



November 18, 2022

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

Subject: Application for ROP Minor Modification for SRN #B2816
Rule 216(2) Minor Modification Change
DTE Electric Company – Monroe Power Plant
MI-ROP-B2816-2019, Section 1

Dear Ms. Orent,

DTE Electric Company hereby submits a ROP minor modification application under Rule 216(2) to ROP No: MI-ROP-B2816-2019 for Monroe Power Plant located at 3500 E. Front Street in Monroe, Michigan. Enclosed are the M-001 and C-001 forms, as required. This minor modification change affects EU-FlyAshStorage in Section 1 of the ROP.

EGLE granted approval for PTI #114-20 on March 25, 2021 to add new equipment and modify existing plant equipment for the Dry Fly Ash Conversion Project to comply with the U.S. EPA Effluent Limitation Guidelines (ELG) rule finalized on September 30, 2015. DTE Electric attaches the AI-001 form and PTI #114-20.

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

Sincerely,

Alexis Thomas /s/

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

Enclosures: *M-001 Form – ROP Rule 216 Modification Application Form*
C-001 Form – ROP Application Certification Form
AI-001 Form – Additional Information Form AI-PTI
PTI #114-20

Cc (electronic): Caryn Owens, EGLE-AQD
Brian Carley, EGLE-AQD
Scott Miller, EGLE-AQD
Michael Twomley, DTE Electric Company

App #202200216

Elise Ciak, DTE Energy
Stefanie Zanke, DTE Energy
Barry Marietta, DTE Energy
Ignatius A. Fadanelli, DTE Energy



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

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

1. SRN B2816	2. ROP Number MI-ROP-B2816-2019 Section 1	3. County Monroe
4. Stationary Source Name DTE Electric Company – Monroe Power Plant		
5. Location Address 3500 E. Front St.		6. City Monroe
<p>7. Submittal Type - <i>The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.</i></p> <p><input type="checkbox"/> Rule 215(1) Notification of change. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 215(2) Notification of change. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 215(3) Notification of change. <i>Complete Items 8 – 11 and 14</i></p> <p><input type="checkbox"/> Rule 215(5) Notification of change. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. <i>Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions.</i></p> <p><input checked="" type="checkbox"/> Rule 216(2) Minor Modification. <i>Complete Items 8 – 12 and 14</i></p> <p><input type="checkbox"/> Rule 216(3) Significant Modification. <i>Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions.</i></p> <p><input type="checkbox"/> Rule 216(4) State-Only Modification. <i>Complete Items 8 – 12 and 14</i></p>		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> <u>12/18/2022</u>		9. Change in emissions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>10. Description of Change - <i>Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).</i></p> <p>EGLE granted approval for PTI 114-20 on March 25, 2021 to add new equipment and modify existing plant equipment for the Dry Fly Ash Conversion Project to comply with the U.S. EPA Effluent Limitation Guidelines (ELG) rule finalized on September 30, 2015. Please see the PTI application for the detailed change of emissions. When the new system is installed and operational, the existing wet extraction/slurry transport systems will be permanently retired and removed from service.</p>		
11. New Source Review Permit(s) to Install (PTI) associated with this application? If Yes, enter the PTI Number(s) <u>114-20</u> - - - - -		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>12. Compliance Status - <i>A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.</i></p> <p>a. Is the change identified above in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>c. If the change includes a future applicable requirement(s), will timely compliance be achieved? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		
13. Operator's Additional Information ID - <i>Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.</i>		AI PTI
14. Contact Name Alexis Thomas	Telephone No. (248) 794-9390	E-mail Address Alexis.thomas@dteenergy.com
15. This submittal also updates the ROP renewal application submitted on / / & / / <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A <i>(If yes, a mark-up of the affected pages of the ROP must be attached.)</i>		

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

For Assistance
Contact: 800-662-9278

www.michigan.gov/egle



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

RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

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

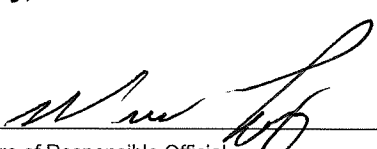
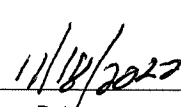
This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN B2816
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Stationary Source Name DTE Electric Company - Monroe Power Plant	
City Monroe	County Monroe

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

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

This form must be signed and dated by a Responsible Official.				
Responsible Official Name Michael Twomey			Title Plant Manager, Energy Supply – Monroe Power Plant	
Mailing address DTE Electric Company, 3500 E. Front Street				
City Monroe	State MI	ZIP Code 48161	County Monroe	Country USA
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.				
 _____ Signature of Responsible Official			 _____ Date	



RENEWABLE OPERATING PERMIT APPLICATION

AI-001: ADDITIONAL INFORMATION

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

SRN: B2816

Section Number (if applicable): 1

1. Additional Information ID

AI-PTI

Additional Information

2. Is This Information Confidential?

 Yes No

Enclosed is PTI #114-20 to add new equipment and modify existing plant equipment for the Dry Fly Ash Conversion Project to comply with the U.S. EPA Effluent Limitation Guidelines (ELG) rule finalized on September 30, 2015. The highlighted sections of the PTI should replace the conditions currently written in EU-FlyAshStorage in the ROP.

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

FEBRUARY 26, 2021

**PERMIT TO INSTALL
114-20**

**ISSUED TO
DTE ELECTRIC COMPANY
MONROE POWER PLANT**

**LOCATED AT
3500 EAST FRONT STREET
MONROE, MICHIGAN 48161**

**IN THE COUNTY OF
MONROE**

**STATE REGISTRATION NUMBER
B2816**

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: December 4, 2020	
DATE PERMIT TO INSTALL APPROVED: February 26, 2021	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install 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 this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit 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 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. 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 Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. 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)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

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-FlyAshStorage	<p>Prior to the modifications to the dry fly ash system as permitted in PTI 113-20, the dry fly ash collection, transfer, storage, and loading equipment and unloading area of the onsite landfill. A fly ash storage facility. The facility consists of two 75-ton surge silos (Nos. 1 and 2), a 3000-ton storage silo, a 200-ton load-out silo, and associated blowers, pressure pumps, compressors, pipe conveyor lines, and spouts. Particulate emissions from the loading of material into surge silo No. 1 are controlled by two filter receivers (FR-101 and FR-102). Particulate emissions from the transferring of material out of surge silo No. 1 are controlled by a bin vent filter (BH-101). Particulate emissions from the loading of material into surge silo No. 2 are controlled by two filter receivers (FR-201 and FR-202). Particulate emissions from the transferring of material out of surge silo No. 2 are controlled by a bin vent filter (BH-201). Particulate emissions from the storage silo will be controlled by a bin vent filter (BH-301). Particulate emissions from the loading of material into and the transfer of material out of (truck or railcar load-out) the load-out silo will be controlled by a bin vent filter (BH-401).</p> <p>After the modifications to the dry fly ash system as permitted in PTI 113-20, EU-FlyAshStorage includes the dry fly ash collection, transfer, storage, and loading equipment and unloading area of the onsite landfill. This emission unit includes the Unit 1 – 4 electrostatic precipitator hoppers, vacuum blowers and piping for pneumatic transfer, a 3000-ton storage silo, and a 4,000-ton storage silo, and a 200 ton silo. A silo-to-silo transfer system allows transfer of ash from one silo to the other silo. The silos each have dustless loading/unloading spouts for loading tanker trucks under a slight negative pressure in enclosed unloading areas below each silo. The emissions from the silos and eight conveyer exhaust systems are controlled by vent bin filters. Two ash conditioners (pug mills) for treating ash for loading ash into open trucks are in an enclosed unloading floor area below the 4,000-ton silo.</p>	TBD	NA

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

EU-FlyAshStorage
EMISSION UNIT CONDITIONS

DESCRIPTION

Prior to the modifications to the dry fly ash system as permitted in PTI 113-20, the dry fly ash collection, transfer, storage, and loading equipment and unloading area of the onsite landfill. A fly ash storage facility. The facility consists of two 75-ton surge silos (Nos. 1 and 2), a 3000-ton storage silo, a 200-ton load-out silo, and associated blowers, pressure pumps, compressors, pipe conveyor lines, and spouts. Particulate emissions from the loading of material into surge silo No. 1 are controlled by two filter receivers (FR-101 and FR-102). Particulate emissions from the transferring of material out of surge silo No. 1 are controlled by a bin vent filter (BH-101). Particulate emissions from the loading of material into surge silo No. 2 are controlled by two filter receivers (FR-201 and FR-202). Particulate emissions from the transferring of material out of surge silo No. 2 are controlled by a bin vent filter (BH-201). Particulate emissions from the storage silo will be controlled by a bin vent filter (BH-301). Particulate emissions from the loading of material into and the transfer of material out of (truck or railcar load-out) the load-out silo will be controlled by a bin vent filter (BH-401).

After the modifications to the dry fly ash system as permitted in PTI 113-20, EU-FlyAshStorage includes the dry fly ash collection, transfer, storage, and loading equipment and unloading area of the onsite landfill. This emission unit includes the Unit 1 – 4 electrostatic precipitator hoppers, vacuum blowers and piping for pneumatic transfer, a 3000-ton storage silo, and a 4,000-ton storage silo, and a 200 ton silo. A silo-to-silo transfer system allows transfer of ash from one silo to the other silo. The silos each have dustless loading/unloading spouts for loading tanker trucks under a slight negative pressure in enclosed unloading areas below each silo. The emissions from the silos and eight conveyer exhaust systems are controlled by vent bin filters. There are two ash conditioners (pug mills) for treating ash prior to loading the ash into open trucks in an enclosed unloading floor area below the 4,000-ton silo.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

The emissions from the silos and eight conveyer exhaust systems are controlled by vent bin filters. The silos each with have dustless loading spouts for loading tankers under a slight negative pressure. The emissions from the conditioned fly ash truck loadout is controlled by the enclosure. Emissions from the unpaved roads are controlled in accordance with a fugitive emissions control plan.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.026 lbs. per 1000 lbs. of exhaust gases calculated on a dry gas basis ^{3,7}	Hourly	EU-FlyAshStorage	SC VI.1	R 336.1331
2. PM-10	0.3 Pounds Per Hour ^{4,7}	Hourly	Each filter receiver portion of EU-FlyAshStorage	SC VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
3. PM-10	0.05 Pounds Per Hour ^{5,7}	Hourly	The surge silo No. 1 portion and the surge silo No. 2 portion of EU-FlyAshStorage	SC VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
4. PM-10	1.4 Pounds Per Hour ⁷	Hourly	The storage silo portion of EU-FlyAshStorage	SC VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
5. PM-10	0.35 Pounds Per Hour ⁷	Hourly	The load-out silo portion of EU-FlyAshStorage	SC VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
6. Opacity	10%	6-minute average	Each exhaust stack portion of EU-FlyAshStorage	SC VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
7. PM-10	0.11 Pounds Per Hour ^{6,8,9}	Hourly	Each filter exhaust of EU-FlyAshStorage	SC VI.2, SC VI.3	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
8. PM-10	0.51 Pounds Per Hour ^{6,8}	Hourly	3,000-ton Silo Bin Vent of EU-FlyAshStorage	SC VI.2, SC VI.3	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
9. PM-10	1.03 Pounds Per Hour ^{6,8}	Hourly	4,000-ton Silo Bin Vent of EU-FlyAshStorage	SC VI.2, SC VI.3	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
10. PM-10	0.017 Pounds Per Hour ^{6,8}	Hourly	Silo-to-Silo Transfer of EU-FlyAshStorage	SC VI.2, SC VI.3	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

³ The 0.026 pounds per 1000 pounds of exhaust gas limit is a concentration limit that applies independently to each of the eight exhaust stacks associated with EU-FlyAshStorage.

⁴ The 0.3 pounds per hour limit is a mass limit that applies independently to each of the four filter receivers and shall be determined from stacks SVFR-101, SVFR-102, SVFR-201, and SVBH-202.

⁵ The 0.05 pounds per hour limit is a mass limit that applies independently to each of the two surge silos and shall be determined from stacks SVBH-101 and SVBH-201.

⁶ Condition applies after the modifications to the dry fly ash system as permitted in PTI 113-20

⁷ Condition applies until the modifications to the dry fly ash system as permitted in PTI 113-20

⁸ PM2.5 emissions are restricted by the permitted PM10 emission limits

⁹ This limit applies to each Stack/Vent FAE-U01, FAE-U02, FAE-U012, FAE-U03, FAE-U04, FAE-U034.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Conditioned (mixed with water) Fly Ash transported to facility landfill ⁶	776,000 tpy	12-month rolling time period, as determined at the end of each calendar month	EU-FlyAshStorage	SC VI.4	R 336.1205, R 336.1225, 40 CFR 52.21 (c) and (d)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-FlyAshStorage unless a program for continuous fugitive emissions control for all plant roadways, the plant yard, and all material handling operations approved by the AQD District Supervisor has been implemented and is maintained. The fugitive emissions control plan will include the use of a dust suppressant for unpaved roads. The permittee shall update the fugitive emissions control plan within 90 days of completion of any modification to the plant roadways, the plant yard, or material handling operations or upon request by the District Supervisor. **(R 336.1225, R 336.1371, R 336.1372, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d), Act 451 324.5524)**
2. The permittee shall not maintain any outside fly ash storage piles in conjunction with EU-FlyAshStorage. **(R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not load material into the surge silo No. 1 portion of EU-FlyAshStorage unless the two filter receivers (Nos. FR-101 and FR-102) are installed, maintained, and operated in a satisfactory manner.⁷ **(R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**
2. The permittee shall not transfer material out of the surge silo No. 1 portion of EU-FlyAshStorage unless the bin vent filter (BH-101) is installed, maintained, and operated in a satisfactory manner.⁷ **(R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**
3. The permittee shall not load material into the surge silo No. 2 portion of EU-FlyAshStorage unless the two filter receivers (Nos. FR-201 and FR-202) are both installed, maintained, and operated in a satisfactory manner.⁷ **(R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**
4. The permittee shall not transfer material out of the surge silo No. 2 portion of EU-FlyAshStorage unless the bin vent filter (BH-201) is installed, maintained, and operated in a satisfactory manner.⁷ **(R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**
5. The permittee shall not operate the storage silo portion of EU-FlyAshStorage unless the bin vent filter (BH-301) is installed, maintained, and operated in a satisfactory manner.⁷ **(R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**
6. The permittee shall not operate or transfer material out of the load-out silo portion of EU-FlyAshStorage unless the bin vent filter (BH-401) is installed, maintained, and operated in a satisfactory manner.⁷ **(R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**
7. The permittee shall not operate the pneumatic conveyor or storage silos of EU-FlyAshStorage unless the emissions are controlled by bin vent filters with a grain loading rating of no more than 0.005 gr/dscfare installed, maintained, and operated in a satisfactory manner.⁶ **(R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**
8. The permittee shall not load out unconditioned ash in EU-FlyAshStorage unless the dustless spout and the associated bin filter for the silo being unloaded are installed, maintained, and operated in a satisfactory manner.⁶ **(R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**
9. The permittee shall not load out conditioned ash in EU-FlyAshStorage unless the unload area is fully enclosed.⁶ **(R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall perform and document non-certified visible emissions observations from exhaust stacks associated with EU-FlyAshStorage once per week when the emission unit is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD. (R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
2. The permittee shall maintain the manufacturer documentation for the grain loading rating for the bin vent filter. All records shall be maintained on-site and made available to the Department upon request.⁶ (R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
3. The permittee shall maintain the manufacturer recommendations for maintenance and replacement for the bin filters controlling emissions from the silos and the ash transfer systems in EU-FlyAshStorage. The permittee shall maintain a record of all maintenance and filter replacements performed. All records shall be maintained on-site and made available to the Department upon request.⁶ (R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
4. The permittee shall keep, in a satisfactory manner, a record of the conditioned fly ash transported to the facility landfill on a monthly and 12-month rolling time period basis. The record shall be maintained on-site and made available to the Department upon request.⁶ (R 336.1225, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))

VII. REPORTING

1. Within 30 days after completion of the modification to the dry fly ash system as authorized by the issuing Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the activity. Completion of the modification is considered to occur not later than commencement of trial operation of the modified system. (R 336.1201(7)(b), R 336.1205, R 336.1225, R 336.1331, R 336.1901, R 336.1910, 40 CFR 52.21(c) and (d))

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 with an asterisk (*) indicating a non-vertical discharge:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVFR-101 ^{7,*}	8	45	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SVFR-102 ^{7,*}	8	45	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
3. SVBH-101 ^{7,*}	6	45	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
4. SVFR-201 ^{7,*}	8	45	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
5. SVFR-202 ^{7,*}	8	45	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
6. SVBH-201 ^{7,*}	6	45	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
7. SVBH-301 ^{6,7,*}	32 x 18	107	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
8. SVBH-401 ^{6,7,*}	NA	94	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
9. SVFAE-U01 ^{6,*}	14	20	R 336.1225, 40 CFR 52.21(c) & (d)
10. SVFAE-U02 ^{6,*}	14	20	R 336.1225, 40 CFR 52.21(c) & (d)
11. SVFAE-U12 ^{6,*}	14	20	R 336.1225, 40 CFR 52.21(c) & (d)
12. SVFAE-U03 ^{6,*}	14	20	R 336.1225, 40 CFR 52.21(c) & (d)
13. SVFAE-U04 ^{6,*}	14	20	R 336.1225, 40 CFR 52.21(c) & (d)
14. SVFAE-U34 ^{6,*}	14	20	R 336.1225, 40 CFR 52.21(c) & (d)
15. SVBH-302 ^{6,*}	30 x 72	155	R 336.1225, 40 CFR 52.21(c) & (d)
16. SVBH-303 ^{6,*}	5	33	R 336.1225, 40 CFR 52.21(c) & (d)

*Stacks vent non-vertically

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

⁶ - Condition applies after the modifications to the dry fly ash system as permitted in PTI 113-20

⁷ - Condition applies until the modifications to the dry fly ash system as permitted in PTI 113-20