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|  | **MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY****AIR QUALITY DIVISION** |  |
| EFFECTIVE DATE: September 1, 2020ISSUED TO**ANR Pipeline Company – Winfield Compressor Station**State Registration Number (SRN): N5578LOCATED AT21453 Tamarack Road, Howard City, Montcalm County, Michigan  |
|  |
| **RENEWABLE OPERATING PERMIT**Permit Number: MI-ROP-N5578-2020Expiration Date: September 1, 2025Administratively Complete ROP Renewal Application Due Between March 1, 2024 and March 1, 2025This 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 Rule 210(1) of the administrative rules promulgated under Act 451, 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. |

Michigan Department of Environment, Great Lakes, and Energy

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Heidi Hollenbach, Grand Rapids District Supervisor**TABLE OF CONTENTS**

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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 are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or is state-only enforceable will be noted as such.

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

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

# A. GENERAL CONDITIONS

## Permit Enforceability

* All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
* Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
* Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

## General Provisions

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

1. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).2 **(R 336.1370)**
2. 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

1. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, “Except as provided in Subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:”2 **(R 336.1301(1))**
	1. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
	2. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.

1. 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:
	1. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.1 **(R 336.1901(a))**
	2. Unreasonable interference with the comfortable enjoyment of life and property.1**(R 336.1901(b))**

## Testing/Sampling

1. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner’s or operator’s expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).2 **(R 336.2001)**
2. 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))**
3. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

## Monitoring/Recordkeeping

1. 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))**
	1. The date, location, time, and method of sampling or measurements.
	2. The dates the analyses of the samples were performed.
	3. The company or entity that performed the analyses of the samples.
	4. The analytical techniques or methods used.
	5. The results of the analyses.
	6. The related process operating conditions or parameters that existed at the time of sampling or measurement.
2. 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

1. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
2. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**
3. 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))**
4. 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))**
	1. 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).
	2. 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.
	3. 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.
5. 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))**
	1. 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.
	2. 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.
6. 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))**
7. 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))**
8. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.2 **(R 336.1912)**

## Permit Shield

1. 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))**
	1. The applicable requirements are included and are specifically identified in the ROP.
	2. 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.

1. Nothing in this ROP shall alter or affect any of the following:
	1. 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))**
	2. 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))**
	3. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
	4. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
2. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
	1. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
	2. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
	3. 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))**
	4. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
	5. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
3. 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

1. 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)**
2. 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))**
3. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**
4. 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

1. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
	1. 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))**
	2. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
	3. 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))**
	4. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

## Renewals

1. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

## Stratospheric Ozone Protection

1. 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.
2. 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

1. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
2. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
	1. June 21, 1999,
	2. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
	3. The date on which a regulated substance is first present above a threshold quantity in a process.
3. 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.
4. 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

1. 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)

1. 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))**
2. 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)**
3. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.2**(R 336.1219)**
4. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.2 **(R 336.1201(4))**

**Footnotes:**

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

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

# B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

**SOURCE-WIDE CONDITIONS – ASBESTOS NESHAP**

**DESCRIPTION**

Asbestos NESHAP (40 CFR Part 61, Subpart M) and report certification requirement*s*.

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(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 waste shipment records of all asbestos-containing waste material transported off the facility site in accordance with the provisions of 40 CFR 61.150(d)(1), (2) and (3). **(40 CFR 61.150(d)(1), (2) and (3))**

**See Appendix 3**

**VII. REPORTING**

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

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

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

1. For all renovation of regulated asbestos containing material and demolition required to submit notification under 40 CFR 61.145(a), the permittee shall provide notification to AQD in accordance with the provisions of 40 CFR 61.145(b). **(40 CFR 61.145(a) and (b))**
2. With the exception of ordered demolitions, as defined by 40 CFR 61.145(a)(3), the permittee shall provide the notification at least ten working days prior to the onset of any activity that would break up, dislodge or similarly disturb asbestos material. **(40 CFR 61.145(b))**
3. For ordered demolitions, as defined by 40 CFR 61.145(a)(3), the permittee shall provide such notification no later than the following workday after the onset of any activity that would break up, dislodge or similarly disturb asbestos material. **(40 CFR 61.145(a)(3))**
4. The permittee shall provide notification to AQD for all instances where a waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the permittee within 45 days of the date the waste was accepted by the initial transporter, in accordance with the provisions of 40 CFR 61.150(d)(4). **(40 CFR 61.150(d)(4))**

**See Appendix 8**

**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall perform renovation of all regulated asbestos containing material (RACM) in accordance with 40 CFR 61.145(c), and if applicable, Appendix A of 40 CFR Part 61, Subpart M. **(40 CFR 61.145(c), 40 CFR Part 61, Subpart M, Appendix A)**
2. The permittee shall dispose all RACM in accordance with the provisions of 40 CFR 61.150(a), (b) and (c). **(40 CRF 61.150(a), (b) and (c))**
3. The permittee shall comply with all applicable portions of 40 CFR Part 61, Subpart M - National Emission Standard for Asbestos and 40 CFR Part 61, Subpart A - General Provisions. **(40 CFR Part 61, Subparts A and M)**

**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).

# C. EMISSION UNIT SPECIAL CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

## EMISSION UNIT SUMMARY TABLE

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

| **Emission Unit ID** | **Emission Unit Description****(Including Process Equipment & Control Device(s))** | **Installation****Date/****Modification Date** | **Flexible Group ID** |
| --- | --- | --- | --- |
| EUWF001 | Superior model 12VGT825; 1,500 hp high speed, four-cycle, turbo charged, lean-burn, spark ignited natural gas-fired internal combustion reciprocating compressor engines used to compress natural gas into the storage reservoir during injection and into the pipeline during withdrawal. | 1971 / NA | FGWFREC |
| EUWF002 | Superior model 12VGT825; 1,500 hp high speed, four-cycle, turbo charged, lean-burn, spark ignited natural gas-fired internal combustion reciprocating compressor engines used to compress natural gas into the storage reservoir during injection and into the pipeline during withdrawal. | 1972 / NA | FGWFREC |
| EUWF003 | Superior model 12VGT825; 1,500 hp high speed, four-cycle, turbo charged, lean-burn, spark ignited natural gas-fired internal combustion reciprocating compressor engines used to compress natural gas into the storage reservoir during injection and into the pipeline during withdrawal. | 1972 / NA | FGWFREC |
| EUWFBOILER | Hi-Delta Boiler; 1.26 MMBTU/hr | 2013 / NA | FGMACTDDDDD |
| EUWFPIPEMAINT | Routine and emergency venting of natural gas from transmission and distribution systems. | NA | FGRULE285(2)(mm) |
| EUWFFIELDMAINT | Routine and emergency venting of field gas from gathering lines. | NA | FGRULE285(2)(mm) |

# D. FLEXIBLE GROUP SPECIAL CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

## FLEXIBLE GROUP SUMMARY TABLE

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

| **Flexible Group ID** | **Flexible Group Description** | **Associated****Emission Unit IDs** |
| --- | --- | --- |
| FGWFREC | The facility uses three 1,500 hp natural gas-fired internal combustion reciprocating compressor engines which are used to compress natural gas for transport via a natural gas pipeline. These engines are used as needed to regulate flow to and from the storage field. All three function identically, and, can be used interchangeably in the system. | EUWF001 EUWF002EUWF003 |
| FGMACTDDDDD | Requirements for a new boiler and process heater with a heat input capacity of <10 MMBTU/hr for major sources of HAP emissions per 40 CFR Part 63, SubpartDDDDD (Boiler MACT). These boilers or process heaters are designed to burn solid, liquid, or gaseous fuels. | EUWFBOILER |
| FGRULE285(2)(mm) | Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 285(2)(mm). | EUWFPIPEMAINTEUWFFIELDMAINT |

## FGWFREC

**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

The facility uses three 1,500 hp natural gas-fired internal combustion reciprocating compressor engines which are used to compress natural gas for transport via a natural gas pipeline. These engines are used as needed to regulate flow to and from the storage field. All three function identically and can be used interchangeably in the system.

**Emission Units:** EUWF001, EUWF002, EUWF003

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall only fire pipeline quality natural gas in the compressor engines at this facility. **(R 336.1301(1)(a)**

**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 monitor and record the natural gas consumption rate for each emission unit for each calendar month. **(R 336.1213(3)(b))**

**VII. REPORTING**

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

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked orreceived 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 orreceived by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

**See Appendix 8**

**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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).

## FGMACTDDDDD

**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Requirements for a new boiler and process heater with a heat input capacity of <10 MMBTU/hr for major sources of HAP emissions per 40 CFR Part 63, SubpartDDDDD (Boiler MACT). These boilers or process heaters are designed to burn solid, liquid, or gaseous fuels.

**Emission Unit:** EUWFBOILER (1.26 MMBTU/hr)

|  |  |
| --- | --- |
| Equal to or less than 5 MMBTU/hr and only burns gaseous or light liquid fuels  | EUWFBOILER (1.26 MMBTU/hr) |
| Greater than 5 MMBTU/hr and less than 10 MMBTU/hr that burns gaseous or light liquid fuels or any unit that is less than 10 MMBTU/hr and burns any heavy liquid or solid fuels | NA |

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee must, for boilers or process heaters with a heat input capacity of less than or equal to 5 MMBTU/hr, conduct a 5-year tune-up according to 40 CFR 63.7540(a)(12). Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. The burner inspection may be delayed until the next scheduled or unscheduled unit shutdown, but each burner must be inspected at least once every 72 months. **(40 CFR 63.7500(d) or (e), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(12), 40 CFR Part 63, Subpart DDDDD, Table 3.1)**
2. The permittee must conduct a tune-up of each boiler or process heater as specified in the following: **(40 CFR 63.7540(a)(11) or (12))**
3. As applicable, inspect the burner and clean or replace any components of the burner as necessary. The permittee may perform the burner inspection any time prior to the tune-up or may delay the burner inspection until the next scheduled unit shutdown. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. **(40 CFR 63.7540(a)(10)(i))**
4. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.7540(a)(10)(ii))**
5. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The permittee may delay the inspection until the next scheduled unit shutdown. **(40 CFR 63.7540(a)(10)(iii))**
6. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOX requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**
7. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**
8. If the unit is not operated on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup. **(40 CFR 63.7540(a)(13))**
9. At all times, the permittee must operate and maintain each existing small boiler or process heater, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.7500(a)(3))**

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

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

NA

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or 2 or 5 year compliance report or one-time energy assessment, as applicable, that the permittee submitted. **(40 CFR 63.7555(a)(1))**
2. The permittee must keep the records in a form suitable and readily available for expeditious review. **(40 CFR 63.7560(a))**
3. The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.7560(b))**
4. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3 years. **(40 CFR 63.7560(c))**

**VII*.* REPORTING**

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

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked orreceived 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 orreceived by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

1. For the initial compliance demonstration for each boiler or process heater, the permittee must submit the Notification of Compliance Status before the close of business on the 60th day following the completion of the initial boiler tune-up for all boiler or process heaters at the facility. The Notification of Compliance Status report must contain all the information specified below.
	1. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by the permittee or the EPA through a petition process to be a non-waste under 40 CFR 241.3, whether the fuel(s) were a secondary material processed from discarded non‑hazardous secondary materials within the meaning of 40 CFR 241.3, and justification for the selection of fuel(s) burned during the compliance demonstration. **(40 CFR 63.7545(e)(1))**
	2. In addition to the information required in 40 CFR 63.9(h)(2), the notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
2. “This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR Part 63, Subpart DDDDD at this site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi).” **(40 CFR 63.7545(e)(8)(i))**
3. Except for units that burn only natural gas, refinery gas, or other gas 1 fuel, or units that qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act, include the following: “No secondary materials that are solid waste were combusted in any affected unit.” **(40 CFR 63.7545(e)(8)(iii))**
4. The permittee must submit the first compliance report for new units and must cover the period beginning on September 30, 2019 and ending on December 31, 2024for units equal to or less than 5 MMBTU/hr and only burn gaseous or light liquid fuels. The first 5-year compliance report must be postmarked or submitted no later than March 15th following the end of the first reporting period. **(40 CFR 63.7550(b)(1), (2) and (5))**
5. The permittee must submit boiler or process heater tune-up compliance reports to the appropriate AQD District Office and must be postmarked or submitted by March 15th of the year following the applicable 5-year period starting from January 1 of the year following the previous tune-up to December 31 (of the latest tune-up year). Compliance reports must also be submitted to EPA using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA’s Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to EPA Region 5. **(40 CFR 63.7550(b)**, **40 CFR 63.7550(h)(3))**
6. The permittee must include the following information in the compliance report. **(40 CFR 63.7550(c)(1))**
7. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**
8. Process unit information, emissions limitations, and operating parameter limitations.

**(40 CFR 63.7550(c)(5)(ii))**

1. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**
2. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done biennially or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**
3. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.7550(c)(5)(xvii))**

**See Appendix 8**

**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and DDDDD for Industrial, Commercial, and Institutional Boilers and Process Heaters. **(40 CFR Part 63, Subparts A and DDDDD)**

**Footnotes:**

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

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

## FGRULE285(2)(mm)

**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 285(2)(mm).

**Emission Units:** EUWFPIPEMAINT, EUWFFIELDMAINT

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall, at a minimum, implement measures to assure safety of employees and the public and minimize impacts to the environment. **(R 336.1285(2)(mm)(ii)(B))**
2. For venting of field gas for routine maintenance or relocation of gathering pipelines in amounts greater than 1,000,000 standard cubic feet, the permittee shall, at a minimum, implement measures to assure safety of employees and the public and minimize impacts to the environment. **(R 336.1285(2)(mm)(iii)(B))**

**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))**

NA

**VII. REPORTING**

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

1. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
2. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
3. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall notify the AQD District Supervisor prior to a scheduled pipeline venting. **(R 336.1285(2)(mm)(ii)(A))**
4. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall provide necessary notification in accordance with the Michigan gas safety standards, the federal pipeline and hazardous materials safety administration standards, and the federal energy regulatory commission standards, as applicable. The permittee is not required to copy the AQD on the notifications. **(R 336.1285(2)(mm)(ii)(B))**
5. For venting of field gas for routine maintenance or relocation of gathering pipelines in amounts greater than 1,000,000 standard cubic feet, the permittee shall notify the AQD District Supervisor prior to a scheduled pipeline venting. **(R 336.1285(2)(mm)(iii)(A))**
6. For venting of field gas for routine maintenance or relocation of gathering pipelines in amounts greater than 1,000,000 standard cubic feet, the permittee shall provide necessary notification in accordance with the Michigan Department of Environment, Great Lakes and Energy, Office of Geological Survey, and the Michigan Public Service Commission Standards, as applicable. The permittee is not required to copy the AQD on the notifications. **(R 336.1285(2)(mm)(iii)(B))**
7. For emergency venting of natural gas or field gasesin amounts greater than 1,000,000 standard cubic feet per event, the permittee shall notify the pollution emergency alert system (PEAS) within 24 hours of an emergency pipeline venting. For purposes of this requirement, an emergency is considered an unforeseen event that disrupts normal operating conditions and poses a threat to human life, health, property, or the environment if not controlled immediately. **(R 336.1285(2)(mm)(iv))**

**See Appendix 8**

**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

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

# 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. Acronyms and Abbreviations

|  |  |
| --- | --- |
| **Common Acronyms** | **Pollutant / Measurement Abbreviations** |
| AQD | Air Quality Division | acfm | Actual cubic feet per minute |
| BACT | Best Available Control Technology | BTU | British Thermal Unit |
| CAA | Clean Air Act | °C | Degrees Celsius |
| CAM | Compliance Assurance Monitoring | CO | Carbon Monoxide |
| CEM | Continuous Emission Monitoring | CO2e | Carbon Dioxide Equivalent |
| CEMS | Continuous Emission Monitoring System | dscf | Dry standard cubic foot |
| CFR | Code of Federal Regulations | dscm | Dry standard cubic meter |
| COM | Continuous Opacity Monitoring | °F | Degrees Fahrenheit |
| Department/department | Michigan Department of Environment, Great Lakes, and Energy | gr | Grains |
| HAP | Hazardous Air Pollutant |
| EGLE | Michigan Department of Environment, Great Lakes, and Energy | Hg | Mercury |
| hr | Hour |
| EU | Emission Unit | HP | Horsepower |
| FG | Flexible Group | H2S | Hydrogen Sulfide |
| GACS | Gallons of Applied Coating Solids | kW | Kilowatt |
| GC | General Condition | lb | Pound |
| GHGs | Greenhouse Gases | m | Meter |
| HVLP | High Volume Low Pressure\* | mg | Milligram |
| ID | Identification  | mm | Millimeter |
| IRSL | Initial Risk Screening Level | MM | Million |
| ITSL | Initial Threshold Screening Level | MW | Megawatts |
| LAER | Lowest Achievable Emission Rate | NMOC | Non-methane Organic Compounds |
| MACT | Maximum Achievable Control Technology | NOx | Oxides of Nitrogen |
| MAERS | Michigan Air Emissions Reporting System | ng | Nanogram |
| MAP | Malfunction Abatement Plan | PM | Particulate Matter |
| MSDS | Material Safety Data Sheet | PM10 | Particulate Matter equal to or less than 10 microns in diameter |
| NA | Not Applicable |
| NAAQS | National Ambient Air Quality Standards | PM2.5 | Particulate Matter equal to or less than 2.5microns in diameter |
| NESHAP | National Emission Standard for Hazardous Air Pollutants | pph | Pounds per hour |
| ppm | Parts per million |
| NSPS | New Source Performance Standards | ppmv | Parts per million by volume |
| NSR | New Source Review | ppmw | Parts per million by weight |
| PS | Performance Specification | % | Percent |
| PSD | Prevention of Significant Deterioration | psia | Pounds per square inch absolute |
| PTE | Permanent Total Enclosure | psig | Pounds per square inch gauge |
| PTI | Permit to Install | scf | Standard cubic feet |
| RACT | Reasonable Available Control Technology | sec | Seconds |
| ROP | Renewable Operating Permit | SO2 | Sulfur Dioxide |
| SC | Special Condition | TAC | Toxic Air Contaminant |
| SCR | Selective Catalytic Reduction | Temp | Temperature |
| SNCR | Selective Non-Catalytic Reduction | THC | Total Hydrocarbons |
| SRN | State Registration Number | tpy | Tons per year |
| TEQ | Toxicity Equivalence Quotient | µg | Microgram |
| USEPA/EPA | United States Environmental Protection Agency | µm | Micrometer or Micron |
| VOC | Volatile Organic Compounds |
| VE | Visible Emissions | yr | Year |

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

## Appendix 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. 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. 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. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

## Appendix 6. Permits to Install

At the time of permit issuance, no Permits to Install have been issued to this facility. Therefore, this appendix is not applicable.

## Appendix 7. Emission Calculations

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

## Appendix 8. Reporting

**A. Annual, Semiannual, and Deviation Certification Reporting**

The permittee shall use EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

**B. Other Reporting**

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.