

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

EFFECTIVE DATE: April 1, 2012
REVISION DATE: December 1, 2015; November 1, 2016, August 18, 2021

ISSUED TO

**DTE Electric Company -
River Rouge Power Plant**

State Registration Number (SRN): B2810

LOCATED AT

1 Belanger Park Drive, River Rouge, Michigan 48218

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2810-2012c

Expiration Date: April 1, 2017

Administratively Complete ROP Renewal Application Due
Between October 1, 2015 and October 1, 2016

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-B2810-2012c

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

Dr. April Wendling, Detroit District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

In accordance with Rule 213(2)(a), all underlying applicable requirements will be identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined or subsumed, or is state only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

SECTION 1

DTE Electric Company - River Rouge Power Plant

State Registration Number (SRN): B2810

LOCATED AT

1 Belanger Park Drive, River Rouge, Michigan 48218

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 federally enforceable Source- wide PTI No. MI-PTI-B2810-2012a pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; “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 Rule 301(1)(a) or (b) unless otherwise specified in this ROP.” The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
 - 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.
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(4))**

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))**:
 - a. Submitting a certification by a responsible official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a responsible official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a responsible official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
 - a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(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):
- 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))**

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, MDEQ.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, or has been interrupted for 18 months, the applicable terms and conditions from that PTI 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, MDEQ, 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.

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

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-PCI_COALMILLS	Four coal mills (1, 2, 5, and 6) for the PCI system, each with a primary air fan, natural gas-fired dryer, and controlled by a filter house dust collector. (PTI No. 215-06B)	1/1/1954; 10/24/1996; 7/31/2007	FG-PCI_COAL_HAND
EU-PCI_TRANS-SY1	PCI transfer system (North) controlled by a baghouse dust collector. (PTI No. 215-06B)	1/1/1954; 10/24/1996	FG-PCI_COAL_HAND
EU-PCI_TRANS-SY2	PCI transfer system (North) controlled by a baghouse dust collector. (PTI No. 215-06B)	1/1/1954; 10/24/1996	FG-PCI_COAL_HAND
EU-PCI_TRANS_VSL	PCI transport vessels T1&T2 controlled by a cyclone vent filter. (PTI No. 215-06B)	1/1/1954; 10/24/1996	FG-PCI_COAL_HAND
EU-PCI_ALSTOM	PCI Alstom coal mill for PCI system, with a primary air fan, natural gas-fired dryer, and controlled by a dust collector. (PTI No. 215-06B)	7/31/2007	FG-PCI_COAL_HAND
EU-PCI_COALSILO	PCI Alstom Coal Silo operations controlled by a bin vent filter. (PTI No. 215-06B)	7/31/2007	FG-PCI_COAL_HAND
EU-PCI_TRUCK	PCI Alstom truck loading operations controlled by "inline" vent filter for the pressure relief vent. (PTI No. 215-06B)	7/31/2007	FG-PCI_COAL_HAND
EU-EMERDG_DPRHS	10 kW emergency diesel generator for the Dumper House and exempt from R 336.1201(1) pursuant to R 336.1282(b)(ii).	NSPS IIII order date of 10/18/2006	FG-EMERDG_FSUPPLY
EU-EMERDG_TFRHS	10 kW emergency diesel generator for the Transfer House and exempt from R 336.1201(1) pursuant to R 336.1282(b)(ii).	NSPS IIII order date of 10/18/2006	FG-EMERDG_FSUPPLY
EU-EMERDG_UNLHS	10 kW emergency diesel generator for the Unloading House and exempt from R 336.1201(1) pursuant to R 336.1282(b)(ii).	NSPS IIII order date of 10/18/2006	FG-EMERDG_FSUPPLY
EU-FUGITIVEDUST	Any fugitive dust source.	NA	FG-FUGITIVEDUST

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCOLDCLEANER	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(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.	NA	FGCOLDCLEANERS
EURULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.	NA	FGRULE290

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

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-PCI_COAL_HAND	Pulverized coal injection (PCI) system (PTI No. 215-06B)	EU-PCI_COALMILLS, EU-PCI_TRANS-SY1, EU-PCI_TRANS-SY2, EU-PCI_TRANS_VSL, EU-PCI_ALSTOM, EU-PCI_COALSILO, EU-PCI_TRUCK
FG-FUGITIVEDUST	The collection of fugitive dust sources at the stationary source.	EU-FUGITIVEDUST
FG-EMERDG_FSUPPLY	Three emergency diesel generators at the site and located in the fuel supply area. Each is a 10 kW generator with an order date of 10/18/2006 and exempt from R 336.1201(1) pursuant to R 336.1282(b)(ii).	EU-EMERDG_DPRHS, EU-EMERDG_TFRHS, EU-EMERDG_UNLHS
FGCOLDCLEANER	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(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.	EUCOLDCLEANER
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.	EURULE290

FG-PCI_COAL_HAND FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Pulverized coal injection (PCI) system. (PTI No. 215-06B)

Emission Units: EU-PCI_COALMILLS, EU-PCI_TRANS-SY1, EU-PCI_TRANS-SY2, EU-PCI_TRANS_VSL, EU-PCI_ALSTOM, EU-PCI_COALSILO, EU-PCI_TRUCK

POLLUTION CONTROL EQUIPMENT

Dust collectors and vent filters.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	0.12 pounds per MMBtu heat input ²	Test Protocol*	Applies individually to EU-PCI_COALMILLS (SV290-001) and EU-PCI-ALSTOM (SV290-002)	SC V.1, SC VI.3.	R 336.1205(3)
2. NOx	48.1 tons per year ²	As determined on a 12-month rolling time period at the end of each calendar month	Applies collectively to EU-PCI_COALMILLS (SV290-001) and EU-PCI-ALSTOM (SV290-002)	SC VI.1	R 336.1205(3)
3. PM	0.031 grains per dry standard cubic foot ²	As specified at 40 CFR 60.257	Each coal mill heater at FG-PCI_COAL_HAND meeting the definition of a thermal dryer at 40 CFR 60.251	SC IX.1	40 CFR 60.250, 40 CFR 60.252(a)(1)
4. PM ^a	0.002 grains per cubic foot of exhaust air ^{2,b}	As determined through reference test method 5B at R 336.2011 or method 5C at R 336.2012	EU-PCI_COALMILLS (SV290-001)	SC VI.4, SC VI.5, SC VI.6	R 336.1331(1)(a), R 336.1331(2)
5. PM ^a	1.83 pounds per hour ²	As determined through reference test method 5B at R 336.2011 or method 5C at R 336.2012	EU-PCI_COALMILLS (SV290-001)	SC VI.4, SC VI.5, SC VI.6	40 CFR 52.21(c)&(d)
6. PM ^a	8.03 tons per year ²	As determined on a 12-month rolling time period at the end of each calendar month	EU-PCI_COALMILLS (SV290-001)	SC VI.4	R 336.1205(3)
7. PM ^a	0.003 grains per cubic foot of exhaust air ^{2,b}	As determined through reference test method 5B at R 336.2011 or method 5C at R 336.2012	EU-PCI_ALSTOM (SV290-002)	SC VI.4, SC VI.5, SC VI.6	R 336.1331(1)(a), R 336.1331(2)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
8. PM ^a	1.58 pounds per hour ²	As determined through reference test method 5B at R 336.2011 or method 5C at R 336.2012	EU-PCI_ALSTOM (SV290-002)	SC VI.4, SC VI.5, SC VI.6	40 CFR 52.21(c)&(d)
9. PM ^a	6.90 tons per year ²	As determined on a 12-month rolling time period at the end of each calendar month	EU-PCI_ALSTOM (SV290-002)	SC VI.4	R 336.1205(3)
10. PM ^a	0.006 grains per cubic foot of exhaust air ^{2,b}	As determined through reference test method 5B at R 336.2011 or method 5C at R 336.2012	Applies individually to EU-PCI_TRANS-SY1 (SV300-001-1) and EU-PCI_TRANS-SY2 (SV300-001-2)	SC VI.4, SC VI.5, SC VI.6	R 336.1331(1)(a), R 336.1331(2)
11. PM ^a	0.33 pounds per hour ²	As determined through reference test method 5B at R 336.2011 or method 5C at R 336.2012	Applies individually to EU-PCI_TRANS-SY1 (SV300-001-1) and EU-PCI_TRANS-SY2 (SV300-001-2)	SC VI.4, SC VI.5, SC VI.6	40 CFR 52.21(c)&(d)
12. PM ^a	1.43 tons per year ²	As determined on a 12-month rolling time period at the end of each calendar month	Applies individually to EU-PCI_TRANS-SY1 (SV300-001-1) and EU-PCI_TRANS-SY2 (SV300-001-2)	SC VI.4	R 336.1205(3)
13. PM ^a	0.01 grains per cubic foot of exhaust air ^{2,b}	As determined through reference test method 5B at R 336.2011 or method 5C at R 336.2012	EU-PCI_TRANS_VSL (SV310-001)	SC VI.4, SC VI.5, SC VI.6	R 336.1331(1)(a), R 336.1331(2)
14. PM ^a	0.025 pounds per hour ²	As determined through reference test method 5B at R 336.2011 or method 5C at R 336.2012	EU-PCI_TRANS_VSL (SV310-001)	SC VI.4, SC VI.5, SC VI.6	40 CFR 52.21(c)&(d)
15. PM ^a	0.11 tons per year ²	As determined on a 12-month rolling time period at the end of each calendar month	EU-PCI_TRANS_VSL (SV310-001)	SC VI.4	R 336.1205(3)
16. PM ^a	0.005 grains per cubic foot of exhaust air ^{2,b}	As determined through reference test method 5B at R 336.2011 or method 5C at R 336.2012	Applies individually to EU-PCI_COALSILO (SV320-001) and EU-PCI_TRUCK (SV330-001)	SC VI.4, SC VI.5, SC VI.6	R 336.1331(1)(a), R 336.1331(2)
17. PM ^a	0.30 pounds per hour ²	As determined through reference test method 5B at R 336.2011 or method 5C at R 336.2012	Applies individually to EU-PCI_COALSILO (SV320-001) and EU-PCI_TRUCK (SV330-001)	SC VI.4, SC VI.5, SC VI.6	40 CFR 52.21(c)&(d)
18. PM ^a	1.30 tons per year ²	As determined on a 12-month rolling time period at the end of each calendar month	Applies individually to EU-PCI_COALSILO (SV320-001) and EU-PCI_TRUCK (SV330-001)	SC VI.4	R 336.1205(3)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
19. VE	5 percent opacity over a 6-minute average ²	Any 6-minute period	Applies individually to emissions from any stack associated with FG-PCI_COAL_HAND	SC VI.7, SC VI.8	R 336.1301(1)(a), 40 CFR 60.252(a)(2), 40 CFR 60.254(a)

^a As determined through reference test method 5B at R 336.2011 or method 5C at R 336.2012.
^b Corrected to 70°F and 29.92 inches Hg.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coal	1,091,160 tons per year ²	As determined on a 12-month rolling time period at the end of each calendar month	Through the collective PCI coal pulverizers of EU-PCI_COALMILLS and EU-PCI_ALSTOM	SC VI.2	R 336.1205(3)
2. Natural gas	76.3 million cubic feet per month ²	As determined at the end of each calendar month	Combusted collectively in the coal mill heaters of EU-PCI_COALMILLS and EU-PCI_ALSTOM	SC VI.1	R 336.1205(3)
3. Natural gas	801 million cubic feet per year ²	As determined on a 12-month rolling time period at the end of each calendar month	Combusted collectively in the coal mill heaters of EU-PCI_COALMILLS and EU-PCI_ALSTOM	SC VI.1	R 336.1205(3)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall ensure all air pollution control equipment associated with FG-PCI_COAL_HAND is installed, maintained, and operated in a satisfactory manner and in accordance with Air Pollution Control Rules and existing law.² **(R 336.1910)**
- The permittee shall not operate coal mills in EU-PCI_COALMILLS, EU-PCI_TRANSY1, EU-PCI_TRANSY2, EU-PCI_TRANS_VSL, the coal mill in EU-PCI_ALSTOM, EU-PCI_COALSILO, or EU-PCI_TRUCK unless a gauge which measures the pressure drop across the emission unit's respective dust collector or vent filter is installed, operating properly, and activates an alarm when the pressure drop exceeds a normal operating value. The normal operating value set points are as follows: 8-inches of water for the coal mill dust collectors 1, 2, 5, & 6; 8-inches of water for each of the transfer system baghouse dust collectors; 12 inches of water for the transport system bin vent filter; 6-inches of water for the Alstom coal mill dust collector; 6-inches of water for the coal silo bin vent filter; and 6-inches of water for the truck loading operations with a "inline" vent filter for the pressure relief vent.² **(R 336.1331(1)(a), R 336.1910)**
- The permittee shall not operate the coal mills in EU-PCI_COALMILLS, PCI_TRANSY1, EU-PCI_TRANSY2, the coal mill in EU-PCI_ALSTOM, or EU-PCI_COALSILO (Alstom) unless a broken bag detector is installed and operated properly on the emission unit's respective dust collector. Alternative monitoring must be approved by the AQD District Supervisor.² **(R 336.1331(1)(a), R 336.1910)**

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))**

1. Upon request of the AQD, verification of the NOx emission rate from EU-PCI_COALMILLS and EU-PCI_ALSTOM, by testing at permittee's expense, in accordance with Department requirements, will be required. No less than 30 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)**

See Appendix 5-1

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 the aggregate natural gas usage in the coal mill air heaters of EU-PCI_COALMILLS and EU-PCI_ALSTOM on a monthly basis and on a 12-month rolling time period.² **(R 336.1205(3))**
2. The permittee shall monitor and record the aggregate coal throughput to the pulverizers of EU-PCI_COALMILLS and EU-PCI_ALSTOM on a monthly basis and on a 12-month rolling time period.² **(R 336.1205(3))**
3. The permittee shall maintain a record of the NOx emission rate from EU-PCI_COALMILLS and EU-PCI_ALSTOM, on pounds per MMBTUs heat input basis. The record shall be based on the most recent test data obtained from EU-PCI_COALMILLS and EU-PCI_ALSOTOM, respectively. If test data is not available, emission factors from the most recent edition of the U.S. EPA AP-42 or alternative emission factors acceptable to the AQD shall be used.² **(R 336.1205(3))**
1. The permittee shall calculate and maintain a record of the PM emission rate from each emission unit of EU-PCI_COALMILLS and EU-PCI_ASLOTOM in units of grains per cubic foot of exhaust air basis corrected to 70°F and 29.92 inches Hg, pounds per hour, and tons per 12-month rolling time period basis, as determined at the end of each calendar month. The record shall be based on emission factors obtained from the most recent test data obtained from the emission units of EU-PCI_COALMILLS and EU-PCI_ALSTOM, and from operating hours of the emission units. Should test data be unavailable, the permittee shall use emission factors from the most recent edition of the US EPA AP-42, or alternative emission factors acceptable to the AQD.² **(R 336.1205(3), R 336.1331(1)(a), 40 CFR 52.21(c)&(d))**
5. The permittee shall monitor and record the pressure drop across each dust collector and vent filter in FG-PCI_COAL_HAND each day coal is transported or processed by any portion of FG-PCI_COAL_HAND.² **(R 336.301(1)(a), R 336.1331(1)(a), R 336.1910)**
6. The permittee shall conduct regular inspections on the dust collectors and vent filters servicing the emission units of FG-PCI_COAL_HAND for the purpose of determining the operational condition of the pollution control devices and, if necessary, the reason for malfunction or failure.² **(R 336.1910)**
7. For each emission unit of FG-PCI_COAL_HAND, the permittee shall perform and record daily visual emissions observations (non-certified) during each day the emission unit is in operation. The visual observations shall be performed in accordance with U.S. EPA Method 22.² **(R 336.1301(1)(a), R 336.1910)**
8. After observing visible emissions from a dust collector or vent filter servicing an emission unit of FG-PCI_COAL_HAND, the permittee shall:
 - a. either shutdown the loading to the emission unit exhibiting the visible emissions or shall conduct visual observations in accordance with U.S. EPA Method 9 by an observer certified in U.S. EPA Method 9. Permittee shall maintain records of all visual observations performed and the records shall be made available to the Department upon request;

- b. immediately conduct an inspection to determine the operational condition of the dust collector and, if necessary, the reasons for failure or malfunction of the bags, metal housings, fans, blowers, hopper bottom discharge valve, reverse air dampers or pulse jets (whichever is applicable), access doors, and gaskets. Any repairs and corrective actions needed to address the causes of malfunction or failure shall be performed immediately;
- c. document records of the event, including the date and time of the event, the date and time the emission unit and dust collector ceased operation or the date and time and result of the Method 9 evaluation, the cause(s) of malfunction or failure, the repairs and the corrective action taken.²
(R 336.1910)

9. For each coal mill heater meeting the definition of a thermal dryer at 40 CFR 60.251, the permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the measurement of the temperature of the gas stream at the exit of the thermal dryer on a continuous basis. The monitoring device is to be certified by the manufacturer to be accurate within 1.7°C (3°F). Each monitoring device is to be recalibrated annually in accordance with procedures under 40 CFR 60.13(b).² **(40 CFR 60.256(a)(1)(i))**

See Appendices 3-1, 4-1, and 7-1

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

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. SV290-001 (Coal Mills 1, 2, 5, 6)	63 ²	200 ²	R 336.1901, 40 CFR 52.21(c)&(d)
2. SV300-001-1 (Trans Sys 1)	18 ²	145 ²	R 336.1901, 40 CFR 52.21(c)&(d)
3. SV300-001-2 (Trans Sys 2)	18 ²	145 ²	R 336.1901, 40 CFR 52.21(c)&(d)
4. SV310-001 (horizontal discharge, Transport Vessel Vent))	12 ²	176 ²	R 336.1901, 40 CFR 52.21(c)&(d)
5. SV290-002 (Alstom Mill)	63 ²	200 ²	R 336.1901, 40 CFR 52.21(c)&(d)
6. SV320-001 (Horizontal discharge, Coal Silo-Alstom)	8 ²	157 ²	R 336.1901, 40 CFR 52.21(c)&(d)
7. SV330-001 (Horizontal discharge, Truck Loading)	8 ²	12 ²	R 336.1901, 40 CFR 52.21(c)&(d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the federal New Source Performance Standards as set forth in 40 CFR 60, Subparts A and Y.² **(40 CFR 60 Subparts A and Y)**

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).

**FG-FUGITIVEDUST
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

The collection of fugitive dust sources at the stationary source.

Emission Unit: EU-FUGITIVEDUST

POLLUTION CONTROL EQUIPMENT

Fugitive dust control measures as described in Appendix 9-1.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fugitive Dust	5 percent opacity	Average of 12 consecutive readings recorded at 15-second intervals ^a	Fugitive dust emissions from any road, lot, storage pile, or material handling activity at a storage pile	SC V.1	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)
2. Fugitive Dust	20 percent opacity	Average of 12 consecutive readings recorded at 15-second intervals ^a	Fugitive dust emissions from any source	SC V.1	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)

^ain accordance with Test Method 9D at Act 451, Section 5525, Paragraph (j)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Permittee shall implement and maintain the fugitive dust plan in Appendix 9-S1 to control all potential sources of fugitive dust, including roads and lots, storage piles, coal and ash handling, and open areas. The permittee may revise the fugitive dust plan provided that the permittee demonstrates, in writing, that the proposed revision does not result in an increase in the level of fugitive dust or particulate emissions and submits the demonstration to the AQD for approval and is approved by the AQD using the procedures found in Consent Order 9-1993. Demonstrations involving chemical dust suppressant applications on unpaved roads shall be made using only petroleum resins, asphalt emulsions, or acrylic cements unless otherwise explicitly provided by the applicable U.S. EPA approved SIP or U.S. EPA approved method. **(Act 451 Section 324.5524, Condition 8 of SIP Order 9-1993)**

See Appendix 9-1

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))**

1. Permittee shall conduct a visible emission observation on any road, lot, storage pile, or material handling activity discharging to the outer air upon request of the AQD. Visible emission observations shall be performed in accordance with Reference Method 9D, as described at Act 451, Section 5525, Paragraph (j). Records of the date, time, duration, and results of visible emissions observations shall be maintained. **(R 336.1213(3), Act 451 Section 5524 Paragraph (2) and Section 5525 Paragraph (j))**

See Appendix 5-1

VI. MONITORING/RECORDKEEPING

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

1. Permittee shall maintain records as specified in the fugitive dust plan in Appendix 9-1. The records shall be kept on file for five years and shall be made available to the Department upon request. **(R 336.1213(3), Conditions 9 and 10 of SIP Order 9-1993)**

See Appendices 3-1, 4-1, 7-1, and 9-1

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. Permittee shall submit on a quarterly basis to the Department a report identifying each day in which any emission limit, operational requirement, or recordkeeping requirement, as specified in the fugitive dust plan in Appendix 9-S1 was not met. This report shall, for each instance, explain the reason that the emission limit, operational requirement, or recordkeeping requirement was not met, the duration of the event, the remedial action taken, and a description of the steps which were taken to prevent a recurrence. These reports shall be submitted within 30 days following the end of the calendar quarter in which the data were collected. **(Condition 11 of SIP Order 9-1993)**

See Appendices 8-1 and 9-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. 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 Chief of the AQD.

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-EMERDG_FSUPPLY
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Three emergency diesel generators at the site and located in the fuel supply area. Each is a 10 kW generator with an order date of 10/18/2006 and exempt from R 336.1201(1) pursuant to R 336.1282(b)(ii).

Emission Units: EU-EMERDG_DPRHS, EU-EMERDG_TFRHS, EU-EMERDG_UNLHS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. CO	6.6 grams per kilowatt-hour	As specified within the test methods and procedures at 40 CFR 60.4212	Applies individually to each emission unit of FG-EMERDG_FSUPPLY	SC VI.1	40 CFR 60.4205(a), 40 CFR 60.4212 40 CFR 63.6590(c)
2. NOx + NMHC	9.5 grams per kilowatt-hour	As specified within the test methods and procedures at 40 CFR 60.4212	Applies individually to each emission unit of FG-EMERDG_FSUPPLY	SC VI.1	40 CFR 60.4205(a), 40 CFR 60.4212 40 CFR 63.6590(c)
3. PM	0.80 grams per kilowatt-hour	As specified within the test methods and procedures at 40 CFR 60.4212	Applies individually to each emission unit of FG-EMERDG_FSUPPLY	SC VI.1	40 CFR 60.4205(a), 40 CFR 60.4212 40 CFR 63.6590(c)
4. SO ₂	120 parts per million by volume at 50% excess air	Instantaneous	Applies individually to each emission unit of FG-EMERDG_FSUPPLY	SC VI.2	R 336.1401(1), Michigan State Implementation Plan

II. MATERIAL LIMIT(S)

1. The permittee shall only fire the emission units in FG-EMERDG_FSUPPLY with diesel fuel that meets the following per-gallon standards within 40 CFR 80.510(b) for nonroad diesel fuel:
 - a. a maximum sulfur content of 15 parts per million by weight; **R 336.401(1), Michigan State Implementation Plan, 40 CFR 60.4207(b), 40 CFR 63.6590(c), 40 CFR 80.510(b)(1)(i)**
 - b. either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. **40 CFR 60.4207(b), 40 CFR 63.6590(c), 40 CFR 80.510(b)(2)(i) and (ii)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate and maintain each emission unit of FG-EMERDG_FSUPPLY to achieve the emission standards at I.1, I.2, and I.3 over the entire life of the emission unit. **40 CFR 60.4206, 40 CFR 63.6590(c)**

2. The permittee shall operate and maintain emission units of FG-EMERDG_FSUPPLY according to the manufacturer's emission-related written instructions and shall change only those emission-related settings that are permitted by the manufacturer. **40 CFR 60.4211(a)(1) and (2), 40 CFR 63.6590(c)**
3. Each emission unit of FG-EMERDG_FSUPPLY may be operated for the purpose of maintenance checks and readiness testing, per 40 CFR 60.4211(f). **40 CFR 60.4211(f), 40 CFR 63.6590(c)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any emission unit of FG-EMERDG_FSUPPLY unless the emission unit is equipped with a functional non-resettable hour meter. **40 CFR 60.4209(a), 40 CFR 63.6590(c)**

V. TESTING/SAMPLING

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

NA

See Appendix 5-1

VI. MONITORING/RECORDKEEPING

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

1. For each emission unit of FG-EMERDG_FSUPPLY the permittee shall maintain a demonstration of compliance with the emission standards within I.1, I.2, and I.3 by one of the following methods: **40 CFR 60.4211(b), 40 CFR 63.6590(c)**
 - a. Purchasing an emission unit certified according to 40 CFR 89 or 40 CFR 94, as applicable, for the same model year and maximum engine power. The emission unit must be installed and configured according to the manufacturer's specifications; **40 CFR 60.4211(b)(1), 40 CFR 63.6590(c)**
 - b. Keeping records of performance test results for each pollutant for a test conducted on a similar emission unit. The test must have been conducted using the same methods specified in Subpart IIII of 40 CFR 60 and these methods must have been followed correctly; **(40 CFR 60.4211(b)(2), 40 CFR 63.6590(c))**
 - c. Keeping records of emission unit manufacturer data indicating compliance with the standards; **40 CFR 60.4211(b)(3), 40 CFR 63.6590(c)**
 - d. Keeping records of control device vendor data indicating compliance with the standards; **40 CFR 60.4211(b)(4), 40 CFR 63.6590(c)**
 - e. Conducting an initial performance test to demonstrate compliance with the emission standards at I.1, I.2, and I.3 according to the requirements specified in 40 CFR 60.4212, as applicable. **40 CFR 60.4211(b)(5), 40 CFR 63.6590(c)**
2. The permittee shall maintain a complete record of the fuel specifications and/or fuel analysis for each delivery, or storage tank, of the fuel fired in FG-EMERDG_FSUPPLY. These records may include purchase records for ASTM specification diesel fuel, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any records adequate to demonstrate compliance with the parts per million by weight sulfur limit and either the minimum cetane index or the maximum aromatic content. **(R 336.1213(3))**
3. For each emission unit of FG-EMERDG_FSUPPLY, the permittee shall keep records of the operation of the emission unit in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee shall record the time of operation of the emission unit and the reason the emission unit was in operation during that time. **R 336.1213(3))**

See Appendices 3-1, 4-1, and 7-1

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

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the federal New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines as set forth in 40 CFR 60, Subparts A and IIII. **(40 CFR 60 Subparts A and IIII)**
2. The permittee shall comply with all applicable provisions of the federal National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines as set forth in 40 CFR 63, Subparts A and ZZZZ. **(40 CFR 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).

FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(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

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(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(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))**
 - 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(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

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGRULE290 FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.

Emission Unit: EURULE290

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(i))**
2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(a)(ii))**
 - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**
 - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(B))**
 - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(C))**
 - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(a)(ii)(D))**
3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: **(R 336.1290(a)(iii))**

- a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**
- b. The visible emissions from the emission unit are not more than 5 percent opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**
- c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**

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 maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**
 - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
 - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**
 - e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**

- b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**
- 3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4-1

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

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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 1-1. Abbreviations and Acronyms

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
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfuction Abatement Plan	MW	Megawatts
EGLE	Michigan Department of Environment, Great Lakes, and Energy	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
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. 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 3-1. 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 4-1. 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 5-1. 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. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No. 199600209.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
215-06A	PCI coal handling equipment	FG-PCI_COAL_HAND

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B2810-2012.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
215-06B	201200112/ December 1, 2015	Incorporate PTI No. 215-06B	FG-PCI_COAL_HAND
82-15A 40-08H	2016000123/ November 1, 2016	Incorporate PTI Nos. 82-15A and 40-08H into Section 1 of the ROP, PTI 82-15A was to install air emission control systems, Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI), on Boiler #3 at River Rouge, as part of the proposed Mercury and Air Toxics Standards (MATS) in accordance with 40 CFR Part 63, Subpart UUUUU.	EU-BOILER#2 EU-BOILER#3 FG-BOILERS_2_&_3 FG-DSI/ACI EU-DSI_METERTRLR EU-ACI_SILO1 EU-ACI_SILO2 FG-MODULAR

		PTI 40-08H was to remove EU-BOILER#2 since it was retired in April 2016, and removes the ability to combust recovered paint solids (RPS) from the fuel portfolio for EU-BOILER#3.	
NA	202100086 / August 18, 2021	<p>EU-BOILER#3, EU-AUX_BOILER, EU-DSI_METERTRLR, EU-ACI_SILO1, EU-ACI_SILO2, EU-FLYASH_SILO#1, EU-FLYASH_SILO#2 were retired from the facility on June 1, 2021 and rendered inoperable. With retiring these emission units, the facility requested to remove the emissions units and respective flexible groups (FG-DSI/ACI, FG-MODULAR, and FG-FLYASH-HANDLG) from the ROP.</p> <p>Additionally, June 2, 2021, the facility submitted a revised Acid Rain Permit Application and a Retired Unit Exemption (RUE) form for EU-BOILER#3 and requested it be removed from the Acid Rain Permit in Appendix 10-1 (also effectively removing the facility's Acid Rain NOx Compliance Plan and NOx Averaging Plan, as they are no longer required).</p>	<p>EU-BOILER#3, EU-AUX_BOILER, EU-DSI_METERTRLR, EU-ACI_SILO1, EU-ACI_SILO2, EU-FLYASH_SILO#1, EU-FLYASH_SILO#2 FG-DSI/ACI, FG-MODULAR, FG-FLYASH-HANDLG</p>
NA	202100095 / August 18, 2021	<p>EU-BOILER#1 was retired from the facility on June 7, 2021 and rendered inoperable.</p> <p>Additionally, June 14, 2021, the facility submitted a RUE form for EU-BOILER#1 and requested to void the Acid Rain Permit under Title IV, and Clean Air Interstate Rule (CAIR) permits. With the voided Acid Rain and CAIR Permits, the facility requested to remove Appendix 10-1 from the ROP.</p>	<p>EU-BOILER#1 Appendix 10-1</p>

Appendix 7-1. 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. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ Report Certification form (EQP 5736) and MDEQ 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 9-1. Fugitive Dust Plan

The following monitoring procedures, methods, or specifications are the details to the requirement identified at EU-FUGITIVEDUST, Conditions III.1, VI.1, and VII.4.

Fugitive Dust Plan

Control Procedures.

All control procedures in this section shall be applied at the stated frequencies, application rates, and dilution ratios, where appropriate except when freezing is a concern, or as otherwise specified. Additionally, controls involving watering shall not be required when there has been at least 0.1 inches of precipitation within the last 24 hours. All controls employed will be logged when performed to ensure compliance.

A. Paved Travel Surfaces.

The speed limit on all paved travel surfaces shall be posted and enforced at 15 MPH.

Paved roads leading to the main plant parking lot shall be power flushed, vacuum swept, or wet broom swept twice per month when freezing is not of concern. Power flushing will be accomplished using approximately 80 psi sprays using copious amounts of water. All other paved roads will be power flushed, vacuum swept, or wet broom swept monthly when freezing is not a concern.

Travel lanes of paved lots B, C, and F shall be power flushed, vacuum swept or wet broom swept twice monthly when freezing is not of concern. Power flushing shall be accomplished using approximately 80 psi sprays or the plant's water wagon using copious amounts of water.

Travel lanes of all remaining paved lots will be power flushed, vacuum swept, or wet broom swept monthly when freezing is not of concern.

All paved lots will be power flushed, vacuum swept, or wet broom swept entirely three times per year; once each in spring, summer and fall.

B. Unpaved Travel Surfaces

The speed limit on all unpaved travel surfaces shall be enforced at 15 MPH.

Unpaved roads L, P, O, Q, R, and S shall be sprayed, with an asphalt emulsion, petroleum resin, or an acrylic cement, three times per year, once each in the spring, summer, and fall, at a rate of 0.1 gallons of raw product per square yard.

Unpaved lots M and N shall be sprayed with an asphalt emulsion, petroleum resin, or an acrylic cement, at a rate of 0.1 gallons of raw product per square yard once per year.

Additional control measures shall be taken as necessary to reduce fugitive dust emissions.

C. Exposed Areas and Storage Piles.

The following shall be utilized:

1. All storage piles shall be compacted and configured to minimize fugitive dust emissions.

2. Pile height shall be limited to a maximum of 50 feet.
3. All storage piles and associated haul roads shall be watered at weekly intervals using the plant's water wagon, except when freezing is a concern, or when there has been at least 0.1 inches of precipitation in the past 24 hours. Water will be applied at 200 to 500 gpm at a minimum of 10,000 gallons per week. A water wagon is provided for this purpose.
4. All mobile equipment exhaust shall be directed upwards.
5. All excessive spillage around the perimeter of the surface will be removed within 48 hours.

Additional control measures shall be taken as necessary to reduce fugitive dust emissions.

D. Materials Handling.

1. Rail delivered coal utilizes an enclosed rotary dumper.
2. Pile unloading is via a combination of underground reclaiming and surface conveyors utilizing mobile equipment.
3. All conveyors are covered and maintained.
4. During dry loading of ash trucks, dust collectors and physical curtains shall be utilized.
5. All ash transported for disposal will be conditioned using water prior to loading for transport.
6. Ash truck wheels shall be cleaned prior to leaving the ash silo area.
7. Areas surrounding ash loading operations shall be flushed after ash loading is completed for each day.

E. Reporting Procedures

1. Documentation logs of all activities specified under the control procedures for this program shall be readily accessible at the plant for a period of three years.
2. The documentation shall be maintained as a Fugitive Dust Control Log
3. The following minimum information shall be included in the Fugitive Dust Control Log. An entry will be made in the log for each activity specified by the control procedures. Any additional control measures taken will also be documented.

Control Activity _____
Date/Time _____
Duration/Quantity _____
Supervisor/Vendor _____

F. Recordkeeping required records

- | | |
|--------------------|--|
| Unpaved Roads/Lots | (a) Date of treatment.
(b) Control measure used.
(c) Responsible person's initials.
(d) Name of product applied.
(e) Amount of solution/water applied.
(f) Dilution ratio.
(g) Road segment/ Lot identification. |
| Paved Roads/Lots | (a) Date of treatment. |

- (b) Control measure used.
- (c) Responsible person's initials.
- (d) Road segment/ Lot identification.

Storage Piles/Material Handling

- (a) Date of treatment.
- (b) Control measure used.
- (c) Responsible person's initials.
- (d) Dilution ratio.
- (e) Amount of dust suppressant/water applied.
- (f) Identification of pile/ material handling operation treated.
- (g) Equipment used.

SECTION 2

DTE Electric Company River Rouge Peakers

State Registration Number (SRN): B2810

LOCATED AT

1 Belanger Park Drive, River Rouge, Michigan 48218

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 federally enforceable Source-wide PTI No. MI-PTI-B2810-2012a pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies

of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; "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 Rule 301(1)(a) or (b) unless otherwise specified in this ROP." The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
 - 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.
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(4))**

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.

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))**

- c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
 - d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(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 reclaiming, 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))**

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, MDEQ.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, or has been interrupted for 18 months, the applicable terms and conditions from that PTI 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, MDEQ, 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.

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

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-PEAKER_DG11-1	#2 oil-fired diesel generator set nominally rated at 2.75 MW.	1/1/1967	FG-DG_PEAKERS
EU-PEAKER_DG11-2	#2 oil-fired diesel generator set nominally rated at 2.75 MW.	1/1/1967	FG-DG_PEAKERS
EU-PEAKER_DG11-3	#2 oil-fired diesel generator set nominally rated at 2.75 MW.	1/1/1967	FG-DG_PEAKERS
EU-PEAKER_DG11-4	#2 oil-fired diesel generator set nominally rated at 2.75 MW.	1/1/1967	FG-DG_PEAKERS

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

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-DG_PEAKERS	Four #2 oil-fired diesel generator sets nominally rated at 2.75 MW each.	EU-PEAKER_DG11-1, EU-PEAKER_DG11-2, EU-PEAKER_DG11-3, EU-PEAKER_DG11-4

**FG-DG_PEAKERS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Four #2 oil-fired diesel generator sets nominally rated at 2.75 MW each.

Emission Units: EU-PEAKER_DG11-1, EU-PEAKER_DG11-2, EU-PEAKER_DG11-3, EU-PEAKER_DG11-4

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. SO ₂	120 parts per million by volume at 50% excess air	Instantaneous when determined by sulfur in fuel analysis; over a three-hour time period when determined by testing	Applies individually to EU-PEAKER_DG11-1, EU-PEAKER_DG11-2, EU-PEAKER_DG11-3, EU-PEAKER_DG11-4	SC V.1, SC VI.2	R 336.1401(1), Michigan State Implementation Plan

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Sulfur content of #2 fuel oil	0.30 percent sulfur, by weight ²	Instantaneous	Applies individually to EU-PEAKER_DG11-1, EU-PEAKER_DG11-2, EU-PEAKER_DG11-3, EU-PEAKER_DG11-4	SC VI.2	R 336.1401(1), Michigan State Implementation Plan

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)(ii))**

1. Upon request of the AQD, verification of the SO₂ ppmv, corrected to 50% excess air, emission rate from any emission unit of FG-DG_PEAKERS, by testing at permittee's expense, in accordance with Department requirements, will be required. 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. (R 336.1213(3), R 336.1401(1), R 336.2001, R 336.2003, R 336.2004, 45 FR 29720, 55 FR 11029, Michigan State Implementation Plan)

See Appendix 5-2

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 the monthly fuel usage in gallons. (R 336.1213(3)(b))
2. The permittee shall maintain a complete record of the 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. (R 336.1213(3))

See Appendices 3-2, 4-2, and 7-2

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

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of the federal National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines as set forth in 40 CFR 63, Subparts A and ZZZZ for EU-PEAKER_DG11-1, EU-PEAKER_DG11-2, EU-PEAKER_DG11-3, and EU-PEAKER_DG11-4.² (40 CFR 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).

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 1-2. Abbreviations and Acronyms

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
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
EGLE	Michigan Department of Environment, Great Lakes, and Energy	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
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. 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 3-2. 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 4-2. 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 5-2. 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 6-2. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No. 199600209.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA

Appendix 7-2. 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 8-2. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ Report Certification form (EQP 5736) and MDEQ 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.