be in a format acceptable to the Administrator. If requested by the AQD District Supervisor, the permittee shall also submit an annual report with the results of the performance tune-ups.² (40 CFR 63.10021(e)(8))

VII. REPORTING

21. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
22. 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))
23. 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))
24. The permittee shall submit any performance test reports including RATA reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))
25. The permittee shall meet the electronic reporting requirements of Appendix A of 40 CFR Part 63 Subpart UUUUU for each Hg CEMS. (40 CFR 63.10031(a)(1), 40 CFR Part 63, Subpart UUUUU, Table 8.1)
26. The permittee shall meet the electronic reporting requirements of Appendix C of 40 CFR Part 63, Subpart UUUUU for each PM CEMS. Electronic reporting of hourly PM emissions data shall begin with the later of the first operating hour on or after January 1, 2024; or the first operating hour after completion of the initial PM CEMS correlation test. These reports are due no later than 30 days after the end of each calendar quarter. (40 CFR 63.10031(a)(3), 40 CFR Part 63, Subpart UUUUU, Table 8.3)
- a. Certification, recertification, quality-assurance, and diagnostic test results for the SO₂ CEMS and for any additional monitoring systems that are required to convert SO₂ concentrations to units of the emission standard, in accordance with 40 CFR 75.64(a)(5); and
 - b. Quarterly electronic emissions reports. The permittee must submit an electronic quarterly report within 30 days after the end of each calendar quarter, starting with a report for the calendar quarter in which the initial 30 boiler operating day performance test begins. Each report must include the following information:
 - i. The applicable operating data specified in 40 CFR 75.57(b).
 - ii. An hourly data stream for the unadjusted SO₂ concentration (in ppm, rounded to one decimal place), and separate unadjusted hourly data streams for the other parameters needed to convert the SO₂ concentrations to units of the standard. (Note: If a default moisture value is used in the emission rate calculations, an hourly data stream is not required for moisture; rather, the default value must be reported in the electronic monitoring plan).
 - iii. An hourly SO₂ emission rate data stream, in units of the standard (i.e., lb/MMBtu or lb/MWh, as applicable), calculated according to 40 CFR 63.10007(e) and (f)(1), rounded to the same precision as the emission standard (i.e., with one leading non-zero digit and one decimal place), expressed in scientific notation.
 - iv. The results of all required daily quality-assurance tests of the SO₂ monitor and the additional monitors used to convert SO₂ concentration to units of the standard, as specified in Appendix B to 40 CFR Part 75; and
 - v. A compliance certification, which includes a statement, based on reasonable inquiry of those persons with primary responsibility for ensuring that all SO₂ emissions from the affected EGUs under 40 CFR Part 63 Subpart UUUUU have been correctly and fully monitored, by a responsible official with that official's name, title, and signature, certifying that, to the best of his or her knowledge, the report is true, accurate, and complete. The permittee must submit such a compliance certification statement in support of each quarterly report.
27. Prior to January 1, 2024, the permittee shall submit semiannual reporting of the information required below. The report shall be postmarked or received by the Administrator by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. The final semiannual compliance report shall cover the period

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from July 1, 2023, through December 31, 2023. The report shall include the following: **(40 CFR 63.10031(b), 40 CFR Part 63, Subpart UUUUU, Table 8.9)**

- k. The information required by the Continuous Monitoring Summary Report located in 40 CFR 63.10(e)(3)(vi). **(40 CFR 63.10031(c)(1))**
 - l. The total fuel use by each affected source subject to an emission limit, for each calendar month within the semiannual reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by EPA or the basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure. **(40 CFR 63.10031(c)(2))**
 - m. Indicate whether any emission unit in FGMATS burned new types of fuel during the reporting period. If new types of fuel were burned, include the date of the performance test where that fuel was in use. **(40 CFR 63.10031(c)(3))**
 - n. Include the date of the most recent tune-up for each emission unit. The date of the tune-up is the date the tune-up provisions specified in 40 CFR 63.10021(e)(6) and (7) were completed. **(40 CFR 63.10031(c)(4))**
 - o. If the permittee chooses to comply using paragraph (2) of the definition of "startup" in 40 CFR 63.10042 then for each instance of startup or shutdown:
 - iii. Include the maximum clean fuel storage capacity and the maximum hourly heat input that can be provided for each clean fuel determined according to the requirements of 40 CFR 63.10032(f). **(40 CFR 63.10031(c)(5)(i))**
 - iv. Include the information required to be monitored, collected, or recorded according to the requirements of 40 CFR 63.10020(e). **(40 CFR 63.10031(c)(5)(ii))**
 - p. Report emergency bypass information annually from units with LEE status. **(40 CFR 63.10031(c)(6))**
 - q. A summary of the results of the annual performance tests and documentation of any operating limits that were reestablished during the test, if applicable. If the permittee is conducting stack tests once every 3 years to maintain LEE status, consistent with 40 CFR 63.10006(b), the report shall include the date of each stack test conducted during the previous 3 years, a comparison of emission level the permittee achieved in each stack test conducted during the previous 3 years to the 50 percent emission limit threshold required in 40 CFR 63.10005(h)(1)(i), and a statement as to whether there have been any operational changes since the last stack test that could increase emissions. **(40 CFR 63.10031(c)(7))**
 - r. A certification. **(40 CFR 63.10031(c)(8))**
 - s. If there is a deviation from any emission limit, work practice standard, or operating limit, the permittee must also submit a brief description of the deviation, the duration of the deviation, emissions point identification, and the cause of the deviation. **(40 CFR 63.10031(c)(9), 40 CFR Part 63, Subpart UUUUU, Table 8)**
 - t. If there is any process or control equipment malfunction(s) during the reporting period, the permittee must include the number, duration, and a brief description for each type of malfunction which occurred during the semiannual reporting period which caused or may have caused any applicable emission limitation to be exceeded. **(40 CFR 63.10031(c)(10))**
28. Prior to January 1, 2024, all reports and notifications shall be submitted to the EPA in the specified format and at the specified frequency, using the Emissions Collection and Monitoring Plan System (ECMPS) Client Tool. Each PDF version of a stack test report, CEMS RATA report, PM CEMS correlation test report, RRA report, and RCA report must include sufficient information to assess compliance and to demonstrate that the reference method testing was done properly. Note that EPA will continue to accept, as necessary, PDF reports that are being phased out at the end of 2023, if the submission deadlines for those reports extend beyond December 31, 2023. **(40 CFR 63.10031(f)(4) and (6))**
29. Prior to January 1, 2024, for each performance stack test completed (including 30-~~for 90-~~ boiler operating day Hg LEE demonstration tests and PM tests to establish operating limits for PM CPMS), the permittee must submit a PDF test report using the ECMPS Client Tool in accordance with 40 CFR Part 63.10031(f)(6), no later than 60 days after the date on which the testing is completed. **(40 CFR 63.10031(f), 40 CFR Part 63, Subpart UUUUU, Table 8.6)**

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30. Prior to January 1, 2024, for each RATA of an Hg, HCl, HF, or SO₂ monitoring system completed and for each PM CEMS correlation test, each relative response audit (RRA) and each response correlation audit (RCA) of a PM CEMS completed prior to that date, the permittee must submit a PDF test report in accordance with 40 CFR Part 63.10031(f)(6), no later than 60 days after the date on which the test is completed. (40 CFR 63.10031(f)(1), 40 CFR Part 63, Subpart UUUUU, Table 8.7)
31. Prior to January 1, 2024, for each PM CEMS, an approved HAP metals CEMS, or a PM CPMS, the permittee must submit quarterly PDF reports in accordance with 40 CFR Part 63.10031(f)(6), which include all of the 30-boiler operating day rolling average emission rates derived from the CEMS data or the 30-boiler operating day rolling average responses derived from the PM CPMS data (as applicable). The quarterly reports are due within 60 days after the reporting periods ending on March 31st, June 30th, September 30th, and December 31st. Submission of these quarterly reports in PDF files shall end with the report that covers the fourth calendar quarter of 2023. (40 CFR 63.10031(f)(2), 40 CFR Part 63, Subpart UUUUU, Table 8.8)
32. For PM CEMS correlation tests completed on or after November 9, 2020, but prior to January 1, 2024, the permittee shall submit the report, in a PDF file using the ECMPMS Client Tool, no later than 60 days after the date on which the test is completed. (40 CFR 63.10031(j), 40 CFR Part 63, Subpart UUUUU, Table 8.13)
33. Starting with the first calendar quarter of 2024, the permittee must use the ECMPMS Client Tool to submit quarterly electronic compliance reports. Each quarterly compliance report shall include the applicable data elements in sections 2 through 13 of Appendix E of 40 CFR Part 63, Subpart UUUUU and submitted in XML format. For each stack test summarized in the compliance report, the permittee must also submit the applicable reference method information in sections 17 through 31 of Appendix E of 40 CFR Part 63, Subpart UUUUU. The compliance reports and associated Appendix E information must be submitted no later than 60 days after the end of each calendar quarter. The permittee shall include in the quarterly compliance reports the applicable data elements in section 13 of Appendix E of 40 CFR Part 63, Subpart UUUUU for any "deviation" (as defined in 40 CFR 63.10042 and elsewhere in 40 CFR Part 63, Subpart UUUUU) that occurred during the calendar quarter. If there were no deviations, the permittee must include a statement to that effect in the quarterly compliance report. (40 CFR 63.10031(d), 40 CFR 63.10031(f)(4), 40 CFR 63.10031(g))
34. If an affected source submits a semiannual compliance report pursuant to 40 CFR Part 63.10031(c) and (d), or two quarterly compliance reports covering the appropriate calendar half pursuant to 40 CFR Part 63.10031(g), along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the compliance report(s) includes all required information concerning deviations from any emission limit, operating limit, or work practice requirement in this subpart, submission of the compliance report(s) satisfies any obligation to report the same deviations in the semiannual monitoring report. Submission of the compliance report(s) does not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. (40 CFR 63.10031(e))
35. On or after January 1, 2024, for each performance stack test completed, the permittee shall submit the applicable reference method information required in sections 17 through 31 of Appendix E of 40 CFR Part 63, Subpart UUUUU along with the quarterly compliance report for the calendar quarter in which the test was completed. (40 CFR 63.10031(f), 40 CFR Part 63, Subpart UUUUU, Table 8.6)
36. On or after January 1, 2024, for each SO₂ or Hg RATA completed the permittee must submit the applicable reference method information in sections 17 through 31 of Appendix E of 40 CFR Part 63, Subpart UUUUU prior to or concurrent with the relevant quarterly emissions report. For HCl or HF RATAs, and for correlation tests, RRAs, and RCAs of PM CEMS that are completed on or after January 1, 2024, submit the Appendix E reference method information together with the summarized electronic test results, in accordance with section 11.4 of Appendix B of 40 CFR Part 63, Subpart UUUUU or section 7.2.4 of Appendix C of 40 CFR Part 63, Subpart UUUUU, as applicable. (40 CFR 63.10031(f)(1), 40 CFR Part 63, Subpart UUUUU, Table 8.7)
37. Beginning with the first calendar quarter of 2024, for each PM CEMS, an approved HAP metals CEMS, or a PM CPMS, the compliance averages shall no longer be reported separately, but shall be incorporated into the quarterly compliance reports. In addition to the compliance averages for PM CEMS, PM CPMS, and/or HAP metals CEMS, the quarterly compliance reports must also include the 30-boiler operating day rolling average emission rates for Hg, HCl, HF, and/or

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SO2, if the permittee has elected to (or are required to) continuously monitor these pollutants. Further, if the EGU or common stack is in an averaging plan, the quarterly compliance reports must identify all of the EGUs or common stacks in the plan and must include all of the 30-group boiler operating day rolling weighted average emission rates (WAERs) for the averaging group. (40 CFR 63.10031(f)(2), 40 CFR Part 63, Subpart UUUUU, Table 8.8)

- 38. For PM CEMS correlation tests completed on or after January 1, 2024, the permittee must submit the test results electronically, according to section 7.2.4 of Appendix C of 40 CFR Part 63, Subpart UUUUU, together with the applicable reference method data in sections 17 through 31 of Appendix E of 40 CFR Part 63, Subpart UUUUU. The applicable data elements in 40 CFR Part 63.10031(f)(6)(i) through (xii) must be entered into ECMPs with the PDF report. (40 CFR 63.10031(j), 40 CFR Part 63, Subpart UUUUU, Table 8.13)
- 39. If the permittee elects to demonstrate compliance using a PM CPMS or an approved HAP metals CEMS, the permittee must submit quarterly reports of the QA/QC activities (e.g., calibration checks, performance audits), in a PDF file, beginning with a report for the first quarter of 2024, if the PM CPMS or HAP metals CEMS is used for the compliance demonstration in that quarter. Otherwise, submit a report for the first calendar quarter in which the PM CPMS or HAP metals CEMS is used to demonstrate compliance. These reports are due no later than 60 days after the end of each calendar quarter. The applicable data elements in 40 CFR Part 63.10031(f)(6)(i) through (xii) must be entered into ECMPs with the PDF report. (40 CFR 63.10031(k), 40 CFR Part 63, Subpart UUUUU, Table 8.14)
- 40. On and after January 1, 2024, the permittee shall report the tune-up date electronically in the quarterly compliance report, in accordance with 40 CFR 63.10031(q) and section 10.2 of Appendix E of 40 CFR Part 63, Subpart UUUUU. The tune-up report date is the date when tune-up requirements in 40 CFR 63.10021(e)(6) and (7) are completed. (40 CFR 63.10021(e)(9))

See Appendix 8-2 BR

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- 1. For each emission unit or emissions averaging group complying with an emission limit as specified in Table 2 of 40 CFR Part 63, Subpart UUUUU, the permittee may request to switch from a mass per heat input to a mass per gross output limit (or vice versa).
 - a. The permittee may switch from a mass per heat input to a mass per gross output limit (or vice-versa), provided that:
 - i. The permittee submits a request that identifies for each emission unit or emissions averaging group involved in the proposed switch both the current and proposed emission limit. (40 CFR 63.10030(e)(7)(iii)(A)(1))
 - ii. The request arrives to the Administrator at least 30 calendar days prior to the date that the switch is proposed to occur. (40 CFR 63.10030(e)(7)(iii)(A)(2))
 - iii. The request demonstrates through performance stack test results or valid CMS data, obtained within 45 days prior to the date of the submission, demonstrating that each EGU or EGU emissions averaging group is in compliance with both the mass per heat input limit and the mass per gross output limit. (40 CFR 63.10030(e)(7)(iii)(A)(3))
 - iv. The permittee revises and submits all other applicable plans, e.g., monitoring and emissions averaging, with the request. (40 CFR 63.10030(e)(7)(iii)(A)(4))
 - v. The permittee maintains records of all information regarding the choice of emission limits. (40 CFR 63.10030(e)(7)(iii)(A)(5))
 - b. The permittee may begin to use the revised emission limits starting in the next reporting period, after receipt of written acknowledgement from the Administrator of the switch. (40 CFR 63.10030(e)(7)(iii)(B))
 - c. From the submission of the request until start of the next reporting period after receipt of written acknowledgement from the Administrator of the switch, the permittee shall demonstrate compliance with both the mass per heat input

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and mass per gross output emission limits for each pollutant for each emission unit or emissions averaging group. (40 CFR 63.10030(e)(7)(iii)(C))

- 2. The permittee may switch from paragraph (1) of the definition of "startup" in 40 CFR 63.10042 to paragraph (2) of the definition of "startup" (or vice-versa), provided that:
 - a. The permittee submits a request that identifies for each emission unit or emissions averaging group involved in the proposed switch both the current definition of "startup" relied on and the proposed definition the permittee plans to rely on. (40 CFR 63.10030(e)(8)(iii)(A))
 - b. The request arrives to the Administrator at least 30 calendar days prior to the date that the switch is proposed to occur. (40 CFR 63.10030(e)(8)(iii)(B))
 - c. The permittee revises and submits all other applicable plans, e.g., monitoring and emissions averaging, with the submission. (40 CFR 63.10030(e)(8)(iii)(C))
 - d. The permittee maintains records of all information regarding the choice of the definition of "startup". (40 CFR 63.10030(e)(8)(iii)(D))
 - e. The permittee begins to use the revised definition of "startup" in the next reporting period after receipt of written acknowledgement from the Administrator of the switch. (40 CFR 63.10030(e)(8)(iii)(E))
- 3. If any emission unit(s) cease(s) to operate in a manner that causes the unit(s) to meet the definition of an EGU subject to 40 CFR Part 63, Subpart UUUUU, the permittee must submit the notification in 40 CFR 63.10000(i)(2) no less than 30 days prior to when the EGU will cease complying with 40 CFR Part 63, Subpart UUUUU. (40 CFR 63.10000(i)(2), 40 CFR 63.10030(f))
- 4. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and UUUUU.² (40 CFR Part 63, Subparts A and UUUUU)

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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).

DESCRIPTION
~~OBsolete TABLE – REPLACE WITH NEW MATS TEMPLATE TABLE.~~
~~NEW TABLE TO COME FROM BRIAN CARLEY.~~

MATS compliance (40 CFR Part 63 Subpart UUUUU) for each boiler that is an Electric Generating Unit (EGU) rated more than 25 MW at the Belle River Power Plant that serves a generator producing electricity for sale and designed to burn coal that is not low-rank virgin coal. Installation of dry sorbent injection (DSI) and activated carbon injection (ACI) systems on Belle River Boiler Nos. 1 and 2.

Emission Units: EU-BOILER1-BR, EU-BOILER2-BR

POLLUTION CONTROL EQUIPMENT

Each EGU is equipped with low-NOx burners, overfire air, ESP, DSI, and ACI

~~I. EMISSION LIMIT(S)~~

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Pollutant	Limit ^a	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
1a. 1. FILTERABLE? Bob to confirm. Check this is the current MACT table. PM	0.03 lb ₂ /MMBtu or 0.30 lb ₂ /MWhr ²	30-boiler operating day rolling arithmetic average updated at the end of each new boiler operating day	Each EGU of FG-MATS-BR	SC VI.1-4	40 CFR 63.9991 Table 2.1.a, 40 CFR 63.10000(a) Exempt from CAM, because post-1990 MACT
AND					
2a. Hydrogen-Chloride (HCl)	0.002 lb ₂ /MMBtu -or 0.020 lb ₂ /MWhr ²	30-boiler operating day rolling arithmetic average updated at the end of each new boiler operating day	Each EGU of FG-MATS-BR	SC VI.1-4	40 CFR 63.9991 Table 2.1.b, 40 CFR 63.10000(a)
AND					
3a. Mercury (Hg)	1.2 lb/TBtu or 0.013 lb/GWhr ²	30-boiler operating day rolling arithmetic average updated at the end of each new boiler operating day Test Protocol shall determine time period	Each EGU of FG- DSI/ACIMATS- BR	SC VI.1-4	40 CFR 63.9991 Table 2.1.c, 40 CFR 63.10000(a)

^aThese limits apply starting April 16, 2016, applying at all times except during periods of startup and shutdown, as defined by 40 CFR Part 60.63, Subpart UUUUU.

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II. MATERIAL LIMIT(S)

1. The permittee must comply with initial compliance standards for material limits in accordance with 40 CFR Part 63, Subpart UUUUU for each EGU of FG-DSI/ACI-BR.² ~~(40 CFR 63.10011)~~ **NA**

III. PROCESS/OPERATIONAL RESTRICTION(S)

~~The permittee shall conduct a tune-up of each emission unit of FG-DSI/ACIMATS-BR burner(s) and combustion controls, as applicable, at least every 48 calendar months (neural network combustion optimization software is employed); (40 CFR 63.10000(e), 40 CFR 63.10006(i), 40 CFR 63.10021(e))~~

~~For the startup of any emission unit of FG-MATS-BR which will comply using paragraph (1) of the definition of "startup" in 40 CFR 63.10042, the permittee must use clean fuels as defined in 40 CFR 63.10042 for ignition. Once the emission unit(s) of FG-DSI/ACIMATS-BR convert(s) to firing coal, residual oil, or solid oil-derived fuel, the permittee must engage all the applicable control technologies except dry scrubber and SCR. The permittee must start the dry scrubber and SCR systems, appropriately to comply with relevant standards applicable during normal operation. The permittee must comply with all applicable emission limits at all times except for periods that meet the applicable definitions of startup and shutdown in 40 CFR Part 63, Subpart UUUUU. (40 CFR 63.10042, 40 CFR Part 63, Subpart UUUUU, Table 3)~~

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~~During shutdown of any emission unit of FG-DSI/ACIMATS-BR while firing coal, residual oil, or solid oil-derived fuel, the permittee must vent emissions to the main stack(s) and operate all applicable control devices and continue to operate those control devices after the cessation of coal, residual oil, or solid oil-derived fuel being fed into the applicable emission unit(s) of FG-DSI/ACIMATS-BR and for as long as possible thereafter considering operational and safety concerns. The permittee must operate their controls when necessary to comply with other standards made applicable to the FG-DSI/ACIMATS-BR by a permit limit or a rule other than 40 CFR Part 63, Subpart UUUUU and that require operation of the control devices. If, in addition to the fuel used prior to initiation of shutdown, another fuel must be used to support the shutdown process, that additional fuel must be one or a combination of the clean fuels defined in 40 CFR 63.10042 and must be used to the maximum extent possible taking into account considerations such as not compromising boiler or control device integrity.~~

~~(40 CFR 63.10042, 40 CFR Part 63, Subpart UUUUU, Table 3)~~

~~The emission limits and operating limits apply at all times except during periods of startup and shutdown; however, the applicable work practice requirements, which are specified in items 3 and 4 of Table 3 of 40 CFR Part 63, Subpart UUUUU must be met during periods of startup or shutdown. (40 CFR 63.10000(a), 40 CFR Part 63, Subpart UUUUU, Table 3)~~

- ~~The permittee must operate and maintain the process and control equipment such that the 30-boiler operating day rolling average PM CPMS output does not exceed the operating limit determined during the most recent performance test demonstrating compliance with the filterable PM, total non-mercury HAP metals, or individual non-mercury HAP metals emissions limitation(s). (40 CFR 63.9991(a)(2), 40 CFR 63.10023(c), 40 CFR Part 63, Subpart UUUUU, Table 4) The permittee must meet the work practice standards and operating limits for each EGU in FG-DSI/ACI-BR, according to 40 CFR Part 63, Subpart UUUUU, Tables 3 and 4.² (40 CFR 63.9991, 40 CFR 63.10000, 40 CFR 63.10011)~~
- The permittee shall operate and maintain each EGU of FG-DSI/ACI-BR including associated air pollution control equipment and monitoring equipment in satisfactory manner.² (40CFR63.10000)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- ~~The permittee shall operate and maintain all associated air pollution control equipment and monitoring equipment necessary for compliance with 40 CFR Part 64, Subpart UUUUU in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.10000(b)) All air pollution control equipment necessary for compliance with any newly applicable emissions limits which apply as a result of the cessation or commencement or recommencement of operations that cause each EGU of FG-DSI/ACI-BR to meet the definition of an EGU subject to this subpart must be installed and operational as of the date your source ceases to be or becomes subject to 40 CFR Part 63 Subpart UUUUU.² (40 CFR 63.10000(j))~~
- All monitoring systems necessary for compliance with any newly applicable monitoring requirements which apply as a result of the cessation or commencement or recommencement of operations that cause each EGU of FG-DSI/ACI-BR to meet the definition of an EGU subject to 40 CFR Part 63 Subpart UUUUU must be installed and operational as of the date your source ceases to be or becomes subject to 40 CFR Part 63 Subpart UUUUU.² (40 CFR 63.10000(k))

V. TESTING/SAMPLING

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

~~1. For each EGU of FG-DSI/ACI-BR, the permittee must demonstrate initial compliance with each applicable emissions limit through performance testing by testing at owner's expense, in accordance with Department requirements. Where two emissions limits are specified for a particular pollutant (e.g., a heat input-based limit in lb/MMBtu and an electrical output-based limit in lb/MWh), the permittee may demonstrate compliance with either emission limit. All subsequent performance tests will be required according to 40 CFR 63.10006. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. The permittee must demonstrate initial compliance no later than April 16, 2016.² (40 CFR 63.9984, 40 CFR 63.10000, 40 CFR 63.10005(a), 40 CFR 63.10006, 40 CFR 63.10007, 40 CFR 63.10011) The permittee shall verify the HCl emission rates from each emission unit by testing at owner's expense, in accordance with 40 CFR 63.10007 and Table 5 to 40 CFR Part 63, Subpart UUUUU. The permittee must complete the test once every calendar quarter and at least 45 days since the previous performance test. The permittee may skip performance testing in those quarters during which less~~

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Next two conditions NOP needed.

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~~than 168 boiler operating hours occur, except that a performance test must be conducted at least once every calendar year. (40 CFR 63.10006(f), 40 CFR 63.10007, 40 CFR 63.10021(d)(1) and (2), 40 CFR Part 63, Subpart UUUUU, Table 5)~~

~~Unless an alternate schedule has been approved by the AQD, no less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing, as applicable. (40 CFR 63.7, 40 CFR 63.10007, 40 CFR 63.10030(a))~~

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VI. MONITORING/RECORDKEEPING

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

~~1. The permittee must operate all Continuous Monitoring Systems (CMS) during startup. Startup means the firing of fuel in a boiler after a shutdown event for any purpose. Startup ends when any of the steam from the boiler is used to generate electricity for sale over the grid or for any other purpose (including on site use). The permittee must comply with the applicable emission limits at all times except for startup and shutdown periods except the permittee must comply with the applicable Hg emission limit at all times. The permittee must collect monitoring data during startup periods, as specified in 40 CFR 63.10020(a) and (b). The permittee must keep records during startup periods, as provided in 40 CFR 63.10032 and 40 CFR 63.10021(h). Any fraction of an hour in which startup occurs constitutes a full hour of startup. (40 CFR Part 63, Subpart UUUUU, Table 3)~~

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~~The permittee must operate all CMS during shutdown. The permittee must also collect appropriate data, and the permittee must calculate the pollutant emission rate for each hour of shutdown for those pollutants for which a CMS is used. The permittee must collect monitoring data during shutdown periods, as specified in 40 CFR 63.10020(a). The permittee must keep records during shutdown periods, as provided in 40 CFR 63.10032 and 40 CFR 63.10021(h). Any fraction of an hour in which shutdown occurs constitutes a full hour of shutdown. (40 CFR Part 63, Subpart UUUUU, Table 3)~~

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~~The permittee shall install, calibrate, maintain and operate a device to monitor and record the PM concentration of the exhaust gas from each emission unit on a continuous basis. The permittee shall install and operate the PM CEMS to meet the timelines, requirements and reporting detailed in Performance Specification 11 in 40 CFR Part 60, Appendix B and Procedure 2 in 40 CFR Part 60, Appendix F. (40 CFR 63.10010(i), 40 CFR Part 63, Subpart UUUUU, Table 5)~~

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~~The permittee shall keep, in a satisfactory manner, 30-day rolling average PM emission rate records for each emission unit excluding periods of startup and shutdown. (40 CFR 63.10010, 40 CFR 63.10021, 40 CFR Part 63, Subpart UUUUU, Table 7)~~

Commented [AMH445]: TEMPLATE SC VI.12

~~The permittee shall install, calibrate, maintain and operate a device to monitor and record the Hg concentration from each emission unit on a continuous basis. The permittee shall install and operate the Hg CEMS or sorbent trap monitoring system to meet the timelines, requirements and reporting detailed in Appendix A of 40 CFR Part 63, Subpart UUUUU. (40 CFR 63.10000(c)(1)(vi))~~

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~~The permittee shall keep, in a satisfactory manner, 30-day rolling average Hg emission rate records for each emission unit excluding periods of startup and shutdown. (40 CFR 63.10010, 40 CFR 63.10021, 40 CFR Part 63, Subpart UUUUU, Table 7)~~

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~~The permittee must operate the required monitoring system(s) and collect data at all required intervals at all times that the affected EGU is operating, except for periods of monitoring system malfunctions or out-of-control periods (see 40 CFR 63.8(c)(7) of 40 CFR Part 63, Subpart A), and required monitoring system quality assurance or quality control activities, including, as applicable, calibration checks and required zero and span adjustments. The permittee is required to affect monitoring system repairs in response to monitoring system malfunctions and to return the monitoring system to operation as expeditiously as practicable. (40 CFR 63.10020(b))~~

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~~The permittee may not use data recorded during startup or shutdown in calculations used to report emissions, except as otherwise provided in 40 CFR 63.10000(c)(1)(vi)(B) and 40 CFR 63.10005(a)(2)(iii). In addition, data recorded during~~

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~~monitoring system malfunctions or monitoring system out-of-control periods, repairs associated with monitoring system malfunctions or monitoring system out-of-control periods or required monitoring system quality assurance or control activities may not be used in calculations used to report emissions or operating levels. The permittee must use all of the quality assured data collected during all other periods in assessing the operation of the control device and associated control system. (40 CFR 63.10020(c))~~

~~Failure to collect required data is a deviation from the monitoring requirements except for periods of monitoring system malfunctions or monitoring system out-of-control periods, repairs associated with monitoring system malfunctions or monitoring system out-of-control periods and required monitoring system quality assurance or quality control activities including, as applicable, calibration checks and required zero and span adjustments. (40 CFR 63.10020(d))~~

Commented [AMH449]: Template SC VI.17

~~The permittee must demonstrate continuous compliance of PM and Hg by using all quality assured hourly data recorded by the CEMS (or sorbent trap monitoring system) and other required monitoring systems to calculate the arithmetic average emissions rate in units of the standard on a continuous 30-boiler operating day (or, if alternate emissions averaging is used for Hg, a 90-boiler operating day) rolling average basis, updated at the end of each new boiler operating day. Use Equation 8 in 40 CFR 63.10021(b) to determine the 30- or 90-boiler operating day rolling average. (40 CFR 63.10021(a) and (b))~~

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~~The permittee must keep the following records:~~

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~~A copy of each notification and report that has been submitted to comply with 40 CFR Part 63, Subpart UUUUU, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that has been submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). (40 CFR 63.10032(a)(1))~~

~~Records of performance stack tests, fuel analyses, or other compliance demonstrations and performance evaluations, as required in 40 CFR 63.10(b)(2)(viii). (40 CFR 63.10032(a)(2))~~

~~For each CEMS, the permittee must keep the following records:~~

~~Records described in 40 CFR 63.10(b)(2)(vi) through (xi). (40 CFR 63.10032(b)(1))~~

~~Previous (i.e., superseded) versions of the performance evaluation plan for a minimum of 5 years since the last revision. (40 CFR 63.10032(b)(2))~~

~~Request for alternatives to relative accuracy test for CEMS. (40 CFR 63.10032(b)(3))~~

~~The date and time that each CEMS deviation started and stopped and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period. (40 CFR 63.10032(b)(4))~~

~~The permittee must keep the records for Hg and/or HCl required under Appendix A and/or Appendix B of 40 CFR Part 63, Subpart UUUUU. (40 CFR 63.10032(a))~~

~~For each emission unit subject to an emission limit,:~~

~~The permittee shall keep the monthly fuel use by each emission unit, including the type(s) of fuel and amount(s) used. (40 CFR 63.10032(d)(1))~~

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~~Regarding startup periods or shutdown periods:~~

~~The permittee shall keep records of the occurrence and duration of each startup or shutdown. (40 CFR 63.10032(f)(1))~~

~~The type(s) and amount(s) of fuel used during each startup or shutdown. (40 CFR 63.10032(i))~~

~~The occurrence and duration of each malfunction of an operation (i.e., process equipment) or the air pollution control and monitoring equipment. (40 CFR 63.10032(g))~~

~~Actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.10000(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (40 CFR 63.10032(h))~~

13. The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record, as applicable according to 40 CFR Part 63,

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~~Subpart UUUUU.² The records must be kept onsite for at least 2 years and may be kept offsite for the remaining 3 years. (40 CFR 63.10033)~~

~~214. The permittee must develop a MATS site-specific monitoring plan and submit this site-specific monitoring plan, if requested, at least 60 days before your initial performance evaluation (where applicable) of your continuous monitoring system (CMS).² (40 CFR 63.10000(d))~~

~~315. The permittee shall maintain on-site and submit, if requested by the AQD District Supervisor, an annual report containing the information for all periodic tune-ups containing the information required by 40 CFR 63.10021(e)(8). The reports shall be in a format acceptable to the Administrator. If requested by the AQD District Supervisor, the permittee shall also submit an annual report with the results of the performance tune-ups. (40 CFR 63.10021(e)(8)) that are performed for each EGU of FG-DSI/ACI-BR, as specified in 40 CFR 63.10021(e).² (40 CFR 63.10000(e), 40 CFR 63.10021(e))~~

Commented [AMH455]: TEMPLATE SC VI.22

~~4. The permittee shall keep records of the following information for startups, shutdowns, and malfunctions:~~

~~a) Each occurrence and duration of each startup and/or shutdown;~~

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~~b) The permittee must keep records of the occurrence and duration of each malfunction of an operation (i.e., process equipment) or the air pollution control and monitoring equipment;~~

~~c) The permittee must keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.10000(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation;~~

~~d) The permittee must keep records of the type(s) and amount(s) of fuel used during each startup or shutdown.~~

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~~The permittee shall keep the records on file at the facility and make them available to the Department upon request.² (40 CFR 63.10032(d))~~

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)(e))~~

~~4. Semiannual reporting shall be postmarked or received by the Administrator by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. The report shall include the following:~~

~~The information required by the Continuous Monitoring Summary Report located in 40 CFR 63.10(e)(3)(vi). (40 CFR 63.10031(c)(1))~~

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- ~~The total fuel use by each affected source for each calendar month within the semiannual reporting period, including a description of the fuel, whether the fuel has received a non-waste determination by EPA or the basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure. (40 CFR 63.10031(c)(2))~~
- ~~Indicate whether any emission unit in FG-DSI/ACI—MATS—BR burned new types of fuel during the reporting period. If new types of fuel were burned, include the date of the performance test where that fuel was in use. (40 CFR 63.10031(c)(3))~~
- ~~Include the date of the most recent tune-up for each emission unit. The date of the tune-up is the date the tune-up provisions specified in SC III.1 were completed. (40 CFR 63.10031(c)(4))~~
- ~~A summary of the results of the annual performance tests and documentation of any operating limits that were reestablished during the test, if applicable. (40 CFR 63.10031(c)(7))~~
- ~~If there are no deviations from any emission limitation (emission limit and operating limit) that applies to FG-DSI/ACI—MATS—BR and there are no deviations from the requirements for work practice standards in Table 3 to 40 CFR Part 63, Subpart UUUUU that apply to FG-DSI/ACI—MATS—BR, the report shall include a statement that there were no deviations from the emission limitations and work practice standards during the reporting period.~~
- ~~If there is a deviation from any emission limitation (emission limit and operating limit) or work practice standard during the reporting period, the report must contain a brief description of the deviation, the duration of the deviation, the cause of the deviation, and the information in 40 CFR 63.10031(d). (40 CFR 63.10031(c)(1) through (9), (d), and (e), 40 CFR 63.10031(a), 40 CFR 63.10031(c)(9), 40 CFR Part 63, Subpart UUUUU, Table 8)~~
- ~~If there were no periods during which the CMSs, including continuous emissions monitoring system, and operating parameter monitoring systems, were out-of-control as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMSs were out-of-control during the reporting period. (40 CFR Part 63, Subpart UUUUU, Table 8)~~
- ~~If there were periods during which the CMS's, including continuous emissions monitoring systems and continuous parameter monitoring systems, were out-of-control, as specified in 40 CFR 63.8(c)(7), the report must contain the information in 40 CFR 63.10031(e). (40 CFR 63.10031(c)(1) through (9), (d), and (e), 40 CFR 63.10031(a), 40 CFR 63.10031(c)(9), 40 CFR Part 63, Subpart UUUUU, Table 8)~~
- ~~If the affected source submits a compliance report pursuant 40 CFR Part 63, Subpart UUUUU, or as part of, the ROP semiannual monitoring report and the compliance report includes all required information concerning deviations from any emission limit, operating limit, or work practice requirement in 40 CFR Part 63, Subpart UUUUU, submission of the compliance report satisfies any obligation to report the same deviations in the semiannual monitoring report required by SC VII.2. (40 CFR 63.10031(e))~~
- ~~The permittee must submit any of the following applicable notifications by the dates specified within the specific citation: 40 CFR 63.7(b) and (c) Notification of performance test and Quality assurance program; 40 CFR 63.8(e) Performance evaluation of continuous monitoring systems; 40 CFR 63.8(f)(4) Request to use alternative monitoring methods; 40 CFR 63.8(f)(6) Alternative to the relative accuracy test; 40 CFR 63.9(b) Initial notifications; 40 CFR 63.9(c) Request for extension of compliance; 40 CFR 63.9(d) Notification that source is subject to special compliance requirements; 40 CFR 63.9(e) Notification of performance test, which shall be submitted at least 30 days before the performance test is scheduled to begin; 40 CFR 63.9(f) Notification of opacity and visible emission observations; 40 CFR 63.9(g) Additional notification requirements for sources with continuous monitoring systems; and 40 CFR 63.9(h) Notification of compliance status. (40 CFR 63.10030(a))~~
- ~~On or after July 1, 2020, within 60 days after the date of completing each performance test, the permittee must submit the performance test reports required by this subpart to EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/index.html). Only data collected using those test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. At the discretion of the AQD, the permittee must also submit these reports, one to the Technical Programs Unit Supervisor and one to the AQD District Supervisor, in a format approved by the AQD. (40 CFR 63.10031(f))~~
- ~~On or after July 1, 2020, within 60 days after the date of completing each CEMS (PM) performance evaluation test, as defined in 40 CFR 63.2, the permittee must submit the relative accuracy test-audit (RCA and RRA data) required by this~~

Commented [AMH456]: TEMPLATE SC VII 4.g

Commented [AMH457]: TEMPLATE SC VII.4h

Commented [AMH458]: TEMPLATE SC VII.4.i

Commented [PAR459]: Included as SC V.2. Not needed Reference to 40CFR 63.7(b)&(c) not needed because this part is done. Delete this part.

Commented [PAR460]: Not requesting alternative method. Not needed

Commented [PAR461]: Satisfied. Not needed

Commented [PAR462]: Subpart UUUUU has been issued not need for extension or special requirements

Commented [PAR463]: Included in SC V.2. Not needed

Commented [PAR464]: Does AQD want a copy sent to them?

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subpart to EPA's WebFIRE database by using CEDRI that is accessed through EPA's CDX (www.epa.gov/cdx). The RCA and RRA data shall be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) (http://www.epa.gov/ttn/chief/ert/index.html). Only RCA and RRA data compounds listed on the ERT Web site are subject to this requirement. At the discretion of the AQD, the permittee must also submit these RCA and RRA reports to the AQD District Supervisor in a format approved by the AQD. Owners or operators shall submit calibration error testing, drift checks, and other information required in the performance evaluation as described in 40 CFR 63.2 and as required in this chapter. (40 CFR 63.10031(f)(1))

Commented [PAR465]: Does AQD want a copy?

On or after July 1, 2020, for a PM CEMS, within 60 days after the reporting periods ending on March 31st, June 30th, September 30th, and December 31st, the permittee must submit quarterly reports to EPA's WebFIRE database by using the CEDRI that is accessed through EPA's CDX (www.epa.gov/cdx). The permittee must use the appropriate electronic reporting form in CEDRI or provide an alternate electronic file consistent with EPA's reporting form output format. For each reporting period, the quarterly reports must include all of the calculated 30-boiler operating day rolling average values derived from the CEMS. (40 CFR 63.10031(f)(2))

Reports for a sorbent trap monitoring system and any supporting monitors for such systems (such as a diluent or moisture monitor) shall be submitted using the ECMPMS Client Tool, as provided for in 40 CFR Part 63, Subpart UUUUU, Appendices A and B and 40 CFR 63.10021(f). (40 CFR 63.10031(f)(3))

On or after July 1, 2020, the permittee must submit all reports required by 40 CFR 63.10031 (c) and (d) electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). The permittee must use the appropriate electronic reporting form in CEDRI or provide an alternate electronic file consistent with EPA's reporting form output format. If requested by the AQD, the permittee must also submit these reports, to the AQD District Supervisor in a format approved by the AQD. (40 CFR 63.10031(f)(4))

Prior to July 1, 2020, all reports subject to electronic submittal in SC VII.6, VII.7, VII.8 and VII.10 shall be submitted to the EPA at the frequency specified in those paragraphs in electronic portable document format (PDF) using the ECMPMS Client Tool. Each PDF version of a submitted report must include sufficient information to assess compliance and to demonstrate that the testing was done properly. The data elements listed at 40 CFR 63.10031(f)(6)(i)-(xii) must be entered into the ECMPMS Client Tool at the time of submission of each PDF file. (40 CFR 63.10031(f)(6))

If requested by the Administrator, the permittee must submit the monitoring plan (or relevant portion of the plan) at least 60 days before the initial performance evaluation of a particular CMS, except where the CMS has already undergone a performance evaluation that meets the requirements of 40 CFR 63.10010 (e.g., if the CMS was previously certified under another program). (40 CFR 63.10000(d)(3))

5. The permittee must submit all of the notifications required; according to 40 CFR Part 63 Subpart UUUUU.² (40 CFR 63.10030, 40 CFR 63.10031)

5. The permittee must report each instance in which FG-DSI/ACI-BR did not meet an applicable emission limit or operating limit in Tables 1 through 4 of 40 CFR Part 63 Subpart UUUUU or failed to conduct a required tune-up. These instances are deviations from the requirements of 40 CFR Part 63 Subpart UUUUU.² (40 CFR 63.10021(g), 40 CFR 63.10031)

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. For each emission unit or emissions averaging group complying with an emission limit as specified in Table 2 of 40 CFR Part 63, Subpart UUUUU, the permittee may request to switch from a mass per heat input to a mass per gross output limit (or vice versa).
The permittee may switch from a mass per heat input to a mass per gross output limit (or vice-versa), provided that:

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- ~~The permittee submits a request that identifies for each emission unit or emissions averaging group involved in the proposed switch both the current and proposed emission limit. (40 CFR 63.10030(e)(7)(iii)(A)(1))~~
- ~~The request arrives to the Administrator at least 30 calendar days prior to the date that the switch is proposed to occur. (40 CFR 63.10030(e)(7)(iii)(A)(2))~~
- ~~The request demonstrates through performance stack test results completed within 30 days prior to the submission, compliance for each emission unit or emissions averaging group with both the mass per heat input and mass per gross output limits. (40 CFR 63.10030(e)(7)(iii)(A)(3))~~
- ~~The permittee revises and submits all other applicable plans, e.g., monitoring and emissions averaging, with the request. (40 CFR 63.10030(e)(7)(iii)(A)(4))~~
- ~~The permittee maintains records of all information regarding the choice of emission limits. (40 CFR 63.10030(e)(7)(iii)(A)(5))~~
- ~~The permittee may begin to use the revised emission limits starting in the next reporting period, after receipt of written acknowledgement from the Administrator of the switch. (40 CFR 63.10030(e)(7)(iii)(B))~~
- ~~From the submission of the request until start of the next reporting period after receipt of written acknowledgement from the Administrator of the switch, the permittee shall demonstrate compliance with both the mass per heat input and mass per gross output emission limits for each pollutant for each emission unit or emissions averaging group. (40 CFR 63.10030(e)(7)(iii)(C))~~
- ~~The permittee may switch from paragraph (1) of the definition of "startup" in 40 CFR 63.10042 to paragraph (2) of the definition of "startup" (or vice-versa), provided that:~~
 - ~~The permittee submits a request that identifies for each emission unit or emissions averaging group involved in the proposed switch both the current definition of "startup" relied on and the proposed definition the permittee plans to rely on. (40 CFR 63.10030(e)(8)(iii)(A))~~
 - ~~The request arrives to the Administrator at least 30 calendar days prior to the date that the switch is proposed to occur. (40 CFR 63.10030(e)(8)(iii)(B))~~
 - ~~The permittee revises and submits all other applicable plans, e.g., monitoring and emissions averaging, with the submission. (40 CFR 63.10030(e)(8)(iii)(C))~~
 - ~~The permittee maintains records of all information regarding the choice of the definition of "startup". (40 CFR 63.10030(e)(8)(iii)(D))~~
- ~~The permittee begins to use the revised definition of "startup" in the next reporting period after receipt of written acknowledgement from the Administrator of the switch. (40 CFR 63.10030(e)(8)(iii)(E))~~
- ~~If using a CMS to demonstrate continuous compliance with an emission limit or operating limit, the permittee must develop a site-specific monitoring plan and submit this site-specific monitoring plan, if requested, at least 60 days before the initial performance evaluation (where applicable) of the CMS. This requirement also applies to the permittee if the permittee petitions the Administrator for alternative monitoring parameters under 40 CFR 63.8(f). This requirement to develop and submit a site-specific monitoring plan does not apply to affected sources with existing monitoring plans that apply to CEMS and CPMS prepared under Appendix B of 40 CFR Part 60 or 40 CFR Part 75, and that meet the requirements of 40 CFR 63.10010. Using the process described in 40 CFR 63.8(f)(4), the permittee may request approval of monitoring system quality assurance and quality control procedures alternative to those specified in this paragraph of this section and, if approved, include those in the site-specific monitoring plan. The monitoring plan must address the following provisions: (40 CFR 63.10000(d), 40 CFR 63.10010)~~
 - ~~Installation of the CMS or sorbent trap monitoring system sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device). See 40 CFR 63.10010(a) for further details. For PM CPMS installations, follow the procedures in 40 CFR 63.10010(h).~~
 - ~~Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems.~~

Commented [IAF466]: The Plans are already written and approved. It would offer a lot of clarity if we can remove portions of Condition IX.3 that DO NOT apply.

Commented [IAF467]:
Does not apply, not using CPMS

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- ~~— Schedule for conducting initial and periodic performance evaluations.~~
 - ~~— Performance evaluation procedures and acceptance criteria (e.g., calibrations), including the quality control program in accordance with the general requirements of 40 CFR 63.8(d).~~
 - ~~— On-going operation and maintenance procedures, in accordance with the general requirements of 40 CFR 63.8(c)(1)(iii), (c)(3), and (c)(4)(ii).~~
 - ~~— Conditions that define a CMS that is out of control consistent with 40 CFR 63.8(c)(7)(i) and for responding to out of control periods consistent with 40 CFR 63.8(c)(7)(ii) and (c)(8).~~
 - ~~— On-going recordkeeping and reporting procedures, in accordance with the general requirements of 40 CFR 63.10(c), (e)(1), and (e)(2)(i), or as specifically required under 40 CFR Part 63, Subpart UUUUU.~~
 - ~~— Alternatively, the requirements are considered to be met for a particular CMS or sorbent trap monitoring system if:
 - ~~— The CMS or sorbent trap monitoring system is installed, certified, maintained, operated, and quality assured either according to 40 CFR Part 75, or Appendix A or B of 40 CFR Part 63, Subpart UUUUU; and~~
 - ~~— The recordkeeping and reporting requirements of 40 CFR Part 75, or Appendix A or B of 40 CFR Part 63, Subpart UUUUU, which pertain to the CMS, are met.~~~~
 - ~~— If the permittee chooses to reapply for LEE status, the permittee must demonstrate all performance tests and CEMS or sorbent trap monitoring system data over a consecutive 3-year period show compliance with the LEE criteria. **(40 CFR 63.10006(b)(2) and (h))**~~
 - ~~— If any emission unit(s) cease(s) to operate in a manner that causes the unit(s) to meet the definition of an EGU subject to 40 CFR Part 63, Subpart UUUUU, the permittee must submit the notification in 40 CFR 63.10000(i)(2) no less than 30 days prior to when the EGU will cease complying with 40 CFR Part 63, Subpart UUUUU. **(40 CFR 63.10000(i)(2), 40 CFR 63.10030(f))**~~
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 UUUUU, for Coal and Oil-fired Electric Utility Steam-Generating Units, as it applies to FG-DSI/ACI-~~MATS~~-BR.² **(40 CFR Part 63, Subparts A and UUUUU)**

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).

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**FG-ISLANDS-BR
 FLEXIBLE GROUP CONDITIONS**

Commented [ER(468): FIND ORIGINAL PTI SHOULD 1A. IT APPEARS THAT THIS PTI APPLIES TO BOTH SCPP AND BRPP.

Commented [ER(469): PTI 18-14

DESCRIPTION

DSI and ACI sorbents delivered and conveyed pneumatically to the appropriate storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on each silo.

Emission Units: EU-BLR01-DSI_SILO1-BR, EU-BLR01-DSI_SILO2-BR, EU-BLR02-DSI_SILO1-BR, EU-BLR02-DSI_SILO2-BR EU-BLR01-ACI_SILO-BR, EU-BLR02-ACI_SILO-BR

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POLLUTION CONTROL EQUIPMENT

Bin vent filters or dust collectors on each emission unit

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Visible Emissions	7 percent opacity ²	6-minute average	Each individual bin vent filter or dust collector for FG-ISLANDS-BR	SC V.3	R 336.1301
2. PM	0.004 gr/dscf ²	hourly	Each individual bin vent filter or dust collector for FG-ISLANDS-BR	SC V.1	R 336.1331
3. PM _{2.5}	0.017 pph ²	hourly	Each individual bin vent filter or dust collector for included in FG-ISLANDS-BR	SC V.2	R 336.2803, R 336.2804
4. PM ₁₀	0.034 pph ²	hourly	Each individual bin vent filter or dust collector for EU-BLR01-DSI_SILO1-BR, EU-BLR01-DSI_SILO2-BR, EU-BLR02-DSI_SILO1-BR, EU-BLR02-DSI_SILO2-BR	SC V.2	R 336.2803, R 336.2804
5. PM ₁₀	0.068 pph ²	hourly	Each individual bin vent filter or dust collector for EU-BLR01-ACI_SILO-BR, EU-BLR02-ACI_SILO-BR	SC V.2	R 336.2803, R 336.2804

Commented [LRF471]: DTE requests this be moved up to SC I.3. so all of the FG-ISLANDS-BR EL's are listed together.

Commented [ER(472R471): MOVED TO ROW 3 PER DTE REQUEST.

II. MATERIAL LIMIT(S)

NA

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III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FG-ISLANDS-BR unless a program for continuous Fugitive Dust Control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1371, R 336.1372, R 336.2803, R 336.2804, 40 CFR 60.672)
2. The permittee shall not operate FG-ISLANDS-BR unless a malfunction abatement plan (MAP), as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804)
3. The permittee shall not operate FG-ISLANDS-BR for more than 12 hours per day, as determined on a daily basis.² (R 336.2803, R 336.2804)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any portion of FG-ISLANDS-BR unless the associated enclosures or fabric filters are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for FG-ISLANDS-BR as required in SC III.2.² (R 336.1910, R 336.1911, R 336.2803, R 336.2804)

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 verify the PM emission rates from each emission unit of FG-ISLANDS-BR or a representative emission unit by testing at owner's expense, in accordance with Department requirements, as requested by the AQD District Supervisor. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.1301, R 336.1331, R 336.2001, R 336.2003, R 336.2004, R 336.2801)
2. The permittee shall verify the PM10 and PM2.5 emission rates from each emission unit of FG-ISLANDS-BR or a representative emission unit by testing at owner's expense, in accordance with Department requirements, as requested by the AQD District Supervisor. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.2001, R 336.2003, R 336.2004, R 336.2801, R 336.2803, R 336.2804)

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Commented [ER(473)]: USE THIS TEXT WHEREVER I NEED TO INSERT A FUGITIVE DUST PROGRAM EXCEPT ONLY USE UARs THAT APPLY TO A FUGITIVE DUST PROGRAM WHEN ADDING THIS TEXT TO OTHER EMISSION UNITS OR FLEXIBLE GROUP.

DO NOT CHANGE THE UARs IN THIS CONDITION BECAUSE THEY COME FROM A PTI

Commented [ER(474)]: FIND PTI TO CONFIRM UAR 60.672 APPLICABILITY

WHY DOES SUBPART 000 APPLY?

ALSO LOOK AT PART 60, SUBPART Y.

Commented [ER(475)]: ADD PM TESTING CONDITION SIMILAR TO WHAT WAS PREVIOUSLY INSERTED IN SECTION I.

ADD AS CONDITION #4 WITH PM, PM10, PM2.5 AND VE TESTING METHOD REQUIREMENTS SC PER NEW SHELL TEMPLATE.

USE FG-ISLANDS-SC, V.3, 4, AND 6.

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- Annually, the permittee shall conduct a Reference Method 9 visible emissions readings of each emission unit of FG-ISLANDS-BR, at a minimum of once per calendar year, during maximum routine operating conditions.² (R 336.1301, R 336.1910, R 336.1911)

VI. MONITORING/RECORDKEEPING

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

- The permittee shall perform and document non-certified visible emissions observations as required in Emission Limit SC I.1 on a daily basis when FG-ISLANDS-BR is operating. If during the observation there are any visible emissions detected from an emission point, an EPA Method 9 certified visible emissions observation shall be performed. Records of the non-certified visible emissions observations, EPA Method 9 observations that are performed, the reason for any visible emissions observed, and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1910, R 336.1911)
- The permittee shall monitor and record, the hours of operation for FG-ISLANDS-BR on a daily basis.² (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1602, R 336.1702, R 336.1901, R 336.1910, R 336.2802, 40 CFR 52.21)

VII. REPORTING

- Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4.-|

See Appendix 8-2 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 Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-BLR01-DSI_SILO1-BR*	15.6 x 15.6 ²	80.5 ²	R 336.2803, R 336.2804
2. SV-BLR01-DSI_SILO2-BR*	15.6 x 15.6 ²	80.5 ²	R 336.2803, R 336.2804
3. SV-BLR02-DSI_SILO1-BR*	15.6 x 15.6 ²	80.5 ²	R 336.2803, R 336.2804
4. SV-BLR02-DSI_SILO2-BR*	15.6 x 15.6 ²	80.5 ²	R 336.2803, R 336.2804
5. SV-BLR01-ACI_SILO-BR*	15.6 x 15.6 ²	57.7 ²	R 336.2803, R 336.2804
6. SV-BLR02-ACI_SILO-BR*	15.6 x 15.6 ²	57.7 ²	R 336.2803, R 336.2804

*Stack/Vents discharged non-vertically.

Commented [LRF476]: This condition has been satisfied (7/16/2015). DTE requests it to be deleted.

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Commented [LRF477]: This FG doesn't reference any special reporting requirements in Appendix 8. DTE requests to remove.

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Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX

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IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

**FG-MATSPROJECTNSR_DSI/ACI-BR
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI) air quality control systems on the Belle River Boiler Nos. 1 and 2 for MATS compliance. The affected emission units commenced operation (on April 15, 2016) and shall continue for 5 years after the commencement of operation through April 15, 2021.

Emission Units: EU-BOILER1-BR, EU-BOILER2-BR, EU-BLR01-DSI_SILO1-BR, EU-BLR01-DSI_SILO2-BR, EU-BLR02-DSI_SILO1-BR, EU-BLR02-DSI_SILO2-BR, EU-BLR01-ACI_SILO-BR, EU-BLR02-ACI_SILO-BR

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. ~~The permittee shall calculate and keep records of PM₁₀, PM_{2.5}, CO₂, and CO₂e emission rates from each emission unit of FG-NSR_DSI/ACI-BR, in tons per year on a calendar year basis. The recordkeeping period shall begin on the first day of the month during which each emission unit of FG-NSR_DSI/ACI-BR and any of the affected emission units commence operation and shall continue for 5 years. The calculations and records shall be kept in a format acceptable to the Department. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205, R 336.2802(4)(e), R 336.2818)~~

Appendix 4-2 BR

VII. REPORTING

1. ~~Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(iii))~~

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))~~

Commented [ER(480)]: PTI 18-14

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Commented [ER(482)]: **KEEP TABLE.**

MAY BE ABLE TO DELETE THIS TABLE IF 30-DAY COMMENT PERIOD ENDS AFTER APRIL 2021.

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Commented [ER(483)]: DTE CHANGED THIS FLEXIBLE GROUP NAME FROM: FG-MATSPROJECT-BR

TO: FG-NSR_DSI/ACI-BR

Commented [ER(484)]: BECAUSE THIS TEXT ORIGINATES IN A PTI, I REJECTED ALL TEXT CHANGES EXCEPT THE UPDATES TO THE NEW FG NAME PROPOSED BY DTE.

Commented [LRF485]: This condition was satisfied 4/15/2021. DTE requests it is deleted.

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
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~~3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))~~

~~4.~~

~~45. The permittee shall submit records of PM, PM₁₀, CO₂, and CO₂e emissions from FG-NSR_DSI/ACI-BR and FG-NSR_DSI/ACI-SC in tons per calendar year to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of each calendar year identified in FG-NSR_DSI/ACI-BR SC VI.1 and FG-NSR_DSI/ACI-SC SC VI.1 if both of the following apply:~~

~~a. The calendar year combined actual emissions of either PM, PM₁₀, CO₂, and CO₂e exceed the baseline actual emissions (BAE) by a significant amount, and~~

~~b. The calendar year combined actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each emission unit included in the Hybrid Test used for FG-NSR_DSI/ACI-BR and FG-NSR_DSI/ACI-SC.~~

~~The report shall contain the name, address, and telephone number of the facility; the annual emissions as calculated pursuant to FG-NSR_DSI/ACI-BR and FG-NSR_DSI/ACI-SC; and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (R 336.2818)~~

~~See Appendix 8.2 BR~~

~~VIII. STACK/VENT RESTRICTION(S)~~

~~NA~~

~~IX. OTHER REQUIREMENT(S)~~

~~NA~~

~~Footnotes:~~

~~¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).~~

~~²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).~~

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Section 2 – Belle River Power Plant

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PTI No.: MI-PTI-B2796-20XX

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
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 PTI No.: MI-PTI-B2796-20XX

APPENDICES

Appendix 1-2 BR. 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 2-2 BR. Schedule of Compliance

Section 2 – Belle River Power Plant

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The following schedule is required by Civil Action No. 2:10-cv-13101 (ECF No. 282) filed on July 22, 2020. This schedule of compliance is only applicable to Emission Unit IDs: EU-BOILER1-BR & EU-BOILER2-BR. The paragraph number below references the Paragraph in the consent decree. **(Civil Action No. 2:10-cv-13101)**

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<u>Compliance Date</u>	<u>Requirement</u>	<u>Paragraph</u>
12/31/2030	Retrofit, refuel, or repower each unit	7
12/31/2029	Notify Plaintiffs in writing which option (from Paragraph 7) is elected to be used for each unit	8
9/20/2020	Comply with the specified emission rates for each individual unit	9 & 24
7/22/2020	Continuously operate pollution controls	10
12/31/2020	Comply with the specified System-Wide Annual Tonnage Limitations for each calendar year	11
3/1/2022	Surrender, sell, bank, use, trade, or transfer NO ^x and SO ₂ Allowances in accordance with Consent Decree, beginning in calendar year 2021.	16, 19, 20, & 21
9/20/2020	Continuously operate each PM control device and use good air pollution control practices at all times each unit is in operation	23

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))

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Appendix 3-2 BR. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-BOILERS-BR.

3-2 BR.1. Continuous Emission Monitoring Systems (SO₂)

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The Continuous Emissions Monitoring Systems (CEMS) performance specifications defined in 40 CFR Part 75, Appendix B are adopted. The Certified SO₂ monitors will be used to determine sulfur dioxide emissions. The data reduction procedures defined in R 336.2175 will be used to convert SO₂ emission monitoring data in parts per million to pounds SO₂/MM BTU. After the last day of each calendar month, the CEMS data recording system will generate and record a monthly average (pounds SO₂/MM BTU) from validated data reported for Part 75 for the previous month.

3-2 BR.2. Continuous Emissions Monitoring System (Title IV)

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

Methods of measurement, frequency of measurement and record keeping methods for CEMS required under 40 CFR 75 are outlined in the most recent version of the DTE CEMS QA/QC Plan for the Belle River Power Plant.

Commented [LRF488]: Specified actual plan for clarification.

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

Commented [ER(489R488)]: I ACCEPTED THE UPDATED PLAN NAME and added "for the Belle River Power Plant" at the end of this sentence.

3-2 BR.3. Continuous Opacity Monitoring Systems

The permittee shall conduct an annual audit of the Continuous Opacity Monitoring System (COMS) The COMS performance specifications defined in 40 CFR Part 60, Appendix B are adopted. (R 336.1213(3))

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

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

Section 2 – Belle River Power Plant

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

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

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

Appendix 4-2 BR. Recordkeeping

~~EGLE INSET HERE~~

~~4-2 BR.4.1~~

~~NA~~

~~4-2 BR.4.2~~

Project Emissions for FG-NSR_DSI/ACI-BR

All information in this Appendix shall be maintained pursuant to R 336.2818(3) for 5 years after the emission units identified in Table C resume normal operation.

A. Project Description

DTE Energy is proposing to install Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI) air quality control systems on the Belle River Units 1 and 2, and on the St. Clair Units 1, 2, 3, 4, 6, and 7 as part of the proposed MATS Compliance Project (the project). The use of DSI to control acid gas emissions is also expected to reduce PM, PM10, PM2.5, and NOx emissions from these units. However, the reaction products from the use of DSI will include carbon dioxide (CO2) which is a greenhouse gas (GHG) and a regulated pollutant under the Michigan New Source Review (NSR) program.

B. Applicability Test Description

DTE Energy has demonstrated that the proposed project will not cause a significant emissions increase to the source using the Hybrid Test. The Combined St. Clair and Belle River Project Emissions Change equals the Combined St. Clair and Belle River Projected Actual Emissions (PAE) minus the existing units Combined Baseline Actual Emissions (BAE) plus new units Potential Emissions, as described in R 336.2802(4)(e). Existing emission units are included in FG-MATS-BR and FG-MATS-SC and new emissions units are included in FG-ISLANDS-BR and FG-ISLANDS-SC.

C. Emissions Table

Pollutant	FG-MATS-BR, FG-MATS-SC and Effected Emission Units			FG-ISLANDS-BR, FG-ISLANDS-SC	
	Combined Baseline Actual Emissions (tpy)	Combined Projected Actual Emissions (tpy)	Combined Excluded Emissions (tpy)	Combined Potential Emissions (tpy)	
PM	735.1	739.1	0	9.7	
PM10	1,362.7	1,364.7	1.0	8.8	
CO2	16,189,473.3	16,237,089.0	47,615.7	0	
CO2e	16,312,916.3	16,360,532.0	47,615.7	0	

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Commented [LRF492]: EGLE AQD to renumber

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

~~D. Netting Calculations and Discussion:~~

~~NA~~

Appendix 5-2 BR. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX

Appendix 6-2 BR. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-2015c09. 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.

Source-Wide PTI No MI-PTI-B2796-2015c09a is being reissued as Source-Wide PTI No. ~~MI-PTI-B2796-20XXYY15~~.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
164-08C	201500008*	Refined emissions fuel project	EU-BOILER1-BR EU-BOILER2-BR

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The following ROP amendments or modifications were issued after the effective date of ROP No. ~~MI-ROP-B2796-20XXYY15~~.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
18-14	201500074/ December 15, 2015	Incorporate PTI No. 18-14 into Sections 1 (St. Clair Power Plant) and 3 (Belle River Power Plant). This PTI is for installation of air emission control systems, Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI), on Belle River Units 1 and 2, and on St. Clair Units 1, 2, 3, 4, 6, and 7 as part of the proposed Mercury and Air Toxics Standards (MATS) in accordance with 40 CFR Part 63, Subpart UUUUU. Existing EGUs must comply with this subpart not later than April 16, 2015, unless they receive an extension (which DTE has received), then they must comply no later than April 16, 2016. DTE has received an extension and have also received a waiver to construct and have started construction.	FG--MATS_BR FG-ISLANDS-BR FG-NSR_DSI/ACI-BR NOTE: The permittee changed the following flexible group names: FG-DSI/ACI-BR changed to FG-MATS-BR, and FG-MATSPROJECT-BR changed to FG-NSR_DSI/ACI-BR.
NA	201500148/ June 16, 2016	Reopening to update from CAIR to CSAPR.	FG-BOILERS-BR

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Appendix 7-2 BR. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX

Expiration Date: XX

PTI No.: MI-PTI-B2796-20XX

Appendix 8-2 BR. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use 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

For [EU-BOILER1-BR and EU-BOILER2-BR](#) (Belle River Boiler Nos. 1 and 2), the permittee shall comply with the reporting requirements of the Standards of Performance for New Sources (NSPS), Subparts A and D. The notification requirements are in addition to the monitoring requirements identified and referenced in FG-BOILERS-BR.

[8-2 BR.1. Notification requirements, per Section 60.7 of 40 CFR, Part 60, Subpart A:](#)

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

Notification of reconstruction activities per Section 60.15 of 40 CFR, Part 60, Subpart A:

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

[8-2 BR.2. Reporting requirements per 40 CFR, Part 60, Subpart D:](#)

Excess emission (EE) reports and monitoring system performance (MPS) reports shall be submitted every quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter. Each EE and MPS report shall include the information required in 60.7(c). Periods of excess emission and monitoring system downtime shall be reported for the following:

1. Opacity: EE are defined as any 6-minute period during which the average opacity of emissions exceed 20% opacity, except that one 6-minute average per hour of up to 27% need not be reported.
2. SO₂: EE are defined as any 3-hour period during which the average emissions (arithmetic average of 3 contiguous one-hour periods) of SO₂ as measured by a CEMS exceeded the applicable standard under 60.43.
3. NO_x: EE are defined as any 3-hour period during which the average emissions (arithmetic average of 3 contiguous one-hour periods) of NO_x as measured by a CEMS exceeded the applicable standard under 60.44.

Commented [ER(499)]: DTE CHANGED CHANGED "#2 FUEL" TO "DIESEL" IN EACH EMISSION UNIT DESCRIPTION..

BOTH CHANGES APPEAR ACCEPTABLE.
Per conversation with Mark Mitchell, the terms #2 fuel oil and diesel are equivalent.

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

Appendix 9-2 BR. Phase Two Acid Rain Permit

EGLE

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

PHASE II ACID RAIN PERMIT

Permit No. MI-AR-6034-20XX20XX21

Permittee	DTE Electric - Belle River Power Plant
Address	4505 King Road, East China Township, MI
SRN	B2796
Plant Code	6034
Issue Date	DRAFT
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-B2796-20XX

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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 federal Clean Air Act, new units are not allocated allowances in 40 CFR Part 73 and must obtain allowances by other means (Section 403(e) of the federal 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 federal 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.

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

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 federal Clean Air Act, the Michigan Department of Environment, Great Lakes, and Energy, 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:

Mr. Brian Carley
Environmental Quality Specialist
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division, Jackson District Office
State Office Building, 4th Floor
301 East Louis B. Glick Highway
Jackson, Michigan 49201-1556

Telephone: 517-416-4631
Facsimile: 517-780-7855

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

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX

Terms and Conditions:

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

		20XX	20XX	20XX	20XX	20XX
Unit 1	SO ₂ allowances	18,536	18,536	18,536	18,536	18,536
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective January 1, 2020. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.27 lb/mmBtu. In addition, this unit shall not have an annual heat input less than 47,540,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

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Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX

Terms and Conditions: (continued)

		20XX	20XX	20XX	20XX	20XX
Unit 2	SO ₂ allowances	18,801	18,801	18,801	18,801	18,801
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective January 1, 2020. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.27 lb/mmBtu. In addition, this unit shall not have an annual heat input less than 42,597,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

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		20XX	20XX	20XX	20XX	20XX
Unit CTG 12-1	SO ₂ allowances	<p>This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).</p>				

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Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX

Terms and Conditions: (continued)

		20XX	20XX	20XX	20XX	20XX
Unit CTG 12-2	SO ₂ allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				

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		20XX	20XX	20XX	20XX	20XX
Unit CTG 13-1	SO ₂ allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				

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Comments, notes and justifications regarding permit decisions, and changes made to the permit application forms during the review process:

Permit Application: (attached)

Acid Rain Permit Application submitted December 3, 2019
Phase II NOx Compliance Plan submitted December 3, 2019
Phase II NOx Averaging Plan submitted June 7, 2019

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

DTE Electric-Belle River Power Plant
Facility (Source) Name (from STEP 1)

Acid Rain - Page 2

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 source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

DTE Electric-Belle River Power Plant
Facility (Source) Name (from STEP 1)

Acid Rain - Page 3

STEP 3, Cont'd.

Excess Emissions Requirements

- (1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

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

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

DTE Electric-Belle River Power Plant
Facility (Source) Name (from STEP 1)

Acid Rain - Page 4

STEP 3, Cont'd.

Effect on Other Authorities

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


- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a source can hold; provided, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

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	Benjamin Felton, Senior Vice President, Fossil Generation	
Signature		Date 11/12/19

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX



United States
 Environmental Protection Agency
 Acid Rain Program

OMB No. 2060-0258
 Approval expires 12/31/2021

Acid Rain NO_x Compliance Plan

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

This submission is: New Revised

Page 1 of 2

STEP 1
 Indicate plant name, State, and Plant code from the current Certificate of Representation covering the facility.

DTE Electric - Belle River Power Plant	MI	6034
Plant Name	State	Plant Code

STEP 2

Identify each affected Group 1 and Group 2 boiler using the unit IDs from the current Certificate of Representation covering the facility. Also indicate the boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom, and select the compliance option for each unit by making an "X" in the appropriate row and column.

	1	2				
	ID#	ID#	ID#	ID#	ID#	ID#
	DBW	DBW				
	Type	Type	Type	Type	Type	Type
(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)						
(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)						
(c) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)						
(d) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)						
(e) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)						
(f) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)						
(g) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)						
(h) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)						
(i) NO _x Averaging Plan (include NO _x Averaging form)	X	X				
(j) 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)						
(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(B) with NO _x Averaging (check the NO _x Averaging Plan box and include NO _x Averaging form)						
(l) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17(a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)						

EPA Form 7610-28 (Revised 8-2019)

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

DTE Electric - Belle River Power Plant
Plant Name (from Step 1)

NO_x Compliance - Page 2
Page 2 of 2

STEP 3
Identify the first calendar year in which this plan will apply.

January 1, 2020

STEP 4
Read the special provisions and certification, enter the name of the designated representative, sign and date.

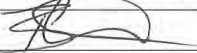
Special Provisions

General.

This source is subject to the standard requirements in 40 CFR 72.9. These requirements are listed in this source's Acid Rain Permit.

Certification

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

Name	Benjamin Felton, Senior Vice President, Fossil Generation	
Signature		Date 11/12/19

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX



United States
 Environmental Protection Agency
 Acid Rain Program

OMB No. 2060-0258
 Approval expires 11/30/2018

Acid Rain NO_x Averaging Plan

For more information, see instructions and refer to 40 CFR 76.11 Page 1

This submission is: New Revised Page 1 of 2

STEP 1

Identify the units participating in this averaging plan by plant name, State, and unit ID. 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 (ACEL) 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.

Plant Name	State	Unit ID#	(a) Emission Limitation	(b) ACEL	(c) Annual Heat Input Limit
Belle River 6034	MI	1	0.46	0.27	47,540,000
Belle River 6034	MI	2	0.46	0.27	42,597,000
MONROE 1733	MI	1	0.68	0.10	39,094,000
MONROE 1734	MI	2	0.68	0.10	50,700,000
MONROE 1735	MI	3	0.68	0.10	54,404,000
MONROE 1736	MI	4	0.68	0.10	54,418,000
River Rouge 1740	MI	3	0.46	0.54	19,201,000
ST CLAIR 1743	MI	2	0.46	0.50	10,469,000
ST CLAIR 1743	MI	3	0.46	0.50	11,782,000
ST CLAIR 1743	MI	6	0.40	0.25	16,877,000
ST CLAIR 1743	MI	7	0.40	0.25	30,308,000
Trenton Channel 1745	MI	9A	0.40	0.24	23,621,000

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 Btu-weighted 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

0.21

$$\frac{\sum_{i=1}^n (R_{ui} \times HI_i)}{\sum_{i=1}^n HI_i}$$

Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7

0.56

$$\frac{\sum_{i=1}^n [R_{li} \times HI_i]}{\sum_{i=1}^n HI_i}$$

≤

Where,

- R_{ui} = Alternative 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;
- HI_i = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;
- n = Number of units in the averaging plan

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
 Expiration Date: XX
 PTI No.: MI-PTI-B2796-20XX

Plant Name (from Step 1) **DTE Energy Electric**

NOx Averaging - Page 2

STEP 3

Identify the first calendar year in which this plan will apply.

January 1, **2020**

STEP 4

Special Provisions

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NOx under the plan only if the following requirements are met:

- (j) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and
- (a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,
- (b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or
- (i) If one or more of the units does not meet the requirements of (j), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.
- (ii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

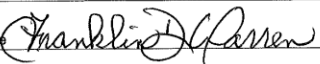
The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

Certification

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

Name Franklin D. Warren, Designated Representative	
Signature 	Date 6-6-19

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

Appendix 10-2 BR. Cross State Air Pollution Rule (CSAPR) Trading Program Title V Requirements

Description of CSAPR Monitoring Provisions

The CSAPR subject units, and the unit-specific monitoring provisions, at this source are identified in the following tables. These units are subject to the requirements for the CSAPR NO_x Annual Trading Program, CSAPR NO_x Ozone Season Group 3 Trading Program, and CSAPR SO₂ Group 1 Trading Program, which are included below as Sections I, II, and III, respectively.

Each unit will use one of the following as the monitoring methodology for each parameter as provided below and shall comply with the general monitoring, recordkeeping, reporting and other requirements in conditions 1 through 5 below and in paragraph (b) of Sections I, II, and III:

- [Continuous emission monitoring system or systems \(CEMS\) requirements pursuant to 40 CFR Part 75, Subpart B \(for SO₂ monitoring\) or 40 CFR Part 75, Subpart H \(for NO_x monitoring\)](#)
- [Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D](#)
- [Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E](#)
- [Low Mass Emissions excepted monitoring \(LME\) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19](#)
- [EPA-approved alternative monitoring system requirements pursuant to 40 CFR Part 75, Subpart E](#)

6. Unit ID: 1	
Parameter	Monitoring Methodology
SO ₂	CEMS requirements pursuant to 40 CFR Part 75, Subpart B
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	CEMS requirements pursuant to 40 CFR Part 75, Subpart B or 40 CFR Part 75, Subpart H

Unit ID: 2	
Parameter	Monitoring Methodology
SO ₂	CEMS requirements pursuant to 40 CFR Part 75, Subpart B
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	CEMS requirements pursuant to 40 CFR Part 75, Subpart B or 40 CFR Part 75, Subpart H

7. [The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 \(CSAPR NO_x Annual Trading Program\), 97.1030 through 97.1035 \(CSAPR NO_x Ozone Season Group 3 Trading Program\), and 97.630 through 97.635 \(CSAPR SO₂ Group 1 Trading Program\). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable CSAPR trading programs.](#)

8. [Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <https://www.epa.gov/airmarkets/monitoring-plans-part-75-sources>.](#)

9. [Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR Part 75, Subpart E and 40 CFR 75.66 and 97.435 \(CSAPR NO_x Annual Trading Program\), 97.1035 \(CSAPR NO_x Ozone Season Group 3 Trading Program\), and/or 97.635 \(CSAPR SO₂ Group 1 Trading Program\). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.](#)

10. [Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 \(CSAPR NO_x Annual Trading Program\), 97.1030 through 97.1034 \(CSAPR NO_x Ozone Season Group 3 Trading Program\), and/or 97.630 through 97.634 \(CSAPR SO₂ Group 1 Trading Program\) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40](#)

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Commented [ER(504)]: [NEW CSAPR PERMIT FROM BRIAN CARLEY](#)

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
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[CFR 75.66 and 97.435 \(CSAPR NO_x Annual Trading Program\)](#), [97.1035 \(CSAPR NO_x Ozone Season Group 3 Trading Program\)](#), and/or [97.635 \(CSAPR SO₂ Group 1 Trading Program\)](#). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.

11. The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (CSAPR NO_x Annual Trading Program), 97.1030 through 97.1034 (CSAPR NO_x Ozone Season Group 3 Trading Program), and 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.

SECTION I: CSAPR NO_x Annual Trading Program requirements (40 CFR 97.406)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

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(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of CSAPR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the CSAPR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

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(c) NO_x emissions requirements.

(1) CSAPR NO_x Annual emissions limitation.

- (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall hold, in the source's compliance account, CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Annual units at the source.
- (ii). If total NO_x emissions during a control period in a given year from the CSAPR NO_x Annual units at a CSAPR NO_x Annual source are in excess of the CSAPR NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:

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(A). The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall hold the CSAPR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and

(B). The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.

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(2) CSAPR NO_x Annual assurance provisions.

- (i). If total NO_x emissions during a control period in a given year from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for

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such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.

- (ii). The owners and operators shall hold the CSAPR NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).
 - (iv). It shall not be a violation of 40 CFR Part 97, Subpart AAAAA or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold CSAPR NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each CSAPR NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.
- (3) Compliance periods.
- (i). A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - (ii). A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
- (i). A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

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- (5) Allowance Management System requirements. Each CSAPR NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart AAAAA.
- (6) Limited authorization. A CSAPR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the CSAPR NO_x Annual Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR Part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A CSAPR NO_x Annual allowance does not constitute a property right.

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(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Annual allowances in accordance with 40 CFR Part 97, Subpart AAAAA.
- (2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

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(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i). The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each CSAPR NO_x Annual unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart AAAAA.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Annual Trading Program.
- (2) The designated representative of a CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall make all submissions required under the CSAPR NO_x Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

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(f) Liability.

- (1) Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual source or the designated representative of a CSAPR NO_x Annual source shall also apply to the owners and operators of such source and of the CSAPR NO_x Annual units at the source.
- (2) Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual unit or the designated representative of a CSAPR NO_x Annual unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the CSAPR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Annual

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source or CSAPR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION II: CSAPR NO_x Ozone Season Group 3 Trading Program Requirements (40 CFR 97.1006)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.1013 through 97.1018.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

(1) The owners and operators, and the designated representative, of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.1030 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.1031 (initial monitoring system certification and recertification procedures), 97.1032 (monitoring system out-of-control periods), 97.1033 (notifications concerning monitoring), 97.1034 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.1035 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

(2) The emissions data determined in accordance with 40 CFR 97.1030 through 97.1035 shall be used to calculate allocations of CSAPR NO_x Ozone Season Group 3 allowances under 40 CFR 97.1011(a)(2) and (b) and 97.1012 and to determine compliance with the CSAPR NO_x Ozone Season Group 3 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.1030 through 97.1035 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_x emissions requirements.

(1) CSAPR NO_x Ozone Season Group 3 emissions limitation.

(i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall hold, in the source's compliance account, CSAPR NO_x Ozone Season Group 3 allowances available for deduction for such control period under 40 CFR 97.1024(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Ozone Season Group 3 units at the source.

(ii). If total NO_x emissions during a control period in a given year from the CSAPR NO_x Ozone Season Group 3 units at a CSAPR NO_x Ozone Season Group 3 source are in excess of the CSAPR NO_x Ozone Season Group 3 emissions limitation set forth in paragraph (c)(1)(i) above, then:

(A). The owners and operators of the source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall hold the CSAPR NO_x Ozone Season Group 3 allowances required for deduction under 40 CFR 97.1024(d); and

(B). The owners and operators of the source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart GGGGG and the Clean Air Act.

(2) CSAPR NO_x Ozone Season Group 3 assurance provisions.

(i). If total NO_x emissions during a control period in a given year from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common

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designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Ozone Season Group 3 allowances available for deduction for such control period under 40 CFR 97.1025(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.1025(b), of multiplying—

- (A). The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and
- (B). The amount by which total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
- (ii). The owners and operators shall hold the CSAPR NO_x Ozone Season Group 3 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season Group 3 trading budget under 40 CFR 97.1010(a) and the state's variability limit under 40 CFR 97.1010(b).
- (iv). It shall not be a violation of 40 CFR Part 97, Subpart GGGGG or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
- (v). To the extent the owners and operators fail to hold CSAPR NO_x Ozone Season Group 3 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
- (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
- (B). Each CSAPR NO_x Ozone Season Group 3 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart GGGGG and the Clean Air Act.
- (3) Compliance periods.
- (i). A CSAPR NO_x Ozone Season Group 3 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.1030(b) and for each control period thereafter.
- (ii). A CSAPR NO_x Ozone Season Group 3 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.1030(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
- (i). A CSAPR NO_x Ozone Season Group 3 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 3 allowance that was allocated for such control period or a control period in a prior year.

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(ii). A CSAPR NO_x Ozone Season Group 3 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 3 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

(5) Allowance Management System requirements. Each CSAPR NO_x Ozone Season Group 3 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart GGGGG.

(6) Limited authorization. A CSAPR NO_x Ozone Season Group 3 allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:

(i). Such authorization shall only be used in accordance with the CSAPR NO_x Ozone Season Group 3 Trading Program; and

(ii). Notwithstanding any other provision of 40 CFR Part 97, Subpart GGGGG, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

(7) Property right. A CSAPR NO_x Ozone Season Group 3 allowance does not constitute a property right.

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(d) Title V permit revision requirements.

(1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Ozone Season Group 3 allowances in accordance with 40 CFR Part 97, Subpart GGGGG.

(2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.1030 through 97.1035, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.1006(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

(1) Unless otherwise provided, the owners and operators of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.

(i). The certificate of representation under 40 CFR 97.1016 for the designated representative for the source and each CSAPR NO_x Ozone Season Group 3 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.1016 changing the designated representative.

(ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart GGGGG.

(iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Ozone Season Group 3 Trading Program.

(2) The designated representative of a CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall make all submissions required under the CSAPR NO_x Ozone Season Group 3 Trading Program, except as provided in 40 CFR 97.1018. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

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(f) Liability.

(1) Any provision of the CSAPR NO_x Ozone Season Group 3 Trading Program that applies to a CSAPR NO_x Ozone Season Group 3 source or the designated representative of a CSAPR NO_x Ozone Season Group 3 source shall also apply to the owners and operators of such source and of the CSAPR NO_x Ozone Season Group 3 units at the source.

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(2) Any provision of the CSAPR NO_x Ozone Season Group 3 Trading Program that applies to a CSAPR NO_x Ozone Season Group 3 unit or the designated representative of a CSAPR NO_x Ozone Season Group 3 unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the CSAPR NO_x Ozone Season Group 3 Trading Program or exemption under 40 CFR 97.1005 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Ozone Season Group 3 source or CSAPR NO_x Ozone Season Group 3 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

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(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

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SECTION III: CSAPR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

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(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

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(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of CSAPR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the CSAPR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

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(c) SO₂ emissions requirements.

(1) CSAPR SO₂ Group 1 emissions limitation.

- (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all CSAPR SO₂ Group 1 units at the source.
- (ii). If total SO₂ emissions during a control period in a given year from the CSAPR SO₂ Group 1 units at a CSAPR SO₂ Group 1 source are in excess of the CSAPR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall hold the CSAPR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and
 - (B). The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.

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(2) CSAPR SO₂ Group 1 assurance provisions.

- (i). If total SO₂ emissions during a control period in a given year from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such

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SO₂ emissions exceeds the respective common designated representative's assurance level; and

(B). The amount by which total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.

- (ii). The owners and operators shall hold the CSAPR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
- (iv). It shall not be a violation of 40 CFR Part 97, Subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
- (v). To the extent the owners and operators fail to hold CSAPR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each CSAPR SO₂ Group 1 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.

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(3) Compliance periods.

- (i). A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
- (ii). A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.

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(4) Vintage of allowances held for compliance.

- (i). A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.
- (ii). A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

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(5) Allowance Management System requirements. Each CSAPR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart CCCCC.

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(6) Limited authorization. A CSAPR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:

- (i). Such authorization shall only be used in accordance with the CSAPR SO₂ Group 1 Trading Program; and
- (ii). Notwithstanding any other provision of 40 CFR Part 97, Subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

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(7) Property right. A CSAPR SO₂ Group 1 allowance does not constitute a property right.

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(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR SO₂ Group 1 allowances in accordance with 40 CFR Part 97, Subpart CCCCC.
- (2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

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(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i). The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each CSAPR SO₂ Group 1 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart CCCCC.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR SO₂ Group 1 Trading Program.
- (2) The designated representative of a CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall make all submissions required under the CSAPR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

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(f) Liability.

- (1) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 source or the designated representative of a CSAPR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the CSAPR SO₂ Group 1 units at the source.
- (2) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 unit or the designated representative of a CSAPR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.

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(g) Effect on other authorities.

No provision of the CSAPR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR SO₂ Group 1 source or CSAPR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

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(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

The CSAPR subject units, and the unit-specific monitoring provisions, at this source are identified in the following tables. These units are subject to the requirements for the CSAPR NO_x Annual Trading Program, CSAPR NO_x Ozone Season Group 2 Trading Program, and CSAPR SO₂ Group 1 Trading Program, which are included below as Sections I, II, and III, respectively.

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Each unit will use one of the following as the monitoring methodology for each parameter as provided below and shall comply with the general monitoring, recordkeeping, reporting and other requirements in conditions 1 through 5 below and in paragraph (b) of Sections I, II, and III:

- ~~Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B (for SO₂ monitoring) or 40 CFR Part 75, Subpart H (for NO_x monitoring)~~
- ~~Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D~~
- ~~Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E~~
- ~~Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19~~
- ~~EPA-approved alternative monitoring system requirements pursuant to 40 CFR Part 75, Subpart E~~

Unit ID: 1	
Parameter	Monitoring Methodology
SO ₂	CEMS requirements pursuant to 40 CFR Part 75, Subpart B
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	CEMS requirements pursuant to 40 CFR Part 75, Subpart B or 40 CFR Part 75, Subpart H

Unit ID: 2	
Parameter	Monitoring Methodology
SO ₂	CEMS requirements pursuant to 40 CFR Part 75, Subpart B
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	CEMS requirements pursuant to 40 CFR Part 75, Subpart B or 40 CFR Part 75, Subpart H

6. ~~The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (CSAPR NO_x Annual Trading Program), 97.830 through 97.835 (CSAPR NO_x Ozone Season Group 2 Trading Program), and 97.630 through 97.635 (CSAPR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable CSAPR trading programs.~~
7. ~~Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <https://www.epa.gov/airmarkets/clean-air-markets-monitoring-plans-part-75-sources>.~~
8. ~~Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR Part 75, Subpart E and 40 CFR 75.66 and 97.435 (CSAPR NO_x Annual Trading Program), 97.835 (CSAPR NO_x Ozone Season Group 2 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.~~
9. ~~Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (CSAPR NO_x Annual Trading Program), 97.830 through 97.834 (CSAPR NO_x Ozone Season Group 2 Trading Program), and/or 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (CSAPR NO_x Annual Trading Program), 97.835 (CSAPR NO_x Ozone Season Group 2 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.~~
10. ~~The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (CSAPR NO_x Annual Trading Program), 97.830 through 97.834 (CSAPR NO_x Ozone Season Group 2 Trading Program), and 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.~~

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SECTION I: CSAPR NO_x Annual Trading Program requirements (40 CFR 97.406)

(i) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

(j) Emissions monitoring, reporting, and recordkeeping requirements.

(3) The owners and operators, and the designated representative, of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

(4) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of CSAPR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the CSAPR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(k) NO_x emissions requirements.

(8) CSAPR NO_x Annual emissions limitation.

(i) As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall hold, in the source's compliance account, CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Annual units at the source.

(ii) If total NO_x emissions during a control period in a given year from the CSAPR NO_x Annual units at a CSAPR NO_x Annual source are in excess of the CSAPR NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:

(A) The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall hold the CSAPR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and

(B) The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.

(9) CSAPR NO_x Annual assurance provisions.

(i) If total NO_x emissions during a control period in a given year from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying—(A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all CSAPR

Commented [ER(505)]: FORMATTING NOTE:
FROM THE "Designated representative requirements"
paragraph through the remainder of the CSAPR permit,
the automatic numbering is incorrect!
There are two issues:
* In the original document provided by Brian Carley, the
"Designated representative requirements" paragraph
starts with "(a)" not (i). "When I correct the "(i)" error in
the working draft it creates another error in numbering
the subparagraphs (Word changes the subparagraph
from numbers to lower case roman numerals).

It appears that I do not have the skills to correct this error.
I will have to leave it to the secretary to correct the
numbering.

Deborah Clavettone, please ask me for the original
"CSAPR NO_x Annual Trading Program." document for
reference

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~~NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.~~

- ~~(ii) The owners and operators shall hold the CSAPR NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.~~
- ~~(iii) Total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).~~
- ~~(iv) It shall not be a violation of 40 CFR Part 97, Subpart AAAAA or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.~~
- ~~(v) To the extent the owners and operators fail to hold CSAPR NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
(A) The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
(B) Each CSAPR NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.~~

~~(10) Compliance periods.~~

- ~~(i) A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.~~
- ~~(ii) A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.~~

~~(11) Vintage of allowances held for compliance.~~

- ~~(i) A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for such control period or a control period in a prior year.~~
- ~~(ii) A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.~~

~~(12) Allowance Management System requirements. Each CSAPR NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart AAAAA.~~

~~(13) Limited authorization. A CSAPR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:~~

- ~~(i) Such authorization shall only be used in accordance with the CSAPR NO_x Annual Trading Program; and~~
- ~~(ii) Notwithstanding any other provision of 40 CFR Part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.~~

~~(14) Property right. A CSAPR NO_x Annual allowance does not constitute a property right.~~

~~(l) Title V permit revision requirements.~~

~~(1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Annual allowances in accordance with 40 CFR Part 97, Subpart AAAAA.~~

~~(2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR~~

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~~75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).~~

~~(m) Additional recordkeeping and reporting requirements.~~

- ~~(3) Unless otherwise provided, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - ~~(i) The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each CSAPR NO_x Annual unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.~~
 - ~~(ii) All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart AAAAA.~~
 - ~~(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Annual Trading Program.~~~~
- ~~(4) The designated representative of a CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall make all submissions required under the CSAPR NO_x Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.~~

~~(n) Liability.~~

- ~~(1) Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual source or the designated representative of a CSAPR NO_x Annual source shall also apply to the owners and operators of such source and of the CSAPR NO_x Annual units at the source.~~
- ~~(2) Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual unit or the designated representative of a CSAPR NO_x Annual unit shall also apply to the owners and operators of such unit.~~

~~(o) Effect on other authorities.~~

~~No provision of the CSAPR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Annual source or CSAPR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.~~

~~(p) Effect on units in Indian country.~~

~~Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.~~

SECTION II: CSAPR NO_x Ozone Season Group 2 Trading Program Requirements (40 CFR 97.806)

~~(i) Designated representative requirements.~~

~~The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.813 through 97.818.~~

~~(j) Emissions monitoring, reporting, and recordkeeping requirements.~~

- ~~(4) The owners and operators, and the designated representative, of each CSAPR NO_x Ozone Season Group 2 source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.830 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.831 (initial monitoring system certification and recertification procedures), 97.832 (monitoring~~

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system out-of-control periods), 97.833 (notifications concerning monitoring), 97.834 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.835 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
(5) The emissions data determined in accordance with 40 CFR 97.830 through 97.835 shall be used to calculate allocations of CSAPR NO_x Ozone Season Group 2 allowances under 40 CFR 97.811(a)(2) and (b) and 97.812 and to determine compliance with the CSAPR NO_x Ozone Season Group 2 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.830 through 97.835 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(k) NO_x emissions requirements.

(8) CSAPR NO_x Ozone Season Group 2 emissions limitation.

- (i) As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Ozone Season Group 2 source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall hold, in the source's compliance account, CSAPR NO_x Ozone Season Group 2 allowances available for deduction for such control period under 40 CFR 97.824(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Ozone Season Group 2 units at the source.
- (ii) If total NO_x emissions during a control period in a given year from the CSAPR NO_x Ozone Season Group 2 units at a CSAPR NO_x Ozone Season Group 2 source are in excess of the CSAPR NO_x Ozone Season Group 2 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A) The owners and operators of the source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall hold the CSAPR NO_x Ozone Season Group 2 allowances required for deduction under 40 CFR 97.824(d); and
 - (B) The owners and operators of the source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart EEEEE and the Clean Air Act.

(9) CSAPR NO_x Ozone Season Group 2 assurance provisions.

- (i) If total NO_x emissions during a control period in a given year from all CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Ozone Season Group 2 allowances available for deduction for such control period under 40 CFR 97.825(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.825(b), of multiplying:
 - (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and
 - (B) The amount by which total NO_x emissions from all CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
- (ii) The owners and operators shall hold the CSAPR NO_x Ozone Season Group 2 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii) Total NO_x emissions from all CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state during a control period

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in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season Group 2 trading budget under 40 CFR 97.810(a) and the state's variability limit under 40 CFR 97.810(b).

- (iv) ~~It shall not be a violation of 40 CFR Part 97, Subpart EEEEE or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.~~
- (v) ~~To the extent the owners and operators fail to hold CSAPR NO_x Ozone Season Group 2 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,~~
- (A) ~~The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and~~
- (B) ~~Each CSAPR NO_x Ozone Season Group 2 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart EEEEE and the Clean Air Act.~~

(10) Compliance periods.

- (i) ~~A CSAPR NO_x Ozone Season Group 2 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.830(b) and for each control period thereafter.~~
- (ii) ~~A CSAPR NO_x Ozone Season Group 2 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.830(b) and for each control period thereafter.~~

(11) Vintage of allowances held for compliance.

- (i) ~~A CSAPR NO_x Ozone Season Group 2 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 2 allowance that was allocated for such control period or a control period in a prior year.~~
- (ii) ~~A CSAPR NO_x Ozone Season Group 2 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 2 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.~~

(12) Allowance Management System requirements. Each CSAPR NO_x Ozone Season Group 2 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart EEEEE.

(13) Limited authorization. A CSAPR NO_x Ozone Season Group 2 allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:

- (i) ~~Such authorization shall only be used in accordance with the CSAPR NO_x Ozone Season Group 2 Trading Program; and~~
- (ii) ~~Notwithstanding any other provision of 40 CFR Part 97, Subpart EEEEE, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.~~

(14) Property right. A CSAPR NO_x Ozone Season Group 2 allowance does not constitute a property right.

(I) Title V permit revision requirements.

(3) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Ozone Season Group 2 allowances in accordance with 40 CFR Part 97, Subpart EEEEE.

(4) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.830 through 97.835, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.806(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

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(m) Additional recordkeeping and reporting requirements.

- ~~(3) Unless otherwise provided, the owners and operators of each CSAPR NO_x Ozone Season Group 2 source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.~~
- ~~(i). The certificate of representation under 40 CFR 97.816 for the designated representative for the source and each CSAPR NO_x Ozone Season Group 2 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.816 changing the designated representative.~~
- ~~(ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart EEEEE.~~
- ~~(iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Ozone Season Group 2 Trading Program.~~
- ~~(4) The designated representative of a CSAPR NO_x Ozone Season Group 2 source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall make all submissions required under the CSAPR NO_x Ozone Season Group 2 Trading Program, except as provided in 40 CFR 97.818. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.~~

(n) Liability.

- ~~(3) Any provision of the CSAPR NO_x Ozone Season Group 2 Trading Program that applies to a CSAPR NO_x Ozone Season Group 2 source or the designated representative of a CSAPR NO_x Ozone Season Group 2 source shall also apply to the owners and operators of such source and of the CSAPR NO_x Ozone Season Group 2 units at the source.~~
- ~~(4) Any provision of the CSAPR NO_x Ozone Season Group 2 Trading Program that applies to a CSAPR NO_x Ozone Season Group 2 unit or the designated representative of a CSAPR NO_x Ozone Season Group 2 unit shall also apply to the owners and operators of such unit.~~

(o) Effect on other authorities.

~~No provision of the CSAPR NO_x Ozone Season Group 2 Trading Program or exemption under 40 CFR 97.805 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Ozone Season Group 2 source or CSAPR NO_x Ozone Season Group 2 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.~~

(p) Effect on units in Indian country.

~~Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.~~

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SECTION III: CSAPR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

~~(h) Designated representative requirements.~~

~~The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.~~

~~(i) Emissions monitoring, reporting, and recordkeeping requirements.~~

~~(3) The owners and operators, and the designated representative, of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).~~

~~(4) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of CSAPR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the CSAPR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.~~

~~(j) SO₂ emissions requirements.~~

~~(8) CSAPR SO₂ Group 1 emissions limitation.~~

~~(i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all CSAPR SO₂ Group 1 units at the source.~~

~~(ii). If total SO₂ emissions during a control period in a given year from the CSAPR SO₂ Group 1 units at a CSAPR SO₂ Group 1 source are in excess of the CSAPR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:~~

~~(A). The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall hold the CSAPR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and~~

~~(B). The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR Part 97, Subpart CCGCC and the Clean Air Act.~~

~~(9) CSAPR SO₂ Group 1 assurance provisions.~~

~~(i). If total SO₂ emissions during a control period in a given year from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—~~

~~(A). The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by~~

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- which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and
- (B) The amount by which total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
- (ii) The owners and operators shall hold the CSAPR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii) Total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
- (iv) It shall not be a violation of 40 CFR Part 97, Subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
- (v) To the extent the owners and operators fail to hold CSAPR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
- (A) The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
- (B) Each CSAPR SO₂ Group 1 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.
- (10) Compliance periods.
- (i) A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
- (ii) A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
- (11) Vintage of allowances held for compliance.
- (i) A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.
- (ii) A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (12) Allowance Management System requirements. Each CSAPR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart CCCCC.
- (13) Limited authorization. A CSAPR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:
- (i) Such authorization shall only be used in accordance with the CSAPR SO₂ Group 1 Trading Program; and
- (ii) Notwithstanding any other provision of 40 CFR Part 97, Subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (14) Property right. A CSAPR SO₂ Group 1 allowance does not constitute a property right.

Section 2 – Belle River Power Plant

ROP No: MI-ROP-B2796-20XX
Expiration Date: XX
PTI No.: MI-PTI-B2796-20XX

~~(k) Title V permit revision requirements.~~

- ~~(3) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR SO₂ Group 1 allowances in accordance with 40 CFR Part 97, Subpart CCCCC.~~
- ~~(4) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).~~

~~(l) Additional recordkeeping and reporting requirements.~~

- ~~(3) Unless otherwise provided, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - ~~(i) The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each CSAPR SO₂ Group 1 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.~~
 - ~~(ii) All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart CCCCC.~~
 - ~~(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR SO₂ Group 1 Trading Program.~~~~
- ~~(4) The designated representative of a CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall make all submissions required under the CSAPR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.~~

~~(m) Liability.~~

- ~~(3) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 source or the designated representative of a CSAPR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the CSAPR SO₂ Group 1 units at the source.~~
- ~~(4) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 unit or the designated representative of a CSAPR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.~~

~~(n) Effect on other authorities.~~

~~No provision of the CSAPR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR SO₂ Group 1 source or CSAPR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.~~

~~(h) Effect on units in Indian country.~~

~~Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.~~

SECTION 43 - BELLE RIVER, PEAKERSERS

LOCATED AT

Belle River Peakers
4505 King Road
China Township, Michigan 48054

St. Clair Peakers
4901 Pointe Drive
~~St. Clair~~ East China Township, Michigan 48054

Dean Peakers
4490 North River Road
East China, Michigan 48054

Commented [LRF506]: Former Section 4 will now be Section 3 of the ROP. In addition to Belle River Peakers, this will also now include St. Clair Peakers and Dean Peakers. We would like this Section 3 simply called "PEAKERS"

Commented [LRF507]: All 3 peakers are at 1 facility. They do however have different physical addresses. Therefore, I listed each peaker's address out individually.

Commented [LRF508]: Note this change in address from the former ROP. It currently lists the incorrect city.

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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))**

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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 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.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. **(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))**:
- 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.
 - 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))**
- The applicable requirements are included and are specifically identified in the ROP.
 - 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:
- 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))**
 - 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))**
 - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
 - The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

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

Revisions

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

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. ² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. ² **(R 336.1201(8), Section 5510 of Act 451)**

~~45-49.~~ 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.² **(R 336.1219)**

~~46-50.~~ 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.² **(R 336.1201(4))**

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

Commented [LRF509]: Neither St. Clair Peakers nor Dean Peakers has Source-Wide Conditions. This Section B should stay as is.

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.

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EMISSION UNIT SUMMARY TABLE C-34

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-DG11-1-BP	<u>Belle River Peakers</u> DG 11-1, diesel fuel-fired, 2.5 MW peaking unit, "limited-use" per 40 CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	11-01-1969	FG-DIESEL-BP
EU-DG11-2-BP	<u>Belle River Peakers</u> DG 11-2, diesel fuel-fired, 2.5 MW peaking unit, "limited-use" per 40 CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	11-01-1969	FG-DIESEL-BP
EU-DG11-3-BP	<u>Belle River Peakers</u> DG 11-3, diesel fuel-fired, 2.5 MW peaking unit, "limited-use" per 40 CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	11-01-1969	FG-DIESEL-BP
EU-DG11-4-BP	<u>Belle River Peakers</u> DG 11-4, diesel fuel-fired, 2.5 MW peaking unit, "limited-use" per 40 CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	11-01-1969	FG-DIESEL-BP
EU-DG11-5-BP	<u>Belle River Peakers</u> DG 11-5, diesel fuel-fired, 2.5 MW peaking unit, "limited-use" per 40 CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	11-01-1969	FG-DIESEL-BP
EU-CTG12-1-BP	<u>Belle River Peakers</u> CTG 12-1. <u>Belle River</u> 82.4 MW nominally rated natural gas-fired simple cycle <u>peaking</u> -combustion turbine generator. Equipped with dry low-NOx burner. (PTI No. 177-07A)	01-01-1999 07-23-2001	FG-CTG-BP
EU-CTG12-2-BP	<u>Belle River Peakers</u> CTG 12-2. <u>Belle River</u> 82.4 MW nominally rated natural gas-fired simple cycle <u>peaking</u> -combustion turbine generator. Equipped with dry low-NOx burner. (PTI No. 177-07A)	01-01-1999 07-23-2001	FG-CTG-BP

Commented [LRF510]: Added Peaker facility name in each EU description.

Commented [LRF511]: Please delete references to the old PTI # for Belle River CTGs.

Commented [AS(512R511)]: ok

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-CTG13-1-BP	Belle River Peakers CTG 13-1. Belle River 82.4 MW nominally rated natural gas-fired simple cycle peaking combustion turbine generator. Equipped with dry low-NOx burner. (PTI No. 177-07A)	01-01-1999 07-23-2001	FG-CTG-BP
EU-CTG11-1-SP	St. Clair Peakers CTG 11-1. 23 MW natural gas-fired peaking combustion turbine generator	01-01-1968	N/A
EU-DG12-1-SP	St. Clair Peakers DG 12-1. Diesel fuel-fired, 2.75 MW peaking unit, "limited-use" per 40 CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	01-01-1970	FG-DIESEL-SP
EU-DG12-2-SP	St. Clair Peakers DG-12-2. Diesel fuel-fired, 2.75 MW peaking unit, "limited-use" per 40 CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	01-01-1970	FG-DIESEL-SP
EU-CTG12-2-DP	Dean Peakers CTG 12-2. Natural gas-fired, simple-cycle combustion turbine generator with dry low-NOx burner peaking unit nominally rated at 82.4 megawatts at ISO conditions.	04-21-2002	FG-CTG-DP
EU-CTG12-1-DP	Dean Peakers CTG 12-1. Natural gas-fired, simple-cycle combustion turbine generator with dry low-NOx burner peaking unit nominally rated at 82.4 megawatts at ISO conditions.	05-04-2002	FG-CTG-DP
EU-CTG11-1-DP	Dean Peakers CTG 11-1. Natural gas-fired, simple-cycle combustion turbine generator with dry low-NOx burner peaking unit nominally rated at 82.4 megawatts at ISO conditions.	05-10-2002	FG-CTG-DP
EU-CTG11-2-DP	Dean Peakers CTG 11-2. Natural gas-fired, simple-cycle combustion turbine generator with dry low-NOx burner peaking unit nominally rated at 82.4 megawatts at ISO conditions	05-13-2002	FG-CTG-DP

Commented [LRF513]: Former Table EU-C2 for St. Clair Peakers has been combined into this table in Section 3

Commented [LRF514]: The FG being listed here was an error. The CTG is not part of the FG (which only contains ZZZZ conditions for the DG peaking units).

Commented [LRF515]: Removed "2.75 MW peaking diesel oil-fired generator, equipped with oxidation catalyst". Now matches Belle River DGs

Commented [LRF516]: DTE suggests this change in FG name so the St. Clair Peaker naming convention is the same as Belle River Peakers. This also helps clarify that not all Peakers at St. Clair are subject to this FG – it is only the diesel ones. (Formerly FG-MACT-ZZZZ-SP in the current ROP)

Commented [LRF517]: Removed "2.75 MW peaking diesel oil-fired generator, equipped with oxidation catalyst". Now matches Belle River DGs

Commented [LRF519]: Former Table EU-C5 for Dean Peakers has been combined into this table in Section 3

Commented [LRF518]: These Unit #s (1, 2, 3, & 4) were previously utilized by the prior owner, DTEES. DTE Electric Company uses 12-2, 12-1, 11-1, and 11-2, respectively.

See former Section 5 for reference to the EU #, owner, and facility name changes.

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EU-CTG11-1-SP
EMISSION UNIT CONDITIONS

DESCRIPTION

St. Clair Peakers. 23 MW natural gas-fired combustion turbine generator.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only fire pipeline quality natural gas, as defined in 40 CFR 72.2, in the combustion turbines. **(R 336.1213(3))**

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IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep a record of the dates when the unit is in use. **(R 336.1213(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 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 appropriate the AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

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See Appendix 8-SP

Commented [LRF520]: No specific reporting requirements. Please delete.

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:

N/A

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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.

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-DIESEL-BP	Belle River Peakers - Five (5) diesel fuel-fired, "limited-use", (per 40CFR 63.6590(b)(3)(iv) stationary reciprocating internal combustion engine (RICE)), peaking units each rated at 2.5 MW	EU-DG11-1-BP EU-DG11-2-BP EU-DG11-3-BP EU-DG11-4-BP EU-DG11-5-BP
FG-CTG-BP	Belle River Peakers - Three (3) Belle River natural gas-fired, simple cycle combustion turbine generator peaking units. Each equipped with dry low-NOx burners nominally rated at 82.4 megawatts at ISO conditions. (PTI No. 177-07A)	EU-CTG12-1-BP EU-CTG12-2-BP EU-CTG13-1-BP
FG-DIESEL-SP	St. Clair Peakers - Two (2) diesel fuel-fired, "limited-use" (per 40CFR 63.6590(b)(3)(iv) stationary reciprocating internal combustion engine (RICE)) peaking units each rated at 2.75 MW	EU-DG12-1-SP EU-DG12-2-SP
FG-CTG-DP	Dean Peakers - Four (4) natural gas-fired, simple cycle combustion turbine generator, each with dry low-NOx burner peaking units rated nominally at 82.4 megawatts at ISO conditions	EU-CTG12-2-DP EU-CTG12-1-DP EU-CTG11-1-DP EU-CTG11-2-DP

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Commented [LRF521]: I added this FG (formerly **FG-MACT-ZZZZ-SP** in the current ROP) for St. Clair Peakers (which was previously in former Section 2).

Commented [LRF522]: This did not match the FG listed in Section C above. I fixed it here.

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Commented [LRF523]: I added this FG for Dean Peakers (which was previously in former Section 5)

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FG-DIESEL-BP
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

~~40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing limited-use RICE greater than 500 bhp. A RICE is existing if the date of installation is before December 19, 2002.~~

Belle River Peakers. Five (5) diesel fuel-fired, "limited-use" (per 40 CFR 63.6590(b)(3)(iv)), stationary reciprocating internal combustion engine (RICE) peaking units each rated at 2.5 MW (existing RICE >500 HP non-emergency compression ignition engine constructed before December 19, 2002).

Emission Unit:

- EU-DG11-1-BP Belle River Peakers DG 11-1. 2.5 MW peaking diesel generator
- EU-DG11-2-BP Belle River Peakers DG 11-2. 2.5 MW peaking diesel generator
- EU-DG11-3-BP Belle River Peakers DG 11-3. 2.5 MW peaking diesel generator
- EU-DG11-4-BP Belle River Peakers DG 11-4. 2.5 MW peaking diesel generator
- EU-DG11-5-BP Belle River Peakers DG 11-5. 2.5 MW peaking diesel generator

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Diesel Fuel	0.7% sulfur by weight with heat value of 19,502 BTUs/lb ² .	As-fired	FG-DIESEL-BP	SC VI.3	R 336.1201(3)

* This is equivalent to 0.72 lb SO₂/mmBTU of heat input.

~~2. The permittee shall burn only diesel fuel in each engine of FG-DIESEL-BP with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. (40 CFR 1090.305)~~

III. PROCESS/OPERATIONAL RESTRICTION(S)

~~3.1. The permittee shall not operate each engine in FG-DIESEL-BP for more than 99.9 hours per 12-month time period as determined at the end of each calendar month. (R 336.1213(2)(d), 40 CFR 63.6600(c), 40 CFR 63.6675)~~

~~4.2. The permittee shall operate and maintain each engine in FG-DIESEL-BP and after-treatment control device (if any) in a manner consistent with good air pollution control practices for minimizing emissions. (40 CFR 63.6605)~~

Commented [AS(524)]: Formerly, **FG-MACT-ZZZZ-SP**

Commented [AS(525R524)]: PTI 483-79 Permit, Remer Station, BLR Diesel Generators

Commented [AS(526R524)]:

Commented [AS(527)]: From AQD Template.

Commented [LRF528]: Listing that this FG is subject to 40 CFR Part 63 Subpart ZZZZ is captured in SC IX.1 below, as EGLE required it to be listed in the ROP.

DTE rejects adding this to the FG description because it misrepresents a description of these EUs & FG, which are NOT subject to any requirements under this Subpart. DTE proposes leaving the FG description as is to capture these are limited-use engines.

Commented [LRF529]: Added this to match St. Clair DG Peakers

Commented [AS(530R529)]: Lisa' draft-Page-242

Commented [LRF531]: Please embed this footnote into the table, as it currently is in the ROP.

Commented [AS(532)]: Added by AQD.

Commented [LRF533]: This UAR and regulation is not applicable to this facility or this FG/EUs. 40 CFR Part 1090 is for fuel manufacturer's, importers, etc.

Commented [LRF534]: For consistency among facilities (i.e. to match the ROP for Monroe DG Peaker) I changed this from 99 to 99.9 hours.

Commented [LRF535]: Why is EGLE changing the hourly limit to 12-month rolling?

ZZZZ is based upon calendar year, which is defined as January – December. DTE does not agree with requiring this monthly and per 12-month rolling, as that is not how the 99 hr/yr applies. This has been confirmed with US EPA.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each engine in FG-DIESEL-BP with a non-resettable hour meter to track the number of hours the engine operates. (R 336.1213(3))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record in a satisfactory manner, the total hours of operation for each engine in FG-DIESEL-BP on a monthly and 12-month time period on a calendar year basis. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1213(3))
2. For each engine in FG-DIESEL-BP, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. (R 336.1213(3))

~~3. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in FG-DIESEL-BP, demonstrating that the fuel meets the requirement of SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 80.510(b))~~

4.3. The permittee shall conduct non-certified visible emissions observation of the diesel generators at least once per day when the generators are operating continuously for 24 hours or more. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall keep a written record of each required observation and corrective action. (R 336.1213(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 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-P~~

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:

Commented [LRF536]: This UAR is not applicable to this FG. Please delete.

Commented [LRF537]: Added non-certified to specify monitoring method.

Commented [AS(538R537)]: First time, I deleted it. However, Per Joyce review on April 28, 2021, I reentered it on June 28.

Commented [LRF539]: No specific reporting requirements in Appendix. Please delete.

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV507-031-BP	32 ²	20 ²	R 336.1201(3)
2. SV507-027-BP	32 ²	20 ²	R 336.1201(3)
3. SV507-023-BP	32 ²	20 ²	R 336.1201(3)
4. SV507-019-BP	32 ²	20 ²	R 336.1201(3)
5. SV507-015-BP	32 ²	20 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

- The permittee shall comply with applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40CFR Part 63, Subpart A and Subpart ZZZZ, for stationary reciprocating internal combustion engine (RICE), upon start-up. **(40 CFR Part 63, Subparts A and ZZZZ)**

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

Commented [LRF540]: Subpart ZZZZ is not applicable to these engines per 40 CFR 63.6590(b)(3)(iv). Therefore, SC IX.1. is requested to be deleted.

Commented [AS(541R540)]: Per 40 CFR 63.6590(b)(3)(iv), this unit is subject to limited use but not exempt from ZZZZ. So AQD wants to keep this condition. See details in SC III.2

Commented [AS(542R540)]: AQD will reject this change.

FG-CTG-BP
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Belle River Peakers. Three (3) natural gas-fired simple cycle combustion turbine generator (CTG) units each nominally rated at 82.4 MW. The combustion turbines are equipped with dry low-NOx burners.

Emission Unit:

- EU-CTG12-1-BP Belle River Peakers CTG 12-1. Natural gas-fired combustion turbine generator
- EU-CTG12-2-BP Belle River Peakers CTG 12-2. Natural gas-fired combustion turbine generator
- EU-CTG13-1-BP Belle River Peakers CTG 13-1. Natural gas-fired combustion turbine generator

POLLUTION CONTROL EQUIPMENT

Dry Low-NOx Burners

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NO _x	9 ppm by volume at 15% oxygen & on a dry gas basis ²	Average of all operating hours in a calendar day; excluding startup, shutdown, and malfunction	Each turbine during steady state operations	SC V.1 and Appendix 7-3 P	R 336.1205(1)(a) & (b), R 336.2810, R 336.2803, <u>R 336.2804</u> , CFR 52.21(c) & (d), 40 CFR 60.332(a)(1)
2. NO _x	60 ppm by volume at 15% oxygen & on a dry gas basis ²	Hourly	Each Turbine	SC IV.2	R 336.2804, R 336.2810, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j)
3. NO _x	230 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month excluding startup, shutdown and malfunction	FG-CTG-BP	SC V.1, VI.3 and Appendix 7-3 P	<u>R336.2803</u> , <u>R 336.2804</u> , R 336.1205(1)(a) & (b), <u>R336.2803</u> , <u>R 336.2810</u> , 40CFR 52.21(c) &(d), 40 CFR 52.21(j)
<u>4. NO_x</u>	<u>100 ppm by volume at 15% oxygen & dry gas basis²</u>	<u>Hourly, rolling arithmetic 4-unit operating hour average, determined at the end of each Unit Operating Hour, excluding startup, shutdown, and malfunction</u>	<u>Each emission unit in FG-CTG-DP</u>	<u>SC IV.2</u>	<u>40CFR 60.332(a)(1)</u> , <u>40CFR 60.8(c)</u>
4. CO	25 ppm by volume at 15% oxygen & on a dry gas basis ²	Average of all operating hours in a calendar day, excluding startup, shutdown and malfunction	Each turbine	SC V.1	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j)

Commented [AS(543): Lisa Fishbeck Oct 22, 2019, As of 10/22/2019, there is a PTI application pending EGLE AQD approval/issuance for the Belle River CTG new NOx limit and to remove PEMS verbiage and add CEMS. Once this is issued, it is hoped that this PTI can be rolled into this section and FG of the ROP.

Shamim: inserted **approved PTI No. 331-98C**, issued on April 21, 2020

Commented [AS(544R543): PTI No. 177-07A, issued on Feb 20, 2015.

Commented [AS(545R543):

Commented [AS(546): Red font word or sentence plus yellow highlighted mean DTE added or deleted those word/sentence.

Commented [LRF547]: Since this FG exceeded the capacity factor, they are no longer "Peakers". DTE requests the word "peaking" to be removed here.

Commented [AS(548R547):

Commented [AS(549): Emission limit table came from PTI No. 331-98C. AQD denied any Change request by DTE.

Commented [IAF550): Remove footnote "a".

Commented [ER(552): Robert Elmouchi added "R 336.2804" to match PTI 331-98C.

SHAMIM, please let me know if R 336.2804 was deleted for a reason or accidentally deleted.

Commented [ER(551): The appendix reference does not appear in PTI 331.98C.

Commented [ER(553): Robert Elmouchi deleted "R 336.2810" because it does not appear in PTI 331-98C;

Robert Elmouchi added R 336.2804 because it appears in PTI 331-98C.

Commented [ER(554):

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Commented [LRF555): Added by DTE, per Andrew.

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
5. CO	382 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month, excluding startup, shutdown, and malfunction	FG-CTG-BP	SC V. 1, VI.3 and Appendix 7-3 P	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j)
6. PM ₁₀	9 pounds per hour ²	Average of all operating hours in a calendar day, excluding startup, shutdown, and malfunction ²	Each Turbine	SC V.2	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j)
7. PM ₁₀	50.4 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month, excluding startup, shutdown, and malfunction	FG-CTG-BP	SC V.2 and Appendix 7-3 P	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j)
8.Opacity	10%, except for uncombined water vapor ²⁻³	6-minute average, excluding startup, shutdown, and malfunction	Each turbine	SC V.3 & SC VI.2	R 336.1301(1)(c), 40 CFR 52.21(j)

Commented [IAF550]: Remove footnote "a".

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II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	13,600 MM scf. ²	Based on a rolling 12-month period, as determined at the end of each month ²	FG-CTG-BP	SC VI.5 and SC VI.10	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j)
2. Sulfur in Natural Gas	0.8 grain per 100 standard cu. ft. ²	As-fired	FG-CTG-BP	SC III.1	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), R 336.1702(a), 40 CFR 52.21, 40 CFR 60.333(b)

Commented [LRF556]: Should SC II.2. be moved to Process/Operational Restrictions and/or be combined with SC III.1.?

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall only burn pipeline quality natural gas in each turbine.² (R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), R 336.1702(a), 40 CFR 52.21(j), 40 CFR 60.333(b))
- The total hours for startup and shutdown for FG-CTG-BP shall not exceed 500 hours per turbine per 12-month rolling time period as determined at the end of each calendar month. Startup is defined as the period of time from initiation of combustion firing until the unit reaches steady state operation (e.g., when premix operating mode is achieved). Shutdown is defined as that period of time from the initial lowering of the turbine output,

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with the intent to shut down, until the point at which the combustion process has stopped.²
(R 336.1205, R336. 2803, R336.2804, 40CFR52.21(c) & (d))

3. The permittee shall not operate FG-CTG-BP unless all provisions of the Federal Prevention of Significant Deterioration regulations, 40 CFR 52.21, are met.² (40 CFR 52.21)
4. The permittee shall maintain and implement the approved "Emission Minimization Plan" describing how emissions will be minimized during startup(s), shutdown(s) and malfunction(s). The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. Alternative plans or modifications to the approved plan must be approved by the District Supervisor.² (R 336.1911, R 336.1912, R 336.2810, R336. 2803, R336.2804, R 336.2810, 40CFR52.21(c) & (d), 40 CFR 52.21(j))

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IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each turbine with a dry low-NOx combustor.² (R 336.1910, R336. 2803, R336.2804, R 336.2810, 40CFR52.21(c) & (d), 40 CFR 52.21(j))
2. The permittee shall install, calibrate, maintain, and operate devices or equipment to monitor and record the NOx emissions and oxygen (O₂) or (CO₂) content of the exhaust gas from each turbine in FG-CTG-BP on a continuous basis, and to meet the timelines and reporting requirements as described in Appendix 3-3 P. The Continuous Emission Monitoring System (CEMS) shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 2 for NOx and PS 3 for O₂ or CO₂ of Appendix B to 40 CFR Part 60.² (R 336.1205(1)(a) & (b), R 336.2150(1)(b), (d), and (e), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), R 336.2810, 40 CFR 60.13 40 CFR 75.12(d)(2), 40 CFR 72.12(c), 40 CFR Part 75 Appendix B & F)

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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 NOx and CO emission rate testing, at owner's expense, for each turbine at least once every 20 calendar quarters. NOx and CO emissions testing will be conducted at two operating load points, one at maximum load and one other mid load. Testing shall be performed using approved EPA Test Methods listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.1205(1)(a) & (b), R 336.1902, R 336.2001, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j), 40 CFR 60.8 & 60.335, 40 CFR 75 Appendix E2)
2. The permittee shall verify PM10 emission rates from each turbine by testing, at owner's expense, in accordance with Department requirements will be required once every five years. Testing must be done for each turbine at 70% and 100% of base load. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.1205(1)(a) & (b), R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j))

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Commented [ER(560)]: Robert Elmouchi changed "Appendix E2" to "Appendix E" because Appendix E2 does not exist in the CFR and Appendix E appears to be the appropriate UAR.

Commented [AS(561)]: Originate from PTI No. 331-98C.

3. The permittee shall conduct federal Reference Method 9 visible emissions reading for each turbine at least once per 1200 hours of operation.² (R 336.1301, 40 CFR 52.21(j))

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4. The permittee shall verify NOx and CO emission rates from FG-CTG-BP by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

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Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
Visible Emission	40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B

An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

~~5. The permittee shall verify the PM, PM10/PM2.5, NOx, CO and visible emission rates from FG-CTG-BP, at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

Commented [LRF564]: There are no ELs for PM and PM2.5. Remove

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6. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.² (R 336.1205(3))

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2. The permittee shall keep a record of federal Reference Method 9 visible emissions reading conducted at least once per 1200 hours of operation.² (R 336.1301, 40 CFR 52.21)

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3. The permittee shall calculate NOx, CO and PM-10 emission rates on a monthly and previous 12-month rolling time period. These emission calculations shall be based upon Appendix 7-3 BP.² (R 336.1205(1)(a) & (b), R336.2803, R336.2804, R336.2810, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j), 40 CFR 60 Subpart GG)

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4. The permittee shall monitor the nitrogen content in the fuel in accordance with 40 CFR 60.334(h)(2) if an allowance for fuel bound nitrogen is claimed.² (40 CFR 60.334(h)(2))

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5. For each turbine, the permittee shall continuously monitor and record hourly the natural gas usage in a manner and with instrumentation acceptable to the AQD District Supervisor.² (R 336.1205(1)(a) & (b), R336.2803, R336.2804, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j))

Commented [LRF570]: Moved the last part of this sentence to the beginning to be a little clearer in this requirement.

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6. For each turbine, the permittee shall keep records of hours of startup and shutdown.² (R 336.1205(1)(a) & (b), R336.2803, R336.2804, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j))

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~~For each turbine, the permittee shall monitor and record the capacity factor for each calendar year. If the capacity factor for each individual turbine exceeds 20% in any calendar year or exceeds 10% averaged over the three previous calendar years, a continuous monitor for nitrogen dioxide must be installed, certified, and operated no later than December 31 of the following calendar year.² (40 CFR 75.12(d)(2))~~

7. Monitoring and recording of emissions and operating information for FG-CTG-BP is required to comply with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A, and Subpart GG, 60.334.² **(40 CFR 60.334)**

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Commented [LRF575]: Per Andrew, please delete SC VI(8-9). These are already included in IV.2. from the PTI.

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~~8. On or before December 31, 2019, the permittee shall install, calibrate, maintain, and operate devices or equipment to monitor and record the NO_x emissions and oxygen (O₂) or (CO₂) content of the exhaust gas from each turbine in FG-CTG-BP on a continuous basis, and to meet the timelines and reporting requirements as described in Appendix 3-3 BP. (R 336.1213(3), 40 CFR 75.12(d)(2), 40 CFR 72.12(c), 40 CFR Part 75 Appendix F).~~

~~9. The Continuous Emission Monitoring System (CEMS) shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 2 for NO_x and PS 3 for O₂ or CO₂ of Appendix B to 40 CFR Part 60. (R336.1213(3), R336.1205(1)(a) & (b), R336.2150(1)(b), R336.2803, R336.2803, R336.2804, R336.2810, 40 CFR 52.21(c) & (d), 40 CFR 75.12(d)(2), 40 CFR 72.12(c), 40 CFR Part 75 Appendix B & F).~~

~~18.~~
~~19.~~
8. The permittee shall record natural gas usage rate in terms of million cubic feet on a monthly & a 12-month rolling time period. (R 336.1213(3))
~~20.~~

See Appendix 3-3 P.

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))** 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))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. **Once CEMS are installed.** After CEMS are installed, the permittee shall report NO_x and either O₂ or CO₂ emissions in accordance with 40 CFR Part 75 within 30 days following the end of each calendar quarter.² **(R 336.1213(3), 40 CFR 75.64)**
5. **Once CEMS are installed.** After NO_x CEMS are installed, in accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and the monitoring system performance summary report in an acceptable format to the AQD Technical Programs Unit and **District Office** AQD District Supervisor, within 30 days following the end of each calendar quarter. The Monitoring System Performance Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:²
 - a. A report of each exceedance above specified permit limits for NO_x. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b. A report of all periods of CEMS downtime and corrective action.
 - c. A report of the total operating time of each combustion turbine in FG-CTG-BP during the reporting period.
 - d. A report of any periods that the CEMS exceeds the instrument range.

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e. If no exceedances or CEMS downtime occurred during the reporting period, the permittee shall report that fact.

The permittee shall keep all monitoring data on file for a period of at least five years and make them available to the AQD upon request. (R 336.1213(3), 40 CFR Part 60.7(c) and (d), 40 CFR 60.334)

6. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CEMS set forth in Part 75, Appendix A and B. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD Technical Programs Unit and District Supervisor in a format acceptable to AQD. (R 336.1213(3), 40 CFR Part 75 Appendix A and B)

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6. (a) Within 30 calendar days after commencement of trial operation of the CEMS, the permittee shall submit two copies of a Monitoring Plan to the AQD Technical Programs Unit and District Office, for review and approval. The Monitoring Plan shall include drawings or specifications showing proposed locations and descriptions of the required CEMS. (R 336.1213(3), 40 CFR Part 75)

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Within 150 calendar days after commencement of trial operation of the CEMS, the permittee shall submit two copies of a complete test plan for the CEMS to the AQD Technical Programs Unit and AQD District Supervisor for approval. (R 336.1213(3))

Within 180 calendar days after commencement of trial operation, the permittee shall complete the installation and testing of the CEMS. (R 336.1213(3))

Within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating the NOx CEMS complies with the requirements of Performance Specification (PS) 2. (R 336.1213(3), R 336.2156)

7. The permittee shall submit any performance test reports, including RATA reports, to the AQD Technical Programs Unit and AQD District Supervisor, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

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See Appendices 3-3 P, 7-3 P and 8-3 P

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VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-CTG13-1-BP	228 x 108 ²	56 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SV-CTG12-1-BP	228 x 108 ²	56 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
3. SV-CTG12-2-BP	228 x 108 ²	56 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

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IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR 60, Subparts A and GG, as they apply to FG-CTG-BP.² (40 CFR 60, Subparts A and GG)

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2. The permittee shall conduct a visual inspection of the silencer elements associated with each turbine once each quarter that the turbine is operated. The visual inspection will evaluate whether or not silencer material has been lost due to operation of the turbines. If there is evidence that silencer material has been lost, the permittee shall notify the District Office of the positive results and take immediate action to replace the silencer elements. Records of the quarterly visual inspections shall be kept on file for a period of at least five years and made available to the AQD upon request. (R 336.1213(3))

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3. The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94 as outlined in a complete Phase II Acid Rain Permit issued by the AQD. The Phase II Acid Rain Permit No. MI-AR-6034-XX2045 is hereby incorporated into this ROP as Appendix 9-3 B.P. (R 336.1299(2)(a))

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4. The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to R 336.1299(2)(d) and 40 CFR Part 72.9(c)(1)(i). (R 336.1299(2)(a), 40 CFR 72.9(c)(1)(i))

5. The permittee shall comply with the provisions of the Cross-State Air Pollution Rule SO₂ Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix 10-3 P. (40 CFR Part 97, Subpart CCCCC)

6. The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NO_x Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAA, and identified in Appendix 10-3 P. (40 CFR Part 97, Subpart AAAAA)

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6. The permittee shall comply with the provisions of the Cross State Air Pollution Rule NO_x Ozone Group 3 Trading Program, as specified in 40 CFR Part 97 Subpart GGGGG, and identified in Appendix XX10-3 P. (40 CFR Part 97 Subpart GGGGG)

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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).

FG-DIESEL-SP
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Applicable requirements as defined in Title 40 of the Code of Federal Regulations (CFR), Part 63, Subpart ZZZZ associated with two (2) 2.75 MW compression ignition (CI) stationary reciprocating internal combustion engines with "limited-use" (per 40 CFR 63.6590(b)(3)(iv)).

(RICE) peaking units. Existing RICE > 500 HP non-emergency compression ignition engine constructed before December 19, 2002.

St. Clair Peakers. Two (2) 2.75 MW diesel-fired, "limited-use" (per 40 CFR 63.6590(b)(3)(iv)) stationary reciprocating internal combustion engines (RICE) peaking units (existing RICE >500 HP non-emergency compression ignition engine constructed before December 19, 2002).

St. Clair Peakers. Two (2) 2.75 MW diesel-fired, "limited-use" (per 40 CFR 63.6590(b)(3)(iv)) stationary reciprocating internal combustion engines (RICE) peaking units (existing RICE >500 HP non-emergency compression ignition engine constructed before December 19, 2002).

Emission Units:

EU-DG12-1-SP: St. Clair Peakers DG 12-1. 2.75 MW peaking diesel generator

EU-DG12-2-SP: St. Clair Peakers DG 12-2. 2.75 MW peaking diesel generator

POLLUTION CONTROL EQUIPMENT

NA

Diesel generators equipped with oxidation catalysts

I. EMISSION LIMIT(S)

NA

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Carbon Monoxide	23 ppmvd @ 15% O2 -OR- 70% reduction in CO emissions	Stack Test Plan	DG 12-1-SP DG 12-2-SP	See Table 1	40 CFR 63.6600(d)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Diesel Fuel	0.7% sulfur by weight with heat value of 19,502 BTUs/lb ² .	As-fired	Each emission unit of FG-DIESEL-SP	SC VI.3	R 336.1201(3)

* This is equivalent to 0.72 lb SO₂/mmBTU of heat input.

2. The permittee shall burn only diesel fuel in each engine of FG-DIESEL-SP with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. (40 CFR 1090.305)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate each engine in FG-DIESEL-SP for more than 99.9 hours per 12-month time period as determined at the end of each calendar month. (R 336.1213(2)(d), 40 CFR 63.6600(c), 40 CFR 63.6675)

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Commented [AS(588R587)]: This unit is subject to limited use per 40 CFR 63.6590(b)(3)(iv) (but not exempt from ZZZZ) (b) Stationary RICE subject to limited requirements. (3) The following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements: (iv) Existing limited use stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions; Limited use stationary RICE
Limited use stationary RICE means any stationary RICE that operates less than 100 hours per year.

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- The permittee shall operate and maintain each engine in FG-DIESEL-SP and after-treatment control device (if any) in a manner consistent with good air pollution control practices for minimizing emissions. (40 CFR 63.6605)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall equip and maintain each engine in FG-DIESEL-SP with non-resettable hours meters to track the operating hours. (R 336.1213(3))

V. TESTING/SAMPLING

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

NA

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VI. MONITORING/RECORDKEEPING

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

- The permittee shall monitor and record in a satisfactory manner, the total hours of operation for each engine in FG-DIESEL-SP through the non-resettable hour meter on a monthly and 12-month time period on a calendar year basis. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1213(3))
- For each engine in FG-DIESEL-SP, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. (R 336.1213(3))

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~~3. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in FG-DIESEL-SP, demonstrating that the fuel meets the requirement of SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 80.510(b))~~

4. The permittee shall conduct non-certified visible emissions observation of the diesel generators at least once per day when the generators are operating continuously for 24 hours or more. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall keep a written record of each required observation and corrective action. (R 336.1213(3))

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Commented [LRF611]: This condition is currently in the ROP and remains the same. Re-ordered this condition from VI.7. to VI.4. to match Belle River DGs. (This was condition VI.3 of the 2009 ROP.)

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5. The permittee shall maintain a complete record of fuel oil specifications and/or fuel analysis for each delivery, or storage tank, of fuel oil used for the diesel generators. Records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. (R 336.1213(3))

See Appendices (Enter 3, 4, and/or 7)

VII. REPORTING

~~3.1~~ Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

- 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-P

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:~~

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 by the initial compliance date. **(40 CFR, Part 63, Subparts A and ZZZZ)**

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).

FG-CTG-DP
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Dean Peakers. Four (4) natural gas-fired simple cycle combustion turbine generator peaking units each nominally rated at 82.4 MW at ISO conditions. Peak mode means operation is above the nominally rated capacity of the turbine, as specified by equipment manufacturer, to supply additional output on a short-term basis with the potential for greater than normal wear on the turbine and increased frequency for periodic inspection and maintenance of the turbine. Base mode means operating at 100 percent load based on ambient temperature conditions. Combustion turbines are equipped with dry low-NOx burners.

Emission Unit:

- EU-CTG12-2-DP Dean Peakers CTG Unit 12-2 (formerly DTE Energy Services Unit 1, EU-CTG01-DP). Natural gas-fired combustion turbine generator
- EU-CTG12-1-DP Dean Peakers CTG Unit 12-1 (formerly DTE Energy Services Unit 2, EU-CTG02-DP). Natural gas-fired combustion turbine generator
- EU-CTG11-1-DP Dean Peakers CTG Unit 11-1 (formerly DTE Energy Services Unit 3, EU-CTG03-DP). Natural gas-fired combustion turbine generator
- EU-CTG11-2-DP Dean Peakers CTG Unit 11-2 (formerly DTE Energy Services Unit 4, EU-CTG04-DP). Natural gas-fired combustion turbine generator

POLLUTION CONTROL EQUIPMENT

Dry Low-NOx Burners.

EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	9 ppm by volume at 15% oxygen & on a dry gas basis ²	Base load, average of all operating hours in a calendar day, excluding startup, shutdown and malfunction	Each emission unit in FG-CTG-DP	SC V.1, and Appendix 7-3 P	R 336.1205(1(a) & (b), 40 CFR 52.21(j)
2. NOx	21 ppm by volume at 15% oxygen & on a dry gas basis ²	Peak mode, average of all operating hours in a calendar day excluding startup, shutdown and malfunction	Each emission unit in FG-CTG-DP	SC V.1 and Appendix 7-3 P	R 336.1205(1(a) & (b), 40 CFR 52.21(j),)
3. NOx	60 ppm by volume at 15% oxygen & on a dry gas basis ²	Hourly	Each emission unit in FG-CTG-DP	SC IV.2	40 CFR 52.21 (c) & (d), 40 CFR 52.21(j)
4. NOx	100 ppm by volume at 15% oxygen & dry gas basis ²	Hourly, rolling arithmetic 4-unit operating hour average, determined at the end of each Unit Operating Hour, excluding startup, shutdown, and malfunction	Each emission unit in FG-CTG-DP	SC IV.2	40CFR 60.332(a)(1), 40CFR 60.8(c)

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- Commented [AS(619)]:** formerly DTE Energy Services Unit 1, EU-CTG01-DP
- Commented [AS(620)]:** formerly DTE Energy Services Unit 2, EU-CTG02-DP
- Commented [AS(621)]:** formerly DTE Energy Services Unit 3, EU-CTG03-DP
- Commented [AS(622)]:** formerly DTE Energy Services Unit 4, EU-CTG04-DP

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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
5. NOx	230 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month	FG-CTG-DP	SC IV.2, SC VI.4 and Appendix 7-3 P	R 336.1205(1(a) & (b)), 40 CFR 52.21(j)
6. CO	25 ppm by volume at 15% oxygen & on a dry gas basis ²	Average of all operating hours in a calendar day ² excluding startup, shutdown and malfunction	Each emission unit in FG-CTG-DP	SC V.1 and Appendix 7-3 P	R 336.1205(1((a) & (b)), 40 CFR 52.21(j)
7. CO	350 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month excluding startup, shutdown and malfunction	FG-CTG-DP	SC V.1 and Appendix 7-3 P	R 336.1205(1((a) & (b)), 40 CFR 52.21(j)
8. PM-10	9.0 pounds per hour ²	Average of all operating hours in a calendar day excluding startup, shutdown and malfunction	Each emission unit in FG-CTG-DP	SC V.2 and Appendix 7-3 P	R 336.1205(1((a) & (b)), 40 CFR 52.21(j)
9. PM-10	46.4 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month excluding startup, shutdown and malfunction	FG-CTG-DP	SC V.2 and Appendix 7-3 P	R 336.1205(1((a) & (b)), 40 CFR 52.21(j)
10. HCOH	4.5 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month excluding startup, shutdown and malfunction	FG-CTG-DP	SC V.3	R 336.1205(2)
11. Opacity	10%, except for uncombined water vapor ²	6-minute average excluding startup, shutdown and malfunction	Each emission unit in FG-CTG-DP	SC V.4	R 336.1301 40 CFR 52.21(j)
12. Sulfur in Natural Gas	0.8 grain per 100 standard cu. ft. ²	As-fired excluding startup, shutdown and malfunction	FG-CTG-DP	SC III.1	R 336.1225, R 336.1702(a) 40 CFR 52.21(j) 40 CFR 60.333(b)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	12,400 MMCF ²	Based on a rolling 12-month period, as determined at the end of each month	FG-CTG-DP	VI.9	R 336.1205(1)(a) & (b), 40 CFR 52.21(j)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only burn pipeline quality natural gas in each turbine. ² (R 336.1225, R 336.1702(a), 40 CFR 52.21, 40 CFR 60.333(b))
2. The permittee shall not operate the turbines FG-CTG-DP at base load for more than a total of 12,400 hours per 12-month rolling time period as determined at the end of each calendar month.² (R 336.1205(1)(a) & (b), 40 CFR 52.21(j))
3. The permittee shall not operate the turbines FG-CTG-DP at peak load for more than a total of 800 hours per 12-month rolling time period as determined at the end of each calendar month.² (R 336.1205(1)(a) & (b), 40 CFR 52.21(j))
4. The permittee must minimize the NO_x, CO and PM-10 emission rates during startup and shutdown in accordance with the turbine manufacturer recommendations.² (R 336.1912, 40 CFR 52.21(j))
5. The total hours for startup and shutdown for FG-CTG DP shall not exceed 500 hours per turbine per 12-month rolling time period as determined at the end of each calendar month. Startup is defined as the period of time from initiation of combustion firing until the unit reaches steady state operation (i.e., when premix operation is achieved). Shutdown is defined as that period of time from the initial lowering of the turbine output, with the intent to shut down, until the point at which the combustion process has stopped.² (40 CFR 52.21(j))
6. The permittee shall not operate FG-CTG-DP unless all provisions of the Federal Prevention of Significant Deterioration regulations, 40 CFR 52.21, are met.² (40 CFR 52.21)
7. The permittee shall maintain and implement the EGLE approved plan describing how emissions are minimized during startup(s), shutdown(s) and malfunction(s). The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. Alternative plans or modifications to the approved plan must be approved by the District Supervisor. Unless notified by the District Supervisor within 30 business days after plan submittal, the plan shall be deemed approved.² (R 336.1911, R 336.1912, 40 CFR 52.21)

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IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each turbine with a dry low-NO_x combustor.² (R 336.1910, 40 CFR 52.21(j))
2. The permittee shall install, calibrate, maintain, and operate devices or equipment to monitor and record the NO_x emissions and oxygen (O₂) or (CO₂) content of the exhaust gas from each turbine in FG-CTG-DP on a continuous basis, and to meet the timelines and reporting requirements as described in Appendix 3-3 P. The Continuous Emission Monitoring System (CEMS) shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 2 for NO_x and PS 3 for O₂ or CO₂ of Appendix B to 40 CFR Part 60.² (R 336.1205(1)(a) & (b), R 336.2150(1)(b), (d), and (e), 40 CFR 52.21(c) & (d), 40 CFR 60.13 40 CFR 75.12(d)(2), 40 CFR 72.12(c), 40 CFR Part 75 Appendix B & F)

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 NOx and CO emission rate testing, at owner's expense, for each turbine at least once every 20 calendar quarters. NOx and CO emissions testing will be conducted at two operating load points, one at maximum load and one other mid load. Testing shall be performed using approved EPA Test Methods listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.1205(1)(a) & (b), R 336.1902, R 336.2001, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d), 40 CFR 52.21(j), 40 CFR 60.8 & 60.335, 40 CFR 75 Appendix E)
2. The permittee shall test PM-10 once every five years. Testing must be done for each turbine at 100% load conditions.² (R 336.2001, R 336.2003, R 336.2004)
3. Emission factors developed from previous stack tests at 65%, 100% and peak load conditions will be used along with hourly fuel usage data to demonstrate compliance with annual HCOH limits.² (R 336.2001, R 336.2003, R 336.2004)
4. The permittee shall conduct federal Reference Method 9 visible emissions reading for each turbine at least once per 825 hours of operation.² (R 336.1301, 40 CFR 52.21)

5. The permittee shall verify NOx, CO, and PM-10 emission rates from FG-CTG-DP by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

6. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

VI. MONITORING/RECORDKEEPING

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

- 2-1. For each turbine, the permittee shall keep a record of federal Reference Method 9 visible emissions reading conducted at least once per 825 hours of operation.² (R 336.1301, 40 CFR 52.21)
- 3-2. The permittee shall keep records for each turbine operating in base mode, of the calendar day NOx emission calculations (ppmv NOx). All such records and calculations (stack test results) are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the AQD upon request.² See Appendix 7-3 P. (R 336.1205(1)(a) & (b), 40 CFR 52.21(j), 40 CFR 60 Subpart GG)
- 4-3. The permittee shall keep records for each turbine operating in peak mode, of the calendar day NOx emission calculations (ppmv NOx). All such records and calculations (stack test results) are for the purpose of compliance

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demonstration and shall be kept on file for a period of at least five years and made available to the AQD upon request.² See Appendix 7-3 P. (R 336.1205(1)(a) & (b), 40 CFR 52.21(j), 40 CFR 60 Subpart GG)

~~5.4.~~ For each turbine, the permittee shall calculate and keep monthly records of the monthly and 12-month rolling total hours of operation at base and peak loads.² (R 336.1205(1)(a) & (b), 40 CFR 52.21(j))

~~6.5.~~ For each turbine, the permittee shall keep records of the monthly and 12-month NOx emission calculations.² See Appendix 7-3 P. (R 336.1205(1)(a) & (b), 40 CFR 52.21, 40 CFR 60 Subpart GG)

~~7.6.~~ For each turbine, the permittee shall keep records of the calendar day average, monthly and 12-month CO emission calculations.² See Appendix 7-3 P. (R 336.1205(1)(a) & (b), 40 CFR 52.21)

~~8.7.~~ For each turbine, the permittee shall keep records of the monthly and 12-month PM-10 emission calculations.² (R 336.1205(1)(a) & (b), 40 CFR 52.21)

~~9.8.~~ For each turbine, the permittee shall keep records of the monthly and 12-month HCOH emission calculations.² (R 336.1205(2))

~~10.9.~~ For each turbine, the permittee shall continuously monitor and record the hourly natural gas usage in a manner and with instrumentation acceptable to the AQD District Supervisor.² (R 336.1205(1)(a) & (b), 40 CFR 52.21)

~~11.10.~~ For each turbine, the permittee shall keep records of hours of startup and shutdown.² (40 CFR 52.21(j))

~~12.11.~~ Monitoring and recording of emissions and operating information for each turbine is required to comply with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A, and Subpart GG, 60.334.² (40 CFR 60.334 & 40 CFR 75, Appendix F)

~~If a continuous monitor is installed for any of the following: NOx, O2, or CO2, the permittee shall install, calibrate, maintain, & operate in a satisfactory manner devices or equipment to monitor and record the NOx emissions and O2 or CO2 content of the exhaust gas from each turbine on a continuous basis. See Appendix 3-3P (R 336.1213(3), 40 CFR 75.12(d)(2), 30 CFR 72.12(c), Appendix F to Part 75)~~

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VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. After CEMS are installed, the permittee shall report NOx and either O₂ or CO₂ emissions in accordance with 40 CFR Part 75 within 30 days following the end of each calendar quarter. (40 CFR 75.64)
5. After NOx CEMs installed, in accordance with 40 CFR 60.7(c) & (d), the permittee shall submit two copies of an excess emission report (EER) and monitoring system performance report in an acceptable format to the AQD District Supervisor and the TPU Supervisor within 30 days following the end of each calendar quarter. The monitoring system performance report shall follow the format of Figure 1 in 40 CFR 60.7(d). The NOx excess emissions (EER) shall include the following information:
 - a. A report of each exceedance above specified permit limits for NOx. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b. A report of all periods of CEMS downtime and corrective action.
 - c. A report of the total operating time of each combustion turbine in FG-CTG-DP during the reporting period.

- d. A report of any periods that the CEMS exceeds the instrument range.
 - e. If no exceedances or CEMS downtime occurred during the reporting period, the permittee shall report that fact.
- (40 CFR 60.7(c) & (d))**

See Appendix 3-3 P.

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-TURBINE1-DP	108 x 228 ²	56 ²	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-TURBINE2-DP	108 x 228 ²	56 ²	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-TURBINE3-DP	108 x 228 ²	56 ²	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV-TURBINE4-DP	108 x 228 ²	56 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall conduct a visual inspection of the silencer elements associated with each turbine once each quarter that the turbine is operated. The visual inspection will evaluate whether or not silencer material has been lost due to operation of the turbines. If there is evidence that silencer material has been lost, the permittee shall notify the District Office of the positive results and take immediate action to replace the silencer elements. Records of the quarterly visual inspections shall be kept on file for a period of at least five years and made available to the AQD upon request.² **(R 336.1901)**
2. The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94 as outlined in a complete Phase II Acid Rain Permit issued by the AQD. The Phase II Acid Rain Permit No. MI-AR-55718-20XX~~21~~ is hereby incorporated into this ROP as **Appendix 9-3 P. (R 336.1299(2)(a))**
3. The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to R 336.1902(1)(q) and 40 CFR 72.9(c)(1)(i). **(R 336.1213(10))**
4. The permittee shall comply with the provisions of the Cross-State Air Pollution Rule SO₂ Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix 10-3 P **(41 CFR Part 97, Subpart CCCCC)**
- 3-5. The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NO_x Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAA, and identified in Appendix 10-3 P. **(40 CFR Part 97, Subpart AAAAA)**
- 4-6. The permittee shall comply with the provisions of the Cross State Air Pollution Rule NO_x Ozone Group 3 Trading Program, as specified in 40 CFR Part 97 Subpart GGGGG, and identified in Appendix 10-3 P. **(40 CFR Part 97 Subpart GGGGG)**
- 5-7. The permittee shall comply with all the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and GG, as they apply to FG-CTG-DP.² **(40 CFR 60, Subparts A and GG)**

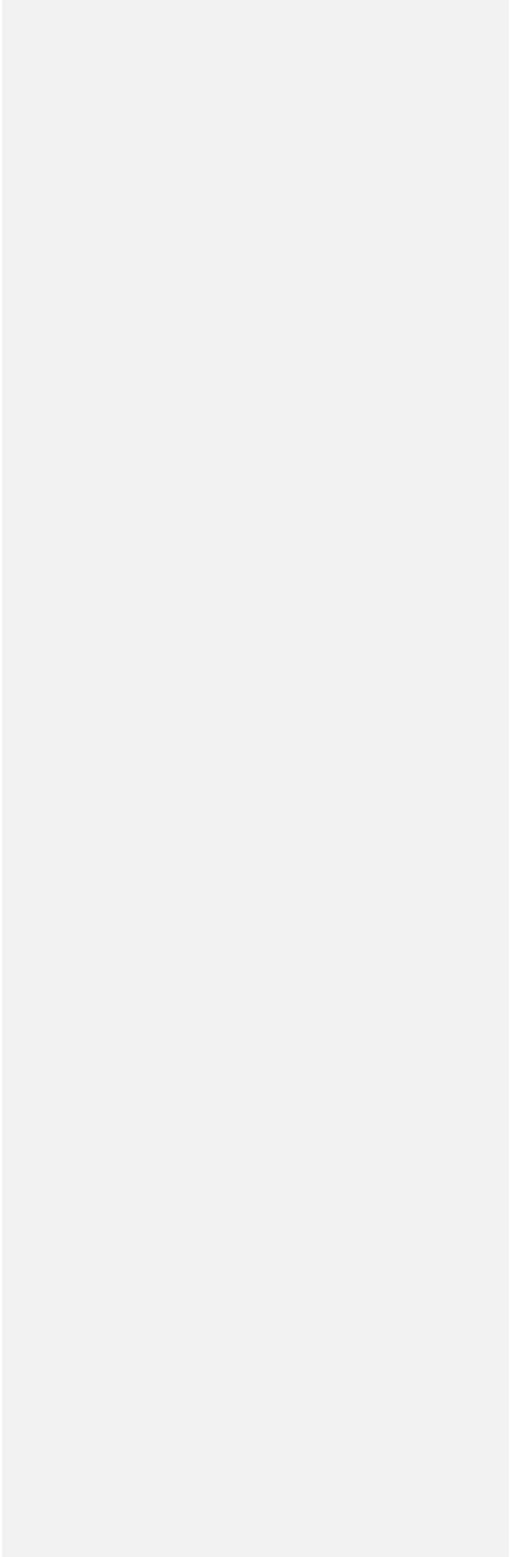
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Footnotes:

¹ This 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).

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E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1-3 P. 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 _{2e}	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-D3 P. 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 3-3 P. Monitoring Requirements

a. FG-CTG-BP:

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-CTG-BP.

Continuous Emission Monitoring System

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

Methods of measurement, frequency of measurement and recordkeeping methods for CEMS required under 40 CFR 75 are outlined in the most recent version of the Acid Rain Program – Belle River Peakers Monitoring Plan.

The data reduction procedures defined in 40 CFR 75.12(c) will calculate hourly, quarterly, and annual NOx emission rates (in lb/MMBtu) by combining the NOx concentration (in ppm), diluent concentration (in percent O₂ or CO₂), and percent moisture (if applicable) measurements according to the procedures in Appendix F of 40 CFR Part 75. Additionally, the CEMS shall ensure that the data obtained is directly correlated with the emission limits established in FG-CTG-BP SC I.1.

The data conversion procedures defined in Appendix F in 40 CFR Part 75 will calculate hourly heat input, MMBtu.

b. FG-CTG-DP:

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-CTG-DP.

Continuous Emission Monitoring System

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

Methods of measurement, frequency of measurement and recordkeeping methods for CEMS required under 40 CFR 75 are outlined in the most recent version of the Acid Rain Program –Dean Peakers Monitoring Plan.

The data reduction procedures defined in 40 CFR 75.12(c) will be used calculate hourly, quarterly, and annual NOx emission rates (in lb/MMBtu) by combining the NOx concentration (in ppm), diluent concentration (in percent O₂ or CO₂), and percent moisture (if applicable) measurements according to the procedures in Appendix F of 40 CFR Part 75. Additionally, the CEMS shall ensure that the data obtained is directly correlated with the emission limits established in FG-CTG-DP SC I.1 and SC I.2.

The data conversion procedures defined in Appendix F in 40 CFR Part 75 will calculate the hourly heat input, MMBtu.

Appendix 4-D3 P. 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-D3 P. Testing Procedures

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

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Appendix 6-~~D3~~P. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-2015. 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.

Source-Wide PTI No [MI-PTI-B2796-2009a](#) [MI-PTI-B2796-2015c](#) is being reissued as Source-Wide PTI No. MI-PTI-B2796-2015XX

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B2796-20XX20.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
116-01A	Xxxxxx*/July 19, 2021	Incorporate PTI No. 116-01A into Section 3 (Dean Peakers). PTI 116-01A to modify permit conditions for the installation of CEMS NOx monitors.	FG-CTG-DP
331-98C	202000159/April 21, 2020	Incorporate PTI No. 331-98C into Section 3 (Belle River Peakers). PTI 331-98C to modify permit conditions for the change from NOx parametric emissions monitoring (PEMS) to NOx continuous emissions monitoring system (CEMS).	FG-CTG-BP
177-07A	201500058/December 15, 2015	Incorporate PTI No. 177-07A into Section 4 (Belle River Peakers). The focus of this PTI relates to load ranges between 50 and 70 percent. The existing ROP (MI-ROP-B2796-2015) treats these loads as Startup/Shutdown/Malfunction (SSM) operating hours, with a maximum of 500 per year, per unit. Recent installation of automated governor controlled (AGC) systems on these generators provides control to the regional electrical system operator (MISO) to, likely, operate these units in this critical load range more frequently. DTE believes this supporting material justifies the operating conditions as steady state, not SSM.	EU-CTG12-1-BP EU-CTG12-2-BP EU-CTG13-1-BP FG-CTG-BP
NA	201500148/June 16, 2016	Reopening to update from CAIR to CSAPR.	FG-CTG-BP
NA	201500180/November 4, 2015	Name change for Section 5 from DTE East China, LLC to DTE Electric Company – Dean Peakers.	NA
NA	201500148/June 16, 2016	Reopening to update from CAIR to CSAPR.	FG-CTG-DP

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Commented [LRF635]: I believe all of these rows can be deleted upon issuance of the new ROP. I wasn't sure so I left in for now.

Commented [LRF636]: I moved these 2 rows from former Section 5, just in case they need to stay in the ROP.

Appendix 7-3 P. Emission Calculations

a. [Belle River Peakers](#)

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FG-CTG-BP:

Natural gas usage is monitored continuously but recorded once per hour and calculated and recorded on a monthly basis.

From stack testing, emission factors for CO and PM10 are developed in lbs. pollutant/million cubic feet of natural gas, for the corresponding loads specified in FG-CTG-BP SC V.1 (CO) and V.2 (PM10). Emission factors for each pollutant are calculated using the average emissions derived from the last representative stack test on a pollutant-specific basis. The emission factors, along with the fuel monitoring requirement, shall be used to calculate and record emissions for each hour to ensure compliance with PM10's calendar day average, and CO's and PM10's rolling 12-month period emission limits.

Once CEMS are installed, compliance with the NOx emission limits based on hourly and 12-month rolling time periods will be determined using the hourly NOx emission rate (lb/MMBtu) and hourly heat rate (MMBtu/hr) values, described in Appendix 3-BP and 40 CFR Part 75 Appendix F indicated below. The NOx emission limit for steady state operations which are based on the average of all operating hours in a calendar day shall continue to be based upon testing results.

Use the following procedures to convert continuous emission monitoring system measurements of NOx concentration (ppm) and diluent concentration (percentage) into NOx emission rates (in lb/mmBtu). Perform measurements of NOx and diluent (O2 or CO2) concentrations on the same moisture (wet or dry) basis.

When the NOx continuous emission monitoring system uses O2 as the diluent, and measurements are performed on a dry basis, use the following conversion procedure:



When the NOx continuous emission monitoring system uses CO2 as the diluent, use the following conversion procedure:



where:

$K = 1.194 \times 10^{-7}$ (lb/dscf)/ppm NOx.

E = Pollutant emissions during unit operation, lb/mmBtu.

Ch = Hourly average pollutant concentration during unit operation, ppm.

%O2, %CO2 = Oxygen or carbon dioxide volume during unit operation (expressed as percent O2 or CO2).

b. Dean Peakers

~~b.~~

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FG-CTG-DP:

Natural gas usage is monitored continuously but recorded once per hour and tracked on a monthly basis.

The CO and PM10 calendar day ppmv limits are assured by the latest stack testing results. The worst-case concentration data (in ppmv) from the tested operating loads are compared to permit limits.

From stack testing, emission factors for CO and PM-10 are developed in lbs pollutant/million cubic feet of natural gas, for the corresponding loads specified in FG-CTG-DP SC V.1 (CO) and V.2 (PM-10). Emission factors for each pollutant are calculated at each tested load point from the last representative stack test. Based upon the average of the three one-hour test runs for each test point, the higher EF value between the tested load points for each

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pollutant shall be multiplied by each hour's monitored fuel usage to calculate and ensure compliance with CO's and PM-10's rolling 12-month period emission limits.

Continuous Emission Monitoring System

Once CEMS are installed, compliance with the NO_x emission limits based on hourly and 12-month rolling time periods will be determined using the hourly NO_x emission rate (lb/MMBtu) and hourly heat rate (MMBtu/hr) values, described in Appendix DP and 40 CFR Part 75 Appendix F indicated below. The NO_x emission limit for steady state operations which are based on the average of all operating hours in a calendar day shall continue to be based upon stack testing results.

Use the following procedures to convert continuous emission monitoring system measurements of NO_x concentration (ppm) and diluent concentration (percentage) into NO_x emission rates (in lb/mmBtu). Perform measurements of NO_x and diluent (O₂ or CO₂) concentrations on the same moisture (wet or dry) basis. When the NO_x continuous emission monitoring system uses O₂ as the diluent, and measurements are performed on a dry basis, use the following conversion procedure:

$$E = K C_h F \frac{20.9}{20.9 - \%O_2}$$

When the NO_x continuous emission monitoring system uses CO₂ as the diluent, use the following conversion procedure:

$$E = K C_h F_c \frac{100}{\%CO_2}$$

where:

K = 1.194 × 10⁻⁷ (lb/dscf)/ppm NO_x.

E = Pollutant emissions during unit operation, lb/mmBtu.

Ch = Hourly average pollutant concentration during unit operation, ppm.

%O₂, %CO₂ = Oxygen or carbon dioxide volume during unit operation (expressed as percent O₂ or CO₂)

Appendix 8-3 P. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use 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.

Appendix 9-3 P. Phase Two Acid Rain Permit

a. Belle River Peakers

The Acid Rain Permit No. **MI-AR-6034-20XX21** for FG-CTG-BP at Belle River Peakers is included in [Section 2 Belle River Power Plant](#), Appendix 9-2 BR, [Section 2 Belle River Power Plant](#).

b. Dean Peakers

**PHASE II ACID RAIN PERMIT
Permit No. MI-AR-55718-2021**

Commented [AS(639): AR permit has been inserted which updated on 2/16/2021 by Brian,,, MI-AR-55718-20XX Draft: DEAN PEAKERS AR PERMIT

Permittee	DTE Electric Company – Dean Peakers
Address	4901 Pointe Dr., East China Township, MI
SRN	B2796
Plant Code	55718
Issue Date	DRAFT
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-B2796-20XX

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 federal Clean Air Act, new units are not allocated allowances in 40 CFR Part 73 and must obtain allowances by other means (Section 403(e) of the federal 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 federal Clean Air Act, new units are not subject to the acid rain nitrogen oxides requirements (40 CFR 76.1(a)).

3. The permit application that this source submitted, as corrected by the AQD. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the application.

Statement of Basis

Statutory and Regulatory Authorities.

In accordance with the Natural Resources and Environmental Protection Act, 1994 PA 451 and Titles IV and V of the federal Clean Air Act, the Michigan Department of Environment, Great Lakes, and Energy, 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:

Mr. Brian Carley
Environmental Quality Specialist
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division, Jackson District Office
State Office Building, 4th Floor
301 East Louis B. Glick Highway
Jackson, Michigan 49201-1556

Telephone: 517-416-4631

Facsimile: 517-780-7855

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

Terms and Conditions:

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

		20XX	20XX	20XX	20XX	20XX
Unit CTG 11-1	SO ₂ allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				

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		20XX	20XX	20XX	20XX	20XX
Unit CTG 11-2	SO ₂ allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				

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		20XX	20XX	20XX	20XX	20XX
Unit CTG 12-1	SO ₂ allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				

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		20XX	20XX	20XX	20XX	20XX
Unit CTG 12-2	SO ₂ allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				

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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 December 3, 2019

DTE Electric Company-Dean Peakers
Facility (Source) Name (from STEP 1)

Acid Rain - Page 2

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 source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

DTE Electric Company-Dean Peakers
Facility (Source) Name (from STEP 1)

Acid Rain - Page 3

STEP 3, Cont'd.

Excess Emissions Requirements

- (1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

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

DTE Electric Company-Dean Peakers
Facility (Source) Name (from STEP 1)

Acid Rain - Page 4

STEP 3, Cont'd.

Effect on Other Authorities

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

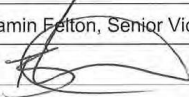
- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a source can hold; provided, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

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	Benjamin Felton, Senior Vice President, Fossil Generation	
Signature		Date 11/12/19

EPA Form 7810-16 (Revised 8-2019)

Appendix 10-3 P. Cross State Pollution Rule (CSAPR) Trading Program Title V Requirements

Description of CSAPR Monitoring Provisions

The CSAPR subject units, and the unit-specific monitoring provisions, at this source are identified in the following tables. These units are subject to the requirements for the CSAPR NO_x Annual Trading Program, CSAPR NO_x Ozone

Commented [AS(640)]: On 6/22/2021, Shamim updated Peakers CSAPR by replacing text with new text provided by Brian Carley on May 5, 2021

Season Group 3 Trading Program, and CSAPR SO₂ Group 1 Trading Program, which are included below as Sections I, II, and III, respectively.

Each unit will use one of the following as the monitoring methodology for each parameter as provided below and shall comply with the general monitoring, recordkeeping, reporting and other requirements in conditions 1 through 5 below and in paragraph (b) of Sections I, II, and III:

- Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B (for SO₂ monitoring) or 40 CFR Part 75, Subpart H (for NO_x monitoring)
- Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
- Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E
- Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19
- EPA-approved alternative monitoring system requirements pursuant to 40 CFR Part 75, Subpart E

Unit ID: Belle River Peakers CTG 12-1	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D

Unit ID: Belle River Peakers CTG 12-2	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D

Unit ID: Belle River Peakers CTG 13-1	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D

Unit ID: Dean Peakers CTG 11-1 (formerly 3)	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D

Unit ID: Dean Peakers CTG 11-2 (formerly 4)	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E

Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
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Unit ID: Dean Peakers CTG 12-1 (formerly 2)	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D

Unit ID: Dean Peakers CTG 11-2 (formerly 1)	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D

(a)1. The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (CSAPR NO_x Annual Trading Program), 97.1030 through 97.1035 (CSAPR NO_x Ozone Season Group 3 Trading Program), and 97.630 through 97.635 (CSAPR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable CSAPR trading programs.

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(b)2. Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <https://www.epa.gov/airmarkets/monitoring-plans-part-75-sources>.

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(c)3. Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR Part 75, Subpart E and 40 CFR 75.66 and 97.435 (CSAPR NO_x Annual Trading Program), 97.1035 (CSAPR NO_x Ozone Season Group 3 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.

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(d)4. Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (CSAPR NO_x Annual Trading Program), 97.1030 through 97.1034 (CSAPR NO_x Ozone Season Group 3 Trading Program), and/or 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (CSAPR NO_x Annual Trading Program), 97.1035 (CSAPR NO_x Ozone Season Group 3 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.

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(e)5. The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (CSAPR NO_x Annual Trading Program), 97.1030 through 97.1034 (CSAPR NO_x Ozone Season Group 3 Trading Program), and 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.

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SECTION I: CSAPR NO_x Annual Trading Program requirements (40 CFR 97.406)

(1)(a) Designated representative requirements.

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The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

(2)(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of CSAPR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the CSAPR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

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(3)(c) NO_x emissions requirements.

- (1) CSAPR NO_x Annual emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall hold, in the source's compliance account, CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Annual units at the source.
 - (ii). If total NO_x emissions during a control period in a given year from the CSAPR NO_x Annual units at a CSAPR NO_x Annual source are in excess of the CSAPR NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - i. (A) The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall hold the CSAPR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and
 - ii. (B) The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.
- (2) CSAPR NO_x Annual assurance provisions.
 - (i). If total NO_x emissions during a control period in a given year from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.

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- (ii). The owners and operators shall hold the CSAPR NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).
 - (iv). It shall not be a violation of 40 CFR Part 97, Subpart AAAAA or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold CSAPR NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - ~~i.~~(A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - ~~ii.~~(B). Each CSAPR NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.
- (3) Compliance periods.
- (i). A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - (ii). A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
- (i). A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each CSAPR NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart AAAAA.
- (6) Limited authorization. A CSAPR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
- (i). Such authorization shall only be used in accordance with the CSAPR NO_x Annual Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR Part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A CSAPR NO_x Annual allowance does not constitute a property right.

(4)(d) Title V permit revision requirements.

~~(i).~~(1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Annual allowances in accordance with 40 CFR Part 97, Subpart AAAAA.

~~(ii).~~(2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be

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added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(5)(e) Additional recordkeeping and reporting requirements.

(a)(1) Unless otherwise provided, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.

a.(i). The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each CSAPR NO_x Annual unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.

b.(ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart AAAAA.

e.(iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Annual Trading Program.

(b)(2) The designated representative of a CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall make all submissions required under the CSAPR NO_x Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

(6)(f) Liability.

(f)(1) Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual source or the designated representative of a CSAPR NO_x Annual source shall also apply to the owners and operators of such source and of the CSAPR NO_x Annual units at the source.

(f)(2) Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual unit or the designated representative of a CSAPR NO_x Annual unit shall also apply to the owners and operators of such unit.

(7)(g) Effect on other authorities.

No provision of the CSAPR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Annual source or CSAPR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(8)(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION II: CSAPR NO_x Ozone Season Group 3 Trading Program Requirements (40 CFR 97.1006)

(1)(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.1013 through 97.1018.

(2)(b) Emissions monitoring, reporting, and recordkeeping requirements.

(1) The owners and operators, and the designated representative, of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.1030 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.1031 (initial monitoring system certification and recertification procedures), 97.1032 (monitoring system out-of-control periods), 97.1033 (notifications concerning monitoring), 97.1034 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.1035 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

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(2) The emissions data determined in accordance with 40 CFR 97.1030 through 97.1035 shall be used to calculate allocations of CSAPR NO_x Ozone Season Group 3 allowances under 40 CFR 97.1011(a)(2) and (b) and 97.1012 and to determine compliance with the CSAPR NO_x Ozone Season Group 3 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.1030 through 97.1035 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(3)(c) NO_x emissions requirements.

(1) CSAPR NO_x Ozone Season Group 3 emissions limitation.

a-(i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall hold, in the source's compliance account, CSAPR NO_x Ozone Season Group 3 allowances available for deduction for such control period under 40 CFR 97.1024(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Ozone Season Group 3 units at the source.

b-(ii). If total NO_x emissions during a control period in a given year from the CSAPR NO_x Ozone Season Group 3 units at a CSAPR NO_x Ozone Season Group 3 source are in excess of the CSAPR NO_x Ozone Season Group 3 emissions limitation set forth in paragraph (c)(1)(i) above, then:

i-(A). The owners and operators of the source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall hold the CSAPR NO_x Ozone Season Group 3 allowances required for deduction under 40 CFR 97.1024(d); and

ii-(B). The owners and operators of the source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart GGGGG and the Clean Air Act.

(2) CSAPR NO_x Ozone Season Group 3 assurance provisions.

a-(i). If total NO_x emissions during a control period in a given year from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Ozone Season Group 3 allowances available for deduction for such control period under 40 CFR 97.1025(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.1025(b), of multiplying—

i-(A). The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and

ii-(B). The amount by which total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.

b-(ii). The owners and operators shall hold the CSAPR NO_x Ozone Season Group 3 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.

c-(iii). Total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season Group 3 trading budget under 40 CFR 97.1010(a) and the state's variability limit under 40 CFR 97.1010(b).

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d.(iv) It shall not be a violation of 40 CFR Part 97, Subpart GGGGG or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.

e.(v) To the extent the owners and operators fail to hold CSAPR NO_x Ozone Season Group 3 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,

i.(A) The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

ii.(B) Each CSAPR NO_x Ozone Season Group 3 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart GGGGG and the Clean Air Act.

(3) Compliance periods.

a.(i) A CSAPR NO_x Ozone Season Group 3 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.1030(b) and for each control period thereafter.

b.(ii) A CSAPR NO_x Ozone Season Group 3 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.1030(b) and for each control period thereafter.

(4) Vintage of allowances held for compliance.

a.(i) A CSAPR NO_x Ozone Season Group 3 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 3 allowance that was allocated for such control period or a control period in a prior year.

b.(ii) A CSAPR NO_x Ozone Season Group 3 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 3 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

(5) Allowance Management System requirements. Each CSAPR NO_x Ozone Season Group 3 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart GGGGG.

(6) Limited authorization. A CSAPR NO_x Ozone Season Group 3 allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:

a.(i) Such authorization shall only be used in accordance with the CSAPR NO_x Ozone Season Group 3 Trading Program; and

b.(ii) Notwithstanding any other provision of 40 CFR Part 97, Subpart GGGGG, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

(7) Property right. A CSAPR NO_x Ozone Season Group 3 allowance does not constitute a property right.

(4)(d) Title V permit revision requirements.

(1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Ozone Season Group 3 allowances in accordance with 40 CFR Part 97, Subpart GGGGG.

(2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.1030 through 97.1035, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.1006(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(5)(e) Additional recordkeeping and reporting requirements.

(a)(1) Unless otherwise provided, the owners and operators of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the

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document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.

a-(i). The certificate of representation under 40 CFR 97.1016 for the designated representative for the source and each CSAPR NO_x Ozone Season Group 3 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.1016 changing the designated representative.

b-(ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart GGGGG.

c-(iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Ozone Season Group 3 Trading Program.

(b)(2) The designated representative of a CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall make all submissions required under the CSAPR NO_x Ozone Season Group 3 Trading Program, except as provided in 40 CFR 97.1018. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

(6)(f) Liability.

- (1) Any provision of the CSAPR NO_x Ozone Season Group 3 Trading Program that applies to a CSAPR NO_x Ozone Season Group 3 source or the designated representative of a CSAPR NO_x Ozone Season Group 3 source shall also apply to the owners and operators of such source and of the CSAPR NO_x Ozone Season Group 3 units at the source.
- (2) Any provision of the CSAPR NO_x Ozone Season Group 3 Trading Program that applies to a CSAPR NO_x Ozone Season Group 3 unit or the designated representative of a CSAPR NO_x Ozone Season Group 3 unit shall also apply to the owners and operators of such unit.

(7)(g) Effect on other authorities.

No provision of the CSAPR NO_x Ozone Season Group 3 Trading Program or exemption under 40 CFR 97.1005 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Ozone Season Group 3 source or CSAPR NO_x Ozone Season Group 3 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(8)(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

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SECTION III: CSAPR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

(1)(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

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(2)(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of CSAPR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the CSAPR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

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(3)(c) SO₂ emissions requirements.

- (1) CSAPR SO₂ Group 1 emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all CSAPR SO₂ Group 1 units at the source.
 - (ii). If total SO₂ emissions during a control period in a given year from the CSAPR SO₂ Group 1 units at a CSAPR SO₂ Group 1 source are in excess of the CSAPR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - i. **(A).** The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall hold the CSAPR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and
 - ii. **(B).** The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.
- (2) CSAPR SO₂ Group 1 assurance provisions.
 - (i). If total SO₂ emissions during a control period in a given year from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—
 - i. **(A).** The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and

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ii.(B). The amount by which total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.

- (ii). The owners and operators shall hold the CSAPR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
- (iv). It shall not be a violation of 40 CFR Part 97, Subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
- (v). To the extent the owners and operators fail to hold CSAPR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,

i.(A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

ii.(B). Each CSAPR SO₂ Group 1 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.

(3) Compliance periods.

- (i). A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
- (ii). A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.

(4) Vintage of allowances held for compliance.

- (i). A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.
- (ii). A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

(5) Allowance Management System requirements. Each CSAPR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart CCCCC.

(6) Limited authorization. A CSAPR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:

- (i). Such authorization shall only be used in accordance with the CSAPR SO₂ Group 1 Trading Program; and
- (ii). Notwithstanding any other provision of 40 CFR Part 97, Subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

(7) Property right. A CSAPR SO₂ Group 1 allowance does not constitute a property right.

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(4)(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR SO₂ Group 1 allowances in accordance with 40 CFR Part 97, Subpart CCCCC.
- (2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

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(5)(e) Additional recordkeeping and reporting requirements.

(a)(1) Unless otherwise provided, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.

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(1)(i) The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each CSAPR SO₂ Group 1 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.

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(2)(ii) All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart CCCCC.

(3)(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR SO₂ Group 1 Trading Program.

(b)(2) The designated representative of a CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall make all submissions required under the CSAPR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

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(6)(f) Liability.

(1) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 source or the designated representative of a CSAPR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the CSAPR SO₂ Group 1 units at the source.

(2) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 unit or the designated representative of a CSAPR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.

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(7)(g) Effect on other authorities.

No provision of the CSAPR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR SO₂ Group 1 source or CSAPR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

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(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

1. ~~The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (TR NO_x Annual Trading Program), 97.530 through 97.535 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.635 (TR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable TR trading programs.~~
2. ~~Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <http://www.epa.gov/airmarkets/emissions/monitoringplans.html>.~~
3. ~~Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR part 75, subpart E and 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.~~
4. ~~Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and/or 97.630 through 97.634 (TR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.~~
5. ~~The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.634 (TR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.~~

SECTION I: TR NO_x Annual Trading Program requirements (40 CFR 97.406)

(c) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

(d) Emissions monitoring, reporting, and recordkeeping requirements.

(3) ~~The owners and operators, and the designated representative, of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).~~

(4) ~~The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of TR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the TR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.~~

(e) NO_x emissions requirements.

(1) ~~TR NO_x Annual emissions limitation.~~

- (i).—As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR-NO_x Annual source and each TR-NO_x Annual unit at the source shall hold, in the source's compliance account, TR-NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR-NO_x Annual units at the source.
 - (ii).—If total NO_x emissions during a control period in a given year from the TR-NO_x Annual units at a TR-NO_x Annual source are in excess of the TR-NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A).—The owners and operators of the source and each TR-NO_x Annual unit at the source shall hold the TR-NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and
 - (B).—The owners and operators of the source and each TR-NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.
- (2) TR-NO_x Annual assurance provisions.
- (i).—If total NO_x emissions during a control period in a given year from all TR-NO_x Annual units at TR-NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR-NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying—(A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all TR-NO_x Annual units at TR-NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - (ii).—The owners and operators shall hold the TR-NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii).—Total NO_x emissions from all TR-NO_x Annual units at TR-NO_x Annual sources in the State and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).
 - (iv).—It shall not be a violation of 40 CFR part 97, subpart AAAAA or of the Clean Air Act if total NO_x emissions from all TR-NO_x Annual units at TR-NO_x Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR-NO_x Annual units at TR-NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v).—To the extent the owners and operators fail to hold TR-NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A).—The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B).—Each TR-NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.
- (3) Compliance periods.
- (i).—A TR-NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.

- (ii).—A TR-NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - (4) ~~Vintage of allowances held for compliance.~~
 - (i).—A TR-NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR-NO_x Annual allowance that was allocated for such control period or a control period in a prior year.
 - (ii).—A TR-NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR-NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
 - (5) ~~Allowance Management System requirements.~~ Each TR-NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart AAAAA.
 - (6) ~~Limited authorization.~~ A TR-NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i).—Such authorization shall only be used in accordance with the TR-NO_x Annual Trading Program; and
 - (ii).—Notwithstanding any other provision of 40 CFR part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
 - (7) ~~Property right.~~ A TR-NO_x Annual allowance does not constitute a property right.
- (f) Title V permit revision requirements.**
- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR-NO_x Annual allowances in accordance with 40 CFR part 97, subpart AAAAA.
 - (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).
- (g) Additional recordkeeping and reporting requirements.**
- (1) Unless otherwise provided, the owners and operators of each TR-NO_x Annual source and each TR-NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i).—The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each TR-NO_x Annual unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.
 - (ii).—All emissions monitoring information, in accordance with 40 CFR part 97, subpart AAAAA.
 - (iii).—Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR-NO_x Annual Trading Program.
 - (2) The designated representative of a TR-NO_x Annual source and each TR-NO_x Annual unit at the source shall make all submissions required under the TR-NO_x Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.
- (h) Liability.**
- (1) Any provision of the TR-NO_x Annual Trading Program that applies to a TR-NO_x Annual source or the designated representative of a TR-NO_x Annual source shall also apply to the owners and operators of such source and of the TR-NO_x Annual units at the source.
 - (2) Any provision of the TR-NO_x Annual Trading Program that applies to a TR-NO_x Annual unit or the designated representative of a TR-NO_x Annual unit shall also apply to the owners and operators of such unit.

(i) Effect on other authorities.

No provision of the TR-NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR-NO_x Annual source or TR-NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(j) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION II: TR-NO_x Ozone Season Trading Program Requirements (40 CFR 97.506)

(f) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.513 through 97.518.

(g) Emissions monitoring, reporting, and recordkeeping requirements.

(2) The owners and operators, and the designated representative, of each TR-NO_x Ozone Season source and each TR-NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.530 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.531 (initial monitoring system certification and recertification procedures), 97.532 (monitoring system out-of-control periods), 97.533 (notifications concerning monitoring), 97.534 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.535 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

(3) The emissions data determined in accordance with 40 CFR 97.530 through 97.535 shall be used to calculate allocations of TR-NO_x Ozone Season allowances under 40 CFR 97.511(a)(2) and (b) and 97.512 and to determine compliance with the TR-NO_x Ozone Season emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.530 through 97.535 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(h) NO_x emissions requirements.

(1) TR-NO_x Ozone Season emissions limitation.

(i) As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR-NO_x Ozone Season source and each TR-NO_x Ozone Season unit at the source shall hold, in the source's compliance account, TR-NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.524(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR-NO_x Ozone Season units at the source.

(ii) If total NO_x emissions during a control period in a given year from the TR-NO_x Ozone Season units at a TR-NO_x Ozone Season source are in excess of the TR-NO_x Ozone Season emissions limitation set forth in paragraph (c)(1)(i) above, then:

(A) The owners and operators of the source and each TR-NO_x Ozone Season unit at the source shall hold the TR-NO_x Ozone Season allowances required for deduction under 40 CFR 97.524(d); and

(B) The owners and operators of the source and each TR-NO_x Ozone Season unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBB and the Clean Air Act.

(2) TR-NO_x Ozone Season assurance provisions.

(i) If total NO_x emissions during a control period in a given year from all TR-NO_x Ozone Season units at TR-NO_x Ozone Season sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period,

where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR-NO_x-Ozone Season allowances available for deduction for such control period under 40 CFR 97.525(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.525(b), of multiplying—

(A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and

(B) The amount by which total NO_x emissions from all TR-NO_x-Ozone Season units at TR-NO_x-Ozone Season sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.

(ii) The owners and operators shall hold the TR-NO_x-Ozone Season allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.

(iii) Total NO_x emissions from all TR-NO_x-Ozone Season units at TR-NO_x-Ozone Season sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x-Ozone Season trading budget under 40 CFR 97.510(a) and the state's variability limit under 40 CFR 97.510(b).

(iv) It shall not be a violation of 40 CFR part 97, subpart BBBBB or of the Clean Air Act if total NO_x emissions from all TR-NO_x-Ozone Season units at TR-NO_x-Ozone Season sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR-NO_x-Ozone Season units at TR-NO_x-Ozone Season sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.

(v) To the extent the owners and operators fail to hold TR-NO_x-Ozone Season allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,

(A) The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

(B) Each TR-NO_x-Ozone Season allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBB and the Clean Air Act.

(3) Compliance periods.

(i) A TR-NO_x-Ozone Season unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.

(ii) A TR-NO_x-Ozone Season unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.

(4) Vintage of allowances held for compliance.

(i) A TR-NO_x-Ozone Season allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR-NO_x-Ozone Season allowance that was allocated for such control period or a control period in a prior year.

(ii) A TR-NO_x-Ozone Season allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR-NO_x-Ozone Season allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

(5) Allowance Management System requirements. Each TR-NO_x-Ozone Season allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart BBBBB.

(6) Limited authorization. A TR-NO_x-Ozone Season allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:

(i) Such authorization shall only be used in accordance with the TR-NO_x-Ozone Season Trading Program; and

(ii). Notwithstanding any other provision of 40 CFR part 97, subpart BBBBB, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

(7) Property right. A TR NO_x Ozone Season allowance does not constitute a property right.

(i) Title V permit revision requirements.

(8) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_x Ozone Season allowances in accordance with 40 CFR part 97, subpart BBBBB.

(9) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.530 through 97.535, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.506(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(j) Additional recordkeeping and reporting requirements.

(3) Unless otherwise provided, the owners and operators of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.

(i). The certificate of representation under 40 CFR 97.516 for the designated representative for the source and each TR NO_x Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.516 changing the designated representative.

(ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart BBBBB.

(iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_x Ozone Season Trading Program.

(4) The designated representative of a TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall make all submissions required under the TR NO_x Ozone Season Trading Program, except as provided in 40 CFR 97.518. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(k) Liability.

(1) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season source or the designated representative of a TR NO_x Ozone Season source shall also apply to the owners and operators of such source and of the TR NO_x Ozone Season units at the source.

(2) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season unit or the designated representative of a TR NO_x Ozone Season unit shall also apply to the owners and operators of such unit.

(l) Effect on other authorities.

No provision of the TR NO_x Ozone Season Trading Program or exemption under 40 CFR 97.505 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NO_x Ozone Season source or TR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(m) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION III: TR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

(b) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

(c) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR-SO₂-Group 1 source and each TR-SO₂-Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of TR-SO₂-Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the TR-SO₂-Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(d) SO₂ emissions requirements.

(1) TR-SO₂-Group 1 emissions limitation.

- (i) As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR-SO₂-Group 1 source and each TR-SO₂-Group 1 unit at the source shall hold, in the source's compliance account, TR-SO₂-Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all TR-SO₂-Group 1 units at the source.
- (ii) If total SO₂ emissions during a control period in a given year from the TR-SO₂-Group 1 units at a TR-SO₂-Group 1 source are in excess of the TR-SO₂-Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A) The owners and operators of the source and each TR-SO₂-Group 1 unit at the source shall hold the TR-SO₂-Group 1 allowances required for deduction under 40 CFR 97.624(d); and
 - (B) The owners and operators of the source and each TR-SO₂-Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR part 97, subpart CCCCC and the Clean Air Act.

(2) TR-SO₂-Group 1 assurance provisions.

- (i) If total SO₂ emissions during a control period in a given year from all TR-SO₂-Group 1 units at TR-SO₂-Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR-SO₂-Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—
 - (A) The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and
 - (B) The amount by which total SO₂ emissions from all TR-SO₂-Group 1 units at TR-SO₂-Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.

- (ii).—The owners and operators shall hold the TR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii).—Total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
 - (iv).—It shall not be a violation of 40 CFR part 97, subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v).—To the extent the owners and operators fail to hold TR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A).—The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B).—Each TR SO₂ Group 1 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart CCCCC and the Clean Air Act.
 - (3) Compliance periods.
 - (i).—A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
 - (ii).—A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
 - (4) Vintage of allowances held for compliance.
 - (i).—A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.
 - (ii).—A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
 - (5) Allowance Management System requirements. Each TR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart CCCCC.
 - (6) Limited authorization. A TR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i).—Such authorization shall only be used in accordance with the TR SO₂ Group 1 Trading Program; and
 - (ii).—Notwithstanding any other provision of 40 CFR part 97, subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
 - (7) Property right. A TR SO₂ Group 1 allowance does not constitute a property right.
- (e) Title V permit revision requirements.**
- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR SO₂ Group 1 allowances in accordance with 40 CFR part 97, subpart CCCCC.
 - (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR part 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(f) Additional recordkeeping and reporting requirements.

- (1) ~~Unless otherwise provided, the owners and operators of each TR-SO₂-Group 1 source and each TR-SO₂-Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.~~
- ~~(i). The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each TR-SO₂-Group 1 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.~~
 - ~~(ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart CCCCC.~~
 - ~~(iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR-SO₂-Group 1 Trading Program.~~
- (2) ~~The designated representative of a TR-SO₂-Group 1 source and each TR-SO₂-Group 1 unit at the source shall make all submissions required under the TR-SO₂-Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 74.~~

(g) Liability.

- (1) ~~Any provision of the TR-SO₂-Group 1 Trading Program that applies to a TR-SO₂-Group 1 source or the designated representative of a TR-SO₂-Group 1 source shall also apply to the owners and operators of such source and of the TR-SO₂-Group 1 units at the source.~~
- (2) ~~Any provision of the TR-SO₂-Group 1 Trading Program that applies to a TR-SO₂-Group 1 unit or the designated representative of a TR-SO₂-Group 1 unit shall also apply to the owners and operators of such unit.~~

(h) Effect on other authorities.

~~No provision of the TR-SO₂-Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR-SO₂-Group 1 source or TR-SO₂-Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.~~

(h) Effect on units in Indian country.

~~Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.~~

Section X – X

ROP No: MI-ROP-B2796-20XX
Expiration Date:
PTI No: MI-PTI-B2796-20XX

Section X – X

ROP No: MI-ROP-B2796-20XX

Expiration Date:

PTI No: MI-PTI-B2796-20XX

SECTION 46 – BELLE RIVER FUELS COMPANY, LLC

LOCATED AT

4505 King Road
China Township, Michigan 48054

Section X – X

ROP No: MI-ROP-B2796-20XX

Expiration Date:

PTI No: MI-PTI-B2796-20XX

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))**

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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 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.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))**

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

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
- 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).
 - 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.
 - 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.

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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))**:
- 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.
 - 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))**
- The applicable requirements are included and are specifically identified in the ROP.
 - 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:
- 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))**
 - 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))**
 - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

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

Revisions

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

Reopenings

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

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Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

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Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**

4-45. 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.² **(R 336.1219)**

2-46. 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.² **(R 336.1201(4))**

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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).

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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.

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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-4-6

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Commented [LRF641]: DTE would like to leave the table number in (as it is in the current ROP). This ROP is so large, it is helpful having a table # to refer to.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU- PREREFEED-BRFC	Coal handling activity consisting of existing coal handling equipment, including conveyors CV23 & 24 transferring coal to two new REF process feed conveyors TH-8A where emissions are controlled by dust collector No. 1 and enclosures.	12/29/2009	FG-REF-BRFC
EU-REF-BRFC	The REF process including coal handling. Consists of a 750-ton 750-ton solid REF Additive (REFA) silo No. 1 controlled by silo dust collector; coal, liquid MerSorb and solid REFA mixing process consisting of two liquid storage tanks and two solid REFA day bins Nos. 1 & 2, each with a bin vent filter discharged into the building; two screw feeders and pug mills Nos. 1 & 2; and a common product (REF coal) conveyor where emissions are controlled by dust collector No. 2.	12/29/2009	FG-REF-BRFC
EU-REFCOAL-BRFC	All treated coal transferring from a common product conveyor to existing conveyors CV19 & CV20 where emissions are controlled by enclosures and dust collector No.1	12/29/2009	FG-REF-BRFC

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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-4

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-REF-BRFC	Emission Units within the Belle River Fuels Company producing the "Reduced Emissions Fuel" refined coal.	EU- PREREFEED-BRFC EU-REF-BRFC, EU-REFCOAL-BRFC

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**FG-REF-BRFC
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

This flexible group represents the REF refined coal production system including: coal handling activity consisting of existing coal conveyors CV23 & CV24 where emissions are controlled by enclosures or dust collectors; two REF process feed conveyors TH-8A where emissions are controlled by enclosures and dust collector #1; a 750 ton solid REFA silo controlled by silo dust collector; coal, liquid REFA and solid REFA mixing process consisting of two liquid storage tanks and two solid REFA day bins Nos. 1 & 2, each with a bin vent filter; two screw feeders & pug mills Nos. 1 and 2; and a common product (refined coal) conveyor where emissions are controlled by dust collector No. 2; all treated coal transferring from common product (refined coal) conveyor to existing coal conveyors CV19 & CV20 where emissions are controlled by enclosures and dust collector No. 2.

Emission Units: EU-PREREFEEED-BRFC, EU-REF-BRFC, EU-REFCOAL-BRFC

POLLUTION CONTROL EQUIPMENT

Enclosures and dust collectors

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.008 grains per dscf ²	<u>Test protocol will specify averaging time: Hourly</u>	Each individual REFA silo dust collector; solid REFA day bin dust collector Nos. 1 and 2, dust collector No. 1 and dust collector No. 2 in FG-REF-BRFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2802(4)(e)
2. PM	0.072 pph ²	<u>Hourly Test protocol will specify averaging time.</u>	REFA silo dust collector in FG-REF-BRFC	SC V.1 SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2802(4)(e)
3. PM	0.392 pph ²	<u>Hourly Test protocol will specify averaging time</u>	Each individual dust collector No. 1 and dust collector No. 2 in FG-REF-BRFC	SC V.1 SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2802(4)(e)
4. PM10	0.072 pph ²	<u>Hourly Test protocol will specify averaging time</u>	REFA silo dust collector in FG-REF-BRFC	SC V.1 SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2803 R 336.2804 R 336.2802(4)(e) 40CFR52.21 (c)&(d)
5. PM10	0.392 pph ²	<u>Hourly Test protocol will specify averaging time</u>	Each individual dust collector No. 1 and dust collector No. 2 in FG-REF-BRFC	SC V.1 SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2803 R 336.2804 R 336.2802(4)(e) 40CFR52.21 (c)&(d)
6. PM2.5	0.072 pph ²	<u>Hourly Test protocol will specify averaging time</u>	REFA silo dust collector in FG-REF-BRFC	SC V.1 SC V.1 and VI.4	R 336.1205 R 336.2902(2)(e) 40 CFR 51 (App S)

Commented [ER(642): NEED TO REVIEW CAM APPLICABILITY PER JZ REVIEW.]

Commented [ER(643): JOYCE ZHU REVIEW QUESTION, 20210429: Is any of the PM limit subject to CAM?]

Commented [ER(644R643): No PM limits are subject to CAM because, per Andrew Fadanelli email on June 28, 2021, 1704 hrs., "The total uncontrolled, CAM PTE, for FG-REF-BRFC is just under 2 tons per year."]

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7. PM2.5	0.392 pph ²	Hourly Test protocol will specify averaging time	Each individual dust collector No. 1 and dust collector No. 2 in FG-REF-BRFC	SC V.1 and VI.4	R 336.1205 R 336.2902(2)(e) 40 CFR 51 (App S)
8. Opacity Visible Emissions	10 percent opacity ²	Test protocol will specify averaging time 6-minute average	Each individual REFA silo dust collector; solid REFA day bin dust collectors -No. 1 & No. 2, and Dust Collectors #1 & #2, in FG-REF-BRFC	SC VI.1	R 336.1301(1)(c)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. S-Sorb	1824 tons/day ²	Calendar Day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3) R 336.1225
2. S-Sorb	250,000 tpy ²	12-month rolling time period as determined at the end of each calendar day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3) R 336.1225
3. Mer Sorb	54 tons/day ²	Calendar Day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3) R 336.1225
4. Mer Sorb	7500 tpy ²	12-month rolling time period as determined at the end of each calendar day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3) R 336.1225
5. PRE REF Coal	36,000 tons/day ²	Calendar Day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3) R 336.1225
6. PRE REF Coal	5,000,000 tpy ²	12-month rolling time period as determined at the end of each calendar day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall maintain and implement a revised Fugitive Dust Control Plan to manage fugitive sources, such as haul roads, etc., from FG-REF-BRFC. If at any time the Fugitive Dust Control Plan fails to address or inadequately addresses an event that meets the characteristics of fugitive dust, the permittee shall amend the Fugitive Dust Control Plan within 45 days after such an event occurs. The permittee shall also amend the Fugitive Dust Control Plan within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the Fugitive Dust Control Plan and any amendments to the Fugitive Dust Control Plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the Fugitive Dust Control Plan or amended Fugitive Dust Control Plan shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(Act 451 Section 324.5524, R 336.1372, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**
2. The permittee shall maintain and implement a malfunction abatement plan (MAP) as described in Rule 911(2), for FG-REF-BRFC. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District

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Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1225, R 336.1331, R 336.1910, R 336.1911)

- 3. The fugitive emission sources of FG-REF-BR shall be operated in a manner which will minimize the fugitive particulate emissions.² (Act 451 Section 324.5524, R 336.1372, R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The permittee shall not operate FG-REF-BRFC unless the enclosed conveyors, silo dust collector, bin vent filters and dust collectors are installed, maintained and operated in a satisfactory manner, and/or in accordance with a malfunction abatement plan (MAP), approvable by the AQD District Supervisor.² (R 336.1901, R 336.1910, R 336.1911)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

- 2. Upon request of the AQD District Supervisor, the permittee shall verify PM, PM10, and PM2.5 emission rates from FG-REF-BRFC by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

- 1. Verification of PM, PM10, and PM2.5 mass emissions from dust collectors No. 1 and No. 2 or representative unit in FG-REF-BRFC by testing at owner's expense, in accordance with Department requirements, may be required. If testing is required, the permittee must complete test once every five years, for the next 10 years of operation after FG-REF-BRFC modification, until December 28, 2019. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (R 336.2001, R 336.2003, R 336.2004, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall perform and document non-certified visible emissions observations on a daily basis when FG-REF-BRFC is operating, as required in SC 1.8. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c), R 336.1303, 40 CFR 60.42a(b))

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Commented [ER(646): REPLACE WITH "UPON REQUEST..." TEST LANGUAGE.

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2. The permittee shall inspect all total enclosure conveyors to determine and record conditions, once per calendar month. **(R 336.1213(3))**
3. The permittee shall keep, in a satisfactory manner records on a daily, monthly and 12-month rolling time period as determined at the end of each calendar month of the PREREF Coal, S-Sorb, and MerSorb processed in FG-REF-BRFC.² **(R 336.1205(1)(a), R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**

~~4. The permittee shall calculate and keep records of PM, PM10 and PM2.5 emissions from FG-REF-BRFC, in tons per calendar year. The annual calendar year recordkeeping period shall begin on the first day of the month during which FG-REF-BRFC commenced operation. Calculations and records shall be kept in the format described in Appendix 4.1-BRFC, or an alternative format acceptable to AQD Permit Section Supervisor. Requirement to conduct calculations for records shall end 10 calendar years after FG-REF-BRFC commences operation, 12-31-2019.² **(R 336.1205, R 336.1901, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)**~~

4. The permittee shall keep records of the activities, operational procedures & maintenance identified by the most current Fugitive Dust Control Plan as well as the MAP. **(Act 451 Section 324.5524, R 336.1372, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d), R 336.1225, R 336.1331, R 336.1910, & R 336.1911)**

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VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

~~4. The permittee shall submit annual records of the PM, PM10, and PM2.5 emissions from FG-REF-BRFC, in tons per calendar year as specified in SC VI.4 to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of the first calendar year. In addition, the records shall identify the following:~~

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~~a. Exceedances of the yearly actual emission of the PM, PM10, and PM2.5 above the baseline actual emissions (BAE) by a significant amount, and~~

~~b. Identify if the year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test used for FG-REF-BRFC.~~

~~The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to SC VI.5, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (R 336.1205, R 336.1901, R 336.2802(4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))~~

See Appendix 8-4 BRFC

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-REFASILO- BRFC	10-inch diameter, non-vertical ²	64 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SV-DUSTCOLL- 1-BRFC	10 X 16 horizontal ²	40 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
3. SV-DUSTCOLL- 2-BRFC	10 X 16 horizontal ²	40 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

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IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Y, as they apply to FG-REF-BRFC.² (40 CFR Part 60 Subparts A & Y, 60.252(c))

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E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

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APPENDICES

Appendix 1-4 BRFC. 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 _{2e}	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.

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Appendix 2-4 BRFC 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 3-4 BRFC. 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 4-4 BRFC. Recordkeeping

4.4

Recordkeeping Provisions for PSD Source Using Hybrid Applicability Test

All information in this Appendix shall be maintained pursuant to R 336.2818 and 40 CFR 52.21 (r)(6)(i) for 10 years after the REF Technology becomes operational, and shall be provided to both the AQD Permit Section Supervisor and the AQD District Supervisor for the first year and thereafter made available to the Department upon request.

A. Project Description:

The project is to install new sorbent technology which uses REF sorbent solution as a fuel additive to reduce mercury, nitrogen oxides and sulfur dioxide emissions. These changes include installation of liquid storage tanks, solid storage silo, day bins, screw feeders and pug mills, existing and new conveyors and other material handling equipment so that coal can be treated with this sorbent material processed in FG-REF-BRFC and before being burned in FG-BOILERS-BR at Belle River Power Plant.

B. Applicability Test Description: Minor modifications are not subject to PSD. Actual to projected actual hybrid applicability test as described in the table below will be used to demonstrate that PSD does not apply to these modifications.

C. Emission Limitations

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions	Excluded Emissions	
FG-REF-BRFC and FG-BOILERS-BR	PM	210	230.63	12.3	FG-REF-BRFC and FG-BOILERS-BR were capable of accommodating emissions up to 12.3 TPY. The projected emission increase of 8.33 tpy is less than significant level of 22.5 tpy (90% of the significant level of 25 tpy).

Commented [ER(651)]: Why did you delete those conditions? Per Joyce Zhu's 20210429 review.

Commented [ER(652R651)]: The conditions were deleted because, per the PTI condition, the recordkeeping requirement expired on 12/31/2019. SEE TEXT IN VI.4 above, where this special condition (which is marked for deletion) states in part, "Requirement to conduct calculations for records shall end 10 calendar years after FG-REF-BRFC commences operation, 12-31-2019."

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Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions	Excluded Emissions	
FG-REF-BRFC and FG-BOILERS-BR	PM10	144	155.38	8	FG-REF-BRFC and FG-BOILERS-BR were capable of accommodating emissions up to 8 TPY. The projected emission increase of 6.38 tpy is less than significant level of 13.5 tpy (90% of the significant level of 15 tpy).
FG-REF-BRFC and FG-BOILERS-BR	PM2.5	64	69.86	3.5	FG-REF-BRFC and FG-BOILERS-BR were capable of accommodating emissions up to 3.5 TPY. The projected emission increase of 5.36 tpy is less than significant level of 9 tpy (90% of the significant level of 10 tpy).

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.

~~D. Netting Calculations and Discussion: NA~~

Appendix 5-4 BRFC. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 6-4 BRFC. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-201599. 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.

Source-Wide PTI No MI-PTI-B2796-2009a15c is being reissued as Source-Wide PTI No. **MI-PTI-B2796-2015XX**.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
464-08CNA	201500008*NA	NARefined-emissions-fuel-project	FG-REF-BRFCNA

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Appendix 7-4 BRFC. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

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Appendix 8-4 BRFC. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use 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.

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Fuels Company, LLC Expiration Date: XX
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~~Company, LLC~~
B2796-20XX

~~Section 55~~ — ~~BLUE WATER ENERGY CENTER~~ ~~St. Clair Fuels~~

Expiration Date: XX

ROP No: MI-ROP-B2796-20XX

PTI No: MI-PTI-

~~SECTION 75~~ — ~~ST. CLAIR FUELS COMPANY, LLC~~

~~LOCATED AT~~

~~4505 King Road~~
~~China Township, Michigan 48054~~

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B2796-20XX

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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

- ~~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))~~
- ~~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))~~
- ~~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))~~
- ~~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)):~~
 - ~~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.~~
 - ~~Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.~~
 - ~~Inspect, at reasonable times, any of the following:~~
 - ~~Any stationary source.~~
 - ~~Any emission unit.~~
 - ~~Any equipment, including monitoring and air pollution control equipment.~~
 - ~~Any work practices or operations regulated or required under the ROP.~~
 - ~~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.~~

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- ~~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 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.~~
- ~~b. A limit specified by an applicable federal new source performance standard.~~
- ~~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))~~

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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 1004 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))**

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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))~~:
- ~~The date, location, time, and method of sampling or measurements.~~
 - ~~The dates the analyses of the samples were performed.~~
 - ~~The company or entity that performed the analyses of the samples.~~
 - ~~The analytical techniques or methods used.~~
 - ~~The results of the analyses.~~
 - ~~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)(e))~~
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data – Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. ~~(R 336.1213(4)(c))~~
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. ~~(R 336.1213(4)(c))~~
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. ~~(R 336.1213(3)(e))~~
- 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).
 - 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.

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- ~~e. 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.~~

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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))~~:
- ~~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.~~
 - ~~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)(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))~~
- ~~The applicable requirements are included and are specifically identified in the ROP.~~
 - ~~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.~~

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27. Nothing in this ROP shall alter or affect any of the following:
- 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))~~
 - 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))~~
 - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. ~~(R 336.1213(6)(b)(iii))~~
 - 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:
- Operational flexibility changes made pursuant to Rule 215. ~~(R 336.1215(5))~~
 - Administrative Amendments made pursuant to Rule 216(1)(a)(i)–(iv). ~~(R 336.1216(1)(b)(iii))~~
 - 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))~~
 - Minor Permit Modifications made pursuant to Rule 216(2). ~~(R 336.1216(2)(f))~~
 - State Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. ~~(R 336.1216(4)(e))~~
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. ~~(R 336.1217(1)(c), R 336.1217(1)(a))~~

Revisions

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

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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:~~
- ~~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))~~
 - ~~If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. (R 336.1217(2)(a)(ii))~~
 - ~~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))~~
 - ~~If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. (R 336.1217(2)(a)(iv))~~

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

38. ~~If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).~~

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- ~~39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):~~
- ~~a. June 21, 1999,~~
 - ~~b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or~~
 - ~~c. The date on which a regulated substance is first present above a threshold quantity in a process.~~
- ~~40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.~~
- ~~41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c); (40 CFR, Part 68)~~

Emission Trading

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

Permit To Install (PTI)

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

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~~Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² (R 336.1201(4))~~

Footnotes:

~~¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).~~

~~²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).~~

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~~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.~~

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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-7

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date/ Modification Date	Flexible Group ID
EU-PREREFEED-SCFC	Coal handling activity consisting of existing coal handling equipment, including Cogar feeder transferring coal to plant feed conveyor then to a chute with two flop gates where emissions are controlled by partial enclosures. Coal is then directed from the chute to pug mill Nos. 1, 2 & 3.	12/29/2009	FG-REF-SCFC
EU-REF-SCFC	The REF production process consists of a 750-ton solid REF Additive (REFA) silo No. 1 controlled by silo dust collector; coal, liquid MerSorb and solid REFA mixing process. The solid REFA mixing process consists of three solid REFA day bins Nos. 1, 2 & 3, each with a bin vent filter discharged into the building; three screw feeders & pug mills Nos. 1, 2 & 3 each controlled by a common dust collector, dust collector No. 1. The liquid MerSorb consisting of three liquid storage tanks, where MerSorb is directed to pug mill Nos. 1, 2 & 3	12/29/2009	FG-REF-SCFC
EU-REFCOAL-SCFC	All treated coal transferring from pug mill Nos. 1, 2 & 3 to existing conveyors CV-113 where emissions are controlled by partial enclosures and dust collector No.1	12/29/2009	FG-REF-SCFC

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~~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-7~~

~~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-REF-SCFC	Emission Units within the St. Clair Fuels Company producing the "Reduced Emissions Fuel" refined coal.	EU-PREREFEEED-SCFC EU-REF-SCFC, EU-REFCOAL-SCFC

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**FG-REF-SCFC
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

This flexible group represents the REF refined coal production system including: coal handling activity consisting of existing coal Cogar feeder, existing coal plant feed conveyor and one coal chute where emissions are controlled by partial enclosures; a 750 ton solid REFA silo No. 1 controlled by silo dust collector; coal, MerSorb process consisting of three liquid MerSorb storage tanks Nos. 1, 2 & 3; and solid REFA mixing process consisting of three solid REFA day bins Nos. 1, 2 & 3 each with a bin vent filter; three screw feeders Nos. 1, 2 & 3; pug mills Nos. 1, 2 & 3 each controlled by a common dust collector, dust collector No. 1; and all the treated coal transferring from three pug mills Nos. 1, 2 & 3 to existing coal conveyors CV-113.

Emission Units: EU-PREREFEED-SCFC, EU-REF-SCFC, EU-REFCOAL-SCFC

Flexible Group ID: FG-REF-SCFC

POLLUTION CONTROL EQUIPMENT

Enclosures and dust collectors

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.008 grains per dscf ²	Test protocol will specify averaging time.	Solid REFA silo No. 1 controlled by a dust collector in FG-REF-SCFC	SC-V.1 and VI.4	R-336.1205 R-336.1331(1)(c) R-336.2802(4)(e)
2. PM	0.078 pph ²	Test protocol will specify averaging time.	Solid REFA silo No. 1 controlled by a dust collector in FG-REF-SCFC	SC-V.1 and VI.4	R-336.1205 R-336.1331(1)(c) R-336.2802(4)(e)
3. PM	0.008 grains per dscf ²	Test protocol will specify averaging time.	Pug mills Nos. 1, 2 & 3 controlled by a common dust collector, dust collector No. 1 in FG-REF-SCFC	SC-V.1 and VI.4	R-336.1205 R-336.1331(1)(c) R-336.2802(4)(e)
4. PM	0.294 pph ²	Test protocol will specify averaging time.	Pug mills Nos. 1, 2 & 3 controlled by a common dust collector, dust collector No. 1 in FG-REF-SCFC	SC-V.1 and VI.4	R-336.1205 R-336.1331(1)(c) R-336.2802(4)(e)

Commented [ER(655): Per Joyce Zhu's review on 20210429, Is any of the PM limits subject to CAM requirements?
Commented [ER(656R655): No PM limits are subject to CAM because, per Andrew Fadanelli email on June 28, 2021 1704 hrs., "The total uncontrolled, CAM PTE, for FG-REF-SCFC is just under 2 tons per year."

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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
5. PM10	0.078 pph ²	Test protocol will specify averaging time.	Solid REFA silo No. 1 controlled by a dust collector in FG-REF-SCFC	SC-V.1 and VI.4	R-336.1205 R-336.1331(1)(c) R-336.2803 R-336.2804 R-336.2802(4)(e) 40-CFR 52.21 (c) and (d)
6. PM10	0.294 pph ²	Test protocol will specify averaging time.	Pug mills Nos. 1, 2 & 3 controlled by a common dust collector, dust collector No. 1 in FG-REF-SCFC	SC-V.1 and VI.4	R-336.1205 R-336.1331(1)(c) R-336.2803 R-336.2804 R-336.2802(4)(e) 40-CFR 52.21 (c) and (d)
7. PM2.5	0.078 pph ²	Test protocol will specify averaging time.	Solid REFA silo No. 1 controlled by a dust collector in FG-REF-SCFC	SC-V.1 and VI.4	R-336.1205 R-336.2902(2)(e) 40-CFR 51 (Appendix S)
8. PM2.5	0.294 pph ²	Test protocol will specify averaging time.	Pug mills Nos. 1, 2 & 3 controlled by a common dust collector, dust collector No. 1 in FG-REF-SCFC	SC-V.1 and VI.4	R-336.1205 R-336.2902(2)(e) 40-CFR 51 (Appendix S)
9. Opacity	10 percent ²	Test protocol will specify averaging time.	Solid REFA silo No. 1 controlled by a dust collector; and pug mills Nos. 1, 2 & 3 controlled by a common dust collector, dust collector No. 1 in FG-REF-SCFC	SC-VI.1	R-336.1301(1)(c)

II. MATERIAL LIMITS

Material	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
1. S-Sorb	3240 tons/day ²	Calendar Day	FG-REF-SCFC	SC-VI.3	R-336.1205(1)(a) & (3), R-336.1225
2. S-Sorb	135,000 tpy ²	12-month rolling time period as determined at the end of each calendar month	FG-REF-SCFC	SC-VI.3	R-336.1205(1)(a) & (3), R-336.1225

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Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
3. Mer - Sorb	162 tons/day ²	Calendar Day	FG-REF-SCFC	SC-VI.3	R 336.1205(1)(a) & (3), R 336.1225
4. Mer - Sorb	6750 tons/year ²	12-month rolling time period as determined at the end of each calendar month	FG-REF-SCFC	SC-VI.3	R 336.1205(1)(a) & (3), R 336.1225
5. PRE - REF - Coal	408,000 tons/day ²	Calendar Day	FG-REF-SCFC	SC-VI.3	R 336.1205(1)(a) & (3), R 336.1225
6. PRE - REF - Coal	4,500,000 tpy ²	12-month rolling time period as determined at the end of each calendar month	FG-REF-SCFC	SC-VI.3	R 336.1205(1)(a) & (3)

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall maintain and implement a revised Fugitive Dust Control Plan to manage fugitive sources, such as haul roads, etc., from FG-REF-SCFC. If at any time the Fugitive Dust Control Plan fails to address or inadequately addresses an event that meets the characteristics of fugitive dust, the permittee shall amend the Fugitive Dust Control Plan within 45 days after such an event occurs. The permittee shall also amend the Fugitive Dust Control Plan within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the Fugitive Dust Control Plan and any amendments to the Fugitive Dust Control Plan to AQD District Supervisor for review and approval. If AQD does not notify the permittee within 90 days of submittal, amended Fugitive Dust Control Plan shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(Act 451 Section 324.5524, R 336.1372, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**
2. The permittee shall maintain and implement a malfunction abatement plan (MAP) as described in Rule 911(2), for FG-REF-SCFC. If at any time, the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to AQD District Supervisor for review and approval. If AQD does not notify the permittee within 90 days of submittal, the amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(R 336.1225, R 336.1331, R 336.1940, R 336.1944)**
3. The fugitive emission sources of FG-REF-SCFC shall be operated in a manner which will minimize the fugitive particulate emissions.² **(Act 451 Section 324.5524, R 336.1372, R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

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- 1. ~~The permittee shall not operate FG-REF-SCFC unless the partial enclosure conveyors, silo dust collector, bin vent filters and dust collectors are installed, maintained and operated in a satisfactory manner, and/or in accordance with a malfunction abatement plan (MAP), approved by the AQD District Supervisor.² (R 336.1901, R 336.1910, R 336.1911)~~
- 2. ~~The permittee shall not discharge any emissions from the solid REFA day bin Nos. 1, 2 and 3 each controlled by a dust collector to the atmosphere.² (R 336.1205)~~

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V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

~~Upon request of the AQD District Supervisor, the permittee shall verify PM, PM10, and PM2.5 emission rates from FG-REF-SCFC by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:~~

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Pollutant	Test Method Reference
PM	40-CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40-CFR Part 51, Appendix M

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~~An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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- 1. ~~Verification of PM, PM10, and PM2.5 mass emissions from Pugmill No. 1, Pugmill No. 2, and Pugmill No. 3, controlled by a common dust collector (Dust Collector No. 1, in FG-REF-SCFC), by testing at owner's expense, in accordance with Department requirements, may be required. If testing is required, the permittee must complete test once every five years, for the next 10 years of operation after the FG-REF-SCFC modification, 12-28-2019. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to AQD within 60 days following the last date of the test.² (R 336.2001, R 336.2003, R 336.2004, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S))~~

Commented [LRF657]: Discussed with Bob Elmouchi on 1/28/2020. This condition will be deleted because the testing has been satisfied. Similar conditions were deleted from BLRPP's section.

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VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. ~~The permittee shall perform and document non-certified visible emissions observations as required in SC-1.9 on a daily basis when FG-REF-SCFC is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective~~

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~~actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(e), R 336.1303, 40 CFR 60.42a(b))~~

- ~~2. The permittee shall inspect all total enclosure conveyors to determine and record conditions, once per calendar month.² (R 336.1213(3))~~
- ~~3. The permittee shall keep, in a satisfactory manner records on a daily, monthly and 12-month rolling time period as determined at the end of each calendar month of the PREREF Coal, S-Sorb, and MerSorb processed in FG-REF-SCFC. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² (R 336.1205(1)(a), R 336.2803, R 336.2804, 40 CFR 52.21 (e) & (d))~~

- ~~4. The permittee shall calculate and keep records of PM, PM10 and PM2.5 emissions from FG-REF-SCFC, in tons per calendar year. The annual calendar year recordkeeping period shall begin on the first day of the month during which FG-REF-SCFC commences operation. The calculations and records shall be kept in the format described in Appendix 4.1-SCFC, or an alternative format acceptable to the AQD Permit Section Supervisor. Requirement to conduct calculations for records shall end 10 calendar years after FG-REF-SCFC commences operation, December 31, 2019. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205, R 336.1901, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)~~

VII. REPORTING

- ~~1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(iii))~~
- ~~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)(ii))~~
- ~~3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))~~

- ~~4. The permittee shall submit annual records of the PM, PM10, and PM2.5 emissions from FG-REF-SCFC, in tons per calendar year as specified in SC VI.4 to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of the first calendar year of operation. The records shall identify the following:~~
 - ~~a. Exceedances of the yearly actual emission of the PM, PM10, and PM2.5 above the baseline actual emissions (BAE) by a significant amount; and~~
 - ~~b. Identify if the year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test used for FG-REF-SCFC.~~

~~The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to SC VI.5; and any other information the~~

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owner or operator wishes to include (i.e., an expansion why emissions differ from the pre-construction projection). (R 336.1305, R 336.1301, R 336.2602 (1)(c), R 336.2603(1)(c), 40 CFR 51 (Appendix 5), R 336.2616, 40 CFR 52.211(a)(6)(ii))

See Appendix 8-SCFC

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VIII. STACK/VENT RESTRICTIONS

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-REFASILO1	10-inch diameter, non-vertical²	64²	R-336.1225, R-336.2803, R-336.2804, 40 CFR 52.21(c) & (d)
2. SV-PUGMILL1-3 -controlled by dust collector No. 1	11.38 x 16.81 horizontal²	20²	R-336.1225, R-336.2803, R-336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

- ~~1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Y, as they apply to FG-REF-SCFC.² (40 CFR Part 60 Subparts A & Y, 60.252(c))~~

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~~E. NON-APPLICABLE REQUIREMENTS~~

~~At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).~~

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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
		sec	Seconds
		SO ₂	Sulfur Dioxide

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SC	Special Condition	TAC	Toxic Air Contaminant
SCR	Selective Catalytic Reduction	Temp	Temperature
SNCR	Selective Non-Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TEQ	Toxicity Equivalence Quotient	µg	Microgram
USEPA/EPA	United States Environmental Protection Agency	µm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

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

Appendix 2-SCFC 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-SCFC 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-SCFC Recordkeeping

4.1

Recordkeeping Provisions for PSD Source Using Hybrid Applicability Test

All information in this Appendix shall be maintained pursuant to R 336.2818 and 40 CFR 52.21 (r)(6)(i) for 10 years after the REF system becomes operational and shall be provided for the first year and all the years made available to the Department upon request.

A. Project Description:

The project is to install new sorbent technology which uses REF sorbent solution as a fuel additive to reduce mercury, nitrogen oxides and sulfur dioxide emissions. These changes include installation of liquid storage tanks, solid storage silo, partially enclosed chutes, day bins, screw feeders and pug mills, existing partially enclosed and new conveyors and other material handling equipment so that coal can be treated with this sorbent material processed in FG-REFSC-FC and before being burned in EU-BOILER-6-SC, EU-BOILER-7-SC, and FG-BLRS-1-4-SC at Saint Clair Power Plant. In addition, these changes include installation of liquid storage tanks, solid storage silo, day bins, screw feeders and pug mills, existing and new conveyors and other material handling equipment so that coal can be treated with this sorbent material processed in FG-REF-BRFC and before being burned in FG-BOILERS-BR at Belle River Power Plant.

Commented [ER661]: PER JOYCE ZHU's REVIEW 20210429, "Why did you delete this appendix?"

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B. Applicability Test Description: Minor modifications are not subject to PSD. Actual to projected actual hybrid applicability test as described in the table below will be used to demonstrate that PSD does not apply to these modifications.

C. Emission Limitations: Saint Clair Power Plant

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions ²	Excluded Emissions	
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC	PM	470	537.03	60	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 60 TPY. The projected emission increase of 7.03 tpy is less than significant level of 22.5 tpy (90% of the significant level of 25 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC	PM10	314.9	358.94	40.18	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 40.18 TPY. The projected emission increase of 3.94 tpy is less than significant level of 13.5 tpy (90% of the significant level of 15 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC	PM2.5	136.3	156.26	17.4	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 17.4 TPY. The projected emission increase of 2.56 tpy is less than significant level of 9 tpy (90% of the significant level of 10 tpy).

² Projected actual emissions = projected actual emissions from the boilers + Chem Mod material handling, storage and conveyance operations

Combined Saint Clair and Belle River Power Plants

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Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions (tpy)	Projected Actual Emissions (tpy)*	Excluded Emissions (tpy)	
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM	680	767.66	72.3	It was capable of accommodating emissions up to 72.3 TPY. The projected emission increase of 15.36 tpy < significant level of 22.5 tpy (90% of the significant level of 25 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM-10	455.9	513.1	48.1	It was capable of accommodating emissions up to 48.1 TPY. The projected emission increase of 10.32 tpy < significant level of 13.5 tpy (90% of the significant level of 15 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM2.5	197.3	226.12	20.9	It was capable of accommodating emissions up to 20.9 TPY. The projected emission increase of 7.92 tpy < significant level of 9 tpy (90% of the significant level of 10 tpy).

* Projected actual emissions = projected actual emissions from the boilers + Chem Mod material handling, storage and conveyance operations

D. Netting Calculations and Discussion: NA

Appendix 5-SCFC. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate source wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 6-SCFC. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-2009. 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.

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~~Source Wide PTI No MI-PTI-B2796-2000a is being re-issued as Source Wide PTI No. MI-PTI-B2796-2015.~~

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Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
176-09A	201500008*	Refined emissions fuel project	FG-REF-SCFC

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Appendix 7-SCFC. Emission Calculations

~~Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.~~

Appendix 8-SCFC. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

~~The permittee shall use 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.~~

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SECTION 65 – BLUE WATER ENERGY CENTER

LOCATED AT

4400 River Road
East China, Michigan 48054

~~BLUE WATER ENERGY CENTER
APPENDIX 9: MI AR 62192 20XX Draft (ACID RAIN)~~

~~APPENDIX 10: BWEC CSAPR Appendix (TRANSPORT RULE)~~

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Commented [LRF665]: EGLE AQD to add PTI 19-18 as its own Section in the ROP (Section 6). A markup of the PTI is included in the ROP Renewal Application.

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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))**

~~4.2.~~ 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))**

~~5.3.~~ 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))**

~~10.4.~~ 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))**

- 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.
- Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
- Inspect, at reasonable times, any of the following:
 - Any stationary source.
 - Any emission unit.
 - Any equipment, including monitoring and air pollution control equipment.
 - Any work practices or operations regulated or required under the ROP.
- 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.

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44-5. 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))**

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42-6. 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))**

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43-7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**

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44-8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

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Equipment & Design

42-9. 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).² **(R 336.1370)**

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44-10. 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)**

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Emission Limits

43-11. 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:"² **(R 336.1301(1))**

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- 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.

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

44-12. 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:

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- 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))**

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Testing/Sampling

~~46.13.~~ 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).² **(R 336.2001)**

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~~47.14.~~ 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))**

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~~48.15.~~ 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))**

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Monitoring/Recordkeeping

48-16. 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.

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49-17. 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))**

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Certification & Reporting

22-18. 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 state 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))**

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23-19. 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))**

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24-20. 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))**

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25-21. 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))**

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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).

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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

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- 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.

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26-22. 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.

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27-23. 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))**

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28-24. 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))**

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29-25. 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.² **(R 336.1912)**

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Permit Shield

27-26. 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.

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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.

28-27. Nothing in this ROP shall alter or affect any of the following:

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- ~~e.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))**
- ~~e.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))**
- ~~f.~~ The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

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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))**

~~29-28.~~ The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:

~~f.a.~~ Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**

~~g.b.~~ Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**

~~h.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))**

~~i.d.~~ Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**

~~j.e.~~ State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

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~~34-29.~~ 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))**

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Revisions

~~35-30.~~ 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)**

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~~36-31.~~ 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))**

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~~37-32.~~ 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))**

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~~38-33.~~ 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))**

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Reopenings

~~35-34.~~ 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))**

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Renewals

38-35. 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))**

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Stratospheric Ozone Protection

39-36. 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.

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40-37. 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.

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Risk Management Plan

42-38. 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).

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43-39. 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):

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- a. June 21, 1999,
- b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
- c. The date on which a regulated substance is first present above a threshold quantity in a process.

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44-40. 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.

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45-41. 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)**

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Emission Trading

47-42 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))**

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Permit to Install (PTI)

~~48.43.~~ The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**

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~~49.44.~~ The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**

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~~50.45.~~ 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.² **(R 336.1219)**

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~~51.46.~~ 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.² **(R 336.1201(4))**

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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).

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~~{OPTIONAL CONDITIONS The conditions in this section are to be used in the appropriate Source-Wide, Emission Unit, or Flex Group tables, if applicable. See instruction document for more details. When the draft ROP is complete, delete this entire Optional Conditions section.}~~

Acid Rain

~~The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94, as outlined in a complete Phase II, Acid Rain Permit issued by the AQD. Phase II, Acid Rain Permit No. (enter permit number) is hereby incorporated into this ROP as Appendix (enter appendix number). (R 336.1902(1)(q))~~

~~The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to R 336.1902(1)(q) and 40 CFR 72.9(e)(1)(i). (R 336.1213(10))~~

Alternative Operating Scenarios

~~The permittee shall maintain contemporaneous records at the facility of any changes from one operating scenario to another. This includes recording in a log the scenario under which it is operating, and any additional information associated with the scenario in question, including, but not limited to batch records, fuel records, operating schedule, or process records. (R 336.1213(8)(a))~~

Emissions Cap

~~The permittee shall provide written notification to the department and the USEPA at least seven days in advance of any emissions trade among emission units within the stationary source, solely for the purpose of complying with an emissions cap. The notice shall state when the change will occur and shall describe the changes in emissions that will result and how these increases and decreases in emissions will comply with the terms and conditions of this ROP. (R 336.1213(9)(a))~~

Streamlined Requirements

~~The footnote on a streamlined condition should read as follows:~~

~~In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined (pick one: opacity limit / emission limit / operational limit / work practice standard / monitoring requirement/recordkeeping requirement / reporting requirement) shall be considered compliance with the (opacity limit(s) / emission limit(s) / operational limit(s) / work practice standard(s) / monitoring requirement(s) / recordkeeping requirement(s) / reporting requirement(s)) in/established by (list Streamlined UAR(s)); and also compliance with the (opacity limit(s) / emission limit(s) / operational limit(s) / work practice standard(s) / monitoring requirement(s) / recordkeeping requirement(s) / reporting requirement(s)) in/established by (list Subsumed UAR(s)); (an) additional applicable requirement(s) that has/have been subsumed within this condition.~~

Consent Orders

~~The conditions contained in this ROP for which a Consent Order is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the Consent Order. The effective date of termination is defined for the purposes of this condition as the date upon which the Termination Order is signed by the AQD Division Director.~~

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Consent Judgment

The conditions contained in this ROP for which a Consent Judgment is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the Consent Judgment.

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Temporary Sources

The permittee of a temporary source shall notify the department not less than ten days in advance of each change in location. (R 336.1213(11))

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Sectioned ROPs with Stationary Source-Wide Requirements Having Multiple Responsible Officials

Each Responsible Official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in the General Conditions in Part A and Rule 213(4)(c). (R 336.1213(4)(c))

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For Non-EGUs that were subject to CAIR but are not subject to CSAPR

If you have non-EGUs that were previously subject to CAIR but are not subject to CSAPR, insert the following conditions in Section IX of the appropriate Emission Unit/Flexible Group Table.

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The permittee shall meet the monitoring, recordkeeping, and reporting requirements of the NO_x SIP Call during the ozone season (May 1 through September 30). (40 CFR Part 96, Subpart H)

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Cross-State Air Pollution Rule (CSAPR)

If the source is subject to the CSAPR regulations, insert the following conditions in Section IX of the appropriate Emission Unit/Flexible Group Table.

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The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NO_x Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAAA, and identified in Appendix XX. (40 CFR Part 97, Subpart AAAAAA)

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The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NO_x Ozone Season Group 2 Trading program, as specified in 40 CFR Part 97, Subpart EEEEE, and identified in Appendix XX. (40 CFR Part 97, Subpart EEEEE)

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The permittee shall comply with the provisions of the Cross-State Air Pollution Rule SO₂ Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix XX. (40 CFR Part 97, Subpart CCCCC)

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Rule 801

~~Standardized special conditions to be used for a NOx emission unit subject to Rule 801 are located in Attachment 4 of the ROP Shell Instructions.~~

Compliance Assurance Monitoring (CAM)

~~Standard conditions to be used for an emission unit subject to CAM can be found in Attachment 5 of the ROP Shell Instructions.~~

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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.

{REMOVE TABLE IF THERE ARE NO SOURCE-WIDE CONDITIONS}

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SOURCE-WIDE CONDITIONS

DESCRIPTION

{Enter description here}

POLLUTION CONTROL EQUIPMENT

{Enter equipment name or NA}

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.—					

{If NA, remove table}

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.—					

{If NA, remove table}

III. PROCESS/OPERATIONAL RESTRICTION(S)

1.—

IV. DESIGN/EQUIPMENT PARAMETER(S)

1.—

V. TESTING/SAMPLING

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

1.—

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1.—

See Appendices { } {Enter 3, 4, and/or 7}

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VII. REPORTING

1. ~~Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))~~
2. ~~Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))~~
3. ~~Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))~~

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. —			

{If NA, remove sentence and table}

IX. OTHER REQUIREMENT(S)

1. ~~—~~

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).

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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.

{REMOVE THIS TABLE IF THERE ARE NO EMISSION UNITS}

EMISSION UNIT SUMMARY TABLE C-5

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Commented [LRF666]: DTE would like this added in. This ROP is so large, it is helpful having a table # to refer to (as it is in the current ROP).

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-CTGHRSG1-BW	A 3,658 MMBTU/hr. natural gas-fired combustion turbine generator (CTG) coupled with a heat recovery steam generator (HRSG). The HRSG is equipped with a natural gas-fired duct burner rated at 800 MMBTU/hr. to provide heat for additional steam production. The HRSG is not capable of operating independently from the CTG. The CTG/HRSG is equipped with a combined oxidation catalyst for the control of CO and VOC's, and selective catalytic reduction (SCR) with dry low NOx burners for the control of nitrogen oxides.	{Use mm-dd-yyyy}	FG-CTGHRSG-BW , FG-PROJECT-BW
EU-CTGHRSG2-BW	A 3,658 MMBTU/hr. natural gas-fired combustion turbine generator (CTG) coupled with a heat recovery steam generator (HRSG). The HRSG is equipped with a natural gas-fired duct burner rated at 800 MMBTU/hr. to provide heat for additional steam production. The HRSG is not capable of operating independently from the CTG. The CTG/HRSG is equipped with a combined oxidation catalyst for the control of CO and VOC's, and selective catalytic reduction (SCR) with dry low NOx burners for the control of nitrogen oxides.	{Use mm-dd-yyyy}	FG-CTGHRSG-BW , FG-PROJECT-BW

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-AUXBOILER-BW	A natural gas-fired auxiliary boiler, rated at 99.9 MMBTU/hr to facilitate startup of the CTG/HRSG trains and to operate as needed to keep the HRSG warm during periods of facility shutdown and startup and to provide steam to the steam turbine generator seals. The auxiliary boiler is equipped with low NO _x burners (LNB) and flue gas recirculation (FGR).	{Use mm-dd-yyyy}	FG-MACT_LG-BW , FG-PROJECT-BW
EU-FUELHTR1-BW	A natural gas-fired 12.12 MMBTU/hr heat input HP water bath fuel heater.	{Use mm-dd-yyyy}	FG-FUELHTRS , FG-MACT_LG-BW , FG-PROJECT-BW
EU-FUELHTR2-BW	A natural gas-fired 2.39 MMBTU/hr heat input LP water bath fuel heater.	{Use mm-dd-yyyy}	FG-FUELHTRS-BW , FG-MACT_SM-BW , FG-PROJECT-BW
EU-EMENGINE-BW	A nominal 2 MW diesel-fueled emergency engine with a model year of 2011 or later, and a displacement of <10 liters/cylinder. The engine is an EPA Tier 2 certified engine subject to NSPS IIII.	{Use mm-dd-yyyy}	FG-PROJECT-BW
FGPROJECTEU-FPEENGINE-BW	A 399 brake HP diesel-fueled emergency fire pump engine with a model year of 2011 or later, and a displacement of <10 liters/cylinder. The engine is an EPA Tier 3 certified engine subject to NSPS IIII.	{Use mm-dd-yyyy}	FG-PROJECT-BW
EU-CTLUBEOILTANKS-BW	Two combustion turbine lube oil tanks with a total storage capacity of 10,800 gallons.	{Use mm-dd-yyyy}	FG-TANKS-BW
EU-STLUBEOILTANKS-BW	A steam turbine lube oil tank with a storage capacity of 5,600 gallons.	{Use mm-dd-yyyy}	FG-TANKS-BW , FG-PROJECT-BW
EU-STHYDROILTANK-BW	A steam turbine hydraulic oil tank with a storage capacity of 740 gallons.	{Use mm-dd-yyyy}	FG-TANKS-BW
EU-STSEALOILTANK-BW	A steam turbine seal oil tank with a storage capacity of 275 gallons.	{Use mm-dd-yyyy}	FG-TANKS-BW
EU-FUELOILTANK-BW	A 600-gallon closed-roof tank for purposes of storing ultra-low sulfur diesel fuel. This tank services the diesel-fueled emergency fire pump engine.	{Use mm-dd-yyyy}	FG-TANKS-BW
EU-GCLUBEOILTANKS-BW	Three gas compressor lube oils tanks with a total storage capacity of 330 gallons.	{Use mm-dd-yyyy}	FG-TANKS-BW
EU-BFPOILTANKS-BW	Four boiler feedwater pump oil tanks with a total storage capacity of 212 gallons.	{Use mm-dd-yyyy}	FG-TANKS-BW
EU-EMFUELTANK-BW	A 3,400-gallon closed-roof tank for purposes of storing ultra-low sulfur diesel fuel. This tank services the diesel-fueled emergency engine.	{Use mm-dd-yyyy}	FG-TANKS-BW
EU-DLNNH3TANKS-BW	Two tanks for storage of 19% aqueous NH3 solution. Total storage capacity is 100,000 gallons.	{Use mm-dd-yyyy}	FG-TANKS-BW

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-SPACEHEATERS-BW	Natural gas-fired space heaters with a combined rating of 10 MMBTU/hr. or less to provide building heating.	{Use mm-dd-yyyy}	FG-SPACEHTRS-BW, FG-PROJECT-BW
EU-COOLINGTOWER-BW	A 14 cell wet mechanical draft cooling tower equipped with drift eliminators.	{Use mm-dd-yyyy}	FG-COOLINGTWR-BW, FG-PROJECT-BW
EU-COLDCLEANER-BW	Closed-cover cold cleaner.	{Use mm-dd-yyyy}	FG-PROJECT-BW
		{Use mm-dd-yyyy}	
		{Use mm-dd-yyyy}	

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[Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.](#)

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EU-AUXBOILER-BWU(ID)
EMISSION UNIT CONDITIONS

Commented [LRF668]: Most UARs in all EUs/FGs for BWEC do not reflect which conditions were added during the ROP renewal vs from the PTI. Please add.

DESCRIPTION

A natural gas-fired auxiliary boiler, rated at 99.9 MMBTU/hr. to facilitate startup of the CTG/HRSG trains and to provide steam to the steam turbine generator seals. The auxiliary boiler is equipped with low NO_x burners (LNB) and flue gas recirculation (FGR). (Enter description here)

Flexible Group ID: FG-MACT LG-BW, FG-PROJECT-BW (Enter Flexible Group IDs or NA)

POLLUTION CONTROL EQUIPMENT

Low NO_x burners and flue gas recirculation for NO_x control. (Enter pollution control equipment names or NA)

Commented [ER(669): NEED EITHER THE MFG. CONTROL EFFICIENCY OR GENERALLY ACCEPTED CONTROL EFFICIENCY FROM WEB SEARCH.

1. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NO _x	0.0036 lb/MMBTU ²	Hourly	EUAUXBOILER-BW	SC V.1 SC V.3	R 336.1205 (1)(a) & (b) R 336.2803 R 336.2804 R 336.2810
2. NO _x	3.60 pph ²	Hourly	EUAUXBOILER-BW	SC V.1 SC V.2 SC VI.5	R 336.1205 (1) (a) & (b) R 336.2803 R 336.2804 R 336.2810
3. CO	0-075 lb/MMBTU ²	Hourly	EUAUXBOILER-BW	SC V.1	R 336.1205 (1) (a) & (b) R 336.2804 R 336.2810
4. CO	7.49 pph ²	Hourly	EUAUXBOILER-BW	SC V.1 SC VI.2 SC VI.5	R 336.1205 (1) (a) & (b) R 336.2804 R 336.2810
5. PM	0.007 lb/MMBTU ²	Hourly	EUAUXBOILER-BW	SC V.1	R 336.1205 (1)(a) & (b) R 336.1331 (1)(c) R 336.2810
6. PM	0.7 pph ²	Hourly	EUAUXBOILER-BW	SC V.1 SC VI.2 SC VI.5	R 336.1331 (1)(c) R 336.2810

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<u>Pollutant</u>	<u>Limit</u>	<u>Time Period/Operating Scenario</u>	<u>Equipment</u>	<u>Monitoring/ Testing Method</u>	<u>Underlying Applicable Requirements</u>
7. PM10	0.007 lb/MMBtu ²	Hourly	EUAUXBOILER-BW	SC V.2	R 336.1205 (1)(a) & (b) R 336.2803 R 336.2804 R 336.2810
8. PM10	0.7 pph ²	Hourly	EUAUXBOILER-BW	SC V.2 SC VI.2 SC VI.5	R 336.1205 (1)(a) & (b) R 336.2803 R 336.2804 R 336.2810
9. PM2.5	0.007 lb/MMBtu ²	Hourly	EUAUXBOILER-BW	SC V.2	R 336.1205 (1)(a) & (b) R 336.2803 R 336.2804 R 336.2810
10. PM2.5	0.7 pph ²	Hourly	EUAUXBOILER-BW	SC V.2 SC VI.2 SC VI.5	R 336.1205 (1)(a) & (b) R 336.2803 R 336.2804 R 336.2810
11. SO2	0.0012 lb/MMBtu ²	Monthly	EUAUXBOILER-BW	SC VI.4	R 336.1205 (1)(a) & (b)
12. VOC	0.008 lb/MMBTU ²	Hourly	EUAUXBOILER-BW	SC V.1	R 336.1205 (1)(a) & (b) R 336.1702(a) R 336.2810
13. VOC	0.80 pph ²	Hourly	EUAUXBOILER-BW	SC V.1	R 336.1205 (1)(a) & (b) R 336.1702(a) R 336.2810
14. GHGs as CO2e	25.623 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUAUXBOILER-BW	SC VI.2 SC VI.6	R 336.1205 (1)(a) & (b) R 336.1702(a) R 336.2810

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II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline natural gas in EUAUXBOILER-BW, with a sulfur content of 0.34 gr per 100 scf or less on a monthly basis.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j))

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III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Within 180 days of initial startup, the permittee shall submit, implement, and maintain a malfunction abatement plan (MAP) as described in Rule 911(2) for EUAUXBOILER-BW. The MAP shall, at a minimum, specify the following:
 a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the

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inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.

- b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
- c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1205(1)(a) & (b), R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)

2. The permittee shall not operate EUAUXBOILER-BW unless an acceptable plan that describes how emissions will be minimized during all startups, shutdowns and malfunctions has been submitted to the AQD District Supervisor. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. The permittee shall submit the emission minimization plan and any modifications to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the plan or modified plan shall be considered approved.² (R 336.1911, R 336.1912, R 336.2810, 40 CFR 52.21(i))
3. The permittee shall not operate EUAUXBOILER-BW for greater than 4,380 hours per 12-month rolling period as determined at the end of each calendar month.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The maximum design heat input capacity for EUAUXBOILER-BW shall not exceed 99.9 MMBTU per hour on a fuel heat input basis.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR Part 60 Subpart Dc)
 1.
2. The permittee shall not operate EUAUXBOILER-BW unless the low NO_x burners and flue gas recirculation system are installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining the air pollution control equipment in accordance with the MAP required in SC III.1.² (R 336.1205(1)(a) & (b), R 336.1910, R 336.2803, R 336.2804, R 336.2810)
3. The permittee shall install, calibrate, maintain and operate, in a satisfactory manner, a device to monitor and record the hourly and daily natural gas usage rate for EUAUXBOILER-BW.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))

V. TESTING/SAMPLING

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

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1. Within 180 days after commencement of initial startup, the permittee shall verify NOx, CO, PM, and VOCs emission rates from EUAUXBOILER-BW by testing at the owner's expense, in accordance with Department requirements. The permittee shall complete the required testing once every five years, thereafter, unless an alternate testing schedule is approved by the District Supervisor. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
NOx	40 CFR Part 60, Appendix A
SO2	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOCs	40 CFR Part 60, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.1205(1)(a) & (b), R 336.1331(1)(c), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)

2. Within 180 days after commencement of initial startup, the permittee shall verify PM10 and PM2.5 emission rates from EUAUXBOILER-BW by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using the approved EPA Method, 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.1205(1)(a) & (b), R 336.1331(1)(c), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)

(UPDATE THIS TEMPLATE TO ADD THE FOLLOWING CONDITIONS FOR ROP RENEWAL WHEN STACK TESTING IS REQUIRED, IF THE LANGUAGE IS NOT ALREADY IN A PTI. IF THERE ARE NO STACK TESTING REQUIREMENTS, REMOVE THESE CONDITIONS)

(Update or remove colored text and select the appropriate test method to use within the condition. Turn selected test method to black font.)

Single pollutant

The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in (TEST METHOD) (choose test method based on pollutant). An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol

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~~that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

Multiple pollutants

~~The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:~~

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A
SO ₂	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOC	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Hydrogen Sulfide	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Total Reduced Sulfurs	40 CFR Part 60, Appendix A
Dioxins / Furans	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A
Hydrogen Halides / Halogens	40 CFR Part 60, Appendix A
Mercury	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Visible Emission	40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B
HAPs	40 CFR Part 63, Appendix A

~~3. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

~~Always include with any stack testing conditions. The permittee shall verify the PM, NOx, SO₂, CO, and VOC (POLLUTANT) emission rates from EUAUXBOILER-BW (EU / FG / PORTION OF THE EU) at a minimum every five years from the date of the last test.² (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

~~4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place before performance tests are conducted.² (R 336.1213(3))~~

~~See Appendix 5 [DELETE REFERENCE]~~

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VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))
2. The permittee shall keep hourly and daily natural gas usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of natural gas used, in cubic feet, on a clock hour and calendar day basis and shall calculate and keep monthly natural gas usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of natural gas used, in cubic feet, on a calendar month basis and a 12-month rolling time period basis. The records must indicate the total amount of natural gas used in EUAUXBOILER. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.48c(g))
3. The permittee shall record hours of operation of EUAUXBOILER-BW in a format acceptable to the AQD District Supervisor, indicating the total hours of operation in an individual calendar month and a 12-month rolling time period basis. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810)
4. The permittee shall keep, in a satisfactory manner, records indicating the monthly sulfur content of the natural gas to meet SC II.1 for EUAUXBOILER-BW on file at the facility and make them available to the Department upon request.² (R 336.1205(1)(a) & (b))
5. The permittee shall calculate and keep, in a satisfactory manner, records of hourly NO_x, CO, PM₁₀ and PM_{2.5} mass emissions (pph) for EUAUXBOILER-BW. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the AQD District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810)
6. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total CO_{2e} mass emissions for EUAUXBOILER-BW. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed according to **Appendix 7-65 BW, (COPY FROM PTI AND INSERT IN APPENDIX 3 or 7?)** or an alternate method approved by the District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j))
7. The permittee shall maintain monthly records of the heat value content of the natural gas based on information from the natural gas supplier. The permittee shall keep record on file and make them available to the Department upon request.² (R 336.1205(1)(a), 40 CFR 60.40c(a))
8. The permittee shall calculate and keep records of hourly heat input (MMBtu/hr) for EUAUXBOILER-BW based on the monthly heat value and hourly gas usage to show compliance with SC IV.1. The permittee shall keep record on file and make them available to the Department upon request.² (R 336.1205(1)(a), 40 CFR 60.40c(a))

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9. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:
- a. Compliance tests and any testing required under the special conditions of this permit.
 - b. Monitoring data.
 - c. Verification of heat input capacity required to show compliance with SC IV.1.
 - d. Identification, type and the amounts of fuel combusted in EUAUXBOILER-BW on an hourly basis, calendar day basis, and calendar month basis.
 - e. All records required by 40 CFR 60.7 and 60.48c.
 - f. All calculations or documents necessary to show compliance with the limits contained in this permit.

All of the above information shall be stored in a format acceptable to the Air Quality Division and shall be consistent with the requirements of 40 CFR 60.7(f). The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1331(1)(c), R 336.1702(a), R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.7(f), 40 CFR Part 60 Subpart Dc)

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VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.² (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 30.² (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.² (R 336.1213(4)(c))

Only include if there are any stack testing conditions

- 5. The permittee shall submit any performance test reports (including RATA reports) to the AQD Technical Programs Unit and District Office, in a format approved by the AQD.² (R 336.1213(3)(c), R 336.2001(5))
- 5. The permittee shall provide written notification for the date construction is commenced, postmarked no later than 30 days after such date and provide written notification for the actual date of startup, postmarked within 15 days after such date, as provided by 40 CFR 60.7. The notifications shall include:
 - a. The design heat input capacity of EUAUXBOILER and identification of the fuels to be combusted in EUAUXBOILER-BW.
 - b. The annual capacity factor at which the owner or operator anticipates operating the facility based on all fuels fired and based on each individual fuel fired. The permittee shall submit the notification(s) to the AQD District Supervisor within the time frames specified in 40 CFR 60.7.² (40CFR60.7(a), 40 CFR 60.48c(a))

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See Appendix 8-5 BW ~~keep regardless~~ NOTE: Keyword search “Appendix”

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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:

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter / Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>
<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter/Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>
1. SVAUXBOILER-BW	43 ²	60 ²	R 336.1225, R 336.2803, R 336.2804

~~{If NA, remove sentence and table}~~

IX. OTHER REQUIREMENT(S)

- The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Dc, as they apply to EUAUXBOILER-BW.² (40 CFR Part 60 Subparts A & Dc)

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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).

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**EU-EMENGINE-BW
 EMISSION UNIT CONDITIONS**

DESCRIPTION

A nominal 2 MW diesel-fueled emergency engine with a model year of 2011 or later, and a displacement of <10 liters/cylinder. The engine is an EPA Tier 2 certified engine subject to NSPS IIII.

Flexible Group ID: FG-PROJECT-BW

POLLUTION CONTROL EQUIPMENT

NA

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I. EMISSION LIMIT(S)

<u>Pollutant</u>	<u>Limit</u>	<u>Time Period / Operating Scenario</u>	<u>Equipment</u>	<u>Testing / Monitoring Method</u>	<u>Underlying Applicable Requirements</u>
1. <u>NMHC^A+NO_x</u>	<u>6.4 g/kW-hr².^B</u>	<u>Hourly</u>	<u>EUENGINE-BW</u>	<u>SC V.1, SC VI.2, SC VI.3</u>	<u>R 336.2803, R 336.2804, R 336.2810, 40 CFR 60.4205(b), 40 CFR 60.4202(a)(2), Table 1 of 40 CFR 89.112</u>
2. <u>CO</u>	<u>3.5 g/kW-hr².^B</u>	<u>Hourly</u>	<u>EUENGINE-BW</u>	<u>SC V.1, SC VI.2, SC VI.3</u>	<u>R 336.2804, R 336.2810, 40 CFR 60.4205(b), 40 CFR 60.4202(a)(2), Table 1 of 40 CFR 89.112</u>
3. <u>PM</u>	<u>0.20 g/kW-hr².^B</u>	<u>Hourly</u>	<u>EUENGINE-BW</u>	<u>SC V.1, SC VI.2, SC VI.3</u>	<u>R 336.1331(1)(c), R 336.2810, 40 CFR 60.4205(b), 40 CFR 60.4202(a)(2), Table 1 of 40 CFR 89.112</u>
4. <u>PM10</u>	<u>1.18 pph²</u>	<u>Hourly</u>	<u>EUENGINE-BW</u>	<u>SC VI.6</u>	<u>R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810</u>
5. <u>PM2.5</u>	<u>1.18 pph²</u>	<u>Hourly</u>	<u>EUENGINE-BW</u>	<u>SC VI.6</u>	<u>R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810</u>
6. <u>GHGs as CO₂e</u>	<u>161 tpy²</u>	<u>12-month rolling time period as determined at the end of each calendar month</u>	<u>EUENGINE-BW</u>	<u>SC VI.7</u>	<u>R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j)</u>

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Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
7. VOC	1.89 pph ²	Hourly	EUENGINE-BW	SC V.2	R 336.1205(1)(a) & (b), R 336.1702, R 336.2810

^A NMHC = nonmethane hydrocarbon

^B These emission limits are for certified engines; if testing becomes required to demonstrate compliance, then the tested values must be compared to the Not to Exceed (NTE) requirements determined through 40 CFR 60.4212(c) where NTE requirements = (1.25) x (the 89.112 standard for each pollutant).

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II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in EUENGINE-BW with the maximum sulfur content of 15 ppm (0.0015 percent) by weight, and a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.² (R 336.1205(1)(a) & (b), 40 CFR 60.4207(b), 40 CFR 80.510(b))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUENGINE-BW for more than 4 hour per day, except during emergency conditions and required stack testing in SC V.1 and SC V.2, and not more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. The 4 hours and the 500 hours includes the hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.2.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))

2. The permittee may operate EUENGINE-BW for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year. EUENGINE-BW may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing. Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity.² (40 CFR 60.4211(f))

3. If EUENGINE-BW is purchased and installed as a certified engine, according to procedures specified in 40 CFR Part 60 Subpart IIII, for the same model year and maximum engine power, the permittee shall meet the following requirements for EUENGINE-BW:

- Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions;
- Change only those emission-related settings that are permitted by the manufacturer; and
- Meet the requirements as specified in 40 CFR 89, 94, and/or 1068, as they apply to EUENGINE-BW.

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If the permittee does not operate and maintain the certified engine and control device according to SC III.3 a through c, the engine will be considered to be operating as a non-certified engine.² (40 CFR 60.4211(a) & (c), R 336.2810, 40 CFR 52.21(j))

- 4. If the permittee is operating EUENGINE-BW as a non-certified engine, the permittee shall keep a maintenance plan for EUENGINE-BW and shall, to the extent practicable, maintain and operate engine in a manner consistent with good air pollution control practice for minimizing emissions.² (40 CFR 60.4211(g)(3), R 336.2810, 40 CFR 52.21(j))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall equip and maintain EUENGINE-BW with a non-resettable hours meter to track the operating hours.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4209(a))
- 2. The maximum rated power output of EUENGINE-BW shall not exceed a nominal capacity of 2.0 MW.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))
- 3. The permittee shall monitor, in a satisfactory manner, the diesel fuel usage for EUENGINE-BW on a continuous basis.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))

V. TESTING/SAMPLING

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

1. If EUENGINE-BW is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:

- a. Conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.
- b. If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212.
- c. Conduct subsequent performance testing every 8,760 hours of engine operation or every 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.

No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (40 CFR 60.4211(g)(3), 40 CFR 60.4212)

- 2. Within 180 days after commencement of trial operation, the permittee shall verify VOC mass emissions from EUENGINE-BW by testing at owner's expense, in accordance with Department requirements. The permittee shall complete the required testing once every five years, thereafter, unless an alternate testing schedule is approved by the District Supervisor. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit

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and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2810)

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3. The permittee shall verify PM10, PM2.5, and VOC emission rates from EUENGINE-BW by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

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Pollutant	Test Method Reference
PM10/PM2.5	40 CFR Part 51, Appendix M
VOC	40 CFR Part 60, Appendix A

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An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

~~The permittee shall verify the PM10, PM2.5, and VOC emission rates from EUENGINE-BW, at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place before performance tests are conducted. (R 336.1213(3))

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See Appendix 5-5 BW

VI. MONITORING/RECORDKEEPING

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

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1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4211, 40 CFR 60.4214)

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2. The permittee shall keep, in a satisfactory manner, the following records for EUENGINE-BW:
a. If operated as a certified engine: The permittee shall keep records of the manufacturer certification documentation.
b. If operated as a non-certified engine: The permittee shall keep records of testing required in SC V.1.

The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2810, 40 CFR 60.4211)

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3. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for EUENGINE-BW:
- If operated as a certified engine: The permittee shall keep records of the manufacturer's emission-related written instructions, and records demonstrating that the engine has been maintained according to those instructions, as specified in SC III.3.
 - If operated as a non-certified engine: The permittee shall keep records of a maintenance plan, as required by SC III.4, and maintenance activities.
- The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2810, 40 CFR 60.4211)
4. The permittee shall keep, in a satisfactory manner, test reports for EUENGINE-BW required by SC V.2 on file at the facility. The permittee shall make the records available to the Department upon request. Records shall be maintained on file for a period of five years.² (R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2810)
5. The permittee shall keep, in a satisfactory manner, records of the diesel fuel usage for EUENGINE-BW on an hourly, monthly, and 12-month rolling time period basis.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))
6. The permittee shall calculate and keep, in a satisfactory manner, records of hourly PM10 and PM2.5 mass emissions for EUENGINE-BW, as required by SC I.4 and SC I.5. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the AQD District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810)
7. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total CO_{2e} mass emissions for EUENGINE-BW, as required by SC I.6. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed according to Appendix 7-65 BW or an alternate method approved by the District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j))
8. The permittee shall monitor and record the total hours of operation and the hours of operation during non-emergencies for EUENGINE-BW, on an hourly, daily, monthly, and 12-month rolling time period basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation of EUENGINE-BW, including what classified the operation as emergency.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4211, 40 CFR 60.4214)
9. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EUENGINE-BW, demonstrating that the fuel meets the requirement of 40 CFR 80.510(b), as specified in SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil.² (R 336.1205(1)(a) & (b), 40 CFR 60.4207(b), 40 CFR 80.510(b))

See Appendices 7-5 BW { } (Enter 3, 4, and/or 7)

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

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2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUENGINE-BW.² (R 336.1201(7)(a))
5. The permittee shall submit a notification specifying whether EUENGINE-BW will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation.² (R 336.1201(3))
6. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD.² (R 336.1213(3)(c), R 336.2001(5))

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See Appendix 8-5 BW

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:

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter/Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>
1. <u>SVENGINE</u>	18 ²	16 ²	R 336.1225, R 336.2803, R 336.2804

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart IIII, as they apply to EUENGINE-BW.² (40 CFR Part 60 Subparts A & IIII, 40 CFR 63.6590)
2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to EUENGINE-BW, upon startup.² (40 CFR Part 63 Subparts A and ZZZZ, 40 CFR 63.6595)

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).

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**EU-FPENGINE-BW
EMISSION UNIT CONDITIONS**

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DESCRIPTION

A 399 brake HP diesel-fueled emergency fire pump engine with a model year of 2011 or later, and a displacement of <10 liters/cylinder. The engine is an EPA Tier 3 certified engine subject to NSPS IIII.

Flexible Group ID: FG-PROJECT-BW

POLLUTION CONTROL EQUIPMENT

NA

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I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NMHC ^A +NO _x	4.0 g/kW-hr ^{2B}	Hourly	EUFENGINE-BW	SC V.1, SC VI.2, SC VI.8	R 336.2803, R 336.2804, R 336.2810 40 CFR 60.4205(c), Table 4 of 40 CFR Part 60 Subpart IIII
2. CO	3.5 g/kW-hr ^{2B}	Hourly	EUFENGINE-BW	SC V.1, SC VI.2, SC VI.8	R 336.2804, R 336.2810, 40 CFR 60.4205(c), Table 4 of 40 CFR Part 60 Subpart IIII
3. PM	0.20 g/kW-hr ^{2B}	Hourly	EUFENGINE-BW	SC V.1, SC VI.2, SC VI.8	R 336.1331(1)(c), R 336.2810, 40 CFR 60.4205(c), Table 4 of 40 CFR Part 60 Subpart IIII
4. PM10	0.13 pph ²	Hourly	EUFENGINE-BW	SC VI.4	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
5. PM2.5	0.13 pph ²	Hourly	EUFENGINE-BW	SC VI.4	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
6. VOC	0.13 pph ²	Hourly	EUFENGINE-BW	SC VI.9	R 336.1205(1)(a) & (b), R 336.1702, R 336.2810
7. GHGs as CO ₂ e	86 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUFENGINE-BW	SC VI.5	R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j)

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^A NMHC = nonmethane hydrocarbon

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^B These emission limits are for certified engines; TESTING/SAMPLING if testing becomes required to demonstrate compliance, then the tested values must be compared to the Not to Exceed (NTE) requirements determined through 40 CFR 60.4212(c).

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II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in EUPENGINE-BW with the maximum sulfur content of 15 ppm (0.0015 percent) by weight, and a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.² (R 336.1205(1)(a) & (b), 40 CFR 60.4207(b), 40 CFR 80.510(b))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUPENGINE-BW for more than 1 hour per day, except during emergency conditions and required stack testing in SC V.1, and not more than 100 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. The 1 hours and the 100 hours includes the hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.2.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))

2. The permittee may operate EUPENGINE-BW for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year. EUPENGINE-BW may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing. Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity.² (40 CFR 60.4211(f))

3. EUPENGINE-BW is purchased and installed as a certified engine, according to procedures specified in 40 CFR Part 60 Subpart IIII, for the same model year and maximum engine power. The permittee shall meet the following requirements for EUPENGINE-BW:
a. Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions;
b. Change only those emission-related settings that are permitted by the manufacturer; and
c. Meet the requirements as specified in 40 CFR 89, 94, and/or 1068, as they apply to EUPENGINE.

If the permittee does not operate and maintain the certified engine and control device according to SC III.3 a through b, the engine will be considered to be operating as a non-certified engine.² (40 CFR 60.4211(a) & (c), R 336.2810, 40 CFR 52.21(j))

4. If the permittee is operating EUPENGINE-BW as a non-certified engine, the permittee shall keep a maintenance plan for EUPENGINE-BW and shall, to the extent practicable, maintain and operate engine in a manner consistent with good air pollution control practice for minimizing emissions.² (40 CFR 60.4211(g)(2), R 336.2810, 40 CFR 52.21(j))

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IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall equip and maintain EUPENGINE-BW with a non-resettable hours meter to track the operating hours.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4209(a))
- 2. The maximum rated power output of EUPENGINE-BW shall not exceed a nameplate capacity of 399 brake HP.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), Table 4 of 40 CFR Part 60 Subpart IIII)
- 3. The permittee shall monitor, in a satisfactory manner, the diesel fuel usage for EUPENGINE-BW on a continuous basis.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))

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V. TESTING/SAMPLING

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

- 1. If EUPENGINE-BW is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:
 - a. Conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.
 - b. If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212.

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No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (40 CFR 60.4211(g)(2), 40 CFR 60.4212)

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- 2. Upon request by the AQD District Supervisor, the permittee shall verify the PM10/PM2.5 and emission rates from EUPENGINE-BW by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

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<u>Pollutant</u>	<u>Test Method Reference</u>
<u>PM10/PM2.5</u>	<u>40 CFR Part 51, Appendix M</u>
<u>VOC</u>	<u>40 CFR Part 60, Appendix A</u>

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An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit

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and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

See Appendix 5-5 BW

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(i), 40 CFR 60.4211, 40 CFR 60.4214)
2. The permittee shall keep, in a satisfactory manner, the following records for EUPENGINE-BW:
 - a. If operated as a certified engine: The permittee shall keep records of the manufacturer certification documentation.
 - b. If operated as a non-certified engine: The permittee shall keep records of testing required in SC V.1.

The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2810, 40 CFR 60.4211)
3. The permittee shall keep, in a satisfactory manner, records of the diesel fuel usage for EUPENGINE-BW on an hourly, monthly, and 12-month rolling time period basis.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))
4. The permittee shall calculate and keep, in a satisfactory manner, records of hourly PM10 and PM2.5 mass emissions for EUPENGINE-BW, as required by SC I.4 and SC I.5. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the AQD District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810)
5. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total CO₂e mass emissions for EUPENGINE-BW, as required by SC I.7. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed according to Appendix 7-65 BW or an alternate method approved by the District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j))
6. The permittee shall monitor and record the total hours of operation and the hours of operation during non-emergencies for EUPENGINE-BW, on an hourly, daily, monthly, and 12-month rolling time period basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation of EUPENGINE-BW, including what classified the operation as emergency.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4211, 40 CFR 60.4214)
7. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EUPENGINE-BW, demonstrating that the fuel meets the requirement of 40 CFR 80.510(b), as specified in SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil.² (R 336.1205(1)(a) & (b), 40 CFR 60.4207(b), 40 CFR 80.510(b))

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- 8. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for EUPENGINE-BW:
 - a. If operated as a certified engine: The permittee shall keep records of the manufacturer's emission-related written instructions, and records demonstrating that the engine has been maintained according to those instructions, as specified in SCIII.3.
 - b. If operated as a non-certified engine: The permittee shall keep records of a maintenance plan, as required by SC III.4, and maintenance activities.

The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2810, 40 CFR 60.4211)

- 9. The permittee shall calculate and keep, in a satisfactory manner, records of hourly VOC mass emissions for EUPENGINE-BW, as required by SC I.6. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the AQD District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2810)

See Appendix 7-5 BWees () (Enter 3, 4, and/or 7)

VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))
- 5. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUPENGINE-BW.² (R 336.1201(7)(a))
- 6. The permittee shall submit a notification specifying whether EUPENGINE-BW will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation.² (R 336.1201(3))

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See Appendix 8-5 BW

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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:

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter/Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>
1. SVFPENGINE-BW	6 ²	13 ²	R 336.1225, R 336.2803, R 336.2804

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart IIII, as they apply to EUPENGINE-BW.² (40 CFR Part 60 Subparts A & IIII, 40 CFR 63.6590)
2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to EUPENGINE-BW, upon startup.² (40 CFR Part 63 Subparts A and ZZZZ, 40 CFR 63.6595)

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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).

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EU-COLDCLEANER-BW
EMISSION UNIT CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Flexible Group ID: FG-PROJECT-BW

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (R 336.1213(2))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (R 336.1611(2)(b), R 336.1707(3)(b))

2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:

- a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(2)(h))
- b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285(2)(r)(iv))

2. The cold cleaner shall be equipped with a device for draining cleaned parts. (R 336.1611(2)(b), R 336.1707(3)(b))

3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))

4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))

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Also, since these conditions stemmed from a PTI, aren't they unable to be changed (as they are slightly below)?

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5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
- a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (R 336.1707(2)(a))
 - b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
 - c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))
- 2. The permittee shall maintain the following information on file for each cold cleaner: (R 336.1213(3))
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
- 3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))
- 4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for

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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 8-5 BW

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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EU(ID)
EMISSION UNIT CONDITIONS

DESCRIPTION

{Enter description here}

Flexible Group ID: {Enter Flexible Group IDs or NA}

POLLUTION CONTROL EQUIPMENT

{Enter pollution control equipment names or NA}

I. EMISSION LIMIT(S)

<u>Pollutant</u>	<u>Limit</u>	<u>Time Period/Operating Scenario</u>	<u>Equipment</u>	<u>Monitoring/ Testing Method</u>	<u>Underlying Applicable Requirements</u>

{If NA, remove table}

II. MATERIAL LIMIT(S)

<u>Material</u>	<u>Limit</u>	<u>Time Period/Operating Scenario</u>	<u>Equipment</u>	<u>Monitoring/ Testing Method</u>	<u>Underlying Applicable Requirements</u>

{If NA, remove table}

III. PROCESS/OPERATIONAL RESTRICTION(S)

IV. DESIGN/EQUIPMENT PARAMETER(S)

V. TESTING/SAMPLING

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

{UPDATE THIS TEMPLATE TO ADD THE FOLLOWING CONDITIONS FOR ROP RENEWAL WHEN STACK TESTING IS REQUIRED, IF THE LANGUAGE IS NOT ALREADY IN A PTI. IF THERE ARE NO STACK TESTING REQUIREMENTS, REMOVE THESE CONDITIONS}

{Update or remove colored text and select the appropriate test method to use within the condition. Turn selected test method to black font.}

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Single pollutant

The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in (TEST METHOD) (choose test method based on pollutant). An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

Multiple pollutants

The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

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Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A
SO ₂	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOC	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Hydrogen Sulfide	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Total Reduced Sulfurs	40 CFR Part 60, Appendix A
Dioxins / Furans	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A
Hydrogen Halides / Halogens	40 CFR Part 60, Appendix A
Mercury	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Visible Emission	40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B
HAPs	40 CFR Part 63, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

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Always include with any stack testing conditions

~~The permittee shall verify the (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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~~The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (R 336.1213(3))~~

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See Appendix 5

VI. MONITORING/RECORDKEEPING

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

See Appendices { } (Enter 3, 4, and/or 7)

VII. REPORTING

~~1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(iii))~~

~~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))~~

Only include if there are any stack testing conditions

~~The permittee shall submit any performance test reports (including RATA reports) to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))~~

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See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter / Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>

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~~{If NA, remove sentence and table}~~

IX. OTHER REQUIREMENT(S)

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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).

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DESCRIPTION

A natural gas-fired auxiliary boiler, rated at 99.9 MMBTU/hr, to facilitate startup of the CTG/HRSG trains and to provide steam to the steam turbine generator seals. The auxiliary boiler is equipped with low NO_x burners (LNB) and flue gas recirculation (FGR). (Enter description here)

Flexible Group ID: FGMACT, FGPROJECT (Enter Flexible Group IDs or NA)

POLLUTION CONTROL EQUIPMENT

Low NO_x burners and flue gas recirculation for NO_x control. (Enter pollution control equipment names or NA)

Commented [ER(677): NEED EITHER THE MFG. CONTROL EFFICIENCY OR GENERALLY ACCEPTED CONTROL EFFICIENCY FROM WEB SEARCH.

I. EMISSION LIMIT(S)

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Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements	Formatted Table
1. NOx	0.036 lb/MMBTU ²	Hourly	EUAUXBOILER-BW	SC V.1	R 336.1205(1)(a) R 336.2803 R 336.2804 R 336.2810	Commented [ER(678)]: EXEMPT FROM CAM IF THEY USE CERTIFIED CEMS, AND CEMS REQUIREMENT IS IN ROP.
2. NOx	3.60 pph ²	Hourly	EUAUXBOILER-BW	SC V.1, SC VI.2, SC VI.5	R 336.1205(1)(a) R 336.2803 R 336.2804 R 336.2810	Commented [ER(679)]: TEST Formatted: Font: Not Bold Formatted: Left Formatted: Font: Not Bold
3. CO	0.075 lb/MMBTU ²	Hourly	EUAUXBOILER-BW	SC V.1	R 336.1205(1)(a) R 336.2804 R 336.2810	Formatted: Font: Not Bold Formatted: Font: Not Bold
4. CO	7.49 pph ²	Hourly	EUAUXBOILER-BW	SC V.1, SC VI.2, SC VI.5	R 336.1205(1)(a) R 336.2804 R 336.2810	Formatted: Font: Not Bold Formatted: Left Formatted: Font: Not Bold
5. PM	0.007 lb/MMBTU ²	Hourly	EUAUXBOILER-BW	SC V.1	R 336.1205(1)(a) R 336.1331(1) R 336.2810	Formatted: Font: Not Bold Formatted: Font: Not Bold
6. PM	0.7 pph ²	Hourly	EUAUXBOILER-BW	SC V.1, SC VI.2, SC VI.5	R 336.1331(1)(c) R 336.2810	Commented [ER(680)]: TEST.
7. PM10	0.007 lb/MMBTU ²	Hourly	EUAUXBOILER-BW	SC V.2	R 336.1205(1)(a) & (b) R 336.2803 R 336.2804 R 336.2810	
8. PM10	0.7 pph ²	Hourly	EUAUXBOILER-BW	SC V.2, SC VI.2, SC VI.5	R 336.1205(1)(a) & (b) R 336.2803 R 336.2804 R 336.2810	
9. PM2.5	0.007 lb/MMBTU ²	Hourly	EUAUXBOILER-BW	SC V.2	R 336.1205(1)(a) & (b) R 336.2803 R 336.2804 R 336.2810	
10. PM2.5	0.7 pph ²	Hourly	EUAUXBOILER-BW	SC V.2, SC VI.2, SC VI.5	R 336.1205(1)(a) & (b) R 336.2803 R 336.2804 R 336.2810	
11. SO2	0.0012 lb/MMBTU ²	Monthly	EUAUXBOILER-BW	SC VI.4	R 336.1205(1)(a) & (b)	
12. VOC	0.008 lb/MMBTU ²	Hourly	EUAUXBOILER-BW	SC V.1	R 336.1205(1)(a) & (b) R 336.1702(a) R 336.2810	
13. VOC	0.80 pph ²	Hourly	EUAUXBOILER-BW	SC V.1	R 336.1205(1)(a) & (b) R 336.1702(a) R 336.2810	
14. GHGs as CO2e	25,623 tpy ²	12-month rolling time period as determined at the end of each calendar month.	EUAUXBOILER-BW	SC VI.2, SC VI.6	R 336.1205(1)(a) & (b) R 336.2810, 40 CFR 52.21(i)	

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(If NA, remove table)

II. MATERIAL LIMIT(S)

~~1. The permittee shall burn only pipeline natural gas in EUAUXBOILER, with a sulfur content of 0.34 gr per 100 scf or less on a monthly basis.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j))~~

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Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.					

(If NA, remove table)

III. PROCESS/OPERATIONAL RESTRICTION(S)

~~1. Within 180 days of initial startup, the permittee shall submit, implement, and maintain a malfunction abatement plan (MAP) as described in Rule 911(2) for EUAUXBOILER. The MAP shall, at a minimum, specify the following:~~

- ~~a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.~~
- ~~b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.~~
- ~~c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.~~

~~If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1205(1)(a) & (b), R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)~~

~~2. The permittee shall not operate EUAUXBOILER unless an acceptable plan that describes how emissions will be minimized during all startups, shutdowns and malfunctions has been submitted to the AQD District Supervisor. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. The permittee shall submit the emission minimization plan and any modifications to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the plan or modified plan shall be considered approved.² (R 336.1911, R 336.1912, R 336.2810, 40 CFR 52.21(j))~~

~~3. The permittee shall not operate EUAUXBOILER for greater than 4,380 hours per 12-month rolling period as determined at the end of each calendar month.² (R 336.1205(1)(a) & (b), R 336.1225, R~~

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336.1702(a),
R 336.2803, R 336.2804, R 336.2810)

2.—

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The maximum design heat input capacity for EUAUXBOILER shall not exceed 99.9 MMBTU per hour on a fuel heat input basis.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR Part 60 Subpart Dc)

2. The permittee shall not operate EUAUXBOILER unless the low NO_x burners and flue gas recirculation system are installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining the air pollution control equipment in accordance with the MAP required in SC III.1.² (R 336.1205(1)(a) & (b), R 336.1910, R 336.2803, R 336.2804, R 336.2810)

3. The permittee shall install, calibrate, maintain and operate, in a satisfactory manner, a device to monitor and record the hourly and daily natural gas usage rate for EUAUXBOILER.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))

1. —

V. TESTING/SAMPLING

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

1. Within 180 days after commencement of initial startup, the permittee shall verify NO_x, CO, PM, and VOCs emission rates from EUAUXBOILER by testing at the owner's expense, in accordance with Department requirements. The permittee shall complete the required testing once every five years, thereafter, unless an alternate testing schedule is approved by the District Supervisor. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 40 of the Michigan Air Pollution Control Rules
NO _x	40 CFR Part 60, Appendix A
SO _x	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOCs	40 CFR Part 60, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQB approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQB Technical Programs Unit and District Office. The AQB must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQB Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205(1)(a) & (b), R 336.1331(1)(c), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)

2. Within 180 days after commencement of initial startup, the permittee shall verify PM₁₀ and PM_{2.5} emission rates from EUAUXBOILER by testing at the owner's expense, in accordance with

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~~Department requirements. Testing shall be performed using the approved EPA Method, 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.1205(1)(a) & (b), R 336.1331(1)(c), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)~~

~~{UPDATE THIS TEMPLATE TO ADD THE FOLLOWING CONDITIONS FOR ROP RENEWAL WHEN STACK TESTING IS REQUIRED, IF THE LANGUAGE IS NOT ALREADY IN A PTI. IF THERE ARE NO STACK TESTING REQUIREMENTS, REMOVE THESE CONDITIONS}~~

~~{Update or remove colored text and select the appropriate test method to use within the condition. Turn selected test method to black font.}~~

Single-pollutant

1. ~~The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in (TEST METHOD) (choose test method based on pollutant). An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

Multiple pollutants

2. ~~The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:~~

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 40 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A
SO ₂	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOC	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Hydrogen Sulfide	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Total Reduced Sulfurs	40 CFR Part 60, Appendix A
Dioxins / Furans	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A

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Hydrogen Halides / Halogens	40 CFR Part 60, Appendix A
Mercury	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Visible Emission	40 CFR Part 61, Appendix M; 40 CFR Part 60, Appendix A and B
HAPs	40 CFR Part 63, Appendix A

~~3. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

~~Always include with any stack testing conditions.~~
~~3. The permittee shall verify the PM, NOx, SO2, CO, and VOC (POLLUTANT) emission rates from EUAUXBOILER-BWEC (EU / FG / PORTION OF THE EU), at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

~~4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (R 336.1213(3))~~

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

~~The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))~~

~~The permittee shall keep hourly and daily natural gas usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of natural gas used, in cubic feet, on a clock hour and calendar day basis and shall calculate and keep monthly natural gas usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of natural gas used, in cubic feet, on a calendar month basis and a 12-month rolling time period basis. The records must indicate the total amount of natural gas used in EUAUXBOILER. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.48c(g))~~

~~The permittee shall record hours of operation of EUAUXBOILER in a format acceptable to the AQD District Supervisor, indicating the total hours of operation in an individual calendar month and a 12-month rolling time period basis. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810)~~

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~~The permittee shall keep, in a satisfactory manner, records indicating the monthly sulfur content of the natural gas to meet SC II.1 for EUAUXBOILER on file at the facility and make them available to the Department upon request.² (R 336.1205(1)(a) & (b))~~

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~~The permittee shall calculate and keep, in a satisfactory manner, records of hourly NOx, CO, PM, PM10 and PM2.5 mass emissions (pph) for EUAUXBOILER. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the AQD District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810)~~

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~~The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total CO₂e mass emissions for EUAUXBOILER. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed according to Appendix B or an alternate method approved by the District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j))~~

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~~The permittee shall maintain monthly records of the heat value content of the natural gas based on information from the natural gas supplier. The permittee shall keep record on file and make them available to the Department upon request.² (R 336.1205(1)(a), 40 CFR 60.40c(a))~~

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~~The permittee shall calculate and keep records of hourly heat input (MMBtu/hr) for EUAUXBOILER based on the monthly heat value and hourly gas usage to show compliance with SC IV.1. The permittee shall keep record on file and make them available to the Department upon request.² (R 336.1205(1)(a), 40 CFR 60.40c(a))~~

~~The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:~~

- ~~a. Compliance tests and any testing required under the special conditions of this permit.~~
- ~~b. Monitoring data.~~
- ~~c. Verification of heat input capacity required to show compliance with SC IV.1.~~
- ~~d. Identification, type and the amounts of fuel combusted in EUAUXBOILER on an hourly basis, calendar day basis, and calendar month basis.~~
- ~~e. All records required by 40 CFR 60.7 and 60.48c.~~
- ~~f. All calculations or documents necessary to show compliance with the limits contained in this permit.~~

~~All of the above information shall be stored in a format acceptable to the Air Quality Division and shall be consistent with the requirements of 40 CFR 60.7(f). The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1331(1)(c), R 336.1702(a), R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.7(f), 40 CFR Part 60 Subpart Dc)~~

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See Appendices { } {Enter 3, 4, and/or 7}

VII. REPORTING

- ~~1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.² (R 336.1213(3)(c)(ii))~~

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~~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 30.² (R 336.1213(3)(e)(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.² (R 336.1213(4)(c))~~

Only include if there are any stack testing conditions

~~5. The permittee shall submit any performance test reports (including RATA reports) to the AQD Technical Programs Unit and District Office, in a format approved by the AQD.² (R 336.1213(3)(c), R 336.2001(5))~~

~~5. The permittee shall provide written notification for the date construction is commenced, postmarked no later than 30 days after such date and provide written notification for the actual date of startup, postmarked within 15 days after such date, as provided by 40 CFR 60.7. The notifications shall include:~~

~~a. The design heat input capacity of EUAUXBOILER and identification of the fuels to be combusted in EUAUXBOILER.~~

~~b. The annual capacity factor at which the owner or operator anticipates operating the facility based on all fuels fired and based on each individual fuel fired. The permittee shall submit the notification(s) to the AQD District Supervisor within the time frames specified in 40 CFR 60.7.² (40CFR60.7(a), 40 CFR 60.48c(a))~~

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See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. —			
<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter/Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>
1. SVAUXBOILER	43 ²	60 ²	R 336.1225, R 336.2803, R 336.2804

{If NA, remove sentence and table}

IX. OTHER REQUIREMENT(S)

~~1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Dc, as they apply to EUAUXBOILER.² (40 CFR Part 60 Subparts A & Dc)~~

~~1. —~~

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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).

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EUENGINE-BW
EMISSION UNIT CONDITIONS

DESCRIPTION

A nominal 2 MW diesel-fueled emergency engine with a model year of 2011 or later, and a displacement of <10 liters/cylinder. The engine is an EPA Tier 2 certified engine subject to NSPS III.

Flexible Group ID: FGPROJECT

POLLUTION CONTROL EQUIPMENT

NA

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I. EMISSION LIMIT(S)

<u>Pollutant</u>	<u>Limit</u>	<u>Time Period / Operating Scenario</u>	<u>Equipment</u>	<u>Testing / Monitoring Method</u>	<u>Underlying Applicable Requirements</u>
<u>1. NMHC+NO_x</u>	<u>6.4 g/kW-hr^{2-B}</u>	<u>Hourly</u>	<u>EUENGINE</u>	<u>SC-V.1, SC-VI.2, SC-VI.3</u>	<u>R 336.2803, R 336.2804, R 336.2810, 40 CFR 60.4205(b), 40 CFR 60.4202(a)(2), Table 1 of 40 CFR 89.112</u>
<u>2. CO</u>	<u>3.5 g/kW-hr^{2-B}</u>	<u>Hourly</u>	<u>EUENGINE</u>	<u>SC-V.1, SC-VI.2, SC-VI.3</u>	<u>R 336.2804, R 336.2810, 40 CFR 60.4205(b), 40 CFR 60.4202(a)(2), Table 1 of 40 CFR 89.112</u>
<u>3. PM</u>	<u>0.20 g/kW-hr^{2-B}</u>	<u>Hourly</u>	<u>EUENGINE</u>	<u>SC-V.1, SC-VI.2, SC-VI.3</u>	<u>R 336.1331(1)(c), R 336.2810, 40 CFR 60.4205(b), 40 CFR 60.4202(a)(2), Table 1 of 40 CFR 89.112</u>
<u>4. PM10</u>	<u>1.18 pph²</u>	<u>Hourly</u>	<u>EUENGINE</u>	<u>SC-VI.6</u>	<u>R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810</u>
<u>5. PM2.5</u>	<u>1.18 pph²</u>	<u>Hourly</u>	<u>EUENGINE</u>	<u>SC-VI.6</u>	<u>R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810</u>

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<u>Pollutant</u>	<u>Limit</u>	<u>Time Period / Operating Scenario</u>	<u>Equipment</u>	<u>Testing / Monitoring Method</u>	<u>Underlying Applicable Requirements</u>
<u>6. GHGs as CO₂e</u>	<u>161 tpy²</u>	<u>12-month rolling time period as determined at the end of each calendar month</u>	<u>EUENGINE</u>	<u>SC VI.7</u>	<u>R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(i)</u>
<u>7. VOC</u>	<u>1.89 pph²</u>	<u>Hourly</u>	<u>EUENGINE</u>	<u>SC V.2</u>	<u>R 336.1205(1)(a) & (b), R 336.1702, R 336.2810</u>

^A NMHC = nonmethane hydrocarbon

^B These emission limits are for certified engines; if testing becomes required to demonstrate compliance, then the tested values must be compared to the Not to Exceed (NTE) requirements determined through 40 CFR 60.4212(c) where NTE requirements = (1.25) x (the 89.112 standard for each pollutant).

II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in EUENGINE with the maximum sulfur content of 15 ppm (0.0015 percent) by weight, and a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.² (R 336.1205(1)(a) & (b), 40 CFR 60.4207(b), 40 CFR 80.510(b))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUENGINE for more than 4 hour per day, except during emergency conditions and required stack testing in SC V.1 and SC V.2, and not more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. The 4 hours and the 500 hours includes the hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.2.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))

2. The permittee may operate EUENGINE for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year. EUENGINE may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing. Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity.² (40 CFR 60.4211(f))

3. If EUENGINE is purchased and installed as a certified engine, according to procedures specified in 40 CFR Part 60 Subpart IIII, for the same model year and maximum engine power, the permittee shall meet the following requirements for EUENGINE:

a. Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions;

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- ~~b. Change only those emission-related settings that are permitted by the manufacturer; and~~
- ~~c. Meet the requirements as specified in 40 CFR 89, 94, and/or 1068, as they apply to EUENGINE.~~

~~If the permittee does not operate and maintain the certified engine and control device according to SC III.3 a through c, the engine will be considered to be operating as a non-certified engine.² (40 CFR 60.4211(a) & (c), R 336.2810, 40 CFR 52.21(j))~~

- ~~4. If the permittee is operating EUENGINE as a non-certified engine, the permittee shall keep a maintenance plan for EUENGINE and shall, to the extent practicable, maintain and operate engine in a manner consistent with good air pollution control practice for minimizing emissions.² (40 CFR 60.4211(g)(3), R 336.2810, 40 CFR 52.21(j))~~

IV. DESIGN/EQUIPMENT PARAMETER(S)

- ~~1. The permittee shall equip and maintain EUENGINE with a non-resettable hours meter to track the operating hours.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4209(a))~~
- ~~2. The maximum rated power output of EUENGINE shall not exceed a nominal capacity of 2.0 MW.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))~~
- ~~3. The permittee shall monitor, in a satisfactory manner, the diesel fuel usage for EUENGINE on a continuous basis.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))~~

V. TESTING/SAMPLING

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

- ~~1. If EUENGINE is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:~~
 - ~~Conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.~~
 - ~~If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212.~~
 - ~~Conduct subsequent performance testing every 8,760 hours of engine operation or every 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.~~

~~No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (40 CFR 60.4211(g)(3), 40 CFR 60.4212)~~

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~~2. Within 180 days after commencement of trial operation, the permittee shall verify VOC mass emissions from EUENGINE by testing at owner's expense, in accordance with Department requirements. The permittee shall complete the required testing once every five years, thereafter, unless an alternate testing schedule is approved by the District Supervisor. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2810)~~

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~~The permittee shall verify PM10, PM2.5, and VOC emission rates from EUENGINE-BW by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method or other:~~

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Pollutant	Test Method Reference
PM10/PM2.5	40 CFR Part 51, Appendix A
VOC	40 CFR Part 60, Appendix A

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~~An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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~~The permittee shall verify the PM10, PM2.5, and VOC emission rates from EUENGINE-BW, at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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~~The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (R 336.1213(3))~~

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See Appendix 5

VI. MONITORING/RECORDKEEPING

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

~~The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(i), 40 CFR 60.4211, 40 CFR 60.4214)~~

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- ~~2. The permittee shall keep, in a satisfactory manner, the following records for EUENGINE:

 - a. If operated as a certified engine: The permittee shall keep records of the manufacturer certification documentation.
 - b. If operated as a non-certified engine: The permittee shall keep records of testing required in SC V.1.~~

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~~The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2810, 40 CFR 60.4211)~~

- ~~3. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for EUENGINE:~~
- ~~a. If operated as a certified engine: The permittee shall keep records of the manufacturer's emission-related written instructions, and records demonstrating that the engine has been maintained according to those instructions, as specified in SC III.3.~~
 - ~~b. If operated as a non-certified engine: The permittee shall keep records of a maintenance plan, as required by SC III.4, and maintenance activities.~~

~~The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2810, 40 CFR 60.4211)~~

- ~~4. The permittee shall keep, in a satisfactory manner, test reports for EUENGINE required by SC V.2 on file at the facility. The permittee shall make the records available to the Department upon request. Records shall be maintained on file for a period of five years.² (R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2810)~~

- ~~5. The permittee shall keep, in a satisfactory manner, records of the diesel fuel usage for EUENGINE on an hourly, monthly, and 12-month rolling time period basis.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(i))~~

- ~~6. The permittee shall calculate and keep, in a satisfactory manner, records of hourly PM10 and PM2.5 mass emissions for EUENGINE, as required by SC I.4 and SC I.5. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the AQD District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810)~~

- ~~7. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total CO₂e mass emissions for EUENGINE, as required by SC I.6. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed according to Appendix B or an alternate method approved by the District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j))~~

- ~~8. The permittee shall monitor and record the total hours of operation and the hours of operation during non-emergencies for EUENGINE, on an hourly, daily, monthly, and 12-month rolling time period basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation of EUENGINE, including what classified the operation as emergency.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4211, 40 CFR 60.4214)~~

- ~~9. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EUENGINE, demonstrating that the fuel meets the requirement of 40 CFR 80.510(b), as specified in SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil.² (R 336.1205(1)(a) & (b), 40 CFR 60.4207(b), 40 CFR 80.510(b))~~

~~See Appendices { } {Enter 3, 4, and/or 7}~~

VII. REPORTING

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- ~~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))~~
- ~~Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))~~
- ~~4. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUENGINE.² (R 336.1201(7)(a))~~
- ~~5. The permittee shall submit a notification specifying whether EUENGINE will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation.² (R 336.1201(3))~~
- ~~The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD.² (R 336.1213(3)(c), R 336.2001(5))~~

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See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter/Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>
1. SVENGINE	18 ²	16 ²	R 336.1225, R 336.2803, R 336.2804

IX. OTHER REQUIREMENT(S)

- ~~1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart IIII, as they apply to EUENGINE.² (40 CFR Part 60 Subparts A & IIII, 40 CFR 63.6590)~~
- ~~2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to EUENGINE, upon startup.² (40 CFR Part 63 Subparts A and ZZZZ, 40 CFR 63.6595)~~

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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).

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EUFENGINE-BW
EMISSION UNIT CONDITIONS

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DESCRIPTION

A 399 brake HP diesel-fueled emergency fire pump engine with a model year of 2011 or later, and a displacement of <10 liters/cylinder. The engine is an EPA Tier 3 certified engine subject to NSPS IIII.

Flexible Group ID: FGPROJECT

POLLUTION CONTROL EQUIPMENT

NA

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I. EMISSION LIMIT(S)

<u>Pollutant</u>	<u>Limit</u>	<u>Time Period / Operating Scenario</u>	<u>Equipment</u>	<u>Testing / Monitoring Method</u>	<u>Underlying Applicable Requirements</u>
<u>1. NMHC^A+NO_x</u>	<u>4.0 g/kW-hr^{2B}</u>	<u>Hourly</u>	<u>EUFENGINE</u>	<u>SC-V.1, SC-VI.2, SC-VI.8</u>	<u>R 336.2803, R 336.2804, R 336.2810 40 CFR 60.4205(c), Table 4 of 40 CFR Part 60 Subpart IIII</u>
<u>2. CO</u>	<u>3.5 g/kW-hr^{2B}</u>	<u>Hourly</u>	<u>EUFENGINE</u>	<u>SC-V.1, SC-VI.2, SC-VI.8</u>	<u>R 336.2804, R 336.2810, 40 CFR 60.4205(c), Table 4 of 40 CFR Part 60 Subpart IIII</u>
<u>3. PM</u>	<u>0.20 g/kW-hr^{2B}</u>	<u>Hourly</u>	<u>EUFENGINE</u>	<u>SC-V.1, SC-VI.2, SC-VI.8</u>	<u>R 336.1331(1)(c), R 336.2810, 40 CFR 60.4205(c), Table 4 of 40 CFR Part 60 Subpart IIII</u>
<u>4. PM10</u>	<u>0.13 pph²</u>	<u>Hourly</u>	<u>EUFENGINE</u>	<u>SC-VI.4</u>	<u>R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810</u>
<u>5. PM2.5</u>	<u>0.13 pph²</u>	<u>Hourly</u>	<u>EUFENGINE</u>	<u>SC-VI.4</u>	<u>R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810</u>
<u>6. VOC</u>	<u>0.13 pph²</u>	<u>Hourly</u>	<u>EUFENGINE</u>	<u>SC-VI.8</u>	<u>R 336.1205(1)(a) & (b), R 336.1702, R 336.2810</u>

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<u>Pollutant</u>	<u>Limit</u>	<u>Time Period / Operating Scenario</u>	<u>Equipment</u>	<u>Testing / Monitoring Method</u>	<u>Underlying Applicable Requirements</u>
<u>7. GHGs as CO₂e</u>	<u>86 tpy²</u>	<u>12-month rolling time period as determined at the end of each calendar month</u>	<u>EUFENGINE</u>	<u>SC-VI.5</u>	<u>R 336.1205(1)(a) & (b), R 336.2810, 40-CFR 52.21(i)</u>

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^A NMHC = nonmethane hydrocarbon

^B These emission limits are for certified engines; if testing becomes required to demonstrate compliance, then the tested values must be compared to the Not to Exceed (NTE) requirements determined through 40 CFR 60.4212(c).

II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in EUFPENGINE with the maximum sulfur content of 15 ppm (0.0015 percent) by weight, and a minimum octane index of 40 or a maximum aromatic content of 35 volume percent.² (R 336.1205(1)(a) & (b), 40-CFR 60.4207(b), 40-CFR 80.510(b))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUFPENGINE for more than 1 hour per day, except during emergency conditions and required stack testing in SC V.1, and not more than 100 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. The 1 hour and the 100 hours includes the hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.2.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40-CFR 52.21(i))

2. The permittee may operate EUFPENGINE for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year. EUFPENGINE may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing. Except as provided in 40-CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity.² (40-CFR 60.4211(f))

3. EUFPENGINE is purchased and installed as a certified engine, according to procedures specified in 40-CFR Part 60 Subpart IIII, for the same model year and maximum engine power. The permittee shall meet the following requirements for EUFPENGINE:

- a. Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions;
- b. Change only those emission-related settings that are permitted by the manufacturer; and
- c. Meet the requirements as specified in 40-CFR 89, 94, and/or 1068, as they apply to EUFPENGINE.

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~~If the permittee does not operate and maintain the certified engine and control device according to SC III.3 a through b, the engine will be considered to be operating as a non-certified engine.² (40 CFR 60.4211(a) & (e), R 336.2810, 40 CFR 52.21(i))~~

~~4. If the permittee is operating EUPENGINE as a non-certified engine, the permittee shall keep a maintenance plan for EUPENGINE and shall, to the extent practicable, maintain and operate engine in a manner consistent with good air pollution control practice for minimizing emissions.² (40 CFR 60.4211(g)(2), R 336.2810, 40 CFR 52.21(i))~~

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IV. DESIGN/EQUIPMENT PARAMETER(S)

~~1. The permittee shall equip and maintain EUPENGINE with a non-resettable hours meter to track the operating hours.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(i), 40 CFR 60.4209(a))~~

~~2. The maximum rated power output of EUPENGINE shall not exceed a nameplate capacity of 399 brake HP.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(i), Table 4 of 40 CFR Part 60 Subpart IIII)~~

~~3. The permittee shall monitor, in a satisfactory manner, the diesel fuel usage for EUPENGINE on a continuous basis.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(i))~~

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V. TESTING/SAMPLING

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

~~1. If EUPENGINE is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:~~

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- ~~Conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.~~
- ~~If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212.~~

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~~No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (40 CFR 60.4211(g)(2), 40 CFR 60.4212)~~

~~Upon request by the AQD District Supervisor, the permittee shall verify the PM10/PM2.5 and emission rates from EUPENGINE by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in~~

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Pollutant	Test Method Reference
PM10/PM2.5	40 CFR Part 51, Appendix W
VOC	40 CFR Part 60, Appendix A

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~~An alternate method, or a modification to the approved EPA Method, may be specified in an AOD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AOD Technical Programs Unit and District Office. The AOD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AOD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2803, R 336.2804, R 336.2810)~~

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

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~~1. The permittee shall complete all required calculations in a format acceptable to the AOD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(i), 40 CFR 60.4211, 40 CFR 60.4214)~~

~~2. The permittee shall keep, in a satisfactory manner, the following records for EUPENGINE:
a. If operated as a certified engine: The permittee shall keep records of the manufacturer certification documentation.
b. If operated as a non-certified engine: The permittee shall keep records of testing required in SC V.1.~~

~~The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2810, 40 CFR 60.4211)~~

~~3. The permittee shall keep, in a satisfactory manner, records of the diesel fuel usage for EUPENGINE on an hourly, monthly, and 12-month rolling time period basis.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(i))~~

~~4. The permittee shall calculate and keep, in a satisfactory manner, records of hourly PM10 and PM2.5 mass emissions for EUPENGINE, as required by SC I.4 and SC I.5. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the AOD District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810)~~

~~5. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total CO₂e mass emissions for EUPENGINE, as required by SC I.7. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed according to Appendix B or an alternate method approved by the District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(i))~~

~~6. The permittee shall monitor and record the total hours of operation and the hours of operation during non-emergencies for EUPENGINE, on an hourly, daily, monthly, and 12-month rolling time period basis, in a manner acceptable to the AOD District Supervisor. The permittee shall document how many hours are spent for emergency operation of EUPENGINE, including what classified the operation as emergency.² (R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(i), 40 CFR 60.4211, 40 CFR 60.4214)~~

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~~7. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EUPENGINE, demonstrating that the fuel meets the requirement of 40 CFR 80.510(b), as specified in SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetano index or aromatic content of the fuel oil.² (R 336.1205(1)(a) & (b), 40 CFR 60.4207(b), 40 CFR 80.510(b))~~

~~8. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for EUPENGINE:~~

~~a. If operated as a certified engine: The permittee shall keep records of the manufacturer's emission-related written instructions, and records demonstrating that the engine has been maintained according to those instructions, as specified in SC III.3.~~

~~b. If operated as a non-certified engine: The permittee shall keep records of a maintenance plan, as required by SC III.4, and maintenance activities.~~

~~The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2810, 40 CFR 60.4211)~~

~~9. The permittee shall calculate and keep, in a satisfactory manner, records of hourly VOC mass emissions for EUPENGINE, as required by SC I.6. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the AQD District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2810)~~

See Appendices { } (Enter 3, 4, and/or 7)

VII. REPORTING

~~1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(iii))~~

~~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)(ii))~~

~~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))~~

~~The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))~~

~~5. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUPENGINE.² (R 336.1201(7)(a))~~

~~6. The permittee shall submit a notification specifying whether EUPENGINE will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation.² (R 336.1201(3))~~

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See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter/Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>
<u>1. SVFPENGINE</u>	<u>6²</u>	<u>13²</u>	<u>R 336.1225, R 336.2803, R 336.2804</u>

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart IIII, as they apply to EUPENGINE.² (40 CFR Part 60 Subparts A & IIII, 40 CFR 63.6590)
2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to EUPENGINE, upon startup.² (40 CFR Part 63 Subparts A and ZZZZ, 40 CFR 63.6595)

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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).

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EUCOLDCLEANER-BW
EMISSION UNIT CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EUCOLDCLEANER-BW

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (R 336.1213(2))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (R 336.1611(2)(b), R 336.1707(3)(b))

2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:

a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(2)(h))

b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285(2)(r)(iv))

2. The cold cleaner shall be equipped with a device for draining cleaned parts. (R 336.1611(2)(b), R 336.1707(3)(b))

3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))

4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))

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~~5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:~~

- ~~a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (R 336.1707(2)(a))~~
- ~~b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))~~
- ~~c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))~~

V. TESTING/SAMPLING

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

~~NA~~

VI. MONITORING/RECORDKEEPING

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

~~1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))~~

~~2. The permittee shall maintain the following information on file for each cold cleaner: (R 336.1213(3))~~

- ~~a. A serial number, model number, or other unique identifier for each cold cleaner.~~
- ~~b. The date the unit was installed, manufactured or that it commenced operation.~~
- ~~c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h).~~
- ~~d. The applicable Rule 201 exemption.~~
- ~~e. The Reid vapor pressure of each solvent used.~~
- ~~f. If applicable, the option chosen to comply with Rule 707(2).~~

~~3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))~~

~~4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(e))~~

VII. REPORTING

~~1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(iii))~~

~~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~~

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~~reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30.
(R 336.1213(3)(c)(i))~~

~~3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))~~

~~See Appendix 8~~

~~VIII. STACK/VENT RESTRICTION(S)~~

~~NA~~

~~IX. OTHER REQUIREMENT(S)~~

~~NA~~

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).~~

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EU(ID)
EMISSION UNIT CONDITIONS

DESCRIPTION

{Enter description here}

Flexible Group ID: {Enter Flexible Group IDs or NA}

POLLUTION CONTROL EQUIPMENT

{Enter pollution control equipment names or NA}

I. EMISSION LIMIT(S)

<u>Pollutant</u>	<u>Limit</u>	<u>Time Period/Operating Scenario</u>	<u>Equipment</u>	<u>Monitoring/ Testing Method</u>	<u>Underlying Applicable Requirements</u>

{If NA, remove table}

II. MATERIAL LIMIT(S)

<u>Material</u>	<u>Limit</u>	<u>Time Period/Operating Scenario</u>	<u>Equipment</u>	<u>Monitoring/ Testing Method</u>	<u>Underlying Applicable Requirements</u>

{If NA, remove table}

III. PROCESS/OPERATIONAL RESTRICTION(S)

IV. DESIGN/EQUIPMENT PARAMETER(S)

V. TESTING/SAMPLING

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

{UPDATE THIS TEMPLATE TO ADD THE FOLLOWING CONDITIONS FOR ROP RENEWAL WHEN STACK TESTING IS REQUIRED, IF THE LANGUAGE IS NOT ALREADY IN A PTI. IF THERE ARE NO STACK TESTING REQUIREMENTS, REMOVE THESE CONDITIONS}

{Update or remove colored text and select the appropriate test method to use within the condition. Turn selected test method to black font.}

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Single pollutant

~~The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in (TEST METHOD) (choose test method based on pollutant). An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

Multiple pollutants

~~The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:~~

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Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A
SO ₂	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOC	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Hydrogen Sulfide	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Total Reduced Sulfurs	40 CFR Part 60, Appendix A
Dioxins / Furans	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A
Hydrogen Halides / Halogens	40 CFR Part 60, Appendix A
Mercury	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Visible Emission	40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B
HAPs	40 CFR Part 63, Appendix A

~~An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

Always include with any stack testing conditions

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~~The permittee shall verify the (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU), at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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~~The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (R 336.1213(3))~~

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See Appendix 5

VI. MONITORING/RECORDKEEPING

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

See Appendices { } {Enter 3, 4, and/or 7}

VII. REPORTING

~~1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(e)(iii))~~

~~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)(e)(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)(e))~~

Only include if there are any stack testing conditions

~~The permittee shall submit any performance test reports (including RATA reports) to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(e), R 336.2001(5))~~

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See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter / Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>

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{If NA, remove sentence and table}

IX. OTHER REQUIREMENT(S)

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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).

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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.

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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.

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{REMOVE THIS TABLE IF THERE ARE NO FLEXIBLE GROUPS}

FLEXIBLE GROUP SUMMARY TABLE D-5

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

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Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-CTGHRSG-BW	Two 3.658 MMBTU/hr natural gas-fired combustion turbine generators (CTGs) coupled with heat recovery steam generators (HRSGs). The HRSGs are equipped with natural gas-fired duct burners rated at 800 MMBTU/hr to provide heat for additional steam production. The HRSGs are not capable of operating independently from the CTG. The CTGs/HRSGs are equipped with a combined oxidation catalyst for the control of CO and VOCs, and selective catalytic reduction (SCR) with dry low NO_x burners for the control of NO_x.	EU-CTGHRSG1-BW , EU-CTGHRSG2-BW
FG-COOLINGTWR-BW	A 14-cell wet mechanical draft cooling tower equipped with drift eliminators.	EU-COOLINGTWR-BW
FG-FUELHTRS-BW	Two (2) natural gas-fired fuel gas heaters. One heater (EUFUELHTR1) is a high pressure heater rated at 20.8 MMBtu/hr and the other heater (EFFUELHTR2), is a low pressure heater rated at 3.8 MMBtu/hr.	EU-FUELHTR1-BW , EU-FUELHTR2-BW
FG-TANKS-BW	Miscellaneous storage tanks.	EU-EMFUEL TANK-BW , EU-CTLUBE OILTANKS-BW , EU-STLUBE OILTANKS-BW , EU-STHYDRO OILTANK-BW , EU-STSEALOILTANK-BW , EU-FUELOILTANK-BW , EU-GCLUBE OILTANKS-BW , EU-BFPOILTANKS-BW , EU-DLNNH3TANKS-BW

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Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs	Formatted Table
FG-SPACEHTRS-BW	Natural gas-fired space heaters and air makeup units with a combined rating of 10 MMBTU/hr or less to provide building heating and ventilation.	EU-SPACEHEATERS-BW	Formatted: Centered
FG-MACT-BW	All equipment subject to the Industrial Boiler MACT.	EU-FUELHTR1-BW, EU-FUELHTR2-BW, EU-AUXBOILER-BW	Formatted: Centered
FG-PROJECT-BW	All equipment associated with the natural gas combined cycle power plant.	EU-CTGHRSG1-BW, EU-CTGHRSG2-BW, EU-AUXBOILER-BW, EU-FUELHTR1-BW, EU-FUELHTR2-BW, EU-EMENGINE-BW, EU-FPENGINE-BW, EU-CTLUBEOILTANKS-BW, EU-STLUBEOILTANKS-BW, EU-STHYDROOILTANK-BW, EU-STELOILTANK-BW, EU-FUELOILTANK-BW, EU-GCLUBEOILTANKS-BW, EU-BFPOILTANKS-BW, EU-EMFUELTANK-BW, EU-DLNNH3TANKS-BW, EU-COOLINGTOWER-BW, EU-COLDCLEANER-BW, EU-SPACEHEATERS-BW	

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Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs

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FG-CTGHRSG-BW{ID}
FLEXIBLE GROUP CONDITIONS

DESCRIPTION Two 3,658 MMBTU/hr natural gas-fired combustion turbine generators (CTGs) coupled with heat recovery steam generators (HRSGs). The HRSGs are equipped with natural gas-fired duct burners rated at 800 MMBTU/hr to provide heat for additional steam production. The HRSGs are not capable of operating independently from the CTGs.

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{Enter description here}

Emission Unit: EU-CTGHRSG1-BW, EU-CTGHRSG2-BW {Enter Emission Unit names or NA}

POLLUTION CONTROL EQUIPMENT

The CTGs/HRSGs are equipped with a combined oxidation catalyst for the control of CO and VOCs, and selective catalytic reduction (SCR) with dry low NO_x burners for the control of NO_x.
 {Enter pollution control equipment names or NA}

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
1. NO _x	2.0 ppmvd at 15% O ₂ (each unit) ^{2, C}	24-hour rolling average as determined each operating hour, except during startup and shutdown	EUCTGHRSG1-BW, EUCTGHRSG2-BW	SC VI.2, SC VI.3, SC VI.10	R 336.2810
2. NO _x	15 ppm at 15% O ₂ (each unit) ^{2, C}	30-day rolling average as determined each operating day	EUCTGHRSG1-BW, EUCTGHRSG2-BW	SC VI.2, SC VI.3, SC VI.10	40 CFR 60.4320(a) ^E , Table 1 of 40 CFR Part 60 Subpart KKKK
3. NO _x	28.90 pph (each unit) ^{2, C}	24-hour rolling average as determined each operating hour, except during startup and shutdown	EUCTGHRSG1-BW, EUCTGHRSG2-BW	SC VI.2, SC VI.3, SC VI.10	R 336.2803, R 336.2804, R 336.2810
4. NO _x	262.4 pph (each unit) ^E	Operating hour during startup or shutdown ^E	EUCTGHRSG1-BW, EUCTGHRSG2-BW	SC VI.2, SC VI.3, SC VI.10	R 336.2803, R 336.2804, R 336.2810
5. CO	0.0045 lb/MMBtu (each unit) ^{2, C}	24-hour rolling average as determined each operating hour, except during startup and shutdown	EUCTGHRSG1-BW, EUCTGHRSG2-BW	SC VI.2, SC VI.4, SC VI.10	R 336.2810

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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
6. CO	17.59 pph (each unit) ^{2, C}	24-hour rolling average as determined each operating hour, except during startup and shutdown	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC VI.2, SC VI.4, SC VI.10	R 336.2804, R 336.2810
7. CO	791.5 pph (each unit) ^{2, E}	Operating hour during startup or shutdown ^E	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC VI.2, SC VI.4, SC VI.10	R 336.2804, R 336.2810
8. PM	16 pph (each unit) ²	Hourly	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC V.1, SC VI.10	R 336.1331(1)(c), R 336.2810
9. PM	12.2 pph (each unit without duct burner firing) ²	Hourly	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC V.1, SC VI.10	R 336.1331(1)(c), R 336.2810
10. PM10	16 pph (each unit) ²	Hourly	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC V.1, SC VI.10	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
11. PM10	12.2 pph (each unit without duct burner firing) ²	Hourly	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC V.1, SC VI.10	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
12. PM2.5	16 pph (each unit) ²	Hourly	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC V.1, SC VI.10	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
13. PM2.5	12.2 pph (each unit without duct burner firing) ²	Hourly	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC V.1, SC VI.10	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
14. SO ₂	4.45 pph (each unit) ²	Hourly	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC V.1, SC VI.10	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804
15. SO ₂	0.0012 lb/MMBTU ² H	Hourly	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC VI.10	R 336.2803, R 336.2804, 40 CFR 60.4330
16. VOC	0.0026 lb/MMBTU (each unit) ^{2, C}	Hourly, except during startup and shutdown	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC V.1, SC VI.10	R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2810

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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
17. VOC	0.0013 lb/MMBTU (each unit without duct burner firing) ² ^c	Hourly, except during startup and shutdown	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC V.1, SC VI.10	R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2810
18. Sulfuric acid mist (H ₂ SO ₄)	0.0013 lb/MMBTU (each unit) ²	Hourly	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC V.1, SC VI.10	R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.2810
19. Sulfuric acid mist (H ₂ SO ₄)	5.04 pph (each unit) ²	Hourly	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC V.1, SC VI.10	R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.2810
20. GHGs as CO ₂ e	2,042.773 tpy (each unit) ²	12-month rolling time period as determined at the end of each calendar month.	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC VI.5, SC VI.6, SC VI.10	R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j)
21. CO ₂	794 lb/MWh (each unit) ²	12-operating- month rolling average basis as determined at the end of each operating calendar month. ^F	EUCTGHRSG1- BW, EUCTGHRSG2- BW	SC VI.7, SC VI.8, SC VI.10	R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j), 40 CFR 60.5520(a) ^G , Table 2 of 40 CFR Part 60 Subpart TTTT ^G
Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements

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ppmvd = parts per million by volume at 15 percent oxygen (O₂) and on a dry gas basis.
lb/MWh = pound per megawatt hour.

Unless otherwise noted, the limits apply at all times, both with the duct burners operating, and without the duct burners operating

^c Does not include startup and shutdown.
^d Table 1 of 40 CFR Part 60 Subpart KKKK also allows 96 ppm at 15 percent O₂ when the turbines are operating at less than 75 percent of peak load and at temperatures less than 0°F.
^e Startup is defined as the period of time from initiation of the combustion process (flame-on) from shutdown status and continues until steady state operation (loads greater than a demonstrated percent of design capacity) is achieved. Shutdown is defined as that period of time from the lowering of the turbine output below the demonstrated steady state level, with the intent to shut down, until the point at which the fuel flow to the combustor is terminated. The demonstrated percent of design capacity, or demonstrated steady state level, shall be described in the plan required in SC III.2.
^f Compliance is determined monthly at the end of the initial and each subsequent 12-operating-month period. The first month of the initial compliance period is defined in 40 CFR 60.5525(c)(1)(i).
^g The emission limit as required in 40 CFR 60.5520(a) and Table 2 of 40 CFR Part 60 Subpart TTTT is 1,000 lb CO₂/MWh. SC I.21 subsumes the NSPS emission limit.
^h The emission limit as required in 40 CFR 40 CFR 60.4330 is 0.060 lb SO₂/MMBTU. SC I.15 subsumes the NSPS emission limit.
{If NA, remove table}

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II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. —					

1. The permittee shall only burn pipeline natural gas with a sulfur content of 0.34 grains per 100 scf or less on an annual basis in any unit in FGCTGHRSG-BW.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4365, 40 CFR 60.4330)

{If NA, remove table}

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Within 180 days of trial operation, the permittee shall submit, implement, and maintain a malfunction abatement plan (MAP) as described in Rule 911(2) for EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.
 - d. Identification of the source, and operating variables and ranges for varying loads, shall be monitored and recorded. The normal operating range of these variables and a description of the method of monitoring shall be maintained.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 90 days after such an event occurs. The permittee shall also amend the MAP within 90 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1702(a), R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))

2. The permittee shall not operate any unit in FGCTGHRSG-BW unless the AQD District Supervisor has approved a plan that describes how emissions will be minimized during startup and shutdown. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices, and shall describe the demonstrated percent of design capacity, or demonstrated steady state level. Unless notified by the District Supervisor within 30 business days after plan submittal, the plan shall be deemed approved.² (R 336.1911, R 336.1912, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4333(a))

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- 3. The total hours for startup and shutdown for each CTG/HRSG train in FGCTGHRSG-BW shall not exceed 500 hours per 12-month rolling time period as determined at the end of each calendar month.² (R 336.2803, R 336.2804, R 336.2810)
- 4. The permittee shall operate and maintain EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW, including associated equipment and monitors, in a manner consistent with safety and good air pollution control practice.² (40 CFR 60.4333(a), 40 CFR 60.5525(b))
- 5. The permittee shall prepare a monitoring plan to quantify the hourly CO2 mass emission rate (tons/hr), in accordance with the applicable provisions in 40 CFR 75.53(g) and (h). The electronic portion of the monitoring plan must be submitted using the ECMPS Client Tool and must be in place prior to reporting emissions data and/or the results of monitoring system certification tests under this subpart. The monitoring plan must be updated as necessary. Monitoring plan submittals must be made by the Designated Representative (DR), the Alternate DR, or a delegated agent of the DR (see 40 CFR 60.5555(c)).² (40 CFR 60.5535(a), 40 CFR 60.5535(d)(1))

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IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The maximum design heat input capacity for each turbine in FGCTGHRSG-BW shall not exceed, on a fuel heat input basis, 3,658 MMBTU/hr per hour and the design heat input capacity for each duct burner in FGCTGHRSG-BW shall not exceed, on a fuel heat input basis, 800 MMBTU per hour.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))
- 2. The permittee shall not operate EUCTGHRSG1-BW or EUCTGHRSG2-BW of FGCTGHRSG-BW unless each respective dry low NO_x burners, selective catalytic reduction, and oxidation catalyst are installed, maintained, and operated in a satisfactory manner, for each CTG/HRSG. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for FGCTGHRSG as required in SC III.1.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1910, R 336.2803, R 336.2804, R 336.2810)
- 3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, devices to monitor and record the NO_x emissions and oxygen (O₂), or carbon dioxide (CO₂), content of the exhaust gas from both EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW on a continuous basis. The permittee shall install and operate the Continuous Emission Monitoring System (CEMS) to meet the timelines, requirements and reporting detailed in Appendix 3-5 BW.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 60.4340(b)(1), 40 CFR 60.4345, 40 CFR Part 75)
- 4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the CO emissions and oxygen (O₂), or carbon dioxide (CO₂), content of the exhaust gas from both EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW on a continuous basis. The permittee shall install and operate the Continuous Emission Monitoring System (CEMS) to meet the timelines, requirements and reporting detailed in Appendix 3-5 BW.² (R 336.1205(1)(a) & (b), R 336.2804, R 336.2810, 40 CFR Part 75)
- 5. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, devices to monitor and record the natural gas flow rate for EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW on a continuous basis. Each device shall be operated in accordance with 40 CFR 60.4345(c).² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4345)

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6. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, devices to continuously measure and record the hourly gross electric output from EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(i), 40 CFR 60.5535(d)(1))

1. _____

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V. TESTING/SAMPLING

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

1. Within 180 days after initial startup, the permittee shall verify PM, PM10, PM2.5, SO₂, VOC, and H₂SO₄ emission rates from EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW at maximum routine operating conditions, by testing at owner's expense, in accordance with Department requirements. The permittee must complete the required testing once every five years of operation, thereafter. Upon approval of the AQD District Supervisor, subsequent testing may be conducted upon EUCTGHRSG1-BW or EUCTGHRSG2-BW as a representative unit. However, the permittee shall not test the same representative unit in subsequent tests unless approved or requested by the AQD District Supervisor. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (R 336.1205(1)(a) & (b), R 336.1331(1)(c), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))

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~~UPDATE THIS TEMPLATE TO ADD THE FOLLOWING CONDITIONS FOR ROP RENEWAL WHEN STACK TESTING IS REQUIRED, IF THE LANGUAGE IS NOT ALREADY IN A PTI. IF THERE ARE NO STACK TESTING REQUIREMENTS, REMOVE THESE CONDITIONS)~~

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Single pollutant

1. The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in (TEST METHOD) (choose test method based on pollutant). An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

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Multiple pollutants

1-2. The permittee shall verify PM, PM10, PM2.5, SO₂, VOC, and H₂SO₄ (POLLUTANT) emission rates from EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW (EU / FG / PORTION OF THE EU) by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

**Section 55 — BLUE WATER ENERGY CENTER St. Clair
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Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A
SO2	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOC	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Hydrogen Sulfide	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Total Reduced Sulfure	40 CFR Part 60, Appendix A
Dioxins / Furans	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A
Hydrogen Halides / Halogens	40 CFR Part 60, Appendix A
Mercury	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Visible Emission	40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B
HAPs	40 CFR Part 63, Appendix A

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An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

- ~~Always include with any stack testing conditions~~
- ~~2. The permittee shall verify the PM, PM10, PM2.5, SO2, VOC, and H2SO4 (POLLUTANT) emission rates from EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW (EU / FG / PORTION OF THE EU), at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~
- 3.4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place before performance tests are conducted. (R 336.1213(3))

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See Appendix 5-5 BW

VI. MONITORING/RECORDKEEPING

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

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1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4345)
2. The permittee shall continuously monitor and record, in a satisfactory manner, the NO_x and CO emissions and the O₂, or CO₂, emissions from EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW. The permittee shall operate each CEMS to meet the timelines, requirements and reporting detailed in Appendix 3-5 BW and shall use the CEMS data for determining compliance with SC I.1, SC I.2, SC I.3, SC I.4, SC I.5, SC I.6, and SC I.7.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 60.4345)
3. The permittee shall keep, in a satisfactory manner, hourly and 24-hour rolling average NO_x concentration and mass emission records, and 30-day rolling average NO_x concentration records for EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW, as required by SC I.1, SC I.2, SC I.3, and SC I.4. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 60.4345)
4. The permittee shall keep, in a satisfactory manner, hourly and 24-hour rolling average CO concentration and mass emission records for EUCTGHRSG1-BW, and EUCTGHRSG2-BW of FGCTGHRSG-BW, as required by SC I.5, SC I.6, and SC I.7. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.2804, R 336.2810)
5. The permittee shall monitor and record, in a satisfactory manner, the natural gas usage for EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW on a monthly basis. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))
6. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total CO₂e mass emissions for EUCTGHRSG1-BW, and EUCTGHRSG2-BW of FGCTGHRSG-BW, as required by SC I.20. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j))
7. The permittee shall determine the hourly CO₂ mass emissions and hourly gross energy output for EUCTGHRSG1-BW, and EUCTGHRSG2-BW of FGCTGHRSG-BW according to 40 CFR 60.5535(b) or (c) and 40 CFR 60.5540(a). The permittee shall keep records of the determined values for hourly CO₂ mass emissions and hourly gross energy output for both EUCTGHRSG1 and EUCTGHRSG2 of FGCTGHRSG.² (40 CFR 60.5535(c), 40 CFR 60.5540(a), 40 CFR 60.5560)
8. The permittee shall calculate and keep, in a satisfactory manner, records of the monthly and initial calculations, and each subsequent 12-operating-month calculation required by SC I.21 according to the procedures described in 40 CFR 60.5540:
 - a. Total data is determined by summing valid operating hours for either CO₂ mass emissions or gross energy output.
 - b. To determine compliance with SC I.21, the total CO₂ mass emissions for each unit, EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW, shall be divided by the total gross energy output value of the same unit, EUCTGHRSG1-BW or EUCTGHRSG2-BW of FGCTGHRSG-BW.

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c. The final calculated value shall be rounded to two significant figures if the calculated value is less than 1,000 and to three significant figures if the calculated value is greater than 1,000.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j), 40 CFR 60.5540(a) & (b), 40 CFR 60.5560)

9. The permittee shall keep, in a satisfactory manner, a record of the monthly and 12-month rolling total hours of startup and shutdown for EUCTGHRSG1-BW and EUCTGHRSG2-BW. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.2803, R 336.2804, R 336.2810)

10. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit for FGCTGHRSG-BW. This information shall include, but shall not be limited to the following:

- a. Compliance tests and any testing required under the special conditions of this permit.
- b. Monitoring data.
- c. Total sulfur content and potential sulfur emissions, as applicable, of the natural gas as required by 40 CFR 60.4365(a) or (b).
- d. Verification of heat input capacity.
- e. Identification, type, and amount of fuel combusted on a calendar month basis.
- f. Gross energy output on a calendar month basis.
- g. Records of the duration of all dates and times of startup and shutdown events.
- h. All calculations necessary to show compliance with the limits contained in this permit.
- i. All records related to, or as required by, the MAP and the startup and shutdown plan.

All of the above information shall be stored in a format acceptable to the AQD District Supervisor and shall be consistent with the requirements of 40 CFR 60.7(f).² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1331(1)(c), R 336.1702(a), R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.7(f), 40 CFR 60.4345, 40 CFR 60.4365, 40 CFR 60.5525(b), 40 CFR 60.5560)

4.

See Appendices {} (Enter 3-5 BW, 4, and/or 7-5 BW)

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))

Only include if there are any stack testing conditions

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4. The permittee shall submit any performance test reports ~~including RATA reports~~ to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUCTGHRSG1-BW or EUCTGHRSG2-BW.² (R 336.1201(7)(a))
6. The permittee shall provide written notification of the date construction commences and the actual date of initial startup of each unit in FGTURBINES-BW, in accordance with 40 CFR 60.7. The permittee shall submit the notification(s) to the AQD District Supervisor within the time frames specified in 40 CFR 60.7 and 40 CFR 60.19, where applicable.² (40 CFR 60.7(a), 40 CFR 60.5550(a))
7. The permittee shall submit reports of excess emissions and monitor downtime, in accordance with 40 CFR 60.7(c) and with 40 CFR 60.4375 and 40 CFR 4380. The reports shall be postmarked by the 30th day following the end of each 6-month period.² (40 CFR 60.7(c), 40 CFR 60.4375(a), 40 CFR 60.4380, 40 CFR 60.4395)
8. The permittee shall prepare and submit the notifications specified in 40 CFR 60.19, as applicable, and 40 CFR 75.61, as applicable, for each unit, EUCTGHRSG1-BW and EUCTGHRSG2-BW of FGCTGHRSG-BW.² (40 CFR 60.5550(a) & (b))
9. The permittee shall submit electronic quarterly reports as follows:
 - a. After each unit has accumulated the first 12-operating months, the permittee shall submit a report for the calendar quarter that includes the twelfth operating month no later than 30 days after the end of that quarter.
 - b. Thereafter, the permittee shall submit a report for each subsequent calendar quarter, no later than 30 days after the end of the quarter.
 - c. Each quarterly report shall include the information specified in 40 CFR 60.5555(a)(2).
 - d. The final quarterly report of each calendar year shall include the information specified in 40 CFR 60.5555(a)(3).
 - e. All electronic reports shall be submitted using the Emissions Collection and Monitoring Plan System (ECMPS) Client Tool provided by the Clean Air Markets Division in the Office of Atmospheric Programs of EPA.² (40 CFR 60.5555(a) & (b))
10. The permittee shall meet all applicable reporting requirements and submit reports as required under 40 CFR Part 75 Subpart G in accordance with 40 CFR 75.64(a), which is also listed in 40 CFR 60.5555(c)(3)(i).² (40 CFR 60.5555(c)(1) & (3)(i))

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See Appendix 8-5 BW

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:

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Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.			
Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCTGHRSG1-BW	276 ²	200 ²	R 336.1225, R 336.2803, R 336.2804
2. SVCTGHRSG2-BW	276 ²	200 ²	R 336.1225, R 336.2803, R 336.2804

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IX. OTHER REQUIREMENT(S)

- The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and KKKK, as they apply to each unit in FGCTGHRSG-BW.² (40 CFR Part 60 Subparts A and KKKK)
- The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and TTTT, as they apply to each unit in FGCTGHRSG-BW.² (40 CFR Part 60 Subparts A and TTTT)
- The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94, as outlined in a complete Phase II, Acid Rain Permit issued by the AQD. Phase II, Acid Rain Permit No. MI-AR-6034-20XX is hereby incorporated into this ROP as Appendix 9-5 BW. (R 336.1902(1)(g))
- The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to R 336.1902(1)(g) and 40 CFR 72.9(c)(1)(i). (R 336.1213(10))
- The permittee shall comply with the provisions of the Cross-State Air Pollution Rule SO₂ Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix 10-5 BW. (40 CFR Part 97, Subpart CCCCC)
- The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NO_x Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAA, and identified in Appendix 10-5 BW. (40 CFR Part 97, Subpart AAAAA)
- The permittee shall comply with the provisions of the Cross State Air Pollution Rule NO_x Ozone Group 3 Trading Program, as specified in 40 CFR Part 97 Subpart GGGGG, and identified in Appendix 10-5 BW. (40 CFR Part 97 Subpart GGGGG)

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Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

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²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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FG-COOLINGTWR-BW
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

A 14 cell mechanical draft (wet) cooling tower.

~~Emission Unit: A 14 cell mechanical draft (wet) cooling tower. EU-COOLINGTWR-BW~~

POLLUTION CONTROL EQUIPMENT

Drift eliminators.

I. EMISSION LIMIT(S)

<u>Pollutant</u>	<u>Limit</u>	<u>Time Period / Operating Scenario</u>	<u>Equipment</u>	<u>Testing / Monitoring Method</u>	<u>Underlying Applicable Requirements</u>
1. PM	1.53 pph ²	Hourly	EUCOOLTWR-BW	SC VI.6	R 336.1205(1)(a) & (b), R 336.1331, R 336.2810
2. PM10	0.184 pph ²	Hourly	EUCOOLTWR-BW	SC VI.6	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
3. PM2.5	0.184 pph ²	Hourly	EUCOOLTWR-BW	SC VI.6	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810

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II. MATERIAL LIMIT(S)

<u>Material</u>	<u>Limit</u>	<u>Time Period / Operating Scenario</u>	<u>Equipment</u>	<u>Testing / Monitoring Method</u>	<u>Underlying Applicable Requirements</u>
1. Total Dissolved Solids (TDS) in cooling water	3,000 ppmw ²	Based on monthly sampling	EUCOOLTWR-BW	SC VI.4	R 336.1205(1)(a) & (b), R 336.2810

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III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Within 180 days after start-up of the plant, the permittee shall submit, to the AQD District Supervisor, an inspection and maintenance program for FGCOOLINGTWR-BW. The permittee shall comply with the submitted program until the AQD District Supervisor approves the program or approves an amended program. Thereafter, the permittee shall comply with the approved program. At any time, the permittee may submit a modified program to the AQD District Supervisor for review and approval.² (R 336.1910, R 336.2810)

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IV. DESIGN/EQUIPMENT PARAMETER(S)

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1. The permittee shall equip and maintain the cooling tower (FGCOOLINGTWR-BW) with drift eliminators with a vendor-certified maximum drift rate of 0.0005 percent or less.² (R 336.1910, R 336.2810)

V. TESTING/SAMPLING

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

1. Within 180 days after start-up of the plant, and every seven years thereafter, the permittee shall determine drift loss from each cooling tower by testing, at owner's expense, in accordance with Department requirements. The permittee shall use the most recent version of the Cooling Technology Institute's Acceptable Test Code (ATC) 140, unless the AQD approves use of an alternate method. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Determination of drift loss includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (R336.2803, R336.2804, R 336.2810)

2. The permittee shall verify PM, PM10, and PM2.5 emission rates from FGCOOLINGTWR-BW by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

~~The permittee shall verify the PM, PM10, and PM2.5 emission rates from FGCOOLINGTWR-BW, at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place before performance tests are conducted. (R 336.1213(3))

See Appendix 5-5 BW

VI. MONITORING/RECORDKEEPING

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

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- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810)
- 1. For FGCOOLINGTWR-BW, the permittee shall maintain a record, for the life of the cooling tower, of the vendor's certification required in SC IV.1.² (R 336.2810)
- 3. The permittee shall monitor the following for FGCOOLINGTWR-BW:
 - a. On a weekly basis, parameters needed to determine the total dissolved solids content of the circulating water.
 - b. On a monthly basis, parameters needed to determine the water recirculation rate.² (R 336.2810)
- 4. The permittee shall calculate and keep records of the TDS in the circulating water for each cooling tower in FG-COOLINGTWRs-BW on a monthly basis.² (R 336.1205(1)(a) & (b), R 336.2810)
- 5. The permittee shall keep, for FGCOOLINGTWR-BW, a record of the date the two most recent drift loss determinations were conducted.² (R 336.2810)
- 6. The permittee shall calculate and keep records of the PM, PM10, and PM2.5 emission rates, as specified in SC I.1 through SC I.3, for each cooling tower in FGCOOLINGTWR-BW FG-COOLTWRs on a monthly basis.² (R 336.1205(1)(a) & (b), R 336.2810)

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VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))
- 5. The permittee shall submit a complete report of the performance test results to the AQD within 60 days following the last date of the test.² (R 336.2001, R 336.2002, R 336.2003)
- 6. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of FGCOOLINGTWR-BW FGCOOLINGTWR authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of FGCOOLINGTWR-BWFGCOOLINGTWR.² (R 336.1201(7)(a))

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See Appendix 8-5 BW

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:

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter/Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>
1. SVCOOLINGTOWER1-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
2. SVCOOLINGTOWER2-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
3. SVCOOLINGTOWER3-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
4. SVCOOLINGTOWER4-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
5. SVCOOLINGTOWER5-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
6. SVCOOLINGTOWER6-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
7. SVCOOLINGTOWER7-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
8. SVCOOLINGTOWER8-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
9. SVCOOLINGTOWER9-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
10. SVCOOLINGTOWER10-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
11. SVCOOLINGTOWER11-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
12. SVCOOLINGTOWER12-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
13. SVCOOLINGTOWER13-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804
14. SVCOOLINGTOWER14-BW	463 (38.6 feet) ²	66.5 ²	R 336.2803, R 336.2804

IX. OTHER REQUIREMENT(S)

NA

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Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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FG-FUELHTR-BW
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two (2) natural gas-fired water bath fuel heaters. One heater (EUFUELHTR1-BW) is a high pressure/high-pressure heater rated at 20-812.1215407 MMBtu/hr. and the other heater (EFFUELHTR2-BW), is a low pressure/low-pressure heater rated at 3-82.3985355 MMBtu/hr.

Emission Unit: EU-FUELHTR1-BW, EU-FUELHTR2-BW

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

<u>Pollutant</u>	<u>Limit</u>	<u>Time Period/ Operating Scenario</u>	<u>Equipment</u>	<u>Testing / Monitoring Method</u>	<u>Underlying Applicable Requirements</u>
1. NO _x	0.75 pph ²	Hourly	EUFUELHTR1- BW	SC VI.5, SC VI.7	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
2. NO _x	0.14 pph ²	Hourly	EUFUELHTR2- BW	SC VI.5, SC VI.7	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
3. CO	0.77 pph ²	Hourly	EUFUELHTR1- BW	SC VI.5, SC VI.7	R 336.1205(1)(a) & (b), R 336.2804, R 336.2810
4. CO	0.14 pph ²	Hourly	EUFUELHTR2- BW	SC VI.5, SC VI.7	R 336.1205(1)(a) & (b), R 336.2804, R 336.2810
5. PM	0.15 pph ²	Hourly	EUFUELHTR1- BW	SC V.1, SC VI.5, SC VI.7	R 336.1331(1)(c), R 336.2810
6. PM	0.03 pph ²	Hourly	EUFUELHTR2- BW	SC V.1, SC VI.5, SC VI.7	R 336.1331(1)(c), R 336.2810
7. PM10	0.15 pph ²	Hourly	EUFUELHTR1- BW	SC VI.5, SC VI.7	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
8. PM10	0.03 pph ²	Hourly	EUFUELHTR2- BW	SC VI.5, SC VI.7	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
9. PM2.5	0.15 pph ²	Hourly	EUFUELHTR1- BW	SC VI.5, SC VI.7	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810

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<u>Pollutant</u>	<u>Limit</u>	<u>Time Period/ Operating Scenario</u>	<u>Equipment</u>	<u>Testing / Monitoring Method</u>	<u>Underlying Applicable Requirements</u>
10. PM2.5	0.03 pph ²	Hourly	EUFUELHTR2- BW	SC VI.5, SC VI.7	R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, R 336.2810
11. VOC	0.17 pph ²	Hourly	EUFUELHTR1- BW	SC VI.5, SC VI.7	R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2810
12. VOC	0.03 pph ²	Hourly	EUFUELHTR2- BW	SC VI.5, SC VI.7	R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2810
13. GHGs as CO ₂ e	6,310 tpy ²	12-month rolling time period as determined at the end of each calendar month.	FGFUELHTR- BW	SC VI.6, SC VI.7	R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j)

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline natural gas in FGFUELHTR-BW, with a sulfur content of 0.34 gr per 100 scf or less on an annualized basis.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j))

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The maximum design heat input capacity for EUFUELHTR1-BW shall not exceed 20.8 MMBTU per hour on a fuel heat input basis. The maximum design heat input capacity for EUFUELHTR2-BW shall not exceed 3.8 MMBTU per hour on a fuel heat input basis.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))
2. The permittee shall install, calibrate, maintain and operate, in a satisfactory manner, a device to monitor and record the hourly and monthly natural gas usage rate for each unit in FGFUELHTR-BW.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.48c(g))

V. TESTING/SAMPLING

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

1. Within 180 days after commencement of initial startup, the permittee shall verify PM emission rates, as an emission factor and pph, from each unit in FGFUELHTR-BW by testing at the owner's expense, in accordance with Department requirements. The permittee shall complete the required testing once every five years, thereafter, unless an alternate testing schedule is approved by the District Supervisor. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol

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and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.1331(1)(c), R 336.2001, R 336.2003, R 336.2004, R 336.2810)

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The permittee shall verify PM emission rates from FGFUELHTR-BW by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

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2.
Multiple pollutants

The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

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Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 61, Appendix M
NOx	40 CFR Part 60, Appendix A
SO ₂	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOG	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Hydrogen Sulfide	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Total Reduced Sulfurs	40 CFR Part 60, Appendix A
Dioxins / Furans	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A
Hydrogen Halides / Halogens	40 CFR Part 60, Appendix A
Mercury	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Visible Emission	40 CFR Part 61, Appendix M; 40 CFR Part 60, Appendix A and B
HAPs	40 CFR Part 63, Appendix A

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~~An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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~~The permittee shall verify the PM emission rates from FGFUELHTR-BW, at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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- 3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place before performance tests are conducted. (R 336.1213(3))

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See Appendix 5-5 BW

VI. MONITORING/RECORDKEEPING

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

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- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))
- 2. The permittee shall keep hourly and monthly natural gas usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of natural gas used, in cubic feet, on a clock hour basis for each unit in FGFUELHTR-BW, and shall calculate and keep monthly natural gas usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of natural gas used, in cubic feet, on a calendar month basis for each unit in FGFUELHTR-BW and a 12-month rolling time period basis for FGFUELHTR-BW. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.48c(q))
- 3. The permittee shall maintain monthly records of the heating value content of the natural gas based on information from the natural gas supplier. The permittee shall make records available to the Department upon request.² (R336.1205(1)(a), 40 CFR 60.40c(a))
- 4. The permittee shall calculate and keep records of hourly heat input (MMBtu/hr) for each heater in FGFUELHTR-BW based on the monthly heat value of natural gas and the hourly gas usage to show compliance with SC IV.1. The permittee shall make records available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))
- 5. The permittee shall calculate and keep, in a satisfactory manner, records of hourly NO_x, CO, PM, PM10, PM2.5, and VOC mass emissions for each unit in FGFUELHTR-BW, as required by SC I.1 through SC 1.12. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the AQD District Supervisor.² (R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2803, R 336.2804, R 336.2810)

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- 6. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total CO₂e mass emissions for FGFUELHTR-BW, as required by SC I.13. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed according to Appendix B7-65 BW or an alternate method approved by the District Supervisor.² (R 336.1205(1)(a) & (b), R 336.2810, 40 CFR 52.21(j))
- 7. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:
 - a. Compliance tests and any testing required under the special conditions of this permit.
 - b. Monitoring data.
 - c. Verification of heat input capacity required to show compliance with SC IV.1.
 - d. Identification, type and the amounts of fuel combusted in each unit in FGFUELHTR-BW on a calendar month basis.
 - e. Sulfur content of the fuel combusted in each unit in FGFUELHTR-BW.
 - f. All records required by 40 CFR 60.7 and 60.48c.
 - g. All calculations or documents necessary to show compliance with the limits contained in this permit.

All of the above information shall be stored in a format acceptable to the Air Quality Division and shall be consistent with the requirements of 40 CFR 60.7. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1331(1)(c), R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.7, 40 CFR Part 60 Subpart Dc)

See Appendix 7-5 BW

VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))
- 5. The permittee shall provide written notification of the date construction commences and actual startup for EUFUELHTR1-BW in accordance with 40 CFR 60.7 and 60.48c. The notification shall include the design heat input, an identification of the fuels to be combusted, and the annual capacity

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factor. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7.² (40 CFR 60.7, 40 CFR 60.48c)

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See Appendix 8-5 BW

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:

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter/Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>
<u>1. SVFUELHTR1-BW</u>	<u>30²</u>	<u>16²</u>	<u>R 336.1225, R 336.2803, R 336.2804</u>
<u>2. SVFUELHTR2-BW</u>	<u>18²</u>	<u>11²</u>	<u>R 336.1225, R 336.2803, R 336.2804</u>

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IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Dc, as they apply to EUFUELHTR1.² (40 CFR Part 60 Subparts A & Dc)

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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).

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FG-TANKS-BW
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Miscellaneous storage tanks.

Emission Unit: EU-EMFUELTANK-BW, EU-CTLUBEOILTANKS-BW, EU-STLUBEOILTANKS-BW, EU-STHYDROOILTANK-BW, EU-STSEALOILTANK-BW, EU-FUELOILTANK-BW, EU-GCLUBEOILTANKS-BW, EU-BFPOILTANKS-BW, EU-DLNNH3TANKS-BW

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POLLUTION CONTROL EQUIPMENT

Conservation vent valves for VOC control on EU-FUELOILTANK-BW.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

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IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, maintain and operate in a satisfactory manner, conservation vent valves on FG-TANKS-BW? (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, R 336.2810)

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V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

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

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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 8-5 BW

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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FG-SPACEHTRS-BW
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Natural gas-fired space heaters and air makeup units with a combined rating of 10 MMBTU/hr or less to provide building heating and ventilation.

Emission Unit: EU-SPACEHEATERS-BW

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in FG-SPACEHTRS-BW.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))

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III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

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IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The maximum combined design heat input capacity for FGS-PACEHTRS-BW shall not exceed 10 MMBTU per hour on a fuel heat input basis.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))

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V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep manufacturer documentation showing the maximum heat input for each space heater in FG-SPACEHTRS-BW.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.2803, R 336.2804, R 228.2810, 40 CFR 52.21(j))

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VII. REPORTING

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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 8-5 BW

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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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).

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FGMACT-BW(ID)
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All equipment subject to the Industrial Boiler MACT:

??? **USE NEW BOILER MACT TABLE**
???

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Emission Unit: {Enter Emission Unit names or NA}

POLLUTION CONTROL EQUIPMENT

{Enter pollution control equipment names or NA}

I. EMISSION LIMIT(S)

<u>Pollutant</u>	<u>Limit</u>	<u>Time Period/Operating Scenario</u>	<u>Equipment</u>	<u>Monitoring/ Testing Method</u>	<u>Underlying Applicable Requirements</u>

{If NA, remove table}

II. MATERIAL LIMIT(S)

<u>Material</u>	<u>Limit</u>	<u>Time Period/Operating Scenario</u>	<u>Equipment</u>	<u>Monitoring/ Testing Method</u>	<u>Underlying Applicable Requirements</u>

{If NA, remove table}

III. PROCESS/OPERATIONAL RESTRICTION(S)

IV. DESIGN/EQUIPMENT PARAMETER(S)

V. TESTING/SAMPLING

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

{UPDATE THIS TEMPLATE TO ADD THE FOLLOWING CONDITIONS FOR ROP RENEWAL WHEN STACK TESTING IS REQUIRED, IF THE LANGUAGE IS NOT ALREADY IN A PTI. IF THERE ARE NO STACK TESTING REQUIREMENTS, REMOVE THESE CONDITIONS}

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(Update or remove colored text and select the appropriate test method to use within the condition. Turn selected test method to black font.)

Single pollutant

~~The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in (TEST METHOD) (choose test method based on pollutant). An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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Multiple pollutants

~~The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:~~

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<u>Pollutant</u>	<u>Test Method Reference</u>
<u>PM</u>	<u>40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules</u>
<u>PM10/PM2.5</u>	<u>40 CFR Part 51, Appendix M</u>
<u>NOx</u>	<u>40 CFR Part 60, Appendix A</u>
<u>SO₂</u>	<u>40 CFR Part 60, Appendix A</u>
<u>CO</u>	<u>40 CFR Part 60, Appendix A</u>
<u>VOC</u>	<u>40 CFR Part 60, Appendix A</u>
<u>Metals</u>	<u>40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A</u>
<u>Sulfuric Acid Mist</u>	<u>40 CFR Part 60, Appendix A</u>
<u>Hydrogen Sulfide</u>	<u>40 CFR Part 60, Appendix A</u>
<u>Total Fluoride</u>	<u>40 CFR Part 60, Appendix A</u>
<u>Total Reduced Sulfurs</u>	<u>40 CFR Part 60, Appendix A</u>
<u>Dioxins / Furans</u>	<u>40 CFR Part 60, Appendix A</u>
<u>Hydrogen Chloride</u>	<u>40 CFR Part 60, Appendix A</u>
<u>Hydrogen Halides / Halogens</u>	<u>40 CFR Part 60, Appendix A</u>
<u>Mercury</u>	<u>40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A</u>
<u>Visible Emission</u>	<u>40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B</u>
<u>HAPs</u>	<u>40 CFR Part 63, Appendix A</u>

~~An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD~~

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~~Technical Programs Unit and District Office within 60 days following the last date of the test.
(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

Always include with any stack testing conditions

~~The permittee shall verify the (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU), at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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~~The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (R 336.1213(3))~~

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See Appendix 5

VI. MONITORING/RECORDKEEPING

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

~~**See Appendices { } (Enter 3, 4, and/or 7)**~~

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))~~

Only include if there are any stack testing conditions

~~The permittee shall submit any performance test reports (including RATA reports) to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))~~

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See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter / Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>
—			

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~~{If NA, remove sentence and table}~~

~~IX. OTHER REQUIREMENT(S)~~

—

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).~~

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FG-PROJECT-BW
FLEXIBLE GROUP CONDITIONS

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DESCRIPTION

All equipment associated with the natural gas combined cycle power plant.

Emission Unit: EU-CTGHRSG1-BW, EU-CTGHRSG2-BW, EU-AUXBOILER-BW, EU-FUELHTR1-BW, EU-FUELHTR2-BW, EU-EMENGINE-BW, EU-FPENGINE-BW, EU-CTLUBEOILTANKS-BW, EU-STLUBEOILTANKS-BW, EU-STHYDROOILTANK-BW, EU-STSEALOILTANK-BW, EU-FUELOILTANK-BW, EU-GCLUBEOILTANKS-BW, EU-BFPOILTANKS-BW, EU-EMFUELTANK-BW, EU-DLNNH3TANKS-BW, EU-SPACEHEATERS-BW, EU-COOLINGTOWER-BW, EU-COLDCLEANERS-BW.

POLLUTION CONTROL EQUIPMENT

See each emission unit.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. SO ₂	39.42 tpy ²	12 month rolling time period as determined at the end of each calendar month	FGPROJECT-BW	SC VI.1, SC VI.2, SC VI.3, SC VI.4, SC VI.5, SC VI.6	R 336.1205(a) & (b), R 336.2902(2)(d)

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II. MATERIAL LIMIT(S)

- The permittee shall only burn pipeline natural gas with a sulfur content of 0.34 grains per 100 scf or less on an annual basis in any unit which combusts natural gas in FGPROJECT-BW.² (R 336.1205(1)(a) & (b), R 336.2902(2)(d))
- The permittee shall burn only diesel fuel in FGPROJECT-BW with the maximum sulfur content of 15 ppm (0.0015 percent) by weight for any emission unit which combusts diesel fuel.² (R 336.1205(1)(a) & (b), R 336.2902(2)(d))
- The natural gas usage for FGPROJECT-BW shall not exceed 81,158 million cubic feet per year on a 12-month rolling time period basis as determined at the end of each calendar month.² (R 336.1205(1)(a) & (b), R 336.2902(2)(d))
- The diesel fuel usage for FGPROJECT-BW shall not exceed 35,731 gallons per year on a 12-month rolling time period basis as determined at the end of each calendar month.² (R 336.1205(1)(a) & (b), R 336.2902(2)(d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

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IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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V. TESTING/SAMPLING

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

1. The permittee shall monitor the sulfur content in the natural gas at a minimum of once per month. Monitoring will be done using fuel sample test data using ASTM standards, or an alternative method approved by the AQD District Supervisor. Sulfur content monitoring will be used to determine compliance with Special Conditions I.1. and II.1.² (R 336.1205(1)(a) & (b))
2. The permittee shall monitor the sulfur content in the natural gas using ASTM Standard D-6667, ASTM Standard D-4468, or one of the ASTM standards authorized by Subpart KKKK of 40 CFR Part 60.

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See Appendix 5-5 BW

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 complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (b), R 336.2902(2)(d))
2. The permittee shall keep, in a satisfactory manner, records indicating the monthly sulfur content of the natural gas to meet SC II.1 for FGPROJECT-BW on file at the facility and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.2902(2)(d))
3. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data for each delivery of diesel fuel oil combusted in FGPROJECT-BW, to meet SC II.2. The certification or test data shall include the name of the oil supplier or laboratory and the sulfur content of the fuel oil.² (R 336.1205(1)(a) & (b), R 336.2902(2)(d))
4. The permittee shall calculate and keep, in a satisfactory manner records of monthly and 12-month rolling total SO₂ mass (tons) emissions for FGPROJECT-BW. The calculations shall be performed using the most recent natural gas sulfur content sampling results as specified in FGPROJECT-BW SC V.1 using a calculation method as approved by the AQD District Supervisor. All records and calculations shall be kept on file and made available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.2902(2)(d))
5. The permittee shall monitor, record, and keep, in a satisfactory manner, the natural gas usage for FGPROJECT-BW on a monthly basis. The permittee shall calculate and keep, in a satisfactory manner, records of the cubic feet of natural gas fired in FGPROJECT-BW on a 12-month rolling basis.² (R 336.1205(1)(a) & (b), R 336.2902(2)(d))
6. The permittee shall monitor, record, and keep, in a satisfactory manner, the diesel fuel usage for FGPROJECT-BW on a monthly basis. The permittee shall calculate and keep, in a satisfactory manner, records of the gallons of diesel fuel fired in FGPROJECT-BW on a 12-month rolling basis.² (R 336.1205(1)(a) & (b), R 336.2902(2)(d))

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VII. REPORTING

- Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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))
- 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))
- The permittee shall report to AQD, the natural gas testing data and SO2 emissions calculations used for each month, including identification fo the test method(s) used. The reports shall be submitted within the semiannual compliance reports required by SC VII.2.

See Appendix 8-5 BW

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- ~~NAThe permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94, as outlined in a complete Phase II, Acid Rain Permit issued by the AQD. Phase II, Acid Rain Permit No. MI-AR-62192-2021, is hereby incorporated into this ROP as Appendix 9-5 BW. (R 336.1902(1)(g))~~
- ~~NA~~
- ~~The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to R 336.1902(1)(g) and 40 CFR 72.9(c)(1)(i). (R 336.1213(10))~~
- ~~The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NOx Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAA, and identified in Appendix 10-5-6 BW. (40 CFR Part 97, Subpart AAAAA)~~
- ~~The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NOx Ozone Season Group 2 Trading program, as specified in 40 CFR Part 97, Subpart EEEEE, and identified in Appendix 10-65 BW. (40 CFR Part 97, Subpart EEEEE)~~
- ~~The permittee shall comply with the provisions of the Cross-State Air Pollution Rule SO2 Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix 10-56 BW. (40 CFR Part 97, Subpart CCCCC)~~

Commented [LRF690]: Acid Rain & CSAPR are ONLY applicable to FG-CTGHRSG-BW and are already listed in SC IX of that FG. They should not also be listed here.
Brian – Note that you have EEEEE here and GGGGG under the FG.

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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).

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FG-MACT LG-BW
FG(ID)
FLEXIBLE GROUP CONDITIONS

Commented [LRF691]: These 2 FG-MACT's look very different than the PTI. Are the original PTI conditions allowed to be changed as such?

UARs do not reflect which conditions were added during the ROP renewal vs from the PTI.

DESCRIPTION

Requirements for a new boilers and process heater that are designed to burn gas 1 subcategory fuel with a heat input capacity of 10 MMBTU/hr or greater at major sources of HAP emissions per 40 CFR Part 63, Subpart DDDDD (Boiler MACT). Units designed to burn gas 1 subcategory fuels include boilers or process heaters that burn only natural gas, refinery gas, and/or Other Gas 1 fuels. Units that burn liquid fuel for testing or maintenance purposes for less than a total of 48 hours per year, or that burn liquid fuel during periods of curtailment or supply interruptions are included in this definition. EUAUXBOILER-BW is natural gas-fired auxiliary boiler, rated at 99.9 MMBTU/hr. equipped with low NOx burners (LNB), flue gas recirculation (FGR) and a continuous oxygen trim system. EUFUELHTR1-BW is a natural gas-fired 12.12 MMBTU/hr. heat input HP fuel heater that does not have a continuous oxygen trim system.

Emission Units: EU-AUXBOILER-BW, EU-FUELHTR1-BW.

POLLUTION CONTROL EQUIPMENT

EUAUXBOILER-BW: Low NOx burners and flue gas recirculation for NOx control.
EUFUELHTR1-BW: NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must, for EUFUELHTR1-BW, complete an initial tune-up as specified in SC III.3 by no later than 13 months after start up. **(40 CFR 63.7510(g))**
2. The permittee must complete an initial tune-up for EUAUXBOILER-BW, which has a continuous oxygen trim system as specified in SC III.3 by no later than 61 months after startup. **(40 CFR 63.7510(g))**
3. The permittee shall conduct an annual tune up of each boiler or process heater, that does not have a continuous oxygen trim system, as specified below. The annual tune-up shall be no more than 13 months after the previous tune-up. **(40 CFR 63.7500(a)(1), 40 CFR 63.7515(d), Table 3 of 40 CFR Part 63, Subpart DDDDD)**
 - a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary. The permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown. Units that produce electricity

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for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. (40 CFR 63.7540(a)(10)(i))

- b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (40 CFR 63.7540(a)(10)(ii))
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. (40 CFR 63.7540(a)(10)(iii))
 - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject. (40 CFR 63.7540(a)(10)(iv))
 - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in dry or wet percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. (40 CFR 63.7540(a)(10)(v))
4. If the unit is not operated on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup. (40 CFR 63.7540(a)(13))
 5. The permittee shall conduct a tune-up of each emission unit that has an oxygen trim system installed in FGMACT LG-BW of the burner(s) and combustion controls, as applicable, every 5 years as specified in 40 CFR 63.7540(a)(10)(i) through (vi). (40 CFR 63.7500(d), 40 CFR 63.7540(a)(12), Table 3 of 40 CFR Part 63, Subpart DDDDD)
 - a. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. (40 CFR 63.7515(d))
 - b. The permittee may delay the burner inspection until the next scheduled or unscheduled unit shutdown, but each burner must be inspected at least once every 72 months. (40 CFR 63.7540(a)(12))
 - c. If the unit is not operating on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup. (40 CFR 63.7540(a)(13))
 6. At all times, the permittee must operate and maintain each existing gas 1 boiler or process heater, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.7500(a)(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee must keep a copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or annual compliance report that the permittee submitted. **(40 CFR 63.7555(a)(1))**
2. If the permittee uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under 40 CFR Part 63, Other Gas 1 fuel, or gaseous fuel subject to another subpart of 40 CFR Part 60 or Part 61, or Part 65, the permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies. **(40 CFR 63.7555(h))**
3. The permittee shall maintain on-site and submit, if requested by the AQD, an annual tune-up report containing the information listed below.
 - a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**
 - b. A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10)(vi)(B))**
 - c. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. **(40 CFR 63.7540(a)(10)(vi)(C))**
4. The permittee's records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). **(40 CFR 63.7560(a))**
5. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.7560(b))**
6. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2-years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3-years. **(40 CFR 63.7560(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for

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Fuels Company, LLC** Expiration Date: XX
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reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30.
(R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. The permittee must submit an Initial Notification not later than 15-days after the actual date of startup of the affected source. (40 CFR 63.7545(c))
5. If the permittee intends to use a fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart of 40 CFR Part 63, Part 60, Part 61, or Part 65, or Other Gas 1 fuel to fire the affected unit during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575, the permittee must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575. The notification must include the information as listed below.
 - a. Company name and address. (40 CFR 63.7545(f)(1))
 - b. Identification of the affected unit. (40 CFR 63.7545(f)(2))
 - c. Reason the permittee is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared, or the natural gas supply interruption began. (40 CFR 63.7545(f)(3))
 - d. Type of alternative fuel that the permittee intends to use. (40 CFR 63.7545(f)(4))
 - e. Dates when the alternative fuel use is expected to begin and end. (40 CFR 63.7545(f)(5))
6. The permittee must submit boiler and process heater tune-up compliance reports to the appropriate AQD District Office. The reports must be postmarked or submitted by March 15th and must cover the period of January 1 through December 31 of the reporting year. For new units, the first report should cover the period of startup to December 31 of the reporting year. Compliance reports must also be submitted to EPA using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). (40 CFR 63.7550(b))
7. The permittee must submit a compliance report containing the following information.
 - a. Company and Facility name and address. (40 CFR 63.7550(c)(5)(i))
 - b. Process unit information, emissions limitations, and operating parameter limitations. (40 CFR 63.7550(c)(5)(ii))
 - c. Date of report and beginning and ending dates of the reporting period. (40 CFR 63.7550(c)(5)(iii))
 - d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv))
 - e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. (40 CFR 63.7550(c)(5)(xvii))
10. The permittee must submit all reports required by Table 9 of this subpart electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if

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the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, submit the report to the EPA Region V at the appropriate address listed in 40 CFR 63.13 and to the appropriate AQD District Office. (40 CFR 63.7550(h)(3))

See Appendix 8-5 BW—

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VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- The permittee shall comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters as specified in 40 CFR Part 63, Subparts A and DDDDD. **(40 CFR Part 63, Subparts A and DDDDD)**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

DESCRIPTION

{Enter description here}

Emission Unit: {Enter Emission Unit names or NA}

POLLUTION CONTROL EQUIPMENT

{Enter pollution control equipment names or NA}

I. EMISSION LIMIT(S)

<u>Pollutant</u>	<u>Limit</u>	<u>Time Period/Operating Scenario</u>	<u>Equipment</u>	<u>Monitoring/ Testing Method</u>	<u>Underlying Applicable Requirements</u>
—					

{If NA, remove table}

II. MATERIAL LIMIT(S)

<u>Material</u>	<u>Limit</u>	<u>Time Period/Operating Scenario</u>	<u>Equipment</u>	<u>Monitoring/ Testing Method</u>	<u>Underlying Applicable Requirements</u>
—					

{If NA, remove table}

III. PROCESS/OPERATIONAL RESTRICTION(S)

—

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IV. DESIGN/EQUIPMENT PARAMETER(S)

V. TESTING/SAMPLING

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

~~(UPDATE THIS TEMPLATE TO ADD THE FOLLOWING CONDITIONS FOR ROP RENEWAL WHEN STACK TESTING IS REQUIRED. IF THE LANGUAGE IS NOT ALREADY IN A PTI. IF THERE ARE NO STACK TESTING REQUIREMENTS, REMOVE THESE CONDITIONS)~~

~~(Update or remove colored text and select the appropriate test method to use within the condition. Turn selected test method to black font.)~~

Single pollutant

~~The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in (TEST METHOD) (choose test method based on pollutant). An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

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Multiple pollutants

~~The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:~~

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<u>Pollutant</u>	<u>Test Method Reference</u>
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 60, Appendix A
NOx	40 CFR Part 60, Appendix A
SO ₂	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOG	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Hydrogen Sulfide	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Total Reduced Sulfurs	40 CFR Part 60, Appendix A
Dioxins / Furans	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A

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Hydrogen Halides / Halogens	<u>40 CFR Part 60, Appendix A</u>
Mercury	<u>40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A</u>
Visible Emission HAPs	<u>40 CFR Part 61, Appendix M; 40 CFR Part 60, Appendix A and B; 40 CFR Part 63, Appendix A</u>

~~An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

Always include with any stack testing conditions

- ~~The permittee shall verify the (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU), at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~
- ~~The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (R 336.1213(3))~~

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See Appendix 5

VI. MONITORING/RECORDKEEPING

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

See Appendices { } (Enter 3, 4, and/or 7)

VII. REPORTING

- ~~Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))~~
- ~~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))~~
- ~~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))~~

Only include if there are any stack testing conditions

- ~~The permittee shall submit any performance test reports (including RATA reports) to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))~~

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See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter / Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>
—			

{If NA, remove sentence and table}

IX. OTHER REQUIREMENT(S)

—

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).

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Fuels Company, LLC** Expiration Date: XX
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FG-MACT SM-BW
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for a new boiler and process heater with a heat input capacity of <10 MMBTU/hr. for major sources of HAP emissions per 40 CFR Part 63, Subpart DDDDD (Boiler MACT). This boiler and process heater is designed to burn natural gas.

Emission Unit: EU-FUELHTR2MACT-BW This emission unit does not have a continuous oxygen trim system.

<u>Equal to or less than 5 MMBTU/hr. and only burns gaseous or light liquid fuels</u>	<u>EU-FUELHTR2-BW 2.39 MMBtu/hr. heat input, without a continuous oxygen trim system.</u>
---	---

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

4. The permittee must, for boilers or process heaters installed after June 4, 2010 with a heat input capacity of less than or equal to 5 MMBTU/hr., complete an initial tune-up as specified in SC III.3 by no later than 61 months after startup. (40 CFR 63.7510(g))
5. The permittee must, for boilers or process heaters with a heat input capacity of less than or equal to 5 MMBTU/hr., conduct a 5-year tune-up according to 40 CFR 63.7540(a)(12). Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. The burner inspection may be delayed until the next scheduled or unscheduled unit shutdown, but each burner must be inspected at least once every 72 months. (40 CFR 63.7500(d) or (e), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(12), 40 CFR Part 63, Subpart DDDDD, Table 3.1)
6. The permittee must conduct a tune-up of each boiler or process heater as specified in the following: (40 CFR 63.7540(a)(11) or (12))
 - a. As applicable, inspect the burner and clean or replace any components of the burner as necessary. The permittee may perform the burner inspection any time prior to the tune-up or may delay the burner inspection until the next scheduled unit shutdown. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. (40 CFR 63.7540(a)(10)(i))

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- b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (40 CFR 63.7540(a)(10)(ii))
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The permittee may delay the inspection until the next scheduled unit shutdown. (40 CFR 63.7540(a)(10)(iii))
 - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject. (40 CFR 63.7540(a)(10)(iv))
 - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. (40 CFR 63.7540(a)(10)(v))
4. If the unit is not operated on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup. (40 CFR 63.7540(a)(13))
 5. At all times, the permittee must operate and maintain each existing small boiler or process heater, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.7500(a)(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or 2 or 5 year compliance report or one-time energy assessment, as applicable, that the permittee submitted. (40 CFR 63.7555(a)(1))
2. The permittee must keep the records in a form suitable and readily available for expeditious review. (40 CFR 63.7560(a))
3. The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (40 CFR 63.7560(b))
4. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence.

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measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3 years. (40 CFR 63.7560(c))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(iii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. The permittee must submit boiler or process heater tune-up compliance reports to the appropriate AQD District Office and must be postmarked or submitted by March 15th of the year following the applicable 5-year period starting from January 1 of the year following the previous tune-up to December 31 (of the latest tune-up year). Compliance reports must also be submitted to EPA using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to EPA Region 5. (40 CFR 63.7550(b), 40 CFR 63.7550(h)(3))
5. The permittee must include the following information in the compliance report. (40 CFR 63.7550(c)(1))
 - a. Company and Facility name and address. (40 CFR 63.7550(c)(5)(i))
 - b. Process unit information, emissions limitations, and operating parameter limitations. (40 CFR 63.7550(c)(5)(ii))
 - c. Date of report and beginning and ending dates of the reporting period. (40 CFR 63.7550(c)(5)(iii))
 - d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done biennially or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv))
 - e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. (40 CFR 63.7550(c)(5)(xvii))

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See Appendix 8-5 BW

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and DDDDD for Industrial,

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Commercial, and Institutional Boilers and Process Heaters. (40 CFR Part 63, Subparts A and DDDDD)

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).

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FG(ID)
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

{Enter description here}

Emission Unit: {Enter Emission Unit names or NA}

POLLUTION CONTROL EQUIPMENT

{Enter pollution control equipment names or NA}

I. EMISSION LIMIT(S)

<u>Pollutant</u>	<u>Limit</u>	<u>Time Period/Operating Scenario</u>	<u>Equipment</u>	<u>Monitoring/ Testing Method</u>	<u>Underlying Applicable Requirements</u>

{If NA, remove table}

II. MATERIAL LIMIT(S)

<u>Material</u>	<u>Limit</u>	<u>Time Period/Operating Scenario</u>	<u>Equipment</u>	<u>Monitoring/ Testing Method</u>	<u>Underlying Applicable Requirements</u>

{If NA, remove table}

III. PROCESS/OPERATIONAL RESTRICTION(S)

IV. DESIGN/EQUIPMENT PARAMETER(S)

V. TESTING/SAMPLING

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

{UPDATE THIS TEMPLATE TO ADD THE FOLLOWING CONDITIONS FOR ROP RENEWAL WHEN STACK TESTING IS REQUIRED, IF THE LANGUAGE IS NOT ALREADY IN A PTI. IF THERE ARE NO STACK TESTING REQUIREMENTS, REMOVE THESE CONDITIONS}

{Update or remove colored text and select the appropriate test method to use within the condition. Turn selected test method to black font.}

Single pollutant

**Section 55 – BLUE WATER ENERGY CENTER St. Clair
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~~The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in (TEST METHOD) (choose test method based on pollutant). An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

Multiple pollutants

~~The permittee shall verify (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU) by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:~~

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A
SO ₂	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOC	40 CFR Part 60, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Sulfuric Acid Mist	40 CFR Part 60, Appendix A
Hydrogen Sulfide	40 CFR Part 60, Appendix A
Total Fluoride	40 CFR Part 60, Appendix A
Total Reduced Sulfurs	40 CFR Part 60, Appendix A
Dioxins / Furans	40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A
Hydrogen Halides / Halogens	40 CFR Part 60, Appendix A
Mercury	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A
Visible Emission	40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A and B
HAPs	40 CFR Part 63, Appendix A

~~An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

Always include with any stack testing conditions

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~~The permittee shall verify the (POLLUTANT) emission rates from (EU / FG / PORTION OF THE EU), at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)~~

~~The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (R 336.1213(3))~~

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

See Appendices { } (Enter 3, 4, and/or 7)

VII. REPORTING

~~1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(iii))~~

~~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))~~

Only include if there are any stack testing conditions

~~The permittee shall submit any performance test reports (including RATA reports) to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))~~

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

<u>Stack & Vent ID</u>	<u>Maximum Exhaust Diameter / Dimensions (inches)</u>	<u>Minimum Height Above Ground (feet)</u>	<u>Underlying Applicable Requirements</u>

~~{If NA, remove sentence and table}~~

IX. OTHER REQUIREMENT(S)

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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).

APPENDICES

Appendix 1-5 BW. 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 _{2e}	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
		SO ₂	Sulfur Dioxide
		TAC	Toxic Air Contaminant

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SCR	Selective Catalytic Reduction	Temp	Temperature
SNCR	Selective Non-Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TEQ	Toxicity Equivalence Quotient	µg	Microgram
USEPA/EPA	United States Environmental Protection Agency	µm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

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

Appendix 2-5 BW. Schedule of Compliance

Appendix 2. Schedule of Compliance

{CHOOSE ONE}

The permittee certified in this ROP application that this stationary source is in compliance with all applicable requirements of this ROP except for the following: {Enter condition number(s)}. As a result, the permittee was required to submit a Schedule of Compliance as defined in Rule 119(a), pursuant to Rule 210(2) and Rule 213(4).

A Schedule of Compliance for any applicable requirements that the permittee is not in compliance with at the time of the ROP issuance is supplemental to, and shall not sanction non-compliance with, the underlying applicable requirements on which it is based.

The permittee shall adhere to this schedule of compliance and submit the required certified progress reports accordingly.

Compliance Plan

The permittee outlined the details of achieving compliance in a narrative compliance plan. The details of the compliance plan are outlined below:

{Insert the narrative details from the Compliance Plan that was submitted}

Schedule of Compliance

The following schedule of compliance conforms with the provisions of Rule 119(a) and Rule 213(4).

Emission Unit/ Flexible Group ID and Condition No.	Applicable Requirement	Remedial Measure	Required Action	Milestone Date	Progress Reports

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Progress Reports

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The permittee shall submit Certified Progress Reports to the appropriate AQD District Supervisor using EGLE AQD Report Certification form (EQP 6736). 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. (R 336.1213(4)(b))

Progress reports shall contain the following information:

The projected dates for achieving scheduled activities, milestones or compliance as required in the schedule of compliance. (R 336.1213(4)(b)(i))

The actual dates that the activities, milestones, or compliance are achieved. (R 336.1213(4)(b)(i))

An explanation of why any dates in the Schedule of Compliance were not or will not be met. (R 336.1213(4)(b)(ii))

A description of any preventative or corrective measures adopted in order to ensure that the schedule of compliance is met. (R 336.1213(4)(b)(iii))

{OR}

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 3-5 BW. Monitoring Requirements

Appendix 3. Monitoring Requirements

{CHOOSE ONE}

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The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-CTGHRSG-BW. (Enter emission unit/flexible group).

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Continuous Emission Monitoring System (CEMS) Requirements for FG-CTGHRSG-BW

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- Within 30 calendar days after commencement of initial start-up, the permittee shall submit two copies of a Monitoring Plan to the AQD, for review and approval. The Monitoring Plan shall include drawings or specifications showing proposed locations and descriptions of the required CEMS.
- Within 150 calendar days after commencement of initial start-up, the permittee shall submit two copies of a complete test plan for the CEMS to the AQD for approval.
- Within 180 calendar days after commencement of initial start-up, the permittee shall complete the installation and testing of the CEMS.

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4. Within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating the CEMS complies with the requirements of the corresponding Performance Specifications (PS) in the following table:

<u>Pollutant</u>	<u>Applicable PS</u>
<u>NO_x</u>	<u>2</u>
<u>O₂ & CO₂</u>	<u>3</u>
<u>CO</u>	<u>4</u>

5. The span value shall be 2.0 times the lowest emission standard or as specified in the federal regulations.
6. The CEMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and the PS, listed in the table above, of Appendix B to 40 CFR Part 60.
7. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CEMS set forth in Appendix F of 40 CFR Part 60. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD in the format of the data assessment report (Figure 1, Appendix F).
8. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and summary report in an acceptable format to the AQD, within 30 days following the end of each calendar quarter. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:
- a) A report of each exceedance above the limits specified in the conditions of this permit. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b) A report of all periods of CEMS downtime and corrective action.
 - c) A report of the total operating time of EUCTGHRSG1-BW, or EUCTGHRSG2-BW during the reporting period.
 - d) A report of any periods that the CEMS exceeds the instrument range.
 - e) If no exceedances or CEMS downtime occurred during the reporting period, the permittee shall report that fact.

The permittee shall keep all monitoring data on file for a period of at least five years and make them available to the AQD upon request.~~{OR}~~

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.

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Appendix 4-5 BW. Recordkeeping

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~~The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in (Enter emission unit/flexible group). Alternative formats must be approved by the AQD District Supervisor.~~

~~{OR}~~

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 5-5 BW. Testing Procedures

~~{CHOOSE ONE}~~

~~The permittee shall use the following approved test plans, procedures, and averaging to measure the pollutant emissions for the applicable requirements referenced in (Enter emission unit/flexible group).~~

~~{OR}~~

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

~~{OR}~~

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

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Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
19-18*	NA	Installation of combustion turbines project.	FGCTGHRSG, FGPROJECT, FGFUELHTRS, FGMACT, FGTANKS, FGSPACEHTRS, FGCOOLINGTWR.
19-18B*	NA	Modify FGCOOLINGTWR (cooling tower) special conditions.	EUCOOLINGTOWER, FGCOOLINGTOWER, FGPROJECT.

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- Commented [LRF692]: FG PROJECT is not in this PTI

Appendix 7-5 BW. Emission Calculations

{CHOOSE ONE}

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in [EUAUXBOILER-BW](#), [EUENGINE-BW](#) and [EUFENGINE-BW](#). {Enter emission unit/flexible group}.

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CO₂e Emission Calculations

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For EU-AUXBOILER-BW and FG-FUELHTR-BW:

$$CO_2e \text{ emissions (tons/month)} = [(Fuel \ Usage \ (MMscf/month) \times Higher \ Heating \ Value \ (MMBTU/MMscf)) \times (CO_2 \ EF \ (kg/MMBTU) \times CO_2 \ GWP + CH_4 \ EF \ (kg/MMBTU) \times CH_4 \ GWP + N_2O \ EF \ (kg/MMBTU) \times N_2O \ GWP)] \times 2.20462 \ (lb/kg) \times 1/2000 \ (ton/lb)$$

Where:

- Fuel Usage (MMscf/month) = monthly fuel usage data from fuel flow meter
- Heat Content (MMBTU/MMscf) = standard value in AP-42 for natural gas or supplier data, if available
- CO₂ EF (kg/MMBTU) = emission factors from 40 CFR Part 98, Subpart C, Table C-1 (January 1, 2014)
- CH₄ EF (kg/MMBTU) = emission factors from 40 CFR Part 98, Subpart C, Table C-2 (January 1, 2014)
- N₂O EF (kg/MMBTU) = emission factors from 40 CFR Part 98, Subpart C, Table C-2 (January 1, 2014)
- CO₂ GWP = global warming potential from 40 CFR Part 98, Subpart A, Table A-1 (January 1, 2014)
- CH₄ GWP = global warming potential from 40 CFR Part 98, Subpart A, Table A-1 (January 1, 2014)
- N₂O GWP = global warming potential from 40 CFR Part 98, Subpart A, Table A-1 (January 1, 2014)

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For EU-EMENGINE-BW and EU-FPENGINE-BW:

$$\text{CO}_2\text{e emissions (tons/month)} = [(\text{Fuel Usage (gallons/month)} \times \text{Higher Heating Value (MMBTU/gallons)}) \times (\text{CO}_2 \text{ EF (kg/MMBTU)} \times \text{CO}_2 \text{ GWP} + \text{CH}_4 \text{ EF (kg/MMBTU)} \times \text{CH}_4 \text{ GWP} + \text{N}_2\text{O EF (kg/MMBTU)} \times \text{N}_2\text{O GWP})] \times 1/2000 \text{ (ton/lb)}$$

Where:

- Fuel Usage (gallons/month) = monthly fuel usage data
- Heat Content (MMBTU/gallons) = standard value in AP-42 for diesel fuel or supplier data, if available
- CO₂ EF (kg/MMBTU) = emission factors from 40 CFR Part 98, Subpart C, Table C-1 (January 1, 2014)
- CH₄ EF (kg/MMBTU) = emission factors from 40 CFR Part 98, Subpart C, Table C-2 (January 1, 2014)
- N₂O EF (kg/MMBTU) = emission factors from 40 CFR Part 98, Subpart C, Table C-2 (January 1, 2014)
- CO₂ GWP = global warming potential from 40 CFR Part 98, Subpart A, Table A-1 (January 1, 2014)
- CH₄ GWP = global warming potential from 40 CFR Part 98, Subpart A, Table A-1 (January 1, 2014)
- N₂O GWP = global warming potential from 40 CFR Part 98, Subpart A, Table A-1 (January 1, 2014)

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For EU-CTGHRSG1-BW and EU-CTGHRSG2-BW:

If not utilizing a CO₂ CEMS:

$$\text{CO}_2 \text{ emissions (tons/month)} = \text{CO}_2 \text{ EF (scf/MMBTU)} \times \text{Fuel Usage (MMscf/month)} \times \text{Higher Heating Value (MMBTU/MMscf)} \times \text{CO}_2 \text{ MW (lb/lb-mol)} \times \text{CO}_2 \text{ GWP / molar volume (scf/lb-mol)} \times 1/2000 \text{ (ton/lb)}$$

Where:

- CO₂ EF (scf/MMBTU) = carbon based F-factor for natural gas according to the methodology from equation G-4 of Appendix G to Part 75
- Fuel Usage (MMscf/month) = monthly fuel usage data from fuel flow meter
- Heat Content (MMBTU/MMscf) = standard value in AP-42 for natural gas or supplier data, if available
- CO₂ MW (lb/lb-mol) = 44 [C = 6; O = 8; 6 + (8 x 2) = 22]
- CO₂ GWP = global warming potential from 40 CFR Part 98, Subpart A, Table A-1 (January 1, 2014)
- Molar volume (scf/lb-mol) = 385

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$$\text{CO}_2\text{e emissions (tons/month)} = \text{CO}_2 \text{ emissions (tons/month)} + [(\text{Fuel Usage (MMscf/month)} \times \text{Higher Heating Value (MMBTU/MMscf)}) \times (\text{CH}_4 \text{ EF (kg/MMBTU)} \times \text{CH}_4 \text{ GWP} + \text{N}_2\text{O EF (kg/MMBTU)} \times \text{N}_2\text{O GWP})] \times 2.20462 \text{ (lb/kg)} \times 1/2000 \text{ (ton/lb)}$$

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Where:

Fuel Usage (MMscf/month) = monthly fuel usage data from fuel flow meter

Heat Content (MMBTU/MMscf) = standard value in AP-42 for natural gas or supplier data, if available

CH₄ EF (kg/MMBTU) = emission factors from 40 CFR Part 98, Subpart C, Table C-2 (January 1, 2014)

N₂O EF (kg/MMBTU) = emission factors from 40 CFR Part 98, Subpart C, Table C-2 (January 1, 2014)

CH₄ GWP = global warming potential from 40 CFR Part 98, Subpart A, Table A-1 (January 1, 2014)

N₂O GWP = global warming potential from 40 CFR Part 98, Subpart A, Table A-1 (January 1, 2014)

{OR}

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

{OR}

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

Appendix 8-5 BW. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

{CHOOSE ONE}

The permittee shall use 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.

{OR}

~~The permittee shall use the attached approved format 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

{CHOOSE ONE}

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~~The permittee shall use the following approved formats and procedures for the reporting requirements referenced in (Enter emission unit/flexible group). Alternative formats must be approved by the AQD District Supervisor.~~

~~{OR}~~

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.

Appendix 9-5 BW. Sulfur Dioxide Emissions Calculations

The permittee shall use the following equation to calculate SO2 emissions for FGPROJECT:

$$(m_{SO2})_i = (V_{NG})_i \times (C_S)_i \times \frac{MW_{SO2}}{MW_S}$$

$$(m_{SO2})_T = \sum_{i=1}^{i=12} (m_{SO2})_i$$

Where:

i = calendar month "i"

(m_{SO2})_i = mass of sulfur dioxide in calendar month "i"

(V_{NG})_i = volume of natural gas used in calendar month "i"

(C_S) = concentration of sulfur in natural gas (per testing at a minimum of once per month)

MW_{SO2} = molecular weight of sulfur dioxide

MW_S = molecular weight of sulfur

(m_{SO2})_T = mass of sulfur dioxide for the calendar year

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Appendix 9-65 BW. Phase Two Acid Rain Permit

PHASE II ACID RAIN PERMIT
Permit No. MI-AR-62192-2021XX

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<u>Permittee</u>	<u>DTE Electric: Blue Water Energy Center</u>
<u>Address</u>	<u>4505 King Road, China Township, MI</u>
<u>SRN</u>	<u>B2796</u>
<u>Plant Code</u>	<u>62192</u>
<u>Issue Date</u>	DRAFT
<u>Effective</u>	<u>Issuance date of this facility's Renewable Operating Permit at the facility in accordance with 40 CFR 72.73.</u>
<u>Expiration</u>	<u>This permit shall expire when the facility's Renewable Operating Permit expires, in accordance with 40 CFR 72.73.</u>
<u>ROP No.</u>	MI-ROP-B2796-20XX

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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 federal Clean Air Act, new units are not allocated allowances in 40 CFR Part 73 and must obtain allowances by other means (Section 403(e) of the federal 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 federal 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.

Company, LLC
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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 federal Clean Air Act, the Michigan Department of Environment, Great Lakes, and Energy, 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:

_____ Mr. Brian Carley
_____ Environmental Quality Specialist
_____ Michigan Department of Environment, Great Lakes, and Energy
_____ Air Quality Division, Jackson District Office
_____ State Office Building, 4th Floor
_____ 301 East Louis B. Glick Highway
_____ Jackson, Michigan 49201-1556
_____ Telephone: 517-416-4631
_____ Facsimile: 517-780-7855

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

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Terms and Conditions:

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

		20XX	20XX	20XX	20XX	20XX
Unit EUCTG HRSG1	SO ₂ allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				

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		20XX	20XX	20XX	20XX	20XX
Unit EUCTG HRSG2	SO ₂ allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				

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Comments, notes and justifications regarding permit decisions, and changes made to the permit application forms during the review process:

Permit Application: (attached)

Acid Rain Permit Application submitted July 30, 2019

DTE ELECTRIC: BLUE WATER ENERGY CENTER (62192)
Facility (Source) Name (from STEP 1)

Acid Rain - Page 2

STEP 3

Permit Requirements

Read the standard requirements.

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

Monitoring Requirements

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

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

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Facility (Source) Name (from STEP 1)

Acid Rain - Page 3

STEP 3, Cont'd.

Excess Emissions Requirements

- (1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority.
 - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

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

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STEP 3, Cont'd.

Effect on Other Authorities

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

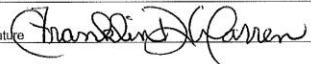
- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a source can hold; provided, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

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.

Franklin D. Warren, Senior Vice President - Fossil Generation, DTE Electric	
Name	
Signature 	Date 2-29-2019

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Appendix 10-65 BW: Cross State Air Pollution Rule (CSAPR) Trading Program Title V Requirements

Description of CSAPR Monitoring Provisions

The CSAPR subject units, and the unit-specific monitoring provisions, at this source are identified in the following tables. These units are subject to the requirements for the CSAPR NO_x Annual Trading Program, CSAPR NO_x Ozone Season Group 3 Trading Program, and CSAPR SO₂ Group 1 Trading Program, which are included below as Sections I, II, and III, respectively.

Each unit will use one of the following as the monitoring methodology for each parameter as provided below and shall comply with the general monitoring, recordkeeping, reporting and other requirements in conditions 1 through 5 below and in paragraph (b) of Sections I, II, and III:

- [Continuous emission monitoring system or systems \(CEMS\) requirements pursuant to 40 CFR Part 75, Subpart B \(for SO₂ monitoring\) or 40 CFR Part 75, Subpart H \(for NO_x monitoring\)](#)
- [Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D](#)
- [Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E](#)
- [Low Mass Emissions excepted monitoring \(LME\) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19](#)
- [EPA-approved alternative monitoring system requirements pursuant to 40 CFR Part 75, Subpart E](#)

Unit ID: EUCTGHRSG1-BW	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D

Unit ID: EUCTGHRSG2-BW	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D

1. [The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 \(CSAPR NO_x Annual Trading Program\), 97.1030 through 97.1035 \(CSAPR NO_x Ozone Season Group 3 Trading Program\), and 97.630 through 97.635 \(CSAPR SO₂ Group 1 Trading Program\). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable CSAPR trading programs.](#)
2. [Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <https://www.epa.gov/airmarkets/monitoring-plans-part-75-sources>.](#)
3. [Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR Part 75, Subpart E and 40 CFR 75.66 and 97.435 \(CSAPR NO_x Annual Trading Program\), 97.1035 \(CSAPR NO_x Ozone Season Group 3 Trading Program\), and/or 97.635 \(CSAPR SO₂ Group 1 Trading Program\). The Administrator's](#)

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response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.

4. Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (CSAPR NO_x Annual Trading Program), 97.1030 through 97.1034 (CSAPR NO_x Ozone Season Group 3 Trading Program), and/or 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (CSAPR NO_x Annual Trading Program), 97.1035 (CSAPR NO_x Ozone Season Group 3 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.

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5. The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (CSAPR NO_x Annual Trading Program), 97.1030 through 97.1034 (CSAPR NO_x Ozone Season Group 3 Trading Program), and 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.

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SECTION I: CSAPR NO_x Annual Trading Program requirements (40 CFR 97.406)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

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(b) Emissions monitoring, reporting, and recordkeeping requirements.

(1) The owners and operators, and the designated representative, of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

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(2) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of CSAPR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the CSAPR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

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(c) NO_x emissions requirements.

(1) CSAPR NO_x Annual emissions limitation.

(i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall hold, in the source's compliance account, CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Annual units at the source.

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(ii). If total NO_x emissions during a control period in a given year from the CSAPR NO_x Annual units at a CSAPR NO_x Annual source are in excess of the CSAPR NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:

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(A). The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall hold the CSAPR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and

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(B). The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.

(2) CSAPR NO_x Annual assurance provisions.

(i). If total NO_x emissions during a control period in a given year from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.

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(ii). The owners and operators shall hold the CSAPR NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.

(iii). Total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).

(iv). It shall not be a violation of 40 CFR Part 97, Subpart AAAAA or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.

(v). To the extent the owners and operators fail to hold CSAPR NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,

(A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

(B). Each CSAPR NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.

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(3) Compliance periods.

(i). A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.

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- (ii). A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
 - (i). A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each CSAPR NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart AAAAA.
- (6) Limited authorization. A CSAPR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the CSAPR NO_x Annual Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR Part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A CSAPR NO_x Annual allowance does not constitute a property right.
- (d) Title V permit revision requirements.**
 - (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Annual allowances in accordance with 40 CFR Part 97, Subpart AAAAA.
 - (2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).
- (e) Additional recordkeeping and reporting requirements.**
 - (1) Unless otherwise provided, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i). The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each CSAPR NO_x Annual unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart AAAAA.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Annual Trading Program.
 - (2) The designated representative of a CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall make all submissions required under the CSAPR NO_x Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or

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otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

(f) Liability.

- (1) Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual source or the designated representative of a CSAPR NO_x Annual source shall also apply to the owners and operators of such source and of the CSAPR NO_x Annual units at the source.
- (2) Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual unit or the designated representative of a CSAPR NO_x Annual unit shall also apply to the owners and operators of such unit.

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(g) Effect on other authorities.

No provision of the CSAPR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Annual source or CSAPR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

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(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

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SECTION II: CSAPR NO_x Ozone Season Group 3 Trading Program Requirements (40 CFR 97.1006)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.1013 through 97.1018.

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(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.1030 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.1031 (initial monitoring system certification and recertification procedures), 97.1032 (monitoring system out-of-control periods), 97.1033 (notifications concerning monitoring), 97.1034 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.1035 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.1030 through 97.1035 shall be used to calculate allocations of CSAPR NO_x Ozone Season Group 3 allowances under 40 CFR 97.1011(a)(2) and (b) and 97.1012 and to determine compliance with the CSAPR NO_x Ozone Season Group 3 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.1030 through 97.1035 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

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(c) NO_x emissions requirements.

- (1) CSAPR NO_x Ozone Season Group 3 emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall hold, in the source's compliance account, CSAPR NO_x Ozone Season Group 3 allowances available for deduction for such control period under 40 CFR 97.1024(a) in an

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amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Ozone Season Group 3 units at the source.

- (ii). If total NO_x emissions during a control period in a given year from the CSAPR NO_x Ozone Season Group 3 units at a CSAPR NO_x Ozone Season Group 3 source are in excess of the CSAPR NO_x Ozone Season Group 3 emissions limitation set forth in paragraph (c)(1)(i) above, then:

- (A). The owners and operators of the source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall hold the CSAPR NO_x Ozone Season Group 3 allowances required for deduction under 40 CFR 97.1024(d); and

- (B). The owners and operators of the source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart GGGGG and the Clean Air Act.

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(2) CSAPR NO_x Ozone Season Group 3 assurance provisions.

- (i). If total NO_x emissions during a control period in a given year from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Ozone Season Group 3 allowances available for deduction for such control period under 40 CFR 97.1025(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.1025(b), of multiplying—

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- (A). The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and

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- (B). The amount by which total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.

- (ii). The owners and operators shall hold the CSAPR NO_x Ozone Season Group 3 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.

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- (iii). Total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season Group 3 trading budget under 40 CFR 97.1010(a) and the state's variability limit under 40 CFR 97.1010(b).

- (iv). It shall not be a violation of 40 CFR Part 97, Subpart GGGGG or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Ozone Season Group 3 units at CSAPR NO_x Ozone Season Group 3 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.

- (v). To the extent the owners and operators fail to hold CSAPR NO_x Ozone Season Group 3 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,

- (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

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(B). Each CSAPR NO_x Ozone Season Group 3 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart GGGGG and the Clean Air Act.

(3) Compliance periods.

- (i). A CSAPR NO_x Ozone Season Group 3 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.1030(b) and for each control period thereafter.
- (ii). A CSAPR NO_x Ozone Season Group 3 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.1030(b) and for each control period thereafter.

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(4) Vintage of allowances held for compliance.

- (i). A CSAPR NO_x Ozone Season Group 3 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 3 allowance that was allocated for such control period or a control period in a prior year.
- (ii). A CSAPR NO_x Ozone Season Group 3 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 3 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

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(5) Allowance Management System requirements. Each CSAPR NO_x Ozone Season Group 3 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart GGGGG.

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(6) Limited authorization. A CSAPR NO_x Ozone Season Group 3 allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:

- (i). Such authorization shall only be used in accordance with the CSAPR NO_x Ozone Season Group 3 Trading Program; and
- (ii). Notwithstanding any other provision of 40 CFR Part 97, Subpart GGGGG, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

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(7) Property right. A CSAPR NO_x Ozone Season Group 3 allowance does not constitute a property right.

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(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Ozone Season Group 3 allowances in accordance with 40 CFR Part 97, Subpart GGGGG.
- (2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.1030 through 97.1035, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.1006(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

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(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i). The certificate of representation under 40 CFR 97.1016 for the designated representative for the source and each CSAPR NO_x Ozone Season Group 3 unit at the source and all documents that

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demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.1016 changing the designated representative.

- (ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart GGGGG.
- (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Ozone Season Group 3 Trading Program.

(2) The designated representative of a CSAPR NO_x Ozone Season Group 3 source and each CSAPR NO_x Ozone Season Group 3 unit at the source shall make all submissions required under the CSAPR NO_x Ozone Season Group 3 Trading Program, except as provided in 40 CFR 97.1018. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

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(f) Liability.

(1) Any provision of the CSAPR NO_x Ozone Season Group 3 Trading Program that applies to a CSAPR NO_x Ozone Season Group 3 source or the designated representative of a CSAPR NO_x Ozone Season Group 3 source shall also apply to the owners and operators of such source and of the CSAPR NO_x Ozone Season Group 3 units at the source.

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(2) Any provision of the CSAPR NO_x Ozone Season Group 3 Trading Program that applies to a CSAPR NO_x Ozone Season Group 3 unit or the designated representative of a CSAPR NO_x Ozone Season Group 3 unit shall also apply to the owners and operators of such unit.

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(g) Effect on other authorities.

No provision of the CSAPR NO_x Ozone Season Group 3 Trading Program or exemption under 40 CFR 97.1005 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Ozone Season Group 3 source or CSAPR NO_x Ozone Season Group 3 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

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(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

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SECTION III: CSAPR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

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(b) Emissions monitoring, reporting, and recordkeeping requirements.

(1) The owners and operators, and the designated representative, of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

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(2) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of CSAPR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the CSAPR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining

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such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) SO₂ emissions requirements.

(1) CSAPR SO₂ Group 1 emissions limitation.

- (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all CSAPR SO₂ Group 1 units at the source.
- (ii). If total SO₂ emissions during a control period in a given year from the CSAPR SO₂ Group 1 units at a CSAPR SO₂ Group 1 source are in excess of the CSAPR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall hold the CSAPR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and
 - (B). The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.

(2) CSAPR SO₂ Group 1 assurance provisions.

- (i). If total SO₂ emissions during a control period in a given year from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and
 - (B). The amount by which total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
- (ii). The owners and operators shall hold the CSAPR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
- (iv). It shall not be a violation of 40 CFR Part 97, Subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the CSAPR SO₂ Group

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1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.

(v). To the extent the owners and operators fail to hold CSAPR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,

(A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

(B). Each CSAPR SO₂ Group 1 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.

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(3) Compliance periods.

(i). A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.

(ii). A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.

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(4) Vintage of allowances held for compliance.

(i). A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.

(ii). A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

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(5) Allowance Management System requirements. Each CSAPR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart CCCCC.

(6) Limited authorization. A CSAPR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:

(i). Such authorization shall only be used in accordance with the CSAPR SO₂ Group 1 Trading Program; and

(ii). Notwithstanding any other provision of 40 CFR Part 97, Subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

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(7) Property right. A CSAPR SO₂ Group 1 allowance does not constitute a property right.

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(d) Title V permit revision requirements.

(1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR SO₂ Group 1 allowances in accordance with 40 CFR Part 97, Subpart CCCCC.

(2) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

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(e) Additional recordkeeping and reporting requirements.

(1) Unless otherwise provided, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.

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- (i). The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each CSAPR SO₂ Group 1 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.
- (ii). All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart CCCCC.
- (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR SO₂ Group 1 Trading Program.
- (2) The designated representative of a CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall make all submissions required under the CSAPR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.

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(f) Liability.

- (1) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 source or the designated representative of a CSAPR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the CSAPR SO₂ Group 1 units at the source.
- (2) Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 unit or the designated representative of a CSAPR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.

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(g) Effect on other authorities.

No provision of the CSAPR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR SO₂ Group 1 source or CSAPR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

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(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state. The CSAPR subject units, and the unit-specific monitoring provisions, at this source are identified in the following tables. These units are subject to the requirements for the CSAPR NO_x Annual Trading Program, CSAPR NO_x Ozone Season Group 2 Trading Program, and CSAPR SO₂ Group 1 Trading Program, which are included below as Sections I, II, and III, respectively.

Each unit will use one of the following as the monitoring methodology for each parameter as provided below and shall comply with the general monitoring, recordkeeping, reporting and other requirements in conditions 1 through 5 below and in paragraph (b) of Sections I, II, and III:

- Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart B (for SO₂ monitoring) or 40 CFR Part 75, Subpart H (for NO_x monitoring)
- Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
- Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR Part 75, Appendix E
- Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19
- EPA-approved alternative monitoring system requirements pursuant to 40 CFR Part 75, Subpart E

Unit ID: EUCTGHRSG1	
Parameter:	Monitoring Methodology

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SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D

Unit ID: EUCTGHRSG2	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D
NO _x	CEMS requirements pursuant to 40 CFR Part 75, Subpart H
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D

~~The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (CSAPR NO_x Annual Trading Program), 97.830 through 97.835 (CSAPR NO_x Ozone Season Group 2 Trading Program), and 97.630 through 97.635 (CSAPR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable CSAPR trading programs.~~

~~Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <https://www.epa.gov/airmarkets/clean-air-markets-monitoring-plans-part-75-sources>.~~

~~Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR Part 75, Subpart E and 40 CFR 75.66 and 97.435 (CSAPR NO_x Annual Trading Program), 97.835 (CSAPR NO_x Ozone Season Group 2 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.~~

~~Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (CSAPR NO_x Annual Trading Program), 97.830 through 97.834 (CSAPR NO_x Ozone Season Group 2 Trading Program), and/or 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (CSAPR NO_x Annual Trading Program), 97.835 (CSAPR NO_x Ozone Season Group 2 Trading Program), and/or 97.635 (CSAPR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.~~

~~The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (CSAPR NO_x Annual Trading Program), 97.830 through 97.834 (CSAPR NO_x Ozone Season Group 2 Trading Program), and 97.630 through 97.634 (CSAPR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.~~

SECTION I: CSAPR NO_x Annual Trading Program requirements (40 CFR 97.406)

~~**Designated representative requirements.**~~

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The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

Emissions monitoring, reporting, and recordkeeping requirements.

The owners and operators, and the designated representative, of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of CSAPR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the CSAPR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

NO_x emissions requirements.

CSAPR NO_x Annual emissions limitation.

As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall hold, in the source's compliance account, CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Annual units at the source.

If total NO_x emissions during a control period in a given year from the CSAPR NO_x Annual units at a CSAPR NO_x Annual source are in excess of the CSAPR NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:

The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall hold the CSAPR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and

The owners and operators of the source and each CSAPR NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.

CSAPR NO_x Annual assurance provisions.

If total NO_x emissions during a control period in a given year from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The

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~~quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.~~

~~The owners and operators shall hold the CSAPR NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.~~

~~Total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).~~

~~It shall not be a violation of 40 CFR Part 97, Subpart AAAAA or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Annual units at CSAPR NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.~~

~~To the extent the owners and operators fail to hold CSAPR NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,~~

~~— The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and~~

~~— Each CSAPR NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart AAAAA and the Clean Air Act.~~

~~Compliance periods.~~

~~A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.~~

~~A CSAPR NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.~~

~~Vintage of allowances held for compliance.~~

~~A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for such control period or a control period in a prior year.~~

~~A CSAPR NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.~~

~~Allowance Management System requirements. Each CSAPR NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart AAAAA.~~

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- ~~Limited authorization. A CSAPR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:~~
- ~~Such authorization shall only be used in accordance with the CSAPR NO_x Annual Trading Program, and~~
- ~~Notwithstanding any other provision of 40 CFR Part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.~~
- ~~Property right. A CSAPR NO_x Annual allowance does not constitute a property right.~~

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Title V permit revision requirements.

- ~~No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Annual allowances in accordance with 40 CFR Part 97, Subpart AAAAA.~~
- ~~This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).~~

Additional recordkeeping and reporting requirements.

- ~~Unless otherwise provided, the owners and operators of each CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.~~
 - ~~The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each CSAPR NO_x Annual unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.~~
 - ~~All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart AAAAA.~~
 - ~~Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Annual Trading Program.~~
- ~~The designated representative of a CSAPR NO_x Annual source and each CSAPR NO_x Annual unit at the source shall make all submissions required under the CSAPR NO_x Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.~~

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Liability.

- ~~Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual source or the designated representative of a CSAPR NO_x Annual source shall also apply to the owners and operators of such source and of the CSAPR NO_x Annual units at the source.~~
- ~~Any provision of the CSAPR NO_x Annual Trading Program that applies to a CSAPR NO_x Annual unit or the designated representative of a CSAPR NO_x Annual unit shall also apply to the owners and operators of such unit.~~

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Effect on other authorities.

~~No provision of the CSAPR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Annual source or CSAPR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.~~

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Effect on units in Indian country.

~~Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.~~

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SECTION II: CSAPR NO_x Ozone Season Group 2 Trading Program Requirements (40 CFR 97.806)

Designated representative requirements.

~~The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.813 through 97.818.~~

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Emissions monitoring, reporting, and recordkeeping requirements.

~~The owners and operators, and the designated representative, of each CSAPR NO_x Ozone Season Group 2 source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.830 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.831 (initial monitoring system certification and recertification procedures), 97.832 (monitoring system out-of-control periods), 97.833 (notifications concerning monitoring), 97.834 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.835 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).~~

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~~The emissions data determined in accordance with 40 CFR 97.830 through 97.835 shall be used to calculate allocations of CSAPR NO_x Ozone Season Group 2 allowances under 40 CFR 97.811(a)(2) and (b) and 97.812 and to determine compliance with the CSAPR NO_x Ozone Season Group 2 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.830 through 97.835 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.~~

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NO_x emissions requirements.

CSAPR NO_x Ozone Season Group 2 emissions limitation.

~~As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Ozone Season Group 2 source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall hold, in the source's compliance account, CSAPR NO_x Ozone Season Group 2 allowances available for deduction for such control period under 40 CFR 97.824(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Ozone Season Group 2 units at the source.~~

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~~If total NO_x emissions during a control period in a given year from the CSAPR NO_x Ozone Season Group 2 units at a CSAPR NO_x Ozone Season Group 2 source are in excess of the CSAPR NO_x Ozone Season Group 2 emissions limitation set forth in paragraph (c)(1)(i) above, then:~~

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~~The owners and operators of the source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall hold the CSAPR NO_x Ozone Season Group 2 allowances required for deduction under 40 CFR 97.824(d); and~~

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- ~~— The owners and operators of the source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart EEEEE and the Clean Air Act.~~
- ~~— CSAPR NO_x Ozone Season Group 2 assurance provisions:~~
 - ~~— If total NO_x emissions during a control period in a given year from all CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Ozone Season Group 2 allowances available for deduction for such control period under 40 CFR 97.825(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.825(b), of multiplying—~~
 - ~~— The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and~~
 - ~~— The amount by which total NO_x emissions from all CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.~~
 - ~~— The owners and operators shall hold the CSAPR NO_x Ozone Season Group 2 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.~~
 - ~~— Total NO_x emissions from all CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season Group 2 trading budget under 40 CFR 97.810(a) and the state's variability limit under 40 CFR 97.810(b).~~
 - ~~— It shall not be a violation of 40 CFR Part 97, Subpart EEEEE or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Ozone Season Group 2 units at CSAPR NO_x Ozone Season Group 2 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.~~
 - ~~— To the extent the owners and operators fail to hold CSAPR NO_x Ozone Season Group 2 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,~~
 - ~~— The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and~~
 - ~~— Each CSAPR NO_x Ozone Season Group 2 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day~~

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~~of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart EEEEE and the Clean Air Act.~~

~~**Compliance periods:**~~

~~A CSAPR NO_x Ozone Season Group 2 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.830(b) and for each control period thereafter.~~

~~A CSAPR NO_x Ozone Season Group 2 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.830(b) and for each control period thereafter.~~

~~**Vintage of allowances held for compliance:**~~

~~A CSAPR NO_x Ozone Season Group 2 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 2 allowance that was allocated for such control period or a control period in a prior year.~~

~~A CSAPR NO_x Ozone Season Group 2 allowance held for compliance with the requirements under paragraphs (c)(1)(iii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Ozone Season Group 2 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.~~

~~Allowance Management System requirements. Each CSAPR NO_x Ozone Season Group 2 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart EEEEE.~~

~~Limited authorization. A CSAPR NO_x Ozone Season Group 2 allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:~~

~~Such authorization shall only be used in accordance with the CSAPR NO_x Ozone Season Group 2 Trading Program; and~~

~~Notwithstanding any other provision of 40 CFR Part 97, Subpart EEEEE, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.~~

~~Property right. A CSAPR NO_x Ozone Season Group 2 allowance does not constitute a property right.~~

~~**Title V permit revision requirements.**~~

~~No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Ozone Season Group 2 allowances in accordance with 40 CFR Part 97, Subpart EEEEE.~~

~~This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.830 through 97.835, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.806(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).~~

~~**Additional recordkeeping and reporting requirements.**~~

~~Unless otherwise provided, the owners and operators of each CSAPR NO_x Ozone Season Group 2 source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.~~

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~~The certificate of representation under 40 CFR 97.816 for the designated representative for the source and each CSAPR NO_x Ozone Season Group 2 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.816 changing the designated representative.~~

~~All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart EEEEE.~~

~~Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Ozone Season Group 2 Trading Program.~~

~~The designated representative of a CSAPR NO_x Ozone Season Group 2 source and each CSAPR NO_x Ozone Season Group 2 unit at the source shall make all submissions required under the CSAPR NO_x Ozone Season Group 2 Trading Program, except as provided in 40 CFR 97.818. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.~~

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Liability:

~~Any provision of the CSAPR NO_x Ozone Season Group 2 Trading Program that applies to a CSAPR NO_x Ozone Season Group 2 source or the designated representative of a CSAPR NO_x Ozone Season Group 2 source shall also apply to the owners and operators of such source and of the CSAPR NO_x Ozone Season Group 2 units at the source.~~

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~~Any provision of the CSAPR NO_x Ozone Season Group 2 Trading Program that applies to a CSAPR NO_x Ozone Season Group 2 unit or the designated representative of a CSAPR NO_x Ozone Season Group 2 unit shall also apply to the owners and operators of such unit.~~

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Effect on other authorities:

~~No provision of the CSAPR NO_x Ozone Season Group 2 Trading Program or exemption under 40 CFR 97.805 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR NO_x Ozone Season Group 2 source or CSAPR NO_x Ozone Season Group 2 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.~~

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Effect on units in Indian country:

~~Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.~~

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SECTION III: CSAPR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

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Emissions monitoring, reporting, and recordkeeping requirements.

The owners and operators, and the designated representative, of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

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The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of CSAPR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the CSAPR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

SO₂ emissions requirements.

CSAPR SO₂ Group 1 emissions limitation.

As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all CSAPR SO₂ Group 1 units at the source.

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If total SO₂ emissions during a control period in a given year from the CSAPR SO₂ Group 1 units at a CSAPR SO₂ Group 1 source are in excess of the CSAPR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:

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The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall hold the CSAPR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and

The owners and operators of the source and each CSAPR SO₂ Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR Part 97, Subpart CCCC and the Clean Air Act.

CSAPR SO₂ Group 1 assurance provisions.

If total SO₂ emissions during a control period in a given year from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control

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~~period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—~~

~~— The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and~~

~~— The amount by which total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.~~

~~— The owners and operators shall hold the CSAPR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.~~

~~— Total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).~~

~~— It shall not be a violation of 40 CFR Part 97, Subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the CSAPR SO₂ Group 1 units at CSAPR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.~~

~~— To the extent the owners and operators fail to hold CSAPR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,~~

~~— The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and~~

~~— Each CSAPR SO₂ Group 1 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR Part 97, Subpart CCCCC and the Clean Air Act.~~

~~— Compliance periods.~~

~~— A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.~~

~~— A CSAPR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.~~

~~— Vintage of allowances held for compliance.~~

~~— A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a CSAPR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.~~

~~— A CSAPR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR SO₂~~

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~~Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.~~

~~Allowance Management System requirements. Each CSAPR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR Part 97, Subpart CCCCC.~~

~~Limited authorization. A CSAPR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:~~

~~Such authorization shall only be used in accordance with the CSAPR SO₂ Group 1 Trading Program; and~~

~~Notwithstanding any other provision of 40 CFR Part 97, Subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.~~

~~Property right. A CSAPR SO₂ Group 1 allowance does not constitute a property right.~~

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Title V permit revision requirements.

- ~~No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR SO₂ Group 1 allowances in accordance with 40 CFR Part 97, Subpart CCCCC.~~
- ~~This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR Part 75, Subparts B and H), an excepted monitoring system (pursuant to 40 CFR Part 75, Appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR Part 75, Subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).~~

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Additional recordkeeping and reporting requirements.

- ~~Unless otherwise provided, the owners and operators of each CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.~~
 - ~~The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each CSAPR SO₂ Group 1 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.~~
 - ~~All emissions monitoring information, in accordance with 40 CFR Part 97, Subpart CCCCC.~~
 - ~~Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR SO₂ Group 1 Trading Program.~~
- ~~The designated representative of a CSAPR SO₂ Group 1 source and each CSAPR SO₂ Group 1 unit at the source shall make all submissions required under the CSAPR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR Parts 70 and 71.~~

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Liability.

- ~~Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 source or the designated representative of a CSAPR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the CSAPR SO₂ Group 1 units at the source.~~
- ~~Any provision of the CSAPR SO₂ Group 1 Trading Program that applies to a CSAPR SO₂ Group 1 unit or the designated representative of a CSAPR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.~~

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Effect on other authorities.

~~No provision of the CSAPR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a CSAPR SO₂ Group 1 source or CSAPR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.~~

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(h) Effect on units in Indian country.

ROP No: MI-ROP-B2796-20XX

Company, LLC
B2796-20XX

Section ~~55~~ -- BLUE WATER ENERGY CENTER ~~St. Clair Fuels~~

Expiration Date: XXXXX

PTI No: MI-PTI-

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.