STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE DIRECTOR

In the matter of administrative proceedings against **CITY OF WYANDOTTE MUNICIPAL POWER PLANT** a municipal entity organized under the laws of the State of Michigan and doing business at 2555 Van Alstyne Street, City of Wyandotte, County of Wayne, State of Michigan	AQD No. 45-2014 SRN: B2132

STIPULATION FOR ENTRY OF FINAL ORDER
BY CONSENT

This proceeding resulted from allegations by the Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) against City of Wyandotte Municipal Power Plant (Company), a municipal entity doing business at 2555 Van Alstyne Street, Wyandotte, Michigan, with State Registration Number (SRN) B2132. The MDEQ alleges that the Company is in violation of Renewable Operating Permit (ROP) MI-ROP-B2132-2010 and Title 40 of the Code of Federal Regulation (CFR), Part 60, Subpart D. Specifically, the MDEQ alleges that the Company exceeded the nitrogen oxides (NOx) limit from EUUNIT7BLR when firing natural gas and reported excessive downtime from the NOx and sulfur dioxide (SO_2) continuous emission monitors for EUUNIT7BLR and EUUNIT8BLR as cited herein and in the Violations Notice dated April 1, 2014. The Company and MDEQ stipulate to the termination of this proceeding by entry of this Stipulation for Entry of a Final Order by Consent (Consent Order).

The Company and MDEQ stipulate as follows:

1. The Natural Resources and Environmental Protection Act, 1994 PA 451 (Act 451), MCL 324.101 *et seq.* is an act that controls pollution to protect the environment and natural resources in this State.

2. Article II, Pollution Control, Part 55 of Act 451 (Part 55), MCL 324.5501 *et seq.* provides for air pollution control regulations in this State.

3. The MDEQ was created as a principal department within the Executive Branch of the State of Michigan pursuant to Executive Order 2011-1 and has all statutory authority, powers, duties, functions and responsibilities to administer and enforce all provisions of Part 55.

4. The Director has delegated authority to the Chief of the AQD (AQD Chief) to enter into this Consent Order.

5. The termination of this matter by a Consent Order pursuant to Section 5528 of Part 55 is proper and acceptable.

6. The Company and the MDEQ agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by the Company that the law has been violated.

7. This Consent Order becomes effective on the date of execution (effective date of this Consent Order) by the AQD Chief.

8. The Company shall achieve compliance with the aforementioned regulations in accordance with the requirements contained in this Consent Order.

COMPLIANCE PROGRAM AND IMPLEMENTATION SCHEDULE

9. A. Permit

1. No later than October 15, 2014, the Company shall submit to the AQD an administratively complete application for the renewal of MI-ROP-B2132-2010.

2. Upon issuance of the renewal of MI-ROP-B2132-2010 and any subsequent permit revision, it shall be attached hereto as Exhibit A of this Consent Order

B. Interim Emission Limitations

1. On and after the effective date of this Consent Order, the NOx emission rate from the EUUNIT7BLR shall not exceed 0.20 pounds per million BTU when firing gaseous fuel. This condition shall expire upon the renewal issuance of MI-ROP-B2132-2010.

GENERAL PROVISIONS

10. This Consent Order in no way affects the Company's responsibility to comply with any other applicable state and federal, or local laws or regulations, including without limitation, any amendments to the federal Clean Air Act, 42 USC 7401 *et seq.*, Act 451, Part 55 or their rules and regulations, or to the State Implementation Plan.

11. This Consent Order constitutes a civil settlement and satisfaction as to the resolution of the violations specifically addressed herein; however, it does not resolve any criminal action that may result from these same violations.

12. Within thirty (30) days after the effective date of this Consent Order, the Company shall pay to the General Fund of the State of Michigan, in the form of a check made payable to the "State of Michigan" and mailed to the Michigan Department of Environmental Quality, Accounting Services Division, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909-8157, a settlement amount of $22,000.00, which includes AQD costs for investigation and enforcement. This total settlement amount shall be paid within thirty (30) days of the effective date of this Consent Order. To ensure proper credit, all payments made pursuant to this Consent Order shall include the "Payment Identification Number AQD40052" on the front of the check and/or in the cover letter with the payment. This settlement amount is in addition to any fees, taxes, or other fines that may be imposed on the Company by law.

13. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.B.1 of this Consent Order, the Company is subject to a stipulated fine of up to $7,500.00 per violation. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.A.1 of this Consent Order, the Company is subject to a stipulated fine of up to $5,000.00 per violation. On and after the effective date of this Consent Order, if the Company fails to comply with any other paragraph or provision of this Consent Order, the Company is subject to a stipulated fine of up to $500.00 per violation. The amount of the stipulated fines imposed pursuant to this paragraph shall be within the discretion of the MDEQ. Stipulated fines submitted under this Consent Order shall be by check, payable to the State of Michigan within thirty (30) days of written demand and shall be mailed to the Michigan Department of Environmental Quality, Accounting Services Division, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909 8157. To ensure proper credit, all payments shall include the "Payment Identification Number AQD40052-S" on the front of the check and/or in the cover letter with

the payment. Payment of stipulated fines shall not alter or modify in any way the Company's obligation to comply with the terms and conditions of this Consent Order.

14. The AQD, at its discretion, may seek stipulated fines or statutory fines for any violation of this Consent Order which is also a violation of any provision of applicable federal and state law, rule, regulation, permit, or MDEQ administrative order. However, the AQD is precluded from seeking both a stipulated fine under this Consent Order and a statutory fine for the same violation.

15. To ensure timely payment of the settlement amount assessed in paragraph 12 and any stipulated fines assessed pursuant to paragraph 13 of this Consent Order, the Company shall pay an interest penalty to the State of Michigan each time it fails to make a complete or timely payment under this Consent Order. The interest payment shall be determined at a rate of interest that is equal to one percent (1%) plus the average interest rate paid at auctions of 5-year United States treasury notes during the six months immediately preceding July 1 and January 1, as certified by the state treasurer, compounded annually, and using the full increment of amount due as principal, calculated from the due date specified in this Consent Order until the date that delinquent payment is finally paid in full. Payment of an interest penalty by the Company shall be made to the State of Michigan in accordance with paragraph 13 of this Consent Order. Interest payments shall be applied first towards the most overdue amount or outstanding interest penalty owed by the Company before any remaining balance is applied to subsequent payment amount or interest penalty.

16. The Company agrees not to contest the legal basis for the settlement amount assessed pursuant to paragraph 12. The Company also agrees not to contest the legal basis for any stipulated fines assessed pursuant to paragraph 13 of this Consent Order, but reserves the right to dispute in a court of competent jurisdiction the factual basis upon which a demand by MDEQ of stipulated fines is made. In addition, the Company agrees that said fines have not been assessed by the MDEQ pursuant to Section 5529 of Part 55 and therefore are not reviewable under Section 5529 of Part 55.

17. This compliance program is not a variance subject to the 12 month limitation specified in Section 5538 of Part 55.

18. This Consent Order shall remain in full force and effect for a period of at least two (2) years. Thereafter, the Consent Order shall terminate only upon written notice of termination issued by the AQD Chief. Prior to issuance of a written notice of termination, the Company shall submit a request, to the

AQD Chief at the Michigan Department of Environmental Quality, Air Quality Division, P.O. Box 30260, Lansing, Michigan 48909-7760, consisting of a written certification that the Company has fully complied with all the requirements of this Consent Order and has made all payments including all stipulated fines required by this Consent Order. Specifically, this certification shall include: (i) the date of compliance with each provision of the compliance program and the date any payments or stipulated fines were paid; (ii) a statement that all required information has been reported to the AQD Detroit District Supervisor; (iii) confirmation that all records required to be maintained pursuant to this Consent Order are being maintained at the facility; and, (iv) such information as may be requested by the AQD Chief.

19. In the event City of Wyandotte Municipal Power Plant sells or transfers the facility, with SRN B2132, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within thirty (30) calendar days, the Company shall also notify the AQD Detroit District Supervisor, in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser and/or transferee. As a condition of the sale, the City of Wyandotte Municipal Power Plant must obtain the consent of the purchaser and/or transferee, in writing, to assume all of the obligations of this Consent Order. A copy of that agreement shall be forwarded to the AQD Detroit District Supervisor within thirty (30) days of assuming the obligations of this Consent Order.

20. Prior to the effective date of this Consent Order and pursuant to the requirements of Sections 5511 and 5528(3) of Part 55, the public was notified of a 30-day public comment period and was provided the opportunity for a public hearing.

21. Section 5530 of Part 55 may serve as a source of authority but not a limitation under which the Consent Order may be enforced. Further, Part 17 of Act 451 and all other applicable laws and any other legal basis or applicable statute may be used to enforce this Consent Order.

22. The Company hereby stipulates that entry of this Consent Order is a result of an action by MDEQ to resolve alleged violations of its facility located at 2555 Van Alstyne Street, Wyandotte, Michigan. The Company further stipulates that it will take all lawful actions necessary to fully comply with this Consent Order, even if the Company files for bankruptcy in the future. The Company will not seek discharge of the settlement amount and any stipulated fines imposed hereunder in any future

bankruptcy proceedings, and the Company will take necessary steps to ensure that the settlement amount and any future stipulated fines are not discharged. The Company, during and after any future bankruptcy proceedings, will ensure that the settlement amount and any future stipulated fines remain an obligation to be paid in full by the Company to the extent allowed by applicable bankruptcy law.

The undersigned certifies that he/she is fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

CITY OF WYANDOTTE MUNICIPAL POWER PLANT

RODERICK J LESKO GENERAL MANAGER
Print Name and Title

Signature Date: 8-20-14

The above signatory subscribed and sworn to before me this 20 day of August, 2014.

Notary Public
VALERIE HALL
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF WAYNE
My Commission Expires January 12, 2019

Approved as to Content:

Mary Ann Dolehanty
for Lynn Fiedler, Acting Chief
AIR QUALITY DIVISION
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Dated: Sept. 9, 2014

Approved as to Form:

Neil Gordon, Section Head
ENVIRONMENTAL REGULATION SECTION
ENVIRONMENT, NATURAL RESOURCES,
AND AGRICULTURE DIVISION
DEPARTMENT OF ATTORNEY GENERAL

Dated: Sept. 5, 2014

FINAL ORDER

The Chief of the Air Quality Division having had opportunity to review the Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Environmental Quality pursuant to the provisions of Part 55 of Act 451 and otherwise being fully advised on the premises,

HAS HEREBY ORDERED that the Consent Order is approved and shall be entered in the record of the MDEQ as a Final Order.

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

MaryAnn Dolehanty
for Lynn Fiedler, Acting Chief
Air Quality Division

Effective Date: Sept. 9, 2014

Michigan Department of Natural Resources and Environment
Air Quality Division

EFFECTIVE DATE: April 15, 2010

ISSUED TO

City of Wyandotte Municipal Power Plant

State Registration Number (SRN): B2132

LOCATED AT

2555 Van Alstyne, Wyandotte, Michigan 48192

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2132-2010

Expiration Date: April 15, 2015

Administratively Complete ROP Renewal Application Due Between October 15, 2013 and October 15, 2014

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B2132-2010

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Natural Resources & Environment

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Teresa Seidel, Southeast Michigan District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**

- Those conditions that are hereby incorporated in a state only enforceable Source-wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**

- Those conditions that are hereby incorporated in federally enforceable Source- wide PTI No. MI-PTI-B2132-2010 pursuant to Rule 201(2)(c) are designated by footnote two**. (R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**

2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**

3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**

4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
   a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
   c. Inspect, at reasonable times, any of the following:
      i. Any stationary source.
      ii. Any emission unit.
      iii. Any equipment, including monitoring and air pollution control equipment.
      iv. Any work practices or operations regulated or required under the ROP.
   d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.

5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed

by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**

7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**

8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

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

10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; “a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP.” The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part)**:
    a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
    b. A limit specified by an applicable federal new source performance standard.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
    a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.[1] **(R 336.1901(a))**
    b. Unreasonable interference with the comfortable enjoyment of life and property. [1] **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner’s or operator’s expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**

14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**

15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
    a. The date, location, time, and method of sampling or measurements.
    b. The dates the analyses of the samples were performed.
    c. The company or entity that performed the analyses of the samples.
    d. The analytical techniques or methods used.
    e. The results of the analyses.
    f. The related process operating conditions or parameters that existed at the time of sampling or measurement.

17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**

19. A responsible official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**

20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
    a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
    b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
    c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
    a. Submitting a certification by a responsible official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
    b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a responsible official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**

24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**

25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a responsible official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

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

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

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

d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
    a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
    b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
    c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
    d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
    e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**

31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**

32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.

37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
    c. The date on which a regulated substance is first present above a threshold quantity in a process.

40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.

41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. [2] **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. [2] **(R 336.1201(8), Section 5510 of Act 451)**

45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ. [2] **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. [2] **(R 336.1201(4))**

Footnotes:
[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).

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUUNIT5BLR	The Unit 5 boiler at the Wyandotte Municipal Power Plant is a 22.5 MW, 900 psi natural gas fired boiler. This boiler is currently used for back up purposes only.	01/01/1958 / 01/01/1992	NA
EUUNIT7BLR	The Unit 7 boiler at the Wyandotte Municipal Power Plant is a 32.5 MW, 900 psi pulverized coal boiler capable of firing coal and natural gas. The boiler exhausts to an electrostatic precipitator (ESP) for controlling particulate emissions.	01/01/1977 / 01/01/1998	NA
EUUNIT8BLR	The Unit 8 boiler at the Wyandotte Municipal Power Plant is a 25 MW, 900 psi circulating fluidized bed boiler capable of firing coal, untreated virgin wood chip waste and tire-derived fuel (TDF), with a maximum steam generating capacity of 275,000 pounds per hour. Natural gas is used in the boiler for start-up. The boiler utilizes limestone injection to control SO2 emissions and a baghouse for particulate matter control.	01/01/1988 / 01/01/1998	NA
EU-WMSENGINE1	2000 kW standby compression ignition diesel fuel fired engine generator with a catalytic oxidation emission control system.	04/09/2007	FGWMSENGINES
EU-WMSENGINE2	2000 kW standby compression ignition diesel fuel fired engine generator with a catalytic oxidation emission control system.	04/09/2007	FGWMSENGINES
EU-WMSENGINE3	2000 kW standby compression ignition diesel fuel fired engine generator with a catalytic oxidation emission control system.	04/09/2007	FGWMSENGINES
EUCOALYARD	The coal yard is comprised of two separate piles covering approximately 2 acres on the south side of the facility. The fugitive dust emissions generated by the coal piles are reduced by the application of water.	01/01/1940	FGMATVENTS
EUROADWAYSB	Fugitive dust generated on the facility roadways.	01/01/1940	FGMATVENTS

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUU7SILOVENT	The Unit 7 boiler (EUUNIT7BLR) exhausts to an electrostatic precipitator (ESP). The flyash collected by the ESP is pneumatically conveyed to the flyash silo.	01/01/1976	FGMATVENTS
EUU8SILOVENT	The Unit 8 boiler (EUUNIT8BLR) exhausts to a baghouse. The flyash collected by the baghouse is pneumatically conveyed to the Unit 8 flyash silo.	01/01/1988	FGMATVENTS
EUFUGLIMESTONE	Emissions from crushed limestone or limestone sinterized product, which is delivered to the facility by barge or truck, unloaded via conveyor and stored in piles.	01/01/1988	FGMATVENTS
EUASHLOAD7	Flyash silo serving the Unit 7 boiler (EUUNIT7BLR). Flyash is loaded into trucks for disposal; fugitive emissions are controlled by wet suppression.	01/01/1976	FGMATVENTS
EUU8LIMESTONE	Emissions from crushed and aggregate limestone used in the Unit 8 boiler (EUUNIT8BLR) to control sulfur dioxide emissions.	01/01/1998	FGMATVENTS
EUASHLOAD8	Flyash silo serving the Unit 8 boiler (EUUNIT8BLR). Flyash is loaded into trucks for disposal; fugitive emissions are controlled by wet suppression.	04/15/1992	FGMATVENTS

EUUNIT5BLR
EMISSION UNIT CONDITIONS

DESCRIPTION
A 22.5 MW, 900 psi natural gas fired boiler. This boiler is currently used for back up purposes only.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT
NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The maximum heat input to EUUNIT5BLR shall not exceed 260 million BTU per hour.[2] **(R 336.1201(3))**

2. EUUNIT5BLR shall only fire natural gas.[2] **(R 336.1201(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. Permittee shall monitor and record the nitrogen oxides, stack gas flow, and carbon dioxide on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division and according to the monitoring requirements in 40 CFR Part 75.[2]

2. Permittee shall calculate and record sulfur dioxide emissions using Equation F-23 in Appendix F of 40 CFR part 75.[2]

See Appendices 3 and 4

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVUNIT5BLR	NA	198 [2]	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94 as outlined in a complete Phase II Acid Rain permit issued by the AQD. The Phase II Acid Rain Permit No. MI-AR-1866-200X is hereby incorporated into this RO Permit as Appendix 11.[2] **(R 336.1299(d))**

2. The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to R 336.1299(d) and 40 CFR Part 72.9(c)(1)(i).[2] **(R 336.1213(10))**

3. The permittee shall comply with the CAIR SO_2 Trading Program provisions of 40 CFR Part 97.201 through 97.288, as adopted and modified by R 336.1420, and as outlined in any complete CAIR SO_2 permit issued by the AQD. CAIR SO_2 Permit No. MI-SO2-1866-200X is hereby incorporated into this ROP as Appendix 12. [2] **(R 336.1420)**

4. The permittee shall hold allowances for complete deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total SO_2 emissions for the control period from the source pursuant to 40 CFR Part 97.254. [2] **(40 CFR Part 97.254)**

5. The permittee shall comply with the CAIR NO_x Annual Trading Program provisions of 40 CFR Part 97.101 through 97.188, as adopted and modified by R 336.1802a, R 336.1803, R 336.1821, and R 336.1830 through R 336.1834, and as outlined in any complete CAIR NO_x Annual permit issued by the AQD. CAIR NO_x Annual Permit No. MI-NOA-1866-2009 is hereby incorporated into this ROP as Appendix 13. [2] **(R 336.1821)**

6. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total NO_x emissions for the control period from the source pursuant to 40 CFR Part 97.154. [2] **(40 CFR Part 97.154)**

7. The permittee shall comply with the CAIR NO_X Ozone Trading Program provisions of 40 CFR Part 97.301 through 97.388, as adopted and modified by R 336.1802a, R 336.1803, and R 336.1821 through R 336.1826,

and as outlined in any complete CAIR NO_x Ozone permit issued by the AQD. CAIR NO_x Ozone Permit No. MI-NOO-1866-2009 is hereby incorporated into this ROP as Appendix 14.[2] **(R 336.1821)**

8. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total NO_x emissions for the control period from the source pursuant to 40 CFR Part 97.354.[2] **(40 CFR Part 97.354)**

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).

EUUNIT7BLR
EMISSION UNIT CONDITIONS

DESCRIPTION
A 32.5 MW, 900 psi pulverized coal boiler capable of firing coal and natural gas.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT
The boiler is equipped with an electrostatic precipitator (ESP) for controlling particulate emissions and a low NO_x burner.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. SO_2	1.2 pounds per million BTU's input[2]	3-hour average	EUUNIT7BLR	VI.1	40 CFR §60.43, R 336.1201(3)
2. NO_x	0.70 pounds per million BTU's input[2]	3-hour average	EUUNIT7BLR	VI.1	40 CFR §60.44, R 336.201(3)
3. PM	1. 0.10 pounds per million BTU's input.[2]	Test Protocol	EUUNIT7BLR	V.1	40 CFR §60.42, R 336.1201(3)
	2. 0.078 pounds per 1,000 pounds of exhaust gases corrected to 50% excess air.[2]	Test Protocol	EUUNIT7BLR	V.1	R 336.1331(c), R 336.1201(3)
	3. 44 pounds per hour.[2]	Test Protocol	EUUNIT7BLR	V.1	R 336.1331(c), R 336.1201(3)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Permittee shall not operate the electrostatic precipitator (ESP) unless it is equipped with a saturable core reactor, silicon-controlled rectifier linear reactor, or equivalent type automatic control system.[2] **(R 336.1330(1))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Each transformer-rectifier set of the ESP shall be capable of operating at the optimum spark-limited mode and shall meter and display the primary RMS voltage and amperage, the average secondary amperage, and the average spark rate. The requirement to meter and display average spark rate shall not apply if the automatic controller employs solid state circuitry to preset power levels based on sparking rate limits.[2] **(R 336.1330(2))**

V. TESTING/SAMPLING

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

1. The permittee shall conduct emission tests to determine the particulate matter emission rate from EUUNIT7BLR once during the term of this ROP. Not less than 30 days prior to the anticipated test date, a complete stack testing plan shall be submitted to the AQD District Supervisor for approval.[2] **(R 336.12001, R 336.2003, R 336.2004)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. Permittee shall monitor and record the sulfur dioxide, nitrogen oxides, stack gas flow, carbon dioxide, and opacity on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division and according to the monitoring requirements in 40 CFR Part 75 which also satisfy the monitoring requirements in 40 CFR Part 60, Subparts A and D.[2] **(40 CFR 60.47a, R 336.1201(3))**

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

3. The permittee shall utilize COMS-recorded opacity as an indicator of the proper functioning of the electrostatic precipitator and the emission unit's compliance with the particulate matter emission limit, except during periods of start-up, shutdown, monitoring system malfunction, system repairs, or QA activities. An excursion is defined as two or more consecutive 1-hour block average opacity values greater than 15% as measured by COMS and recorded by the DAHS. During the particulate matter emission testing required in Condition V.1, the permittee shall monitor opacity to determine the COM opacity value that corresponds to a compliant particulate matter emission rate; if this opacity value is less than 15%, then the lower opacity value shall become the trigger for a defined excursion. This condition does not affect compliance with R336.1301.[2] **(40 CFR 64.6(c)(1)(i & ii), c(2), c(3), and 64.7(c))**

4. The permittee shall operate the COMS during all required periods when EUUNIT7BLR is operating. Data recorded during periods of start-up and shutdown, monitoring malfunctions, repair activities and QA/QC operations shall not be used for 40 CFR Part 64 compliance.[2] **(40 CFR 64.6(c)(3), 64.7(c))**

5. Upon detecting CAM exceedances/excursions, the permittee shall restore operation of the emission unit, control device and associated pollutant capture system equipment to normal/compliant operation. CAM exceedances/excursions trigger initial inspections, corrective actions and recordkeeping of the probable cause and corresponding resolution.[2] **(40 CFR 64.7(d))**

6. Permittee shall perform an annual audit of the COMS using the procedures set forth in either USEPA publication No. 450/4-92-010, "Performance Audits Procedures for Opacity Monitors", and all amendments thereto, Method 203, Determination of the Opacity of Emissions from Stationary Sources by Continuous Opacity Monitoring Systems, or procedures approved by the District Supervisor of the Air Quality Division.[2] **(40 CFR 64.6(c)(1)(iii))**

See Appendices 3 and 4

VII. REPORTING

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

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

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

4. Excess emission reports and monitoring system performance reports shall be submitted every quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter. Each excess emission and monitoring system performance report shall include the information required in §60.7(c). Periods of excess emission and monitoring system downtime that shall be reported are defined as followed:[2]

   a. Opacity: Excess emissions are defined as any 6-minute period during which the average opacity of emissions exceeds 20% opacity, except that one 6-minute average per hour of up to 27% need not be reported.[2]

   b. SO2: Excess emissions are defined as any 3-hour period during which the average emissions (arithmetic average of 3 contiguous one-hour periods) of SO2 as measured by a CEMS exceeded the applicable standard under § 60.43.[2]

   c. NOx: Excess emissions are defined as any 3-hour period during which the average emissions (arithmetic average of 3 contiguous one-hour periods) of NOx as measured by a CEMS exceeded the applicable standard under § 60.44.[2] **(40 CFR § 60.45(g))**

   d. Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and-or summary report form (see paragraph (d) of 40 CFR part 60.7) to the Administrator semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period. Written reports of excess emissions shall include the following information: [2]

      A. The magnitude of excess emissions computed in accordance with §60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.[2]

B. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.[2]

C. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.[2]

D. When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.[2]

(Consent Order 89-7, Consent Order 93-015, 40 CFR §60.7(c))

5. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances.[2] **(40 CFR 64.9(a)(2)(i))**

6. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime.[2] **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVUNIT7BLR	75 [2]	173 [2]	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. Permittee shall implement and maintain a Malfunction Abatement Plan and a Maintenance Procedures and Schedules Plan for EUUNIT7BLR, the Low NO_x burners, electrostatic precipitator, and monitoring equipment. In addition, these plans shall address abnormal conditions, startup/shutdown, malfunctions, and excess emissions abatement. These plans and procedures must be approved by the Air Quality Division.[2] **(R 336.1911)**

2. The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94 as outlined in a complete Phase II Acid Rain permit issued by the AQD. The Phase II Acid Rain Permit No. MI-AR-1866-200X is hereby incorporated into this RO Permit as Appendix 11.[2] **(R 336.1299(d))**

3. The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to R 336.1299(d) and 40 CFR Part 72.9(c)(1)(i).[2] **(R 336.1213(10))**

4. The permittee shall comply with the CAIR SO_2 Trading Program provisions of 40 CFR Part 97.201 through 97.288, as adopted and modified by R 336.1420, and as outlined in any complete CAIR SO_2 permit issued by the AQD. CAIR SO_2 Permit No. MI-SO2-1866-200X is hereby incorporated into this ROP as Appendix 12.[2] **(R 336.1420)**

5. The permittee shall hold allowances for complete deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total SO_2 emissions for the control period from the source pursuant to 40 CFR Part 97.254. [2] **(40 CFR Part 97.254)**

6. The permittee shall comply with the CAIR NO_x Annual Trading Program provisions of 40 CFR Part 97.101 through 97.188, as adopted and modified by R 336.1802a, R 336.1803, R 336.1821, and R 336.1830 through R 336.1834, and as outlined in any complete CAIR NO_x Annual permit issued by the AQD. CAIR NO_x Annual Permit No. MI-NOA-1866-2009 is hereby incorporated into this ROP as Appendix 13. [2] **(R 336.1821)**

7. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total NO_x emissions for the control period from the source pursuant to 40 CFR Part 97.154. [2] **(40 CFR Part 97.154)**

8. The permittee shall comply with the CAIR NO_X Ozone Trading Program provisions of 40 CFR Part 97.301 through 97.388, as adopted and modified by R 336.1802a, R 336.1803, and R 336.1821 through R 336.1826, and as outlined in any complete CAIR NO_x Ozone permit issued by the AQD. CAIR NO_x Ozone Permit No. MI-NOO-1866-2009 is hereby incorporated into this ROP as Appendix 14. [2] **(R 336.1821)**

9. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total NO_x emissions for the control period from the source pursuant to 40 CFR Part 97.354. [2] **(40 CFR Part 97.354)**

10. The permittee shall notify the appropriate District Office of the AQD for the need to modify the CAM monitoring plan if the approved monitoring is found to be inadequate and shall submit a proposed modification to the plan if appropriate. [2] **(40 CFR 64.7(e))**

11. The permittee shall properly maintain the monitoring systems, including maintaining necessary parts for routine repairs of monitoring equipment. [2] **(40 CFR 64.7(b))**

12. The permittee shall comply with all requirements of 40 CFR Part 64. [2] **(40 CFR Part 64)**

13. Visible emissions from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal associated with EUUNIT7BLR shall not exceed 20 percent opacity. [2] **(40 CFR 60.254)**

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).

EUUNIT8BLR
EMISSION UNIT CONDITIONS

DESCRIPTION

A 25 MW, 900 psi circulating fluidized bed boiler capable of firing coal, untreated virgin wood chip waste and tire-derived fuel (TDF), with a maximum steam generating capacity of 275,000 pounds per hour. Natural gas is used in the boiler for start-up.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Baghouse for particulate control; limestone injection for SO2 control.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM_{10}	1. Shall not exceed 0.025 pound per million BTU heat input.[2]	Instantaneous	EUUNIT8BLR	V.1	40 CFR 52.21 (j)
	2. Shall not exceed 9.23 pounds per hour.[2]	Test Protocol	EUUNIT8BLR	V.1	40 CFR 52.21 (j)
2. PM	1. Shall not exceed 0.025 pound per million BTU heat input.[2]	Instantaneous	EUUNIT8BLR	V.1	40 CFR 52.21(j), 40 CFR 60 Subpart Da §60.42a, R 336.1331
	2. Shall not exceed 9.23 pounds per hour.[2]	Test Protocol	EUUNIT8BLR	V.1	40 CFR 52.21 (j)
3. SO_2	1. Shall not exceed 0.496 pound per million BTU heat input.[2]	24 hour average	EUUNIT8BLR	VI.1	40 CFR §52.21(j), 40 CFR 60 Subpart Da §60.43a
	2. Shall not exceed 182.97 pounds per hour.[2]	24 hour average	EUUNIT8BLR	VI.1	40 CFR §52.21(j)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
3. SO_2	3. Shall not exceed 779.5 tons per year.[2]	12 month rolling time period as determined at the end of each calendar month.	EUUNIT8BLR	VI.1	40 CFR §52.21(j)
4. NO_x	1. Shall not exceed 0.40 pound per million BTU heat input.[2]	24 hour average	EUUNIT8BLR	VI.1	40 CFR 52.21 (j), 40 CFR 60 Subpart Da§60.44a
	2. Shall not exceed 147.6 pounds per hour.[2]	24 hour average	EUUNIT8BLR	VI.1	40 CFR §52.21(j)
	3. Shall not exceed 628.8 tons per year.[2]	12 month rolling time period as determined at the end of each calendar month.	EUUNIT8BLR	VI.1	40 CFR §52.21(j)
5. CO	1. Shall not exceed 0.24 pounds per million BTU heat input.[2]	24-hour average.	EUUNIT8BLR	VI.2	R 336.1201(3), 40 CFR §52.21 (b)(32)(v)(c)
	2. Shall not exceed 88.6 pounds per hour.[2]	24-hour average.	EUUNIT8BLR	VI.2	R 336.1201(3), 40 CFR §52.21 (b)(32)(v)(c)
	3. Shall not exceed 388.1 tons per year.[2]	12-month rolling time period as determined at the end of each calendar month.	EUUNIT8BLR	VI.2	R 336.1201(3), 40 CFR §52.21 (b)(32)(v)(c)
6. VOC	Shall not exceed 8.86 pounds per hour.[2]	Test Protocol	EUUNIT8BLR	V.1	R 336.1702
7. Lead	Shall not exceed 0.005 pound per hour.[2]	Test Protocol	EUUNIT8BLR	V.1	R 336.1201(3), R 336.1205
8. Visible emissions	10 percent opacity.[2]	Six minute average	EUUNIT8BLR	VI.1	R 336.1301(1)(c)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coal	Shall not exceed maximum sulfur content of 3.5 percent by weight.[2]	Per delivery of coal	EUUNIT8BLR	VI.5	R 336.1205
2. Tire-derived fuel	1. Shall not exceed 7.78 tons per hour.[2]	Daily average	EUUNIT8BLR	VI.3, 4	40 CFR 52.21 (j) .
	2. Shall not exceed 55 percent by weight of the total fuel load of the Boiler No. 8. [2]	30-day rolling time period as determined at the end of each calendar day.	EUUNIT8BLR	VI.3, 4	40 CFR 52.21 (j)
	3. Shall not exceed 68,150 tons per year.[2]	12-month rolling time period as determined at the end of each calendar month.	EUUNIT8BLR	VI.3, 4	40 CFR 52.21 (j)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall utilize natural gas or propane in EUUNIT8BLR for start-up only, and shall not have coal, TDF, wood or any other AQD approved fuels introduced until temperatures are stabilized such that proper combustion of the fuels occurs. The permittee shall not burn any fuel in EUUNIT8BLR other than coal, TDF, wood (wood shall consist of clean, untreated wood), propane, or natural gas without prior notification to and approval by the Department.[2]
   (R 336.1205, R 336.1225)

2. Permittee shall not operate EUUNIT8BLR unless the limestone injection system and the baghouse are installed and operating properly.[2] **(R 336.1224, R 336.1301, R 336.1331, 40 CFR §52.21(j))**

3. Exhaust gases from EUUNIT8BLR shall not bypass the baghouse unless the flue gas temperature exceeds 500°F or the flue gas temperature is less than 250°F.[2] **(R 336.1205, R 336.1224, R 336.1910, R 336.1911))**

4. Permittee shall equip and maintain the baghouse with a device that measures the pressure drop across the baghouse.[2] **(R 336.1331, R 336.1910, 40 CFR 64.6(c)(1)(i & ii), c(2), c(3), and 64.7(c))**

5. In the case of CEMS malfunction, applicant shall maintain the fluidized bed combustion temperature between 1450°F and 1650°F. Temperature monitoring devices acceptable to the Division shall be installed to monitor the bed temperature.[2] **(R 336.1205, R 336.1224, 40 CFR §52.21(j))**

6. Permittee shall equip and maintain the baghouse with a bag leak detection system that measures relative changes in PM emissions.[2] **(40 CFR §52.21(j), R 336.1331, R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The permittee shall conduct emission tests to determine the emission rates of particulate matter (PM), PM_{10}, volatile organic compounds and lead from EUUNIT8BLR once during the term of this ROP. Test results for PM, PM_{10}, volatile organic compounds and lead shall be used to develop an emission factor in terms of pound(s) of pollutant per MMBtu heat input to EUUNIT8BLR. The permittee shall use the worst case emission factor for PM, PM_{10}, volatile organic compounds and lead from stack testing. The emission factor, along with the monitoring requirement, shall be applied to each hour to ensure compliance with the appropriate time periods. Not less than 30 days prior to the anticipated test date, a complete stack testing plan shall be submitted to the AQD District Supervisor for approval.[2] **(R 336.12001, R 336.2003, R 336.2004)**

See Appendix 5 and 7

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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the opacity, sulfur dioxide and nitrogen oxides emissions, oxygen or carbon dioxide from Boiler No. 8 on a continuous basis, in accordance with 40 CFR, Part 60, Subpart Da, 60.47a. Installation and operation of each CEM system shall meet the timelines, requirements and reporting detailed in 40 CFR 60.49a. The CEMS data shall be used for determining compliance for opacity, sulfur dioxide, and nitrogen oxides emissions.[2] **(40 CFR 60.47a)**

2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the carbon monoxide emissions and air flow from Boiler No. 8 on a continuous basis, as approved in writing by the AQD. Installation and operation of each CEM system shall meet the timelines, requirements and reporting detailed in 40 CFR 75. The CEMS data shall be used for determining compliance for carbon monoxide emissions.[2] **(40 CFR §52.21(j), 40 CFR Part 75)**

3. The permittee shall monitor and record the amount of coal, TDF, wood or any other AQD approved fuel combusted in Boiler No. 8 during each calendar month using a procedure as approved in writing by the AQD District Supervisor.[2] **(R 336.1201(3), R 336.1205, 40 CFR §52.21(j))**

4. The permittee shall monitor and record the amount in percent by weight and mass weight, of TDF, combusted in Boiler No. 8 on each calendar day and on a 30 day rolling time period as determined at the end of each calendar day in accordance with the procedures outlined in the Fuel Management Plan or an alternative plan as approved in writing by the AQD District Supervisor.[2] **(R 336.1201(3*)*, (R 336.1205, 40 CFR §52.21(j))**

5. The permittee shall keep a copy of the coal analysis, indicating percent by weight sulfur and Btu content, as supplied by the coal vendor, for each delivery.[2] **(R 336.1201(3*)*, R 336.1205, R 336.1401)**

6. Permittee shall keep a copy of the wood analysis, indicating Btu content of the fuel, based on supplier data or the permittee's own fuel analysis.[2] **(R 336.1201(3), R 336.1205)**

7. For each calendar quarter that TDF is delivered, the permittee shall keep a copy of the TDF analysis, indicating percent by weight sulfur and Btu content of the fuel, based on supplier data or the permittee own fuel analysis**.**[2] **(R 336.1201(3), R 336.1205, R 336.1401)**

8. Permittee shall maintain records of actions taken as outlined in and pursuant to the Malfunction Abatement Plan/Maintenance Procedures and Schedules Plan.[2] **(R336.1911)**

9. The permittee shall utilize COMS-recorded opacity as an indicator of the proper functioning of the baghouse and the emission unit's compliance with the particulate matter emission limit, except during periods of start-up, shutdown, monitoring system malfunction, system repairs, or QA activities. An excursion is defined as two or more consecutive 1-hour block average opacity values greater than 5% as measured by COMS and recorded by the DAHS. During the PM and PM-10 emission testing required in Condition V.1, the permittee shall monitor opacity to determine an opacity value that corresponds to a compliant particulate matter emission rate; if this opacity value is less than 5%, then the lower opacity value shall become the trigger for a defined excursion. This condition does not affect compliance with R336.1301.[2]
(40 CFR 64.6(c)(1)(i & ii), c(2), c(3), and 64.7(c))

10. The permittee shall operate the COMS during all required periods when EUUNIT8BLR is operating. Data recorded during periods of start-up and shutdown, monitoring malfunctions, repair activities and QA/QC operations shall not be used for 40 CFR Part 64 compliance.[2]
(40 CFR 64.6(c)(3), 64.7(c))

11. Permittee shall perform an annual audit of the COMS using the procedures set forth in either USEPA publication No. 450/4-92-010, "Performance Audits Procedures for Opacity Monitors", and all amendments thereto, Method 203, Determination of the Opacity of Emissions from Stationary Sources by Continuous Opacity Monitoring Systems, or procedures approved by the District Supervisor of the Air Quality Division.[2]
(40 CFR 64.6(c)(1)(iii))

12. The permittee shall monitor and record the pressure drop across the baghouse as an indicator of the proper functioning of the baghouse and the emission unit's compliance with the particulate matter emission limit, except during periods of start-up, shutdown, monitoring system malfunction, system repairs, or QA activities. An excursion is defined as a measured pressure drop across the baghouse of greater than seven inches of water column. This condition does not affect compliance with R336.1301.[2]
(40 CFR 64.6(c)(1)(i & ii), c(2), c(3), and 64.7(c))

13. The permittee shall calibrate the pressure gauges that measure the pressure drop across the baghouse at least once per calendar quarter to ensure that the monitoring equipment is operating properly.[2]
(40 CFR 64.6(c)(1)(iii))

14. The permittee shall implement a baghouse inspection and maintenance program to ensure proper functioning of the baghouse, which will serve as an indicator of the emission unit's compliance with the particulate matter emission limit. The inspection and maintenance program shall include an annual internal inspection of the baghouse. The program shall include a visual inspection of the baghouse for deterioration and leaks performed by trained personnel.[2] **(40 CFR 64.6(c)(1)(iii))**

15. Upon detecting CAM exceedances/excursions, the permittee shall restore operation of the emission unit, control device and associated pollutant capture system equipment to normal/compliant operation. CAM exceedances/excursions trigger initial inspections, corrective actions and recordkeeping of the probable cause and corresponding resolution.[2] **(40 CFR 64.7(d))**

See Appendices 4, 9 and 10

VII. REPORTING

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

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

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

4. Excess emission reports and monitoring system performance reports shall be submitted every quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter. Each excess emission and monitoring system performance report shall include the information required in §60.7(c). Periods of excess emission and monitoring system downtime that shall be reported are defined as followed: [2]

   a) Calendar date.
   b) Excess emissions are defined as any 24-hour period during which the average emissions (arithmetic average of 24 contiguous one-hour periods) of sulfur dioxide as measured by a continuous emission monitor system exceeded the applicable standard under §60.43a.
   c) Excess emissions are defined as any 24-hour period during which the average emissions (arithmetic average of 24 contiguous one-hour periods) of nitrogen oxides as measured by a continuous emission monitor system exceeded the applicable standard under §60.44a.
   d) The average sulfur dioxide emission, percent reduction of potential combustion concentration of sulfur dioxide, and nitrogen oxide emission rate for each 30 successive boiler operating days, ending with the last 30 day period in the quarter; reasons for non-compliance with the emission standard; and, description of corrective action taken.
   e) Identification of the boiler operating days for which pollutant or dilutent data have not been obtained by an approved method for at least 18 hours of operation of the facility; justification for not obtaining sufficient data; and description of corrective actions taken.
   f) Identification of the times when emissions data have been excluded from the calculation of average emission rates because of startup, shut-down, malfunction (NOx only), emergency conditions (SO2 only), or other reasons, and justification for excluding data for reasons other than startup, shutdown, malfunction, or emergency conditions.
   g) Identification of ''F'' factor used for calculations, method of determination, and type of fuel combusted.
   h) Identification of times when hourly averages have been obtained based on manual sampling methods.
   i) Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system.
   j) Description of any modifications to the continuous monitoring system which could affect the ability of the continuous monitoring system to comply with Performance Specifications 2 or 3.
   k) Excess emission for opacity are defined as all 6-minute periods during which the average opacity exceeds the applicable opacity standards under §60.42a. **(40 CFR Subpart Da §60.49a)**

5. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances.[2] **(40 CFR 64.9(a)(2)(i))**

6. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime.[2] **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVUNIT8BLR	84 [2]	215 [2]	R 336.1201(3), R 336.1225, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the CAIR SO_2 Trading Program provisions of 40 CFR Part 97.201 through 97.288, as adopted and modified by R 336.1420, and as outlined in any complete CAIR SO_2 permit issued by the AQD. CAIR SO_2 Permit No. MI-SO2-1866-200X is hereby incorporated into this ROP as Appendix 12. [2] **(R 336.1420)**

2. The permittee shall hold allowances for complete deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total SO_2 emissions for the control period from the source pursuant to 40 CFR Part 97.254. [2] **(40 CFR Part 97.254)**

3. The permittee shall comply with the CAIR NO_x Annual Trading Program provisions of 40 CFR Part 97.101 through 97.188, as adopted and modified by R 336.1802a, R 336.1803, R 336.1821, and R 336.1830 through R 336.1834, and as outlined in any complete CAIR NO_x Annual permit issued by the AQD. CAIR NO_x Annual Permit No. MI-NOA-1866-2009 is hereby incorporated into this ROP as Appendix 13. [2] **(R 336.1821)**

4. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total NO_x emissions for the control period from the source pursuant to 40 CFR Part 97.154. [2] **(40 CFR Part 97.154)**

5. The permittee shall comply with the CAIR NO_X Ozone Trading Program provisions of 40 CFR Part 97.301 through 97.388, as adopted and modified by R 336.1802a, R 336.1803, and R 336.1821 through R 336.1826, and as outlined in any complete CAIR NO_x Ozone permit issued by the AQD. CAIR NO_x Ozone Permit No. MI-NOO-1866-2009 is hereby incorporated into this ROP as Appendix 14. [2] **(R 336.1821)**

6. The permittee shall hold allowances for compliance deductions in the source's compliance account as of the allowance transfer deadline in an amount not less than the total NO_x emissions for the control period from the source pursuant to 40 CFR Part 97.354. [2] **(40 CFR Part 97.354)**

7. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Da, as they apply to Boiler No. 8.[2] **(40 CFR Part 60 Subparts A & Da)**

8. The permittee shall notify the appropriate District Office of the AQD for the need to modify the CAM monitoring plan if the approved monitoring is found to be inadequate and shall submit a proposed modification to the plan if appropriate.[2] **(40 CFR 64.7(e))**

9. The permittee shall properly maintain the monitoring systems, including maintaining necessary parts for routine repairs of monitoring equipment.[2] **(40 CFR 64.7(b))**

10. The permittee shall comply with all requirements of 40 CFR Part 64.[2] **(40 CFR Part 64)**

11. Visible emissions from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal associated with EUUNIT8BLR shall not exceed 20 percent opacity. [2] **(40 CFR 60.254)**

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).

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGWMSENGINES	Three 2000 kW standby compression ignition diesel fuel fired engine generators equipped with catalytic oxidation emission control systems.	EU-WMSENGINE1, EU-WMSENGINE2, EU-WMSENGINE3
FGMATVENTS	Emission units relating to coal, flyash and limestone handling.	EUCOALYARD, EUROADWAYSB, EUU7SILOVENT, EUU8SILOVENT, EUFUGLIMESTONE, EUASHLOAD7, EUU8LIMESTONE, EUASHLOAD8

FGWMSENGINES
FLEXIBLE GROUP CONDITIONS

DESCRIPTION
Three 2000 kW standby compression ignition diesel fuel fired engine generators equipped with catalytic oxidation emission control systems.

Emission Units: EU-WMSENGINE1, EU-WMSENGINE2, EU-WMSENGINE3

POLLUTION CONTROL EQUIPMENT
Catalytic oxidation system on each engine

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	35.9 tons per year [2]	12-month rolling time period as determined at the end of each calendar month.	FGWMSENGINES	V.2, VI.6	R 336.1205 (3), 40 CFR 52.21 (c) & (d)

*The NO_x limit is based on an emission factor from each year of testing as required in SC V.2. The tested emission factor shall be used until a new emission factor is developed from the stack test. A limit of 34.1 pounds NO_x per hour shall be used until the initial stack test is performed.

2. The permittee shall reduce CO emissions by 70 percent or more or comply with a formaldehyde emission limit of 580 parts per billion by volume, dry and at 15% oxygen. These limits apply to each engine included in FG-WMSENGINES and during all periods of operation except during periods of startup, shutdown and malfunction. Compliance with the emission limits are as follows:

   a) Conduct required performance test as specified in SC V.1. [2]
   b) Collect the catalyst inlet temperature as specified in SC VI.3 and calculate the 4-hour rolling averages [2]
   c) Maintain the 4-hour rolling average within the operating limitation established during the performance test. [2]
   d) Measure the pressure drop across each catalyst once per month and demonstrate that the pressure drop is within the operating limitation established during the performance test. [2]

   [40 CFR 63.6600(b), 63.6630, 63.6640]

II. MATERIAL LIMIT(S)

1. The sulfur content of the diesel fuel oil shall not exceed 0.05 percent by weight on an annual average. The annual average shall be calculated as specified in 40 CFR 72.7(d)(3). [2] **(40 CFR Part 72.7, R 336.1401)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGWMSENGINES unless the Preventative Maintenance Plan specified in Appendix A, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. [2] **(R 336.1911, R336.1912, 40 CFR 63.6640(c))**

2. The permittee shall operate FGWMSENGINES within normal operating ranges specified by the manufacturer or established through stack testing. If normal operating ranges are exceeded, the permittee shall implement the preventative maintenance plan. [2] **(R 336.1911, R 336.1912, 40 CFR 63.6640(d))**

3. The total break-in hours for each engine included in FGWMSENGINES shall not exceed 200 hours. The break-in period is defined as the period of time from initiation of combustion firing. [2] **(40 CFR 63.6640(d))**

4. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and ZZZZ, as they apply to FGWMSENGINES. [2]
(40 CFR Part 63 Subparts A & ZZZZ)

See Appendix 3

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate each engine included in FGWMSENGINES unless each catalytic oxidation system is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes the following:

   a) Catalyst replacement schedule based on the manufacturer's recommended guidelines. [2]
   b) Maintaining each catalyst so that the pressure drop across the catalyst does not change by more than two inches of water at 100 percent load (plus or minus 10 percent from the pressure drop measured during the initial performance test). [2]
   c) Maintaining the catalyst inlet temperature greater than or equal to 450° F and less than or equal to 1350°F.[2] **(R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 63.6600(b))**

V. TESTING/SAMPLING

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

1. Verification of the catalytic system efficiency or the formaldehyde emission, from each engine included in FGWMSEMGINES, by testing at owner's expense, in accordance with 40 CFR, 63.6620 will be required. If the catalytic system efficiency is tested, the permittee shall use CO emission rates as a surrogate to ensure compliance with the 70 percent reduction. Testing must be conducted semi-annually and at any load condition within ±10 percent of 100 percent load. After two consecutive passing events, the test plan can be changed to annually. The permittee shall record the pressure drop across each catalyst and each catalyst inlet temperature during the performance test. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. The report must include the requirements listed in 40 CFR 63.6620(i). [2]
(R 336.1201(3), R336.1225, R 336.2001, R 336.2003, R 36.2004, 40 CFR 63.6610, 63.6615, 63.6620)

2. Verification of NO_x emission rates from one of the engines included in FGWMSENGINES, by testing at owner's expense, in accordance with Department requirements, will be required. The permittee shall complete the test annually. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. [2]
(R 336.1201(3), R 336.1205(3), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor in a satisfactory manner the diesel fuel oil usage rate for FGWMSENGINES on a monthly basis. [2] **(R 336.1205(3), R 336.1225, R 336.1702(a), 40 CFR 52.21 (c) & (d))**

2. The permittee shall keep, in a satisfactory manner, monthly fuel use records for FGWMSENGINES. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [2]
(R 336.1205(3), R 336.1225, R 336.1702(a), 40 CFR 52.21 (c) & (d))

3. The permittee shall install, operate and maintain a continuous parameter monitoring system (CPMS), according to the requirements in 40 CFR 63.8, to continuously monitor each catalyst inlet temperature. [2] **(40 CFR 63.6625(b), 63.6630, 63.6640)**

4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the pressure drop across each catalyst on a continuous basis. [2] **(40 CFR 63.6625(b), 63.6630, 63.664)**

5. The permittee shall keep, in a satisfactory manner, 4-hour rolling average for each catalyst inlet temperature and monthly pressure drop records for each catalyst. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [2] **(40 CFR 63.3355)**

6. The permittee shall keep, in a satisfactory manner, monthly and previous 12-month NO_x emission calculation records for FGWMSENGINES. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [2] **(R 336.1205(3), 40 CFR 52.21 (c) & (d))**

7. The permittee shall keep records of the sulfur content calculations, in percent by weight, on an annual average. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [2] **(40 CFR Part 72.7)**

8. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 20th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. [2] **(R 336.1205, 40 CFR 52.21 (c) & (d))**

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))**

4. The permittee shall submit to the AQD District Supervisor, a semi-annual report, as specified in 40 CFR 63.6650, which contains all deviations during the reporting period from any emission limitation or operating limitation or if there were periods during which the continuous parametric monitoring system (CPMS) was out of control as specified in 40 CFR 63.8(c)(7). If there are no deviations from any emission limitations or operating limitations or no periods that the CPMS was out of control as specified in 40 CFR 63.8(c)(7), the report shall contain a statement that there were no deviations from the emission limitations or operating limitations during the reporting period and a statement that there were not periods that the CPMS was out of control. The first report shall cover the period between startup of the source and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after startup of the source. Each subsequent report must cover the semi-annual period from January 1 through June 30, or from July 1 through December 31, or according to the dates outlined in ROP No. 199600303. The report must also contain the following information, as specified in 40 CFR 63.6650 (c): [2]

   a) Company name and address.
   b) Certification of the report by the permittee's responsible official.
   c) Date of report and beginning and ending dates of the reporting period.
   d) A brief description of each engine included in FGWMSENGINES.
   e) A brief description of the CPMS.
   f) The date of the latest CPMS certification or audit.

g) A description of any changes in the CPMS, processes or controls during the last reporting period.
h) An identification of each parameter monitored and whether CO or formaldehyde was monitored.
i) The date and time that each malfunction started and stopped.
j) The number of startups, shutdowns and malfunctions that occurred during the reporting period and demonstration that the Preventative Maintenance Plan in Appendix A was followed during such events.
k) The date, time and duration that each CPMS was inoperative and out of control (as defined in 40 CFR 63.8(c)(7)) and the corrective actions taken.
l) The date and time that each deviation started and stopped and whether each deviation occurred during a period of malfunction or during another period.
m) A summary of the total duration of the deviations during the reporting period and the percent of the total duration during the total source operating time of that reporting period.
n) A breakdown of the total duration of deviations due to control equipment problems, process problems, other known causes and any unknown causes.
o) A summary of the total duration of CMPS downtime during the reporting period and the percent of the total duration of downtime during the total source operating time of that reporting period.

A copy of the reports shall be kept on file at the site for a period of at least five years and made available to the Department upon request.[2] **(40 CFR 63.6645, 63.6650, 63.6655, and 63.6660)**

5. The permittee shall submit to the AQD District Supervisor, a startup, shutdown and malfunction report if actions addressing the startup, shutdown and malfunction were not consistent with the Preventative Maintenance Plan in Appendix A. Notification of the event shall be submitted by fax or telephone within 2 working days after the even occurred. Within 7 working days after the event, the permittee shall submit a letter to the AQD District Supervisor which contains the actions taken during the event.[2] **(40 CFR 63.6650)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVWMSENGINE1	18 [2]	21 [2]	R 336.1225, 40 CFR 52.21 (c) & (d)
2. SVWMSENGINE2	18 [2]	21 [2]	R 336.1225, 40 CFR 52.21 (c) & (d)
3. SVWMSENGINE3	18 [2]	21 [2]	R 336.1225, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

1. The sulfur content of the diesel fuel oil shall not exceed 0.05 percent by weight on an annual average. The annual average shall be calculated as specified in 40 CFR 72.7(d)(3).[2] **(40 CFR Part 72.7)**

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).

FGMATVENTS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION
Emission units relating to coal, flyash and limestone handling.

Emission Units: EUCOALYARD, EUROADWAYSB, EUU7SILOVENT, EUU8SILOVENT, EUFUGLIMESTONE, EUASHLOAD7, EUU8LIMESTONE, EUASHLOAD8

POLLUTION CONTROL EQUIPMENT
Wet suppression is utilized in some of the operations. Fabric filters are utilized on the coal, limestone and ash handling systems.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.025 grains per dry standard cubic foot.[2]	Instantaneous	Limestone and flyash handling systems.	V.1	R 336.1201 (3)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Permittee shall not operate the coal, limestone and ash handling systems unless the fabric filter collectors are installed and operating properly.[2] **(R 336.1301, R 336.1331, R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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

1. The permittee shall conduct and record Reference Method 9 visible emissions readings of each coal, limestone and ash handling system fabric filter exhaust point, at a minimum of once per calendar year, during maximum routine operating conditions. **(R 336.1213(3))**

See Appendix 5

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

1. The permittee shall perform a visible emission observation of each coal, limestone and ash handling system fabric filter exhaust point, at least once every 7 days during routine operation. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall keep a record of each required observation and corrective action. Permittee shall maintain a written record of each required corrective action. **(R 336.1213(3))**

2. Permittee shall keep a log of all of the fugitive emission reduction measures relating to the activities covered by FGMATVENTS. **(R 336.213(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))**

4. Permittee shall submit within 30 days following the end of the calendar quarter a report identifying each day in which any emission limit, operational requirement, or recordkeeping requirement, as specified in the fugitive dust plan in Appendix 3, was not met. This report shall, for each instance, explain the reason the emission limit, operational requirement, or recordkeeping requirement was not met, the duration of the event, the remedial action taken, and a description of the steps which were taken to prevent recurrence. **(Consent Order 34-1993)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. Site visible emissions resulting from fuel, fuel supplements (such as limestone), fuel byproducts (such as coal ash) and any other fugitive emission shall be monitored, measured, reported, and controlled in accordance with Consent order SIP No. 34-1993 and the site fugitive dust plan in Appendix 3. The permittee may revise the fugitive dust plan provided that the permittee demonstrates, in writing, that the proposed revision does not result in an increase in the level of fugitive dust or particulate emissions and submits the demonstration to the AQD for approval and is approved by the AQD using the procedures found in Consent Order 34-1993.

Demonstrations involving chemical dust suppressant applications on unpaved roads shall be made using only petroleum resins, asphalt emulsions, or acrylic cements unless otherwise explicitly provided for by the applicable U.S.EPA approved SIP or U.S. EPA approved method. [2]
(Consent Order 34-1993, Act 451 Section 324.5524, R 336.1371, R 336.1372)

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).

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: Abbreviations and Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Natural Resources and Environment	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
gr	Grains	psig	Pounds per square inch gauge
HAP	Hazardous Air Pollutant	PeTE	Permanent Total Enclosure
Hg	Mercury	PTI	Permit to Install
hr	Hour	RACT	Reasonable Available Control Technology
HP	Horsepower	ROP	Renewable Operating Permit
H_2S	Hydrogen Sulfide	SC	Special Condition
HVLP	High Volume Low Pressure *	scf	Standard cubic feet
ID	Identification (Number)	sec	Seconds
IRSL	Initial Risk Screening Level	SCR	Selective Catalytic Reduction
ITSL	Initial Threshold Screening Level	SO_2	Sulfur Dioxide
LAER	Lowest Achievable Emission Rate	SRN	State Registration Number
lb	Pound	TAC	Toxic Air Contaminant
m	Meter	Temp	Temperature
MACT	Maximum Achievable Control Technology	THC	Total Hydrocarbons
MAERS	Michigan Air Emissions Reporting System	tpy	Tons per year
MAP	Malfunction Abatement Plan	µg	Microgram
MDEQ	Michigan Department of Environmental Quality	VE	Visible Emissions
mg	Milligram	VOC	Volatile Organic Compounds
mm	Millimeter	yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (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

A – Preventative Maintenance Plan for FGWMSENGINES

Preventative Maintenance Plan

A1 Weekly:

A1.1 Perform visual checks for leaks or any unusual problems.

A1.2 Start engine, run unloaded for 10 minutes, and check the following parameters during operation:

a. Proper fuel and oil pressures
b. Proper electrical voltage and frequency
c. No leaks or unusual noises
d. Proper input temperature and differential pressure on catalytic oxidizer

A1.3 Shut off engine and insure that engine and generator reset to standby states

A1.4 Check fuel/oil water separator and drain off any water collected.

A2 Monthly:

A2.1 Perform weekly checks in addition to paralleling with the utility grid and loading unit to 90-100% of rated load for minimum of thirty minutes.

A3 Semi-Annually: Level 1 Service, consisting of the following:

A3.1 Cooling System:

a. Visual inspection of radiator/heat exchanger for leaks, damage, and obstruction
b. Add coolant to bring the coolant to the correct level
c. Inspect the condition of the radiator cap gasket, and sealing surface
d. Visually inspect the water pump and cooling system gaskets for leaks
e. Inspect the vee belts for cracking and fraying
f. Check vee belt tension
g. Check the jacket water heater(s) for proper operation
h. Inspect flexible water connections and hoses for cracking, leaks, and pliability
i. Visually inspect the pulleys for excessive wear
j. Analyze the coolant for proper antifreeze percentage
k. Analyze the coolant conditioner level and add additional supplemental coolant additive as needed (up to two quarts)
l. Tighten hose clamps as needed
m. Lubricate the fan drive with manufacturer recommended lubricant

A3.2 Lubrication System:

a. Add crank case oil to bring the oil to its correct level
b. Inspect the oil heater for proper operation and leaks
c. Check for excessive crankcase blow-by with the engine running
d. Visually inspect the front and rear crankshaft seals and lubrication system gaskets for leaks
e. Check the crankcase breather, and inspect the hose and connections
f. Take an oil sample and have it analyzed according to the manufacturer's recommendations.

A3.3 Fuel System:

a. Inspect the flexible fuel lines for cracks, leaks, and pliability
b. Test the day tank pump for proper operation and level
c. Operate the fuel priming pump and check for proper operation and leaks
d. Drain water from water separator
e. Check fuel system for leaks
f. Check governor oil level and add oil as needed
g. Record fuel level in main fuel tank
h. Inspect the steel fuel lines for cracks, leaks, and proper placement of line bracket supports
i. Clean the primary screen type fuel filter
j. Drain the water and sediment from the day tank
k. Change the inlet filters to the day tank (if accessible)
l. Test the day tank alarms
m. Lubricate the governor linkage
n. Dispose of waste filters

A3.4 Battery/Starting System:

a. Top off electrolyte level
b. Check and record battery charger amperage
c. Check battery charger and adjust float rate for optimum battery performance and life
d. Check and record alternator for proper charge rate with engine running
e. Check for proper cranking termination upon starting
f. Clean the battery terminals and apply corrosion inhibiter to the battery posts and terminals
g. Tighten battery connections
h. Tighten starter motor(s) connections and wiring
i. Test and record battery electrolyte specific gravity (if maintenance type batteries)
j. Check and record battery voltage dip during over-crank test for minimum voltage required to maintain controls during startup

A3.5 Exhaust System:

a. Inspect the flexible exhaust coupling for cracks and excessive leakage
b. Check for abnormal exhaust characteristics with the engine running (signs of wet stacking)
c. Inspect exterior of exhaust manifold s for oil/fuel slobbering (signs of wet stacking)
d. Inspect exhaust rain protection and exhaust outlet screening
e. Drain water in exhaust moisture traps
f. Inspect exhaust manifolds for broken or missing hardware

A3.6 Air Intake System

a. Inspect air filters for plugging, deterioration, and seal pliability
b. Test the air cleaner indicator
c. Check air intake piping for damage, or loose connections
d. Inspect the turbocharger for excessive end play and seal leakage

A3.7 Generator
a. Lubricate generator bearing with recommended manufacturer lubrication.

A3.8 Installation
a. Inspect the generator set vibration isolators and adjust as necessary
b. Check the unit for the capability to be online within ten seconds
c. Check the unit for abnormal noise or vibration
d. Re-check the oil level with the engine running
e. Re-check for leaks with the engine running
f. Check for proper operation of remote fan motors, thermostats, circulating pumps, and solenoid valves
g. Check the inlet and discharge louvers for proper operation with engine running and stopped

A3.9 Control Panels
a. Perform an operational check of illumination and safety lamps
b. Check for proper operation of engine and generator instruments with generator running
c. Adjust the governor control for optimum performance and frequency
d. Adjust the voltage regulator for proper voltage
e. Check for and tighten loose terminals
f. Test alarms on annunciator panel(s)

A4 Every 250 hours or Annually: Level 2 Service, consisting of the following:

A4.1 Lubrication System
a. Change oil filters
b. Change lubricating oil using manufacturer's recommended oil type.
c. Dispose of waste oil and filters

A5 Every 30000 hours or As Required Per Test Results:

A5.1 Cooling System
a. Drain and flush cooling system
b. Inspect and replace hoses as necessary
c. Fill cooling system with new coolant and conditioner

- **B – Fugitive Dust Plan for FGMATVENTS**

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FGMATVENTS:

Fugitive Dust Plan

Fugitive emissions generated by coal handling, ash handling, limestone handling, and traffic on plant roadways will be controlled in accordance with the fugitive dust control operating program (FDCOP). This FDCOP was prepared in accordance with the Consent Order (SIP No. 34-1993) issued on September 9, 1994 and it can be revised as outlined in the Consent Order.

Management Practices:

Storage Pile:

The Wyandotte facility has two (2) coal storage piles. One pile is for stoker coal while the other contains run-of-mine coal for use in the pulverized coal-fired boiler. These piles encompass a total area of approximately 2.4 acres.

Control of fugitive dust from the storage piles will be maintained through a combination of compaction and water spraying. Compaction is accomplished using a bulldozer and is performed when coal is originally unloaded. The run-of-mine coal pile is generally the active pile and it is, therefore, compacted on a daily basis. Water spraying of the piles will be performed during the warmer weather months, April through the first two weeks of November. The application rate will be approximately 0.25 inches of water per square foot of surface area. Frequency of application will depend on weather conditions. However, it is proposed that the pile be sprayed on the fourth consecutive day of no precipitation. During dry and windy conditions, extra precautions and/or water spraying will be performed in order to minimize any fugitive emissions during compacting operations.

Coal Handling:

Coal handling consists of the following processes:

1. Unloading coal from the self unloading barge to the coal pile.
2. Compacting the coal.
3. Moving the coal to the truck hopper.
4. Conveying the coal from the truck hopper to the coal bunkers.

Coal is transported to the Wyandotte facility by barge. The barges are of the self loading type, using a conveyor system to unload the coal. During unloading, fugitive emissions will be minimized by water spraying and by minimizing the height between the coal pile and the conveyor. It is proposed that the distance between the conveyor and coal pile not exceed fifteen (15) feet. Water will be sprayed at a rate of approximately 12 gallons per ton of coal (100 lbs water/ton coal). This will increase the coal's moisture content from approximately 5% to 10% and should significantly decrease fugitive emissions. The spray system will utilize the same pumping station that is used for spraying the coal pile.

Compacting the coal occurs during and immediately after the coal is unloaded. This is a part of routine operation and therefore occurs at no additional coat.

During dry and windy conditions, extra precautions and/or water spraying will be performed in order to minimize any fugitive emissions during both compaction and unloading operations.

Moving of the coal to the truck hopper differs for the two (2) types of coal. The stoker coal must be carried from the pile using a front end loader and dropped into the truck hopper. Minimizing fugitive dust from this operation will be accomplished by minimizing the drop height from the front end loader to the truck hopper. It is proposed that this distance not exceed two (2) feet. The stoker coal is used for boiler No. 5 which is operated on an intermittent basis. Therefore, front end loader operation will also be on an intermittent basis. Some spillage will occur due to front end loader operation. This spillage will be picked up and placed back in the storage pile three (3) times per week. The run-of-mine coal is pushed to the truck hopper using a bulldozer. Water spraying of the pile will assure that the coal has some surface moisture. This will minimize fugitive dust emissions during operations. This combined with the fact that no run-of-mine coal is dropped should result in acceptable levels of fugitive dust.

Transporting of the coal from the truck hopper to the coal bunkers is accomplished by belt conveyors. The conveyors are totally enclosed (360 degrees) in an aluminum sided coal gallery. Once per week, the transfer tower is cleaned resulting in a small discharge of coal from a floor grate. The coal which does fall to the ground is put back on the pile as a part of normal operation.

Roadways:

The Wyandotte facility has three (3) types of road surfaces - paved, gravel and dirt.

For reasons of safety, vehicle speeds on these roadways typically do not exceed 10 mph. This slow traffic pattern lends itself to minimizing fugitive dust emissions. However, additional levels of dust control are planned.

It is proposed that fugitive dust from the paved road be minimized by having the roadway cleaned once per week during the period from April 1 to mid-November. Road cleaning will be performed by the Wyandotte Department of Public Works, using an Elgin vacuum street sweeper. This vacuum sweeper in of the three (3) wheel water spray and broom variety typically used by municipalities. Cleaning the paved roads should result in no additional cost to the City since the service will be provided by another City department.

Control of fugitive dust from unpaved areas will be performed through the use of a 38% calcium chloride solution. For the dirt area, it is proposed to make five (5) applications of calcium chloride during the April to mid-November period. Applications would occur in early April, early June, late July, late August and late September. The liquid would be applied by an application resulting in a coverage of 1 gallon per 20 square feet. The entire dirt area would be covered in each application. This equates to an area of roughly 57,500 square feet. Therefore, each application would require 2,875 gallons. It is proposed that the entire gravel area be sprayed once per year in early June. The center strip of the gravel will be sprayed an additional four (4) times per year at the same time that the unpaved roads are sprayed. The center strip is the area that is used for traffic flow. The side areas are for parking. The center strip area to be sprayed is approximately 3600 square feet. Calcium chloride would be applied at the same rate as the dirt area, one (1) gallon per 20 square feet. Therefore, application to the center strip area will require 180 gallons per application. The entire gravel area is approximately 20,000 square feet in size. The once a year application to this entire area will require 1,000 gallons.

Calcium Chloride Alternative:

An asphalt emulsion applied at the manufacturer's recommended dilution ratio and application rate is an acceptable alternative to calcium chloride applications required for unpaved areas. The frequency for asphalt emulsion application is the same as that required for calcium chloride, given under the heading of “Roadways."

Fly Ash Silo Unloading:

Fly ash from boiler operation is collected using an electrostatic precipitator, baghouse and mechanical collector. The fly ash is pneumatically transported to the storage silo. Fly ash from the silo is unloaded into trucks using a rotary dustless unloader model No. 530 manufactured by United Conveyor Corp. The unloader is equipped with water spray nozzles and a blade assembly and operates such that the water used is limited to that required for dust prevention. The unloader is designed to pass 1440 cubic feet of dry ash per hour with a water application rate of 60 GPM. Assuming a fly ash density of approximately 60 Lbs/cubic feet. This equates to 500 lbs of water per 1440 lbs of dry fly ash resulting in a wet fly ash having a moisture content of approximately 25.7%. A minimal amount of additional water is sprayed into the ash truck bed upon completion of unloading.

Operation of the unloader is a routine part of operation. For the purposes of fugitive dust control, it is performed at no additional cost to the City.

RECORDKEEPING FOR FUGITIVE DUST SOURCES

REQUIRED RECORDS

Unpaved Roads/Lots	1. DATE OF TREATMENT 2. CONTROL MEASURE USED 3. RESPONSIBLE PERSON'S INITIALS 4. NAME OF PRODUCT APPLIED 5. AMOUNT OF SOLUTION/WATER APPLIED 6. DILUTION RATIO 7. ROAD SEGMENT/LOT IDENTIFICATION
Paved Roads/Lots	1. DATE OF TREATMENT 2. CONTROL MEASURE USED 3. RESPONSIBLE PERSON'S INITIALS 4. ROAD SEGMENT/LOT IDENTIFICATION
Storage Piles/Material Handling	1. DATE OF TREATMENT 2. CONTROL MEASURE USED 3. RESPONSIBLE PERSON'S INITIALS 4. DILUTION RATIO (IF APPLICABLE) 5. AMOUNT OF DUST SUPPRESSANT/WATER APPLIED 6. IDENTIFICATION OF PILE/MATERIAL HANDLING OPERATION TREATED 7. EQUIPMENT USED

OPTIONAL RECORDS

Weather Conditions	1. PRECIPITATION 2. TEMPERATURE 3. WIND DIRECTION AND VELOCITY

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

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

Appendix 6. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No. 199600303a:

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
253-98D	A 25 MW, 900 psi circulating fluidized bed boiler capable of firing coal, untreated virgin wood chip waste and tire-derived fuel (TDF), with a maximum steam generating capacity of 275,000 pounds per hour. Natural gas is used in the boiler for start-up.	EUUNIT8BLR
90-05	Three 2000 kW standby compression ignition diesel fuel fired engine generators equipped with catalytic oxidation emission control systems.	FGWMSENGINES

Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUUNIT8BLR:

Monthly heat input to EUUNIT8BLR (MMBtu/month as determined at the end of each calendar month) =

$$\sum_{i=1}^{3} H\ (\text{MMBtu/ton}) \times W\ (\text{ton/month}) \times P\ (\text{wt \%})$$

H (MMBtu/ton) = the fuel heat content from Special Conditions VI.5, VI.6 and VI.7 of EUUNIT8BLR

W (ton/month) = monthly fuel use as recorded per the requirements in Special Condition VI.3 of EUUNIT8BLR

P (wt %) = weight percent of fuel i fed to EUUNIT8BLR

(fuel 1 is coal, fuel 2 is TDF, and fuel 3 is wood)

Annual PM and VOC emissions (tons/12-month rolling time period as determined at the end of each calendar month) =

$$\sum_{i=1}^{12} EF\ (\text{lb/MMBtu}) \times A\ (\text{MMBtu/month})$$

EF (lb/MMBtu) = the PM or VOC emission rate from above

A (MMBtu/month) = the heat input during calendar month i

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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

Appendix 9. Fuel Management Plan

Permittee shall implement and maintain a Fuel Management Plan for Boiler No. 8 as approved by the AQD. Any changes made to the approved Fuel Management Plan must have prior approval by the District Supervisor prior to implementation. **(R 336.1201(3), R 336.1205)**

Appendix 10. Malfunction Abatement Plan/Maintenance Procedures and Schedules Plan

Permittee shall implement and maintain a Malfunction Abatement Plan/Maintenance Procedures and Schedules Plan for Boiler No. 8 baghouse and monitoring equipment. In addition, these plans shall address abnormal conditions, startup/shutdown, malfunctions, and excess emissions abatement. Any changes made to the approved Malfunction Abatement Plan/Maintenance Procedures and Schedules Plan must have prior approval by the District Supervisor prior to implementation. **(R 336.1911)**

Appendix 11. Acid Rain Permit

PHASE II ACID RAIN PERMIT
Permit No. MI-AR-1866-2010

Permittee	Wyandotte DMS
Address	2555 Van Alstyne, Wyandotte, MI
SRN	B2132
ORIS code	1866
Issue Date	
Effective:	Issuance date of this facility's Renewable Operating Permit at the facility in accordance with 40 CFR 72.73.
Expiration	This permit shall expire when the facility's Renewable Operating Permit expires, in accordance with 40 CFR 72.73.
ROP No.	MI-ROP-B2132-2010

The Acid Rain Permit Contents

1. A statement of basis prepared by the Air Quality Division (AQD) containing:

   References to statutory and regulatory authorities, and with comments, notes, and justification that apply to the source in general;

2. Terms and conditions including:

   A table of sulfur dioxide allowances to be allocated during the term of the permit, if applicable, authorized by this permit during Phase II. Unless they are subject to sections 405(g)(2) or (3) of the Clean Air Act, new units are not allocated allowances in 40 CFR part 73 and must obtain allowances by other means (sec. 403(e) of the Clean Air Act).;

   Comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process, and any additional requirements; and,

   Any applicable nitrogen oxides compliance plan. Unless they are coal fired utility units regulated pursuant to sections 404, 405, or 409 of the Clean Air Act, new units are not subject to the acid rain nitrogen oxides requirements [40 CFR 76.1(a)].

3. The permit application that this source submitted, as corrected by the AQD. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the application.

Statement of Basis

Statutory and Regulatory Authorities.

In accordance with the Natural Resources and Environmental Protection Act, 1994 PA 451 and Titles IV and V of the Clean Air Act, the Michigan Department of Natural Resources and Environment, Air Quality Division (AQD), issues this permit pursuant to the provisions of R 336.1210 to R 336.1218, and R 336.1299(d).

For further information contact:

Brian Carley
Environmental Quality Specialist
Michigan Department of Natural Resources and Environment
Air Quality Division
301 Louis Glick Highway
Jackson, Michigan 49201
Telephone: (517) 780-7843
Facsimile: (517) 780-7437

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

Terms and Conditions:

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

		2010	2011	2012	2013	2014
Unit 5	SO_2 allowances	549	549	549	549	549
	NOx Limits	Pursuant to 40 CFR Part 76, the State of Michigan Department of Natural Resources and Environment, Air Quality Division approves a NOx standard emissions limitation compliance plan for unit 5. The NOx compliance plan is effective beginning 2010 through 2014. Under the NOx compliance plan, this unit's annual average NOx emissions rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.7(a)(2), of **0.46 lb/mmBtu** for dry bottom wall-fired boilers. In addition to the described NOx compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NOx compliance plan and requirements covering excess emissions.				

		2010	2011	2012	2013	2014
Unit 7	SO_2 allowances	545	545	545	545	545
	NOx Limits	Pursuant to 40 CFR Part 76, the State of Michigan Department of Natural Resources and Environment, Air Quality Division approves a NOx standard emissions limitation compliance plan for unit 5. The NOx compliance plan is effective beginning 2010 through 2014. Under the NOx compliance plan, this unit's annual average NOx emissions rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.7(a)(2), of **0.46 lb/mmBtu** for dry bottom wall-fired boilers. In addition to the described NOx compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NOx compliance plan and requirements covering excess emissions.				

Terms and Conditions (Cont.):

		2010	2011	2012	2013	2014
Unit 8	SO_2 allowances	This affected unit shall hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under § 73.34(c) of this chapter) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and comply with the applicable Acid Rain emissions limitation for sulfur dioxide in accordance with 40 CFR 72.9 (c).				
	NOx Limits	Pursuant to 40 CFR Part 76, the State of Michigan Department of Natural Resources and Environment, Air Quality Division approves a NOx standard emissions limitation compliance plan for unit 5. The NOx compliance plan is effective beginning 2010 through 2014. Under the NOx compliance plan, this unit's annual average NOx emissions rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.7(a)(2), of **0.40 lb/mmBtu** for circulating fluidized bed boilers. In addition to the described NOx compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NOx compliance plan and requirements covering excess emissions.				

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

Permit Application: (attached)

Acid Rain Permit Application submitted November 15, 2007
Phase II NOx Compliance Plan submitted November 15, 2007

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258

Acid Rain Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31

This submission is: ☐ New ☒ Revised

STEP 1

Identify the source by plant name, State, and ORIS code.

Plant Name	State	ORIS Code
WYANDOTTE	MI	001866

STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a." For new units, enter the requested information in columns "c" and "d."

a	b	c	d
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	New Units Commence Operation Date	New Units Monitor Certification Deadline
5	Yes		
7	Yes		
8	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		

EPA Form 7610-16 (rev. 12-03)

WYANDOTTE
Plant Name (from Step 1)

STEP 3

Read the standard requirements

Permit Requirements

(1) The designated representative of each affected source and each affected unit at the source shall:
(i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
(2) The owners and operators of each affected source and each affected unit at the source shall:
(i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
(ii) Have an Acid Rain Permit.

Monitoring Requirements

(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

(1) The owners and operators of each source and each affected unit at the source shall:
(i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another affected unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
(i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

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WYANDOTTE
Plant Name (from Step 1)

STEP 3, Cont'd.

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

Excess Emissions Requirements

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

Recordkeeping and Reporting Requirements

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

Liability

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.

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WYANDOTTE
Plant Name (from Step 1)

Step 3, Cont'd.

Liability, Cont'd.

(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

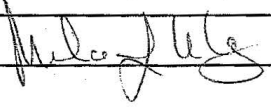
No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:
(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
(2) Limiting the number of allowances a unit can hold; *provided,* that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

STEP 4

Certification

Read the certification statement, sign, and date

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

Name	Melanie McCOy	
Signature		Date 11/14/07

EPA Form 7610-16 (rev. 12-03)

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258

Phase II NO_x Compliance Plan

Page 1 of 2

For more information, see instructions and refer to 40 CFR 76.9

This submission is: ☐ New ☒ Revised

STEP 1
Indicate plant name, State, and ORIS code from NADB, if applicable

Plant Name	State	ORIS Code
Wyandotte	MI	001866

STEP 2

Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable. Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.

	ID# 5 Type CB	ID# 7 Type DB	ID# 8 Type CFB	ID# Type	ID# Type	ID# Type
(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)	☐	☐	☐	☐	☐	☐
(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)	☐	☐	☐	☐	☐	☐
(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)	☐	☐	☐	☐	☐	☐
(d) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)	☒	☒	☐	☐	☐	☐
(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)	☐	☐	☒	☐	☐	☐
(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)	☐	☐	☐	☐	☐	☐
(g) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)	☐	☐	☐	☐	☐	☐
(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)	☐	☐	☐	☐	☐	☐
(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)	☐	☐	☐	☐	☐	☐
(j) NO_x Averaging Plan (include NO_x Averaging form)	☐	☐	☐	☐	☐	☐
(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)	☐	☐	☐	☐	☐	☐
(l) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(B) with NO_x Averaging (check the NO_x Averaging Plan box and include NO_x Averaging form)	☐	☐	☐	☐	☐	☐

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Plant Name (from Step 1)						NO_x Compliance - Page 2 Page 2 of 2
Wyandotte						

STEP 2, cont'd.

	5	7	8			
	ID#	ID#	ID#	ID#	ID#	ID#
	CB	DB	CFB			
	Type	Type	Type	Type	Type	Type
(m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17 (a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)	☐	☐	☐	☐	☐	☐
(n) AEL (include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)	☐	☐	☐	☐	☐	☐
(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing	☐	☐	☐	☐	☐	☐
(p) Repowering extension plan approved or under review	☐	☐	☐	☐	☐	☐

STEP 3
Read the standard requirements and certification, enter the name of the designated representative, sign &

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).
Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.
Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7.

Certification

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

Name	Melanie McCoy	
Signature		Date 11/14/07

EPA Form 7610-28 (12-03)

Appendix 12. CAIR Sulfur Dioxide Budget Permit

CAIR Sulfur Dioxide Budget Permit
Permit No. MI-SO2-1866-2009

Permittee	Wyandotte Municipal Service-Power Plant
Address	2555 Van Alstyne, Wyandotte, MI
SRN	B2132
ORIS code	1866
Issue Date	
Expiration	This permit shall expire when the facility's Renewable Operating Permit (ROP) expires in accordance with 40 CFR 97.221(b).
ROP No.	MI-ROP-B2132-2010

This permit incorporates automatically the definitions of terms under Air Pollution Control Rule 336.1420.

This permit incorporates automatically, upon recordation by the EPA Administrator in accordance with 40 CFR part 97 subpart FFF, GGG, or III every allocation, transfer, or deduction of a SO2 allowance to or from the compliance accounts of the CAIR SO2 unit(s) covered by the permit.

The owners and operators of the source must comply with the standard requirements and special provisions set forth in this permit.

This permit incorporates any attached comments, notes or justifications regarding permit decisions and changes made to the permit application forms during the review process.

Units covered under this permit

AQD Unit ID	Unit Type			
EUUnit5BLR	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EUUnit7BLR	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EUUnit8BLR	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other

Permit Application:

CAIR SO2 Annual Permit application submitted September 12, 2008

Standard requirements

(a) Permit requirements.

(1) The CAIR designated representative of each CAIR SO2 source required to have a ROP and each CAIR SO2 unit required to have a ROP at the source shall:

(i) Submit to the permitting authority a complete CAIR permit application under § 97.222 in accordance with the deadlines specified in § 97.221; and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR SO2 source required to have a ROP and each CAIR SO2 unit required to have a ROP at the source shall have a CAIR permit issued by the permitting authority under subpart CCC of 40 CFR part 97 for the source and operate the source and the unit in compliance with such CAIR permit.

(b) Monitoring, Reporting, and Recordkeeping Requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR SO2 source and each CAIR SO2 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subpart HHH of 40 CFR part 97.

(2) The emissions measurements recorded and reported in accordance with subpart HHH of 40 CFR part 97 shall be used to determine compliance by each CAIR SO2 source with the CAIR SO2 emissions limitation under paragraph (c) of this permit.

(c) Sulfur Dioxide Emission Requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO2 source and each CAIR SO2 unit at the source shall hold, in the source's compliance account, a tonnage equivalent in CAIR SO2 allowances available for compliance deductions for the control period, as determined in accordance with § 97.254(a) and (b), not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO2 units at the source, as determined in accordance with subpart HHH of 40 CFR part 97.

(2) A CAIR SO2 unit shall be subject to the requirements under paragraph (c)(1) of this section for the control period starting on the later of January 1, 2010 or the deadline for meeting the unit(s monitor certification requirements under § 97.270(b)(1),(2), or (5) and for each control period thereafter.

(3) A CAIR SO2 allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this section, for a control period in a calendar year before the year for which the CAIR SO2 allowance was allocated.

(4) CAIR SO2 allowances shall be held in, deducted from, or transferred into or among CAIR SO2 Allowance Tracking System accounts in accordance with subparts FFF, GGG, and III of 40 CFR part 97.

(5) A CAIR SO2 allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO2 Trading Program. No provision of the CAIR SO2 Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.205 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(6) A CAIR SO2 allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart FFF, GGG, or III of 40 CFR part 97, every allocation, transfer, or deduction of a CAIR SO2 allowance to or from a CAIR SO2 source's compliance account is incorporated automatically in any CAIR permit of the source.

(d) Excess emissions requirements.

If a CAIR SO2 source emits sulfur dioxide during any control period in excess of the CAIR SO2 emissions limitation, then:
(1) The owners and operators of the source and each CAIR SO2 unit at the source shall surrender the CAIR SO2 allowances required for deduction under § 97.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

(e) Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR SO2 source and each CAIR SO2 unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the permitting authority or the Administrator.

(i) The certificate of representation under § 97.213 for the CAIR designated representative for the source and each CAIR SO2 unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.213 changing the CAIR designated representative.
(ii) All emissions monitoring information, in accordance with subpart HHH of 40 CFR part 97, provided that to the extent that subpart HHH of 40 CFR part 97 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR SO2 Trading Program.
(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR SO2 Trading Program or to demonstrate compliance with the requirements of the CAIR SO2 Trading Program.

(2) The CAIR designated representative of a CAIR SO2 source and each CAIR SO2 unit at the source shall submit the reports required under the CAIR SO2 Trading Program, including those under subpart HHH of 40 CFR part 97.

(f) Liability.

(1) Each CAIR SO2 source and each CAIR SO2 unit shall meet the requirements of the CAIR SO2 Trading Program.
(2) Any provision of the CAIR SO2 Trading Program that applies to a CAIR SO2 source or the CAIR designated representative of a CAIR SO2 source shall also apply to the owners and operators of such source and of the CAIR SO2 units at the source.
(3) Any provision of the CAIR SO2 Trading Program that applies to a CAIR SO2 unit or the CAIR designated representative of a CAIR SO2 unit shall also apply to the owners and operators of such unit.

(g) Effect On Other Authorities.

No provision of the CAIR SO2 Trading Program, a CAIR permit application, a CAIR permit, or an exemption under § 97.205 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR SO2 source or CAIR SO2 unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

Appendix 13. CAIR Annual Nitrogen Oxide Budget Permit

CAIR Annual Nitrogen Oxide Budget Permit
Permit No. MI-NOA-1866-2009

Permittee	Wyandotte Municipal Service-Power Plant
Address	2555 Van Alstyne, Wyandotte, MI
SRN	B2132
ORIS code	1866
Issue Date	
Expiration	This permit shall expire when the facility's Renewable Operating Permit expires in accordance with Air Pollution Control Rule 336.1821.
ROP No.	MI-ROP-B2132-2010

This permit incorporates automatically the definitions of terms under Air Pollution Control Rule 336.1803.

This permit incorporates automatically, upon recordation by the EPA Administrator in accordance with Air Pollution Control Rule 336.1830, 336.1831 and 336.1834 every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx Budget unit(s) covered by the permit.

The owners and operators of the source must comply with the standard requirements and special provisions set forth in this permit.

This permit incorporates any attached comments, notes or justifications regarding permit decisions and changes made to the permit application forms during the review process.

Units covered under this permit

AQD Unit ID	Unit Type			
EUUnit5BLR	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EUUnit7BLR	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EUUnit8BLR	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other

Permit Application:

CAIR NOx Annual Permit application submitted September 12, 2008

Standard Requirements

(a) **Permit Requirements**.

(1) The CAIR designated representative of each CAIR NOX source required to have a Renewable Operating Permit (ROP) and each CAIR NOX unit required to have a ROP at the source shall:

(i) Submit to the Michigan Department of Natural Resources and Environment, Air Quality Division (MDNRE-AQD) a complete CAIR permit application under R 336.1821(3) in accordance with the deadlines specified in 40 CFR 97.121; and
(ii) Submit in a timely manner any supplemental information that the MDNRE-AQD determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR NOX source required to have a ROP and each CAIR NOX unit required to have a ROP at the source shall have a CAIR permit issued by the MDNRE-AQD under subpart CC of 40 CFR part 97 for the source and operate the source and the unit in compliance with such CAIR permit.

(b) **Monitoring, Reporting, and Recordkeeping Requirements.**

(1) The owners and operators, and the CAIR designated representative, of each CAIR NOX source and each CAIR NOX unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subpart HH of 40 CFR part 97.

(2) The emissions measurements recorded and reported in accordance with subpart HH of 40 CFR part 97 shall be used to determine compliance by each CAIR NOX source with the CAIR NOX emissions limitation under paragraph (c) of this permit.

(c) **Nitrogen Oxides Emission Requirements.**

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NOX source and each CAIR NOX unit at the source shall hold, in the source's compliance account, CAIR NOX allowances available for compliance deductions for the control period under 40 CFR 97.154(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NOX units at the source, as determined in accordance with subpart HH of 40 CFR part 97.

(2) A CAIR NOX unit shall be subject to the requirements under paragraph (c)(1) for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.170(b)(1), (2), or (5) and for each control period thereafter.

(3) A CAIR NOX allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this section, for a control period in a calendar year before the year for which the CAIR NOX allowance was allocated.

(4) CAIR NOX allowances shall be held in, deducted from, or transferred into or among CAIR NOX Allowance Tracking System accounts in accordance with subparts EE, FF, GG, or II of 40 CFR part 97.

(5) A CAIR NOX Ozone Season allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NOX Ozone Season Trading Program. No provision of the CAIR NOX Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.105 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(6) A CAIR NOX allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NOX Annual Trading Program. No provision of the CAIR NOX Annual Trading Program, the CAIR permit application, the CAIR permit, or an exemption under 40 CFR 97.105 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(7) A CAIR NOX allowance does not constitute a property right.

(8) Upon recordation by the Administrator under subpart EE, FF, GG, or II of 40 CFR part 97, every allocation, transfer, or deduction of a CAIR NOX allowance to or from a CAIR NOX source's compliance account is incorporated automatically in any CAIR permit of the source.

(d) **Excess Emissions Requirements.**

If a CAIR NOX source emits nitrogen oxides during any control period in excess of the CAIR NOX emissions limitation, then:

(1) The owners and operators of the source and each CAIR NOX unit at the source shall surrender the CAIR NOX allowances required for deduction under 40 CFR 97.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and

(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, the Clean Air Act, and applicable State rules.

(e) **Recordkeeping and Reporting Requirements.**

(1) Unless otherwise provided, the owners and operators of the CAIR NOX source and each CAIR NOX unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the MDEQ-AQD or the Administrator.

(i) The certificate of representation under § 97.113 for the CAIR designated representative for the source and each CAIR NOX unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.113 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with subpart HH of 40 CFR part 97.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NOX Annual Trading Program.

(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NOX Annual Trading Program or to demonstrate compliance with the requirements of the CAIR NOX Annual Trading Program.

(2) The CAIR designated representative of a CAIR NOX source and each CAIR NOX unit at the source shall submit the reports required under the CAIR NOX Annual Trading Program, including those under subpart HH of 40 CFR part 97.

(f) **Liability.**

(1) Each CAIR NOX source and each CAIR NOX unit shall meet the requirements of the CAIR NOX Annual Trading Program.

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

(3) Any provision of the CAIR NOX Annual Trading Program that applies to a CAIR NOX unit or the CAIR designated representative of a CAIR NOX unit shall also apply to the owners and operators of such unit.

(g) **Effect on Other Authorities.**

No provision of the CAIR NOX Annual Trading Program, a CAIR permit application, a CAIR permit, or an exemption under § 97.105 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NOX source or CAIR NOX unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

Appendix 14. CAIR Ozone Nitrogen Oxide Budget Permit

CAIR Ozone Nitrogen Oxide Budget Permit
Permit No. MI-NOO-1866-2009

Permittee	Wyandotte Municipal Service-Power Plant
Address	2555 Van Alstyne, Wyandotte, MI
SRN	B2132
ORIS code	1866
Issue Date	
Expiration	This permit shall expire when the facility's Renewable Operating Permit expires in accordance with Air Pollution Control Rule 336.1821.
ROP No.	MI-ROP-B2132-2010

This permit incorporates automatically the definitions of terms under Air Pollution Control Rule 336.1803.

This permit incorporates automatically, upon recordation by the EPA Administrator in accordance with Air Pollution Control Rule 336.1822, 336.1823 and 336.1834 every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx Budget unit(s) covered by the permit.

The owners and operators of the source must comply with the standard requirements and special provisions set forth in this permit.

This permit incorporates any attached comments, notes or justifications regarding permit decisions and changes made to the permit application forms during the review process.

Units covered under this permit

AQD Unit ID	Unit Type			
EUUnit5BLR	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EUUnit7BLR	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other
EUUnit8BLR	**X** Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other

Permit Application:

CAIR NOx Ozone Season Permit application submitted September 12, 2008

Standard Requirements

(a) **Permit Requirements**.

(1) The CAIR designated representative of each CAIR NOX source required to have a Renewable Operating Permit (ROP) and each CAIR NOX unit required to have a ROP at the source shall:

(i) Submit to the Michigan Department of Natural Resources and Environment, Air Quality Division (MDNRE-AQD) a complete CAIR permit application under R 336.1821(3) in accordance with the deadlines specified in 40 CFR 97.321; and
(ii) Submit in a timely manner any supplemental information that the MDNRE-AQD determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR NOX source required to have a ROP and each CAIR NOX unit required to have a ROP at the source shall have a CAIR permit issued by the MDNRE-AQD under subpart CCCC of 40 CFR part 97 for the source and operate the source and the unit in compliance with such CAIR permit.

(b) **Monitoring, Reporting, and Recordkeeping Requirements.**

(1) The owners and operators, and the CAIR designated representative, of each CAIR NOX source and each CAIR NOX unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subpart HHHH of 40 CFR part 97.

(2) The emissions measurements recorded and reported in accordance with subpart HHHH of 40 CFR part 97 shall be used to determine compliance by each CAIR NOX source with the CAIR NOX emissions limitation under paragraph (c) of this permit.

(c) **Nitrogen Oxides Emission Requirements.**

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NOX source and each CAIR NOX unit at the source shall hold, in the source's compliance account, CAIR NOX allowances available for compliance deductions for the control period under 40 CFR 97.354(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NOX units at the source, as determined in accordance with subpart HHHH of 40 CFR part 97.

(2) A CAIR NOX unit shall be subject to the requirements under paragraph (c)(1) for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.370(b)(1), (2), (3) or (7) and for each control period thereafter.

(3) A CAIR NOX allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this permit, for a control period in a calendar year before the year for which the CAIR NOX allowance was allocated.

(4) CAIR NOX allowances shall be held in, deducted from, or transferred into or among CAIR NOX Allowance Tracking System accounts in accordance with subparts EEEE, FFFF, GGGG, or IIII of 40 CFR part 97.

(5) A CAIR NOX Ozone Season allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NOX Ozone Season Trading Program. No provision of the CAIR NOX Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.305 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(6) A CAIR NOX allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EEEE, FFFF, GGGG, or IIII of 40 CFR part 97, every allocation, transfer, or deduction of a CAIR NOX allowance to or from a CAIR NOX source's compliance account is incorporated automatically in any CAIR permit of the source.

(d) **Excess Emissions Requirements.**

If a CAIR NOX source emits nitrogen oxides during any control period in excess of the CAIR NOX emissions limitation, then:

(1) The owners and operators of the source and each CAIR NOX unit at the source shall surrender the CAIR NOX allowances required for deduction under 40 CFR 97.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and

(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, the Clean Air Act, and applicable State rules.

(e) **Recordkeeping and Reporting Requirements.**

(1) Unless otherwise provided, the owners and operators of the CAIR NOX source and each CAIR NOX unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the MDNRE-AQD or the Administrator.

(i) The certificate of representation under § 97.313 for the CAIR designated representative for the source and each CAIR NOX unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.313 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with subpart HHHH of 40 CFR part 97.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NOX Ozone Trading Program.

(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NOX Ozone Trading Program or to demonstrate compliance with the requirements of the CAIR NOX Ozone Trading Program.

(2) The CAIR designated representative of a CAIR NOX source and each CAIR NOX unit at the source shall submit the reports required under the CAIR NOX Ozone Trading Program, including those under subpart HHHH of 40 CFR part 97.

(f) **Liability.**

(1) Each CAIR NOX source and each CAIR NOX unit shall meet the requirements of the CAIR NOX Ozone Trading Program.

(2) Any provision of the CAIR NOX Ozone Trading Program that applies to a CAIR NOX source or the CAIR designated representative of a CAIR NOX source shall also apply to the owners and operators of such source and of the CAIR NOX units at the source.

(3) Any provision of the CAIR NOX Ozone Trading Program that applies to a CAIR NOX unit or the CAIR designated representative of a CAIR NOX unit shall also apply to the owners and operators of such unit.

(g) **Effect on Other Authorities.**

No provision of the CAIR NOX Ozone Trading Program, a CAIR permit application, a CAIR permit, or an exemption under § 97.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NOX source or CAIR NOX unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.