



December 12, 2022

Ms. Kelly Orent
EGLE - AQD
Grand Rapids District Office
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503

Subject: SRN #B2796 ROP Minor Modification
Rule 216(2) Minor Modification
DTE Electric Company – St. Clair Power Plant
Section 1 of MI-ROP-B2796-2015c
Retirement of EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, and EU-BOILER7-SC

Dear Ms. Orent,

DTE Electric Company hereby submits a ROP minor modification application under Rule 216(2) to ROP MI-ROP-B2796-2015c for St. Clair Power Plant located at 4901 Pointe Drive in East China, Michigan in St. Clair County. Enclosed are the M-001 and C-001 forms, as required. This minor modification change only affects Section 1 of the ROP.

EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, and EU-BOILER7-SC were retired effective May 31, 2022. Therefore, the following sections are now obsolete in the working draft ROP: EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, EU-BOILER7-SC, FG-BLR_GEN-SC, FG-BLR2-3-SC, FG-ASH_HAND-SC, FG-ESPCAM-SC, FG-ISLANDS-SC, and FG-MATS-SC. DTE requests that EGLE AQD remove these emission units and flexible groups from the working draft ROP.

Furthermore, as part of this permit modification, DTE requests EGLE AQD remove the Acid Rain Permit in Appendix 9-1 SC of Section 1 of the ROP. With Boiler 2, 3, 6, and 7's retirement, this facility is no longer subject to the Acid Rain Program. The Retired Unit Exemption (RUE) notices for St. Clair Power Plant, ORIS Code No. 1743, Unit IDs #2, 3, 6 and 7 and request to void the facility's Acid Rain Permit will be submitted to Mr. Brian Carley of EGLE AQD and US EPA, as required; a copy will be emailed to you as well.

For your records, note that DTE will also submit a request to EGLE AQD Permit Section in Lansing to void PTI 16-22 for EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, EU-BOILER7-SC, FG-BLR_GEN-SC, and FG-BLR2-3-SC effective May 31, 2022.

Should you have any questions regarding this ROP minor modification application, please contact Alexis Thomas at alexis.thomas@dteenergy.com or (248) 794-9390.

Sincerely,

Alexis Thomas /s/

Alexis Thomas
Staff Environmental Engineer
Environmental Management & Safety – Emissions Quality
DTE Electric Company

Enclosure: ROP 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 Form – Additional Information Form AI-ROP*
4. *Emission Unit and Flexible Group Summary Tables*

Cc: Ms. Caryn Owens, EGLE AQD, Cadillac District Environmental Engineer via email at owensc1@michigan.gov

Ms. Kerry Kelly, EGLE AQD, Warren District Office, Senior Environmental Quality Analyst via email at KellyK6@michigan.gov

Mr. Brian Carley, EGLE AQD, Jackson District Office, Environmental Quality Specialist via email at CARLEYB@michigan.gov

Ms. Joyce Zhu, EGLE AQD, Warren District Office, District Supervisor via email at ZhuJ@michigan.gov

Mr. Mark Dziadosz, EGLE AQD, Warren District Office, Environmental Engineer via email at DziadoszM@michigan.gov

Leann Warner, DTE, Energy Supply, Plant Manager – St. Clair Power Plant via email at leann.warner@dteenergy.com

Dominic Vendittelli, DTE, EM&S, Environmental Engineer – St. Clair Power Plant via email at dominic.vendittelli@dteenergy.com

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

Andrew Fadanelli, DTE, EM&S, Principal Environmental Engineer – Emissions Quality via email at ignatius.fadanelli@dteenergy.com

File in SharePoint



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

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

1. SRN B2796	2. ROP Number MI-ROP-B2796-2015c	3. County St. Clair
4. Stationary Source Name DTE Electric Company – St. Clair Power Plant		
5. Location Address 4901 Pointe Drive		6. City East China
<p>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></p> <p><input type="checkbox"/> Rule 215(1) Notification of change. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 215(2) Notification of change. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 215(3) Notification of change. Complete Items 8 – 11 and 14</p> <p><input type="checkbox"/> Rule 215(5) Notification of change. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. Complete Items 8 – 10 and 14</p> <p><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.</p> <p><input checked="" type="checkbox"/> Rule 216(2) Minor Modification. Complete Items 8 – 12 and 14</p> <p><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.</p> <p><input type="checkbox"/> Rule 216(4) State-Only Modification. Complete Items 8 – 12 and 14</p>		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> 05/31/2022		9. Change in emissions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>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></p> <p>EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, and EUBOILER7-SC were retired effective May 31, 2022. Therefore, the following sections are now obsolete in the working draft ROP: EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, EU-BOILER7-SC, FG-BLR_GEN-SC, FG-BLR2-3-SC, FG-ASH_HAND-SC, FG-ESPCAM-SC, FG-ISLANDS-SC, and FG-MATS-SC. With this retirement, the facility is no longer subject to the Acid Rain Program. These emission units, flexible groups, and the Acid Rain Permit in Appendix 9-1 SC are requested to be removed from the working draft ROP.</p> <p>With this change, facility emissions will decrease.</p>		
11. New Source Review Permit(s) to Install (PTI) associated with this application? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
If Yes, enter the PTI Number(s) 16-22 - - - -		
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 ROP
14. Contact Name Alexis Thomas	Telephone No. (248) 794-9390	E-mail Address Alexis.thomas@dteenergy.com

M-001 Instructions

15. This submittal also updates the ROP renewal application submitted on mm/dd/yyyy

Yes N/A

(If yes, a mark-up of the affected pages of the ROP must be attached.)

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
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Stationary Source Name DTE Electric Company – St. Clair Power Plant	
City East China	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 1</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 ROP	

CONTACT INFORMATION	
Contact Name Alexis Thomas	Title Staff Environmental Engineer
Phone number (248) 794-9390	E-mail address Alexis.thomas@dteenergy.com

This form must be signed and dated by a Responsible Official.				
Responsible Official Name Leann Warner			Title Plant Manager, Energy Supply – St. Clair Power Plant	
Mailing address DTE Electric Company, 4901 Pointe Drive				
City East China	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			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): 1

1. Additional Information ID

AI-ROP

Additional Information

2. Is This Information Confidential?

 Yes No

Enclosed are the emission unit and flexible group summary tables from Section 1 of the working draft ROP. The highlighted emission units and flexible groups will be removed from the working draft ROP as a result of the retirement of Boilers 2, 3, 6 and 7.

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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.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-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, and/or their blends as auxiliary fuel. The boiler is equipped with low NOx burners, dry cold-side electrostatic precipitators (ESP), overfire air, DSI, ACI.	02-01-1951/ 01-04-2006/ 01-30-2012/ 07-25-2014	FG-BLR_GEN-SC FG- BLR2-3-SC FG-MATS-SC FG-ESPCAM-SC
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, and/or their blends as auxiliary fuel. The boiler is equipped with low NOx burners, dry cold-side electrostatic precipitators (ESP), overfire air, DSI, ACI.	02-01-1951/ 06-20-2004/ 01-30-2012/ 07-25-2014	FG-BLR_GEN-SC FG-BLR2-3-SC FG-MATS_SC FG-ESPCAM-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.	01-01-1959/ 02-23-2003/ 07-25-2014	FG-BLR_GEN-SC FG-MATS_SC FG-ESPCAM-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.	01-01-1967/ 04-11-2001/ 07-25-2014	FG- BLR_GEN-SC FG-MATS_SC FG-ESPCAM-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

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
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. Baghouse vents directly to Unit 6 ESP.	02-01-1951	FG-ASH_HAND-SC FG-ESPCAM-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. Used for unloading coal delivered by railroad.	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, wet dust extraction units, 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
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.	06-12-1995	NA
EU-STC2-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 2 DSI Silo 1.	07-25-2014	FG-ISLANDS-SC
EU-STC2-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 2 DSI Silo 2.	07-25-2014	FG-ISLANDS-SC
EU-STC3-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 3 DSI Silo 1.	07-25-2014	FG-ISLANDS-SC

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-STC3-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 3 DSI Silo 2.	07-25-2014	FG-ISLANDS-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.	07-25-2014	FG-ISLANDS-SC
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.	07-25-2014	FG-ISLANDS-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.	07-25-2014	FG-ISLANDS-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.	07-25-2014	FG-ISLANDS-SC
EU-STC2-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 2 ACI Silo.	07-25-2014	FG-ISLANDS-SC
EU-STC3-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 3 ACI Silo.	07-25-2014	FG-ISLANDS-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.	07-25-2014	FG-ISLANDS-SC

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
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.	07-25-2014	FG-ISLANDS-SC

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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

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-BLRS2-3-SC	Common particulate matter and used oil requirements for St. Clair Power Plant Boiler Nos. 2 and 3.	EU-BOILER2-SC EU-BOILER3-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 rule applicability for particulate matter 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-ESPCAM-SC	Compliance Assurance Monitoring (CAM) requirements for the PM emission limits	EU-BOILER2-SC EU-BOILER3-SC EU-BOILER6-SC EU-BOILER7-SC
FG-COALHAND-SC	Emission units representing coal handling at St. Clair Power Plant. Includes bunker houses, transfer houses, crusher house, and coal storage piles.	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-MATS-SC	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).	EU-BOILER2-SC EU-BOILER3-SC EU-BOILER6-SC EU-BOILER7-SC

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Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-ISLANDS-SC	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.	EU-STC2-DSI_SILO1 EU-STC2-DSI_SILO2 EU-STC3-DSI_SILO1 EU-STC3-DSI_SILO2 EU-STC06-DSI_SILO1 EU-STC06-DSI_SILO2 EU-STC07-DSI_SILO1 EU-STC07-DSI_SILO2 EU-STC2-ACI_SILO EU-STC3-ACI_SILO EU-STC06-ACI_SILO EU-STC07-ACI_SILO