

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

EFFECTIVE DATE: July 15, 2015
REVISION DATES: December 15, 2015, June 16, 2016, July 15, 2019

ISSUED TO

**DTE ELECTRIC COMPANY
ST. CLAIR/BELLE RIVER POWER PLANT**

State Registration Number (SRN) B2796

LOCATED AT

4901 Pointe Drive, St. Clair, Michigan 48054

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2796-2015c

Expiration Date: July 15, 2020

Administratively Complete ROP Renewal Application
Due Between January 15, 2019 and January 15, 2020

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-B2796-2015c

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

Michigan Department of Environment, Great Lakes, and Energy

Joyce Zhu, Warren District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

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SECTION 1 – ST. CLAIR POWER PLANT

LOCATED AT

4901 Pointe Drive
St. Clair, Michigan 48054

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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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. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following: **(R 336.1301(1))**
 - 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.

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

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(5))**

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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.

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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))**

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- 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(10))**
- 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))**

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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(8))**

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 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

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

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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, EGLE.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 of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

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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 C-1

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 or Modification Date	Flexible Group ID
EU-BOILER1-SC	St. Clair Boiler No. 1. Nominally rated 150 MW coal fired boiler (ignition with natural gas). Also, fires #6 fuel oil, off specification used oil, or their blends as auxiliary fuel, and recovered paint solids. The boiler is equipped with low NOx burners, dry cold-side electrostatic precipitators (ESP), overfire air, dry sorbent injection (DSI), and activated carbon injection (ACI). (PTI No. 18-14)	02-01-1951/ 01-04-2006/ 01-30-2012/ 07-25-2014	FG-BLR_GEN-SC FG-BLR1-4-SC FG-DSI/ACI-SC FG-MATSPROJECT-SC
EU-BOILER2-SC	St. Clair Boiler No. 2. Nominally rated 150 MW coal fired boiler (ignition with natural gas). Also, fires #6 fuel oil, off specification used oil, or their blends as auxiliary fuel, and recovered paint solids. The boiler is equipped with low NOx burners, dry cold-side electrostatic precipitators ESP, overfire air, DSI, ACI. (PTI No. 18-14)	02-01-1951/ 01-04-2006/ 01-30-2012/ 07-25-2014	FG-BLR_GEN-SC FG-BLR1-4-SC FG-DSI/ACI-SC FG-MATSPROJECT-SC
EU-BOILER3-SC	St. Clair Boiler No. 3. Nominally rated 150 MW coal fired boiler (ignition with natural gas). Also, fires #6 fuel oil, off specification used oil, or their blends as auxiliary fuel, and recovered paint solids. The boiler is equipped with low NOx burners, dry cold-side electrostatic precipitators ESP, overfire air, DSI, ACI. (PTI No. 18-14)	02-01-1951/ 06-20-2004/ 01-30-2012/ 07-25-2014	FG-BLR_GEN-SC FG-BLR1-4-SC FG-DSI/ACI-SC FG-MATSPROJECT-SC

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date or Modification Date	Flexible Group ID
EU-BOILER4-SC	St. Clair Boiler No. 4. Nominally rated 150 MW coal fired boiler (ignition with natural gas). Also, fires #6 fuel oil, off specification used oil, or their blends as auxiliary fuel, and recovered paint solids. The boiler is equipped with low NOx burners, dry cold-side electrostatic precipitators ESP, overfire air, DSI, ACI. (PTI No. 18-14)	02-01-1951/ 09-16-2004/ 1-30-2012/ 07-25-2014	FG-BLR_GEN-SC FG-BLRS1-4-SC FG-DSI/ACI-SC FG-MATSPROJECT-SC
EU-BOILER6-SC	St. Clair Boiler No. 6. Nominally rated 350 MW coal fired boiler (ignition with natural gas) and natural gas as a secondary fuel. The boiler is equipped with low NOx burners, dry cold-side ESP, overfire air, DSI, and ACI. Also, fires natural gas and #2 fuel oil for the primary air duct heaters. (PTI No. 18-14)	01-01-1959/ 02-23-2003/ 07-25-2014	FG-BLR_GEN –SC FG-DSI/ACI-SC FG-MATSPROJECT-SC
EU-BOILER7-SC	St. Clair Boiler No. 7. Nominally rated 450 MW coal fired boiler (ignition with #2 fuel oil) and #2 fuel oil as a secondary fuel. The boiler is equipped with low NOx burners, dry cold-side ESP, overfire air, DSI, and ACI. Also, fires natural gas and #2 fuel oil for the primary air duct heaters. (PTI No. 18-14)	01-01-1967/ 04-11-2001/ 07-25-2014	FG- BLR_GEN –SC FG-DSI/ACI-SC FG-MATSPROJECT-SC
EU-ASH_S_SILO-SC	Flyash handling activity at the South Flyash Silo, including ash load-out facilities, where emissions are limited by enclosures, sprays, or baghouse dust collectors.	02-01-1951/ 01-01-1959	FG-ASH_HAND-SC
EU-ASH_N_SILO-SC	Flyash handling activity at the North Flyash Silo, including ash load-out facilities, where emissions are limited by enclosures or sprays. EU baghouse vents directly to Unit 6 ESP.	02-01-1951	FG-ASH_HAND-SC
EU-ASH_U6_VAC-SC	Flyash handling activity at Boiler No. 6 Flyash Hydrovac System, including Flyash load-out facilities, where emissions are limited by enclosures, sprays or baghouse dust collectors.	01-01-1959	FG-ASH_HAND-SC
EU-RAILCAR-SC	Rail car coal dumper house with baghouse control.	12-31-1989	NA
EU-BUNKER_HS-SC	Coal handling activity in the bunker houses, where emissions are limited by enclosures, sprays, or dust collectors.	06-19-1987	FG-COALHAND-SC
EU-TRANSFER_HS-SC	Coal handling activity in the transfer houses, where emissions are limited by enclosures, sprays, or dust collectors.	06-30-1997	FG-COALHAND-SC
EU-CRUSHER_HS-SC	Coal handling activity in the crusher house, where emissions are limited by enclosures, sprays, or dust collectors.	06-19-1987/ 06-30-1997	FG-COALHAND-SC

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date or Modification Date	Flexible Group ID
EU-PARTSCLN-SC	Cold solvent parts cleaners located at St. Clair Power Plant.	09-30-1996	FG-COLDCLNR-SC
EU-FIREPUMP-SC	#2 Screenhouse, Rule 285(g) exempt, 300 BHp, emergency diesel engine.	06/12/1995	FG-EMERGENS-SC
EU-FULTON-SC	2.5 MM BTU/hr natural gas-fired boiler located at Fuel Supply Admin Building.	10/14/1998	NA
EU-STC12-DSI_SILO1	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Units 1 & 2 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC
EU-STC12-DSI_SILO2	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Units 1 & 2 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC
EU-STC34-DSI_SILO1	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Units 3 & 4 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC
EU-STC34-DSI_SILO2	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Units 3 & 4 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC
EU-STC06-DSI_SILO1	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Unit 6 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date or Modification Date	Flexible Group ID
EU-STC06-DSI_SILO2	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Unit 6 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC
EU-STC07-DSI_SILO1	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Unit 7 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC
EU-STC07-DSI_SILO2	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Unit 7 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC
EU-STC12-ACI_SILO	ACI sorbent delivered by enclosed dry bulk semi-trailer trucks and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Units 1 & 2 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC
EU-STC34-ACI_SILO	ACI sorbent delivered by enclosed dry bulk semi-trailer trucks and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Units 3 & 4 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC
EU-STC06-ACI_SILO	ACI sorbent delivered by enclosed dry bulk semi-trailer trucks and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Unit 6 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC
EU-STC07-ACI_SILO	ACI sorbent delivered by enclosed dry bulk semi-trailer trucks and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the St. Clair Unit 7 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-SC, FG-MATSPROJECT-SC

**EU-BOILER6-SC
EMISSION UNIT CONDITIONS**

DESCRIPTION

St. Clair Boiler No. 6. Nominally rated, 350 MW coal fired boiler. See FG-BLR_GEN-SC for description.

Flexible Group ID: FG-BLR_GEN-SC

POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitators and Low-NOx burners.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.15 lb/1,000 lbs of exhaust gases on a wet basis, corrected to 50% excess air ²	Test Protocol	Boiler No. 6	SC V.1	R 336.1331(1)
Test protocol will specify averaging time period.					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. # 2 Fuel Oil	0.5% sulfur by weight ²	As-fired	Boiler No. 6	SC VI.1	R 336.1401

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any of the boilers unless the electrostatic precipitators are installed, maintained, and operated satisfactorily.² **(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. Once every three years or more frequently upon the request of the AQD District Supervisor, the permittee shall verify and quantify particulate matter emission rates by testing at owner’s expense in accordance with EGLE requirements. **(R 336.2001, R 336.1213(3))**
2. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R 336.1331, R 336.2001, R 336.2003, R 336.2004)**

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3. Within 180 days after commencement of trial operation, the permittee shall verify PM, PM10, and PM2.5 emission rates from EU-BOILER6-SC by testing at owner's expense, in accordance with Department requirements. The permittee must complete the test once every three years, thereafter for the next 10 years of operation after the EU-BOILER6-SC modification (NOTE: EU-BOILER6-SC was modified on December 22, 2009). Not less than 30 days prior to testing, the permittee shall submit a complete test plan to AQD. AQD must approve the final plan prior to testing. The permittee shall notify AQD no less than 7 days prior to the anticipated test date. Verification of emission rates includes submittal of a complete report of test results to AQD within 60 days following the last date of test.² (R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.2001, R 336.2003, R 336.2004, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S))

VI. MONITORING/RECORDKEEPING

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

1. For sulfur content of fuel oil, the permittee shall maintain a complete record of fuel oil specifications and/or fuel analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by vendor at time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with percent sulfur limit in fuel oil. (R 336.1213(3))
2. The permittee shall calculate and keep records of PM, PM10 and PM2.5 emissions from EU-BOILER6-SC, in tons per calendar year. The annual recordkeeping period shall begin on the first day of the month during which REF refined coal combustion commences. The calculations and records shall be kept in the format described in Appendix 4.1-SC, or an alternative format acceptable to the AQD Permit Section Supervisor. The requirement to conduct calculations and keep records shall end 10 calendar years (December 31, 2019) after REF refined coal combustion commences. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)

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 records of the annual emission of PM, PM10, and PM2.5 from EU-BOILER6-SC, in tons per year on a calendar year basis, to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of each recordkeeping year thru 10 calendar years (December 31, 2019) identified in SC VI.2, if either of the following occur:
 - a. The yearly actual emission of PM, PM10, and/or PM2.5 exceed the baseline actual emissions (BAE) by a significant amount, and/or
 - b. The year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test.

The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to EU-BOILER6-SC Condition VI.2, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))

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See Appendix 8-SC

I. 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. SV002-060	160 ²	425 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. Any readings, measurements, calculations and records required by this permit and the Department's Rules for Air Pollution Control shall be rounded to the nearest significant digit specified; i.e., for a limit specified as 0.5, 0.54 shall be 0.5, and 0.55 shall be 0.6.² (R 336.1201(3))
2. The permittee shall maintain and implement the approved malfunction abatement and preventative maintenance program (Program) for the electrostatic precipitators. Alternate formats or revisions to the approved Program must be approved by the AQD District Supervisor.² (R 336.1911)

Footnotes:

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

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

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**EU-BOILER7-SC
EMISSION UNIT CONDITIONS**

DESCRIPTION

St. Clair Boiler No. 7. Nominally rated 450 MW coal fired boiler. See FG-BLR_GEN-SC for description.

Flexible Group ID: FG-BLR_GEN-SC

POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitators and Low-NOx burners.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.13 lb/1,000 lbs of exhaust gases on a wet basis, corrected to 50% excess air ²	Test Protocol	Boiler No. 7	SC V.1	R 336.1331(1)
Test protocol will specify averaging time period.					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. # 2 Fuel Oil	0.5% sulfur by weight ²	As-fired	Boiler No. 7	SC VI.1	R 336.1401
2. Biodiesel	2, 000,000 gallons per year ²	Annual	Boiler No. 7	SC VI.3	R 336.1205(3)
3. Biodiesel	0.05% sulfur by weight ²	As-fired	Boiler No. 7	SC VI.1	R 336.1401

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any of the boilers unless the electrostatic precipitator are installed, maintained, and operated satisfactorily.² (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. Once every three years or more frequently upon the request of the AQD District Supervisor, the permittee shall verify and quantify particulate matter emission rates by testing at owner's expense in accordance with EGLE requirements. (R 336.1201(3), R 336.2001)
2. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date.

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Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R 336.1331, R 336.2001, R 336.2003, R 336.2004)**

3. Within 180 days after commencement of trial operation, the permittee shall verify PM, PM10, and PM2.5 emission rates from EU-BOILER7-SC by testing at owner's expense, in accordance with Department requirements. The permittee must complete the test once every three years, thereafter for the next 10 years of operation after the EU-BOILER7-SC modification (NOTE: EU-BOILER7-SC was modified on December 22, 2009). Not less than 30 days prior to testing, the permittee shall submit a complete test plan to AQD. AQD must approve the final plan prior to testing. The permittee shall notify AQD no less than 7 days prior to the anticipated test date. Verification of emission rates includes submittal of a complete report of test results to AQD within 60 days following the last date of test.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.2001, R 336.2003, R 336.2004, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S)**

VI. MONITORING/RECORDKEEPING

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

1. For Sulfur content of fuel oil, the permittee shall maintain a complete record of fuel oil specifications and/or fuel analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by vendor at time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with percent sulfur in fuel oil.² **(R 336.1213(3))**
2. The permittee shall calculate and keep records of PM, PM10 and PM2.5 emissions from EU-BOILER7-SC, in tons per calendar year. Annual recordkeeping period shall begin on the first day of the month during which REF refined coal combustion commences. Calculations and records shall be kept in the format described in Appendix 4.1-SC, or an alternative format acceptable to AQD Permit Section Supervisor. Requirement to calculate and keep records shall end 10 calendar years (December 31, 2019) after REF refined coal combustion commences. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)**
3. The permittee shall calculate and keep records of NO_x, SO₂, PM, PM10 and PM2.5 emissions from EU-BOILER7-SC, in tons per calendar year. Annual recordkeeping period shall begin on the first day of the month during which the permittee begins using biodiesel fuel in EU-BOILER7-SC. Calculations and records shall be kept in the format described in Appendix 4.2-SC, or an alternative format acceptable to AQD Permit Section Supervisor. Requirement to calculate and keep records shall end 10 calendar years after the use of biodiesel fuel in EU-BOILER7 commences. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)**
4. The permittee shall monitor and record, in a satisfactory manner, the biodiesel usage from EU-BOILER7 on a monthly basis.² **(R 336.1224, R 336.1225, 40 CFR 52.21)**

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))**

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4. The permittee shall submit records of the annual emission of PM, PM10, and PM2.5 from EU-BOILER7-SC, in tons per year on a calendar year basis, to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of each recordkeeping year thru 10 calendar years (December 31, 2019) identified in SC VI.2., if either of the following occur:
 - a. The yearly actual emission of PM, PM10, and/or PM2.5 exceed the baseline actual emissions (BAE) by a significant amount, and/or
 - b. The year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test.

The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to EU-BOILER7-SC Condition VI.2, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))

5. The permittee shall submit records of the annual emission of NO_x, SO₂, PM, PM10, and PM2.5 from EU-BOILER7-SC, in tons per year on a calendar year basis, to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of first calendar year identified in SC VI.3. Thereafter, the permittee shall submit records of the annual emission of NO_x, SO₂, PM, PM10, and PM2.5 from EU-BOILER7-SC, in tons per year on a calendar year basis, to both the AQD Permit Section Supervisor and AQD District Supervisor within 60 days following the end of each recordkeeping year identified in Special Condition VI.3, if either of the following occur:
 - a. The yearly actual emission of NO_x, SO₂, PM, PM10, and/or PM2.5 exceed the baseline actual emissions (BAE) by a significant amount, and/or
 - b. The year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test.

The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to EU-BOILER7-SC Condition VI.3, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))

See Appendix 8-SC

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. SV002-070	192 ²	600 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. Any readings, measurements, calculations and records required by this permit and the Department's Rules for Air Pollution Control shall be rounded to the nearest significant digit specified; i.e., for a limit specified as 0.5, 0.54 shall be 0.5, and 0.55 shall be 0.6.² (R 336.1201(3))

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2. The permittee shall maintain and implement the approved malfunction abatement and preventative maintenance program (Program) for the electrostatic precipitators. Alternate formats or revisions to the approved Program must be approved by the AQD District Supervisor.² **(R 336.1911)**

Footnotes:

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

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

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**EU-RAILCAR-SC
EMISSION UNIT CONDITIONS**

DESCRIPTION

Rail car coal dumper house with baghouse control. Used for unloading coal delivered by railroad.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Baghouse

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	18.0 pounds ²	Hourly	Rail car coal dumper house	SC III.1	R 336.1331(1)(b) & (c)
2. Particulate Matter	1.3 tons ²	Monthly	Rail car coal dumper house	SC VI.3	R 336.1331(1)(b) & (c)
3. Particulate Matter	0.73 tons ²	Monthly, based on a rolling 12-month average	Rail car coal dumper house	SC VI.3	R 336.1331(1)(b) & (c)
4. Particulate Matter	0.015 grains per actual cubic foot ²	Test Protocol	Rail car coal dumper house	SC VI.2	R 336.1331(1)(b) & (c)

Test protocol will specify averaging time period.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coal	220,000 tons ²	Monthly	Rail car coal dumper house	Section VI.1	R 336.1201(3)
2. Coal	121,333 tons ²	Monthly, based on a rolling 12-month average	Rail car coal dumper house	Section VI.1	R 336.1201(3)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the rail car dumper house unless the baghouse dust collection system is installed and operating properly.² (R 336.1201(3), R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the rail car dumper house unless a gauge which measures the pressure drop across the baghouse dust collector is installed and operating properly.² (R 336.1201(3))

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V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall conduct and keep a record of Method 9 visible emissions readings during maximum routine operating conditions from the rail car dumper house pollution control equipment stacks, at a minimum of once per calendar year. (R 336.1213(3))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall calculate and record the following information:
 - a. Total tons of unloaded coal per month.
 - b. Average tons of unloaded coal per month based on a 12-month rolling average, as determined at the end of each month. (R 336.1213(3))
2. The permittee shall conduct and record visible emission observations of each rail car dumper house pollution control equipment stack at least once every seven days during coal dumping activity. The permittee shall initiate corrective action upon observation of excessive visible emissions from the rail car dumper house and shall keep a record of each corrective action. (R 336.1213(3))
3. The permittee shall calculate and record the monthly and rolling 12-month average particulate emission rate from the rail car coal dumper house, as determined at the end of each month. (R 336.1213(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))

See Appendix 8-SC

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. SV022-143	69 ²	72 ²	R 336.1201(3)
2. SV022-144	69 ²	72 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approved malfunction abatement/preventative maintenance program for the baghouse dust collection system. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor.² (R 336.1911)

Footnotes:

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

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

EU-FULTON-SC EMISSION UNIT CONDITIONS
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DESCRIPTION

An existing, heating boiler (EU-FULTON-SC), subject to 40 CFR 63, Subpart DDDDD (Industrial Boiler MACT) located at the Fuel Supply Admin Building. The boiler is exempt from Michigan Rule 201 permit requirements pursuant to Rule 278 and Rule 282(b). The boiler has a heat input capacity of less than 5 MM BTU/hr.

Units designed to burn gas 1 subcategory include any boiler that burns only natural gas.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must have a one-time energy assessment that includes each affected boiler by January 31, 2016, performed by a qualified energy assessor as required in Table 3 of 40 CFR 63, Subpart DDDDD. **(40 CFR 63.7500)(a), 40 CFR 63.7495(b), (40 CFR 63.7510)(e), 40 CFR 63.7575)**
2. The permittee must complete an initial tune-up of the boilers by following the procedures described in §63.7540(a)(10)(i) through (vi) no later than January 31, 2016. **(40 CFR 63.7495(b), 40 CFR 63.7510(e))**
3. To demonstrate continuous compliance, the permittee shall conduct a tune-up of the boilers every five years (within 61 months) as specified in § 63.7540(a)(10)(i) through (vi). If a boiler is not operating on the required date for tune-up, the tune-up must be conducted within 30 calendar days of startup. **(40 CFR 63.7500(a), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(12) & (13))**
4. The permittee, at all times, must operate and maintain the boilers in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.7500)(a)(3))**
5. The permittee must install a fuel meter or may share a fuel meter for each affected source. **(R 336.1213(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

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VI. MONITORING/RECORDKEEPING

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

1. A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report submitted according to the requirements in § 63.10(b)(2)(xiv). **(40 CFR 63.7555(a))**
2. The permittee shall keep records of compliance demonstrations. **(R 336.1212(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 applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), as specified in 40 CFR 63.7545. **(40 CFR 63.7545)(a))**
5. The permittee must submit a signed statement in the Notification of Compliance Status report that contains the results of the initial compliance demonstration according to the requirements in 40 CFR 63.7545(e), indicating that an initial tune-up has been conducted and that the one-time energy assessment was completed and is an accurate depiction at the time of the assessment. The permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration before the close of business on the 60th day following the completion of the initial compliance demonstration. The Notification of Compliance Status report must contain all information specified in 40 CFR 63.7575(e)(1) and (8), as applicable. **(40 CFR 63.7530(d), (e), & (f); 40 CFR 63.7545(e))**
6. As specified in 40 CFR 63.7550(b)(1) through (4), the permittee must submit a 5-year compliance report based on a requirement to conduct a tune-up every 5 years. The first 5-year compliance report must cover the period beginning on the compliance date and ending 5 years after the compliance date. The first 5-year compliance report must be postmarked or submitted no later than March 15 after the 5-year period. Each subsequent 5-year compliance report must cover the 5-year periods from January 1 to December 31 and must be postmarked or submitted no later than March 15 following the 5-year period. **(40 CFR 63.7550(b))**
NOTE: In accordance with 40 CFR 63.9, the permittee may request, in writing, to change the deadline for the compliance reports. The deadline for the compliance reports is changed from January 31 to March 15 to coincide with the deadline for the ROP Certification Reports.
7. The permittee must maintain on-site and submit, if requested by the Administrator, a five-year report containing the following information associated with the performance of the compliance tune-ups:
 - a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
 - b. A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10) & (12))**

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VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters as they apply to emission units subject to Subpart DDDDD. **(40 CFR Part 63, Subparts A and DDDDD)**

Footnotes:

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

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

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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 D-1

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-BLR_GEN-SC	Applicable requirements associated with St. Clair Power Plant Boiler Nos. 1 to 4, 6, and 7; including low-NOx burner & CAM requirements	EU-BOILER1-SC EU-BOILER2-SC EU-BOILER3-SC EU-BOILER4-SC EU-BOILER6-SC EU-BOILER7-SC
FG-BLRS1-4-SC	Common particulate matter and used oil requirements for St. Clair Power Plant Boiler Nos. 1 to 4	EU-BOILER1-SC EU-BOILER2-SC EU-BOILER3-SC EU-BOILER4-SC
FG-ASH_HAND-SC	Emission units representing Flyash collection and handling at St. Clair Power Plant, including Flyash loadout facilities	EU-ASH_S_SILO-SC EU-ASH_N_SILO-SC EU-ASH_U6_VAC-SC
FG-COALHAND-SC	Emission units representing coal handling at St. Clair Power Plant	EU-BUNKER_HS-SC EU-TRANSFER_HS-SC EU-CRUSHER_HS-SC
FG-COLDCLNR-SC	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv).	EU-PARTSCLN-SC
FG-EMERGENS-SC	Onsite, stationary, emergency engines exempt from Rule 201 pursuant to Rule 278 and Rule 285(g). Emergency engines are subject to 40 CFR 63 Subpart ZZZZ.	EU-FIREPUMP-SC
FG-RPSPROJECT-SC	The project is to include recovered paint solids (RPS) as part of the fuel burned in Units 1, 2, 3, and 4. There are no equipment changes to accommodate the RPS. Based on the actual-to-projected-actual applicability test, this project results in a minor modification with respect to major source review for both attainment area and nonattainment area regulations.	EU-BOILER1-SC EU-BOILER2-SC EU-BOILER3-SC EU-BOILER4-SC EU-ASH_S_SILO-SC
FG-DSI/ACI-SC	Installation of dry sorbent injection (DSI) and activated carbon injection (ACI) systems on St. Clair Units 1, 2, 3, 4, 6, and 7. (PTI No. 18-14)	EU-BOILER1-SC, EU-BOILER2-SC EU-BOILER3-SC, EU-BOILER4-SC EU-BOILER6-SC, EU-BOILER7-SC

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Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-ISLANDS-SC	DSI and ACI sorbents delivered and conveyed pneumatically to the appropriate storage silo. (PTI No. 18-14)	EU-STC12-DSI_SILO1, EU-STC12-DSI_SILO2, EU-STC34-DSI_SILO1, EU-STC34-DSI_SILO2, EU-STC06-DSI_SILO1, EU-STC06-DSI_SILO2, EU-STC07-DSI_SILO1, EU-STC07-DSI_SILO2 EU-STC12-ACI_SILO, EU-STC34-ACI_SILO, EU-STC06-ACI_SILO, EU-STC07-ACI_SILO
FG-MATSPROJECT-SC	Hybrid Analysis recordkeeping and reporting used for MATS project. (PTI No. 18-14)	FG-DSI/ACI-SC, FG-ISLANDS-SC

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FG-BLR_GEN-SC FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Applicable requirements associated with St. Clair Power Plant Boiler Nos. 1 through 4, 6, and 7; including low-NOx burners & CAM requirements

Emission Units:

EU-BOILER1-SC	St. Clair Boiler No. 1. Nominally rated 150 MW coal fired boiler (ignition with natural gas) with ability to be fueled by recovered paint solids and equipped with electrostatic precipitators, low-NOx burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). Also fires #6 fuel oil, off specification used oil and their blends as auxiliary fuel.
EU-BOILER2-SC	St. Clair Boiler No. 2. Nominally rated 150 MW coal fired boiler (ignition with natural gas) with ability to be fueled by recovered paint solids and equipped with electrostatic precipitators, low-NOx burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). Also fires #6 fuel oil, off-specification used oil, and their blends as auxiliary fuel.
EU-BOILER3-SC	St. Clair Boiler No. 3. Nominally rated 150 MW coal fired boiler (ignition with natural gas) with ability to be fueled by recovered paint solids and equipped with electrostatic precipitators, low-NOx burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). Also fires #6 fuel oil, off- specification used oil, and their blends as auxiliary fuel.
EU-BOILER4-SC	St. Clair Boiler No. 4. Nominally rated 150 MW coal fired boiler (ignition with natural gas) with ability to be fueled by recovered paint solids and equipped with electrostatic precipitators, low-NOx burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). Also fires #6 fuel oil, off-specification used oil, and their blends as auxiliary fuel.
EU-BOILER6-SC	St. Clair Boiler No. 6. Nominally rated 350 MW coal fired boiler with electrostatic precipitators, low-NOx burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). Natural gas as secondary fuel, ignition, and primary air duct heaters. Also fires #2 fuel oil for primary air duct heaters.
EU-BOILER7-SC	St. Clair Boiler No. 7. Nominally rated 450 MW coal fired boiler with electrostatic precipitators, low-NOx burners, overfire air, dry sorbent injection (DSI) and activated carbon injection (ACI). #2 fuel oil for boiler ignition, primary air duct heaters and as auxiliary fuel into boiler. Also fires natural gas for primary air duct heaters.

POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitators, Low-NOx Burners, Overfire Air, Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. SO ₂ ^a	1.67 lbs per MM BTU ²	Monthly average ^b	FG-BLR_GEN-SC	SC VI.1	R 336.1401(3)

The SO₂ limit is a combined limit for St. Clair Power Plant Boiler Nos. 1 through 4, 6, and 7, and is based on a 1% sulfur content of coal with a heat value of 12,000 BTU/lb.^a

The permittee may monitor the SO₂ emission rate on a monthly average using a CEMS certified under 40 CFR 60 or 40 CFR 75.^b

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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 permittee shall not operate any of the boilers unless the electrostatic precipitators and low-NOx burners are installed, maintained, and operated satisfactorily.² **(R 336.1910)**
2. The permittee shall maintain and operate the boilers in a satisfactory manner using efficient combustion practices. Satisfactory operation includes operating the boilers according to the procedures outlined in the electrostatic precipitator malfunction abatement/preventative maintenance plan and the CO Minimization Plan.² **(R 336.1910, R 336.1911, 40 CFR 52.21(j), R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. For Boiler Nos. 1 and 2, test records to verify and quantify CO emission rates and efficient combustion parameters shall be kept on file and made available to EGLE upon request.² **(R 336.1205(1)(a) & (b), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(j), R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 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 SO₂ emissions on a continuous basis and in accordance with 40 CFR 60 and/or 75.² **See Appendix 3.1-SC and 3.2-SC. (40 CFR 60 & 75 Appendix B)**
2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the gas flow, CO₂, and NOx emissions on a continuous basis and in accordance with 40 CFR 75.² **See Appendix 3.2-SC. (40 CFR 75 Appendix B)**
3. The permittee shall develop a QA/QC program for the CEM systems. At a minimum, include in each QA/QC program a written plan that describes in detail complete, step-by-step procedures and operations for the activities specified in Appendix B to 40 CFR 75.² **(40 CFR 75 Appendix B.1)**
4. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the opacity on a continuous basis and in accordance with 40 CFR 60.² **See Appendix 3.3-SC. (40 CFR 60.13, 40 CFR 60 Appendix B)**
5. For Boiler Nos. 1 and 2, the permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period CO calculation records. The permittee shall keep all records on file for a period of at least five years and make them available to EGLE upon request.² **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR 52.21(j), R 336.1213(3))**
6. The permittee shall conduct monitoring and keep written records for all boilers, as required in the approved Carbon Monoxide Minimization Protocol to demonstrate that CO is being minimized on an ongoing basis. The permittee may only change the monitoring and recordkeeping with the written approval of the AQD District Supervisor.² **(R 336.1213(3))**

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7. The permittee shall utilize COMS-recorded opacity as an indicator of the emission unit's compliance with the particulate matter limit, except during periods of 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 20% as measured by COMs & recorded by the DAHS". This condition does not affect compliance with R 336.1301.² **(40 CFR 64.6(c)(1)(i) & (ii), (c)(2), (c)(3), and 64.7(c))**
8. The permittee shall operate the COMS during all required periods when the coal-fired boiler is operating. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for 40 CFR Part 64 compliance, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, in frequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.² **(40 CFR 64.6(c)(3), 64.7(c))**
9. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). CAM exceedances/excursions trigger initial inspections, corrective action(s), and recordkeeping of the probable cause & corresponding resolution.² **(40 CFR 64.7(d))**
10. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**
11. The permittee shall perform an annual COMS audit using certified filters to ensure accurate opacity readings.² **(40 CFR 64.6(c)(1)(iii))**

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. For the continuous monitoring system for the measurement of opacity and SO₂, the permittee shall submit to the District Supervisor and Compliance Support Unit Supervisor, Air Quality Division and to the Chief of the Air Compliance Branch, U.S. Environmental Protection Agency, within 30 days of the end of the calendar quarter, a written report for each calendar quarter which shall include all of the following information:²
 - a. Excess emissions, corrective action taken and the nature and cause of excess emissions, if known, as follows: For opacity measurements, the report shall consist of the magnitude, in actual percent opacity, of all 6-minute averages of opacity more than the applicable opacity standard for each hour of operation (all allowable exceptions are to be deducted prior to determining the excess averages of opacity). Average

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values shall be obtained by integration over the averaging period or by arithmetically averaging a minimum of 24 equally spaced, instantaneous opacity measurements per 6 minutes.²

- b. 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 repairs or adjustments made.²
- c. If the monitoring system has not been inoperative, repaired, or adjusted, and if no excess emissions occurred, a statement attesting to this fact.² **(R 336.2170(1)(a), (b) & (c); Title I (Air Pollution Prevention and Control) of the Clean Air Act, Section 114(a), R 336.1213(3))**
5. The permittee shall submit to the Chief of the Air Compliance Branch, U.S. Environmental Protection Agency and the District Supervisor of the Air Quality Division, within 30 days of the end of the calendar quarter, a written report for each calendar quarter which shall include sulfur dioxide monthly emission rate averages.² **(R 336.1401, Clean Air Act Section 114(a))**
6. The permittee shall report sulfur dioxide, nitrogen oxide and carbon dioxide emissions, volumetric flow, and opacity data in accordance with 40 CFR, Part 75 (Continuous Emission Monitoring).² **(40 CFR 75)**
7. Semiannually or more frequently report Compliance Assurance Monitoring (CAM) summary information on the number, duration, and cause of exceedances/excursions in the reporting period, and the corrective actions taken in response. If there were no exceedances/excursions in the reporting period, then this report shall include a statement that there were no exceedances/excursions. **40 CFR 64.9(a)(2)(i), R 336.1213(3)(c)**
8. Semiannually or more frequently report Compliance Assurance Monitoring (CAM) summary information on the monitor downtime in the reporting period. 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), R 336.1213(3)(c))**

See Appendix 8-SC

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
SV002-060	160 ²	425 ²	R 336.1201(3)
Sv002-070	192 ²	600 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-1743-2015 is hereby incorporated into this ROP as **Appendix 9-SC. (R 336.1299(2)(a))**
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(2)(d) and 40 CFR Part 72.9(c)(1)(i). **(R 336.1299(2)(a), 40 CFR 72.9(c)(1)(i))**

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3. The permittee shall comply with the provisions of the Transport Rule SO₂ Group 1 Trading Program, as specified in 40 CFR, Part 97, Subpart CCCCC, as they apply to EU-BOILER1-SC, EU-BOILER2-SC, EU-BOILER3-SC, EUBOILER4-SC EU-BOILER6-SC, and BOILER7-SC. **(40 CFR Part 97 Subpart CCCCC)**
4. The permittee shall comply with the provisions of the Transport Rule NO_x Annual Trading Program, as specified in 40 CFR, Part 97, Subpart AAAAA, as they apply to EU-BOILER1-SC, EU-BOILER2-SC, EU-BOILER3-SC, EUBOILER4-SC EU-BOILER6-SC, and BOILER7-SC. **(40 CFR Part 97 Subpart AAAAA)**
5. The permittee shall comply with the provisions of the Transport Rule NO_x Ozone Trading Program a specified in 40 CFR, Part 97, Subpart BBBB, as they apply to EU-BOILER1-SC, EU-BOILER2-SC, EU-BOILER3-SC, EUBOILER4-SC EU-BOILER6-SC, and BOILER7-SC. **(40 CFR Part 97 Subpart BBBB)**
6. The permittee shall comply with the NO_x standards which have been promulgated in a federal implementation plan under section 110(c) or required under Section 126 of the CAA.² **(R 336.1801(14))**
7. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.² **(40 CFR 64.7(e))**
8. The permittee shall properly maintain the monitoring systems, including maintaining necessary parts for routine repairs of monitoring equipment. **(40 CFR 64.7(b))**
9. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**
10. The permittee shall comply with applicable requirements of the federal National Emissions Standards for Hazardous Air Pollutants as set forth in 40 CFR 63, Subparts A and UUUUU (NESHAP for Coal and Oil-fired Electric Utility Steam Generating Units). The permittee shall comply with all notice requirements, emissions standards and continuous emissions monitoring, recordkeeping, and reporting requirements as required in 40 CFR 63, Subparts A and UUUUU. All emission and operating data shall be kept on file for a period of at least five years and made available to the AQD upon request. **(40 CFR 63 Subparts A and UUUUU)**

Footnotes:

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

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

**FG-BLRS1-4-SC
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Particulate matter and used oil requirements for St. Clair Power Plant Boiler Nos. 1 through 4. For a description of Boiler Nos. 1 through 4, see FG-BLR_GEN-SC.

Emission Unit: EU-BOILER1-SC, EU-BOILER2-SC, EU-BOILER3-SC, and EU-BOILER4-SC.

POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitators and Low-NOx burners

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.17 lb/1,000 lbs of exhaust gases on a wet basis, corrected to 50% excess air ²	Test Protocol	Boiler Nos. 1 - 4	SC V.1	R 336.1331(1)
Test protocol will specify averaging time period.					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. # 6 Fuel Oil, Off-Specification Used Oil, or blends of the two oils	1.0% sulfur by wt. ²	As-fired	Boiler Nos. 1 - 4	SC VI.1	R 336.1401

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any of the boilers unless the electrostatic precipitators are installed, maintained, and operated satisfactorily.² (R 336.1910)

IV. DESIGN / EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. Once every three years or more frequently upon the request of the AQD District Supervisor, the permittee shall verify and quantify particulate matter emission rates by testing at owner's expense in accordance with EGLE requirements.² (R 336.1201(3), R 336.2001)
2. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date.

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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 336.1331, R 336.2001, R 336.2003, R 336.2004)**

3. Within 180 days after permit issuance, the permittee shall verify PM, PM10, and PM2.5 emission rates from each boiler in FG-BLRS1-4-SC by testing at owner's expense, in accordance with Department requirements. The permittee must complete the test once every three years, thereafter for the next 10 years of operation after FG-REFSC-FC modification (NOTE: FG-BLRS1-4-SC was modified on December 22, 2009). No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. 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 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.2001, R 336.2003, R 336.2004, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. For Sulfur content of fuel oil burned, the permittee shall maintain a complete record of fuel oil specifications and/or fuel analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil.² **(R 336.1201(3))**
2. For Boiler Nos. 1 through 4, the permittee shall comply with the Off-Specification Used Oil Monitoring specified in **Appendix 3.4-SC**. **(R 336.1213(3))**
3. The permittee shall keep individual usage records of fuel oil #6 and off-specification used oil. **(R 336.1213(3))**
4. The permittee shall calculate and keep records of PM, PM10 & PM2.5 emissions from each boiler in FG-BLRS1-4-SC, in tons per calendar year. The annual recordkeeping period shall begin on the first day of the month during which REF refined coal combustion commences. The calculations and records shall be kept in the format described in Appendix 4.1-SC, or an alternative format acceptable to the AQD Permit Section Supervisor. The requirement to conduct calculations for records shall end 10 calendar years (December 31, 2019) after REF refined coal combustion commences. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)**

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 records of the annual emission of PM, PM10, and PM2.5 from each boiler in FG-BLRS1-4-SC, in tons per year on a calendar year basis, to both the AQD Permit Section Supervisor and AQD District Supervisor within 60 days following the end of each calendar year identified in SC VI.4. Thereafter, the permittee shall submit records of the annual emission of PM, PM-10, and PM2.5 from each boiler in FG-BLRS1-4-SC, in tons per year on a calendar year basis to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of each recordkeeping year thru 10 calendar years (December 31, 2019) identified in SC VI.4 if either of the following occur:

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- a. The yearly actual emission of PM, PM10, and/or PM2.5 exceed the baseline actual emissions (BAE) by a significant amount, and/or
- b. The year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test.

The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to each boiler in FG-BLRS1-4-SC Condition VI.4, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))

See Appendix 8-SC

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. The permittee shall maintain and implement the approved malfunction abatement and preventative maintenance program (Program) for the electrostatic precipitators. Alternate formats or revisions to the approved Program must be approved by the AQD District Supervisor.² (R 336.1911)

Footnotes:

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

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

**FG-ASH_HAND-SC
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Emission units representing Flyash collection and handling at St. Clair Power Plant, including the Flyash load-out facilities.

Emission Units:

EU-ASH_S_SILO-SC Flyash handling activity at the South Flyash Silo, including ash load-out facilities, where emissions are limited by enclosures, sprays, or baghouse dust collectors.

EU-ASH_N_SILO-SC Flyash handling activity at the North Flyash Silo, including ash load-out facilities, where emissions are limited by enclosures or sprays. North Flyash Silo baghouse vents directly to Unit 6 ESPs.

EU-ASH_U6_VAC-SC Flyash handling activity at Boiler No. 6 Flyash Hydrovac System, including Flyash load-out facilities, where emissions are limited by enclosures, sprays or dust collectors.

POLLUTION CONTROL EQUIPMENT

Enclosures, Sprays, or Dust Collectors

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.10 pound per 1000 pounds of exhaust gases, calculated on a wet basis ²	Instantaneous	FG-ASH_HAND-SC	SC V.1 & SC VI.1	R 336.1331(1)(a)

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 permittee shall not transfer flyash from the storage silo to the trucks unless the transfer site is enclosed on at least three sides.² (R 336.1201(3))
2. The permittee shall vacuum sweep all paved roads, including the plant entrance, weather permitting on all days that flyash is hauled.² (R 336.1201(3))

IV. DESIGN / EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the south or north flyash silo unless the respective bag filter dust collection system is installed and operating properly.² (R 336.1201(3))

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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 a Reference Method 9 visible emissions readings of each ash handling system baghouse exhaust stack, at a minimum of once per calendar year, during maximum routine operating conditions. (R 336.1213(3))

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 ash handling system baghouse exhaust stack, at least once every 7 days during routine flyash loading. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall keep a record of each required observation and corrective action. The permittee shall maintain a written record of each required corrective action. (R 336.1213(3))
2. The permittee shall keep a record of the date of each flyash hauling and the date of each vacuum sweeping of all paved roads. (R 336.1213(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 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-SC

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. SV008-011	16 X 10 ²	93.5 ²	R 336.1201(3)
2. SV008-012	16 X 10 ²	93.5 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall maintain and implement the approved fugitive flyash dust control program (Program). Alternate formats or revisions to the approved Program must be approved by the AQD District Supervisor.² (R 336.1201(3), Section 324.5524 of Act 451)
2. Any readings, measurements, calculations and records required by this permit Department's Rules for Air Pollution Control shall be rounded to the nearest significant digit specified; i.e., for a limit specified as 0.5, 0.54 shall be 0.5, and 0.55 shall be 0.6.² (R 336.1201(3))

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3. The permittee shall implement and maintain an approved malfunction abatement/preventative maintenance program for the baghouse dust collection system. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor². **(R 336.1911)**

Footnotes:

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

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

**FG-COALHAND-SC
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Emission Units representing coal handling at the St. Clair Power Plant. Includes bunker houses, transfer houses, crusher house, and coal storage piles.

The following are among the emission points included: Bunker House 1/2-30DC105, Bunker House 3/4-30DC106, Bunker House 6-30DC107, Bunker House 7-30DC108, Crusher House 30DC201, Transfer House A-30DC202, Transfer House 3TH2-30DC03, Transfer House 3TH3-30DC04, Transfer House 3TH4-30DC05, Transfer House 3TH5-30DC06-6 & 30DC06-8, Transfer House 3TH6-30DC07 & 30DC08, Transfer House TH1-30DC102 baghouse stacks and Transfer House 3TH1-30DC01 wet dust collector stack.

Emission Units:

- EU-BUNKR_HS-SC Coal handling activity in the bunker houses, where emissions are limited by enclosures, sprays, or baghouse dust collectors.
- EU-TRANSFER_HS-SC Coal handling activity in the transfer houses, where emissions are limited by enclosures, sprays, or baghouse dust collectors.
- EU-CRUSHER_HS-SC Coal handling activity in the crusher house, where emissions are limited by enclosures, sprays, or baghouse dust collectors

POLLUTION CONTROL EQUIPMENT

Enclosures, Sprays, or Dust Collectors

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.038 grains per dry standard cu ft. ²	Test Protocol	FG-COALHAND-SC	SC V.1 & SC VI.1	R 336.1201(3)
Test protocol will specify averaging time period.					

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. Radial stackers shall be operated in a manner which will minimize the free fall distance of the material being handled.² (R 336.1201(3))
2. The permittee shall not operate the coal handling equipment unless the bag filters are installed and operating properly.² (R 336.1201(3), R 336.1910)

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IV. DESIGN/EQUIPMENT PARAMETER(S)

1. All conveyor belting shall be totally enclosed to control particulate fallout either on public or company property or into the water.² (R 336.1201(3))

NOTE: This condition refers to Phase I Coal Handling System consisting of Transfer House 3TH1 through 3TH5.

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 a Method 9 visible emissions reading from the coal handling system pollution control equipment stacks, at a minimum of once per calendar year, during maximum routine operating conditions. (R 336.1213(3))

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 the coal handling system pollution control equipment exhaust stacks, radial stackers drop points and coal storage piles at least once every 7 days during routine operating conditions. The permittee shall initiate corrective action upon observation of excessive visible emissions and maintain a written record of each required observation and corrective action. (R 336.1213(3))
2. The permittee shall inspect conveyor belting enclosures to determine and record conditions, once per calendar year. (R 336.1213(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))

See Appendix 8-SC

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. The permittee shall implement and maintain an approved malfunction abatement/preventative maintenance program for the baghouse dust collection system. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor.² (R 336.1201(3), R 336.1911)

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2. The permittee shall implement and maintain an approved fugitive dust control program for the coal storage piles. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor.
(R 336.1213(3))

Footnotes:

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

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

FG-COLDCLNR-SC FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EU-PARTSCLN-SC, Cold cleaners located at St. Clair Power Plant

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than 5 percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. **(R 336.1213(2))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. **(R 336.1611(2)(b), R 336.1707(3)(b))**
2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than 10 square feet. **(R 336.1281(h))**
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**
2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**
4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**

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- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**
4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20%, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. **(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of compliance 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. Due annually by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8-SC

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FG-EMERGENS-SC FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Existing, exempt, emergency engines, ≤ 500 HP, subject to 40 CFR 63, Subpart ZZZZ (RICE MACT). Existing engines are engines constructed before June 12, 2006.

Emission Units: EU-FIREPUMP-SC at #2 Screen House

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)

1. The permittee shall meet fuel limits specified in 40 CFR 63.6604(b). Beginning January 1, 2015, permittee must use nonroad diesel fuel in accordance with 40 CFR 80.510(b): maximum sulfur content of 15 ppm, and either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. Any existing diesel fuel purchased prior to January 1, 2015 may be used until depleted. **(40 CFR 63.6604(b), 40 CFR 80.510(b))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. In order for the engine to be considered an emergency stationary RICE, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 63.6640(f)(1) through (3) is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) to (3), the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.
 - a. There is no time limit in emergency situations. **(40 CFR 63.6640(f)(1))**
 - b. Operate up to 100 hours per year for maintenance and testing. **(40 CFR 63.6640(f)(2))**
 - c. Operate up to 50 hours per year in non-emergency situations (counted towards the 100 hours per calendar year for maintenance and testing). **(40 CFR 63.6640(f)(3))**
2. The permittee shall meet the following operating requirements specified per §63.6602:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in Process/Operational Restriction III.3;
 - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. **(40 CFR 63.6602, Table 2c to Subpart ZZZZ of Part 63)**
3. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in §63.6602. The oil analysis program must be performed at same frequency as oil changes are required. Analysis program must test the parameters and keep records per §63.6625(i). **(40 CFR 63.6625(i))**

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4. The permittee shall not operate FG-EMERGENS-SC unless operation and maintenance is performed according to manufacturer's emission-related written instructions or the permittee's maintenance plan. To the extent practicable, the permittee's plan must provide for maintenance and operation of engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6625(e), 40 CFR 63.6640(a))**
5. The permittee shall minimize time spent at idle during startup and minimize engine's startup time to a period needed for safe loading of engine, not to exceed 30 minutes. **(40 CFR 63.6625(h))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Emission unit shall be equipped with a non-resettable hour meter to track operating hours. **(40 CFR 63.6625(f))**

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. If using oil analysis program, the permittee shall test for and record the Total Base Number, viscosity and percent water content every 500 hours, or annually, whichever comes first, and maintain within acceptable limits in (§63.6625(i)). **(40 CFR 63.6625(i))**
2. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the engine was operated and maintained according to the maintenance plan. **(40 CFR 63.6655(e))**
3. The permittee shall record the number of hours the engine operated from the non-resettable hour meter and document the hours spent for emergency, including what classified the operation as emergency, and non-emergency operation. **(40 CFR 63.6655(f))**
4. The permittee must keep records of the occurrence and duration of each malfunction of operation of the engine. **(40 CFR 63.6655(a)(2))**
5. The permittee shall keep in a satisfactory manner, records of action taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process to its normal or usual manner of operation. **(40 CFR 63.6655(a)(5))**

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))**

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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. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) as they apply to emission units subject to Subpart ZZZZ. **(R 336.1213(3), 40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:

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

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

FG-RSPROJECT-SC FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

Project includes recovered paint solids (RPS) as part of the fuel burned in Units 1, 2, 3, and 4. There are no equipment changes to accommodate the RPS. Based on the actual-to-projected-actual applicability test, this project results in a minor modification with respect to major source review for both attainment area and nonattainment area regulations.

Emission Units: EU-BOILER1-SC, EU-BOILER2-SC, EU-BOILER 3-SC, EU-BOILER4-SC, and EU-ASH_S_SILO-SC

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Recovered paint solids (RPS) burned	60 tons per day ²	Calendar day	FG-RSPROJECT-SC	SC VI.1	R 336.1205(1)(a)(ii)
2. RPS burned	10,000 tons per year ²	12-month rolling time period as determined at the end of each calendar month	FG-RSPROJECT-SC	SC VI.2	R 336.1205(1)(a)(ii)

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record, in a satisfactory manner, the amount of RPS burned in FG-RSPROJECT-SC for each calendar day, on a daily basis². (R 336.1205(1)(a)(ii))

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2. The permittee shall monitor and record, in a satisfactory manner, the amount of RPS burned in FG-RPSPROJECT-SC for each calendar month and for the 12-month rolling time period ending that month, on a monthly basis². **(R 336.1205(1)(a)(ii))**

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 compliance 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. Due annually by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8-SC

VIII. STACK/VENT RESTRICTIONS

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 Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV002-010	160 ¹	599 ¹	R 336.1225
2. SV002-020	160 ¹	599 ¹	R 336.1225
3. SV002-030	160 ¹	599 ¹	R 336.1225
4. SV002-040	160 ¹	599 ¹	R 336.1225

IX. OTHER REQUIREMENTS

NA

Footnotes:

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

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

**FG-DSI/ACI-SC
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

MATS Compliance Project (40 CFR Part 63, Subpart UUUUU) for each boiler that is an Electric Generating Unit (EGU) at St. Clair Power Plant. Installation of dry sorbent injection (DSI) and activated carbon injection (ACI) systems on St. Clair Units 1, 2, 3, 4, 6, and 7. (PTI No. 18-14)

Emission Unit: EU-BOILER1-SC, EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER4-SC, EU-BOILER6-SC, EU-BOILER7-SC

POLLUTION CONTROL EQUIPMENT

Each EGU is equipped with low NOx burners, overfire air, ESP, DSI, and ACI

I. EMISSION LIMIT(S)

Pollutant	Limit ^a	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1a. PM	0.03 lb/MMBtu or 0.3 lb/MW ² hr ²	Test Protocol shall determine time period	Each EGU of FG-DSI/ACI- SC	SC VI.1 -4	40 CFR 63.9991 Table 2, 40 CFR 63.10000(a)
AND					
2a. Hydrogen Chloride (HCl)	0.002 lb/MMBtu or 0.02 lb/MW ² hr ²	Test Protocol shall determine time period	Each EGU of FG-DSI/ACI- SC	SC VI.1 -4	40 CFR 63.9991 Table 2, 40 CFR 63.10000(a)
AND					
3a. Mercury (Hg)	1.2 lb/TBtu or 0.013 lb/GW ² hr ²	Test Protocol shall determine time period	Each EGU of FG-DSI/ACI- SC	SC VI.1 -4	40 CFR 63.9991 Table 2, 40 CFR 63.10000(a)

^aThese limits apply starting April 16, 2016, applying at all times except during periods of startup and shutdown, as defined by 40 CFR Part 60, Subpart UUUUU.

II. MATERIAL LIMIT(S)

1. The permittee must comply with initial compliance standards for material limits in accordance with 40 CFR Part 63, Subpart UUUUU for each EGU of FG-DSI/ACI-SC.² **(40 CFR 63.10011)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must meet the work practice standards and operating limits for each EGU in FG-DSI/ACI-SC, according to 40 CFR Part 63, Subpart UUUUU, Tables 3 and 4.² **(40 CFR 63.9991, 40 CFR 63.10000, 40 CFR 63.10011)**
2. The permittee shall operate and maintain each EGU of FG-DSI/ACI-SC, including associated air pollution control equipment and monitoring equipment in satisfactory manner.² **(40CFR63.100000)**

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IV. DESIGN/EQUIPMENT PARAMETER(S)

1. All air pollution control equipment necessary for compliance with any newly applicable emissions limits which apply as a result of the cessation or commencement or recommencement of operations that cause each EGU of FG-DSI/ACI-SC to meet the definition of an EGU subject to this subpart must be installed and operational as of the date your source ceases to be or becomes subject to 40 CFR Part 63 Subpart UUUUU.² **(40 CFR 63.10000(j))**
2. All monitoring systems necessary for compliance with any newly applicable monitoring requirements which apply as a result of the cessation or commencement or recommencement of operations that cause each EGU of FG-DSI/ACI-SC to meet the definition of an EGU subject to 40 CFR Part 63 Subpart UUUUU must be installed and operational as of the date your source ceases to be or becomes subject to 40 CFR Part 63 Subpart UUUUU.² **(40 CFR 63.10000(k))**

V. TESTING/SAMPLING

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

1. For each EGU of FG-DSI/ACI-SC, the permittee must demonstrate initial compliance with each applicable emissions limit through performance testing by testing at owner's expense, in accordance with Department requirements. Where two emissions limits are specified for a particular pollutant (e.g., a heat input-based limit in lb/MMBtu and an electrical output-based limit in lb/MWh), the permittee may demonstrate compliance with either emission limit. All subsequent performance tests will be required according to 40 CFR 63.10006. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. 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 Technical Programs Unit and District Office within 60 days following the last date of the test. The permittee must demonstrate initial compliance no later than April 16, 2016.² **(40 CFR 63.9984, 40 CFR 63.10000, 40 CFR 63.10005(a), 40 CFR 63.10006, 40 CFR 63.10007, 40 CFR 63.10011)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record, as applicable according to 40 CFR Part 63, Subpart UUUUU.² **(40 CFR 63.10033)**
2. The permittee must develop a site-specific monitoring plan and submit this site-specific monitoring plan, if requested, at least 60 days before your initial performance evaluation (where applicable) of your continuous monitoring system (CMS).² **(40 CFR 63.10000(d))**
3. The permittee shall maintain on-site and submit, if requested by the AQD District Supervisor, an annual report containing the information for all periodic tune-ups that are performed for each EGU of FG-DSI/ACI-SC, as specified in 40 CFR 63.10021(e).² **(40 CFR 63.10000(e), 40 CFR 63.10021(e))**
4. The permittee shall keep records of the following information for startups, shutdowns, and malfunctions:
 - a. Each occurrence and duration of each startup and/or shutdown;
 - b. The permittee must keep records of the occurrence and duration of each malfunction of an operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment;
 - c. The permittee must keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.10000(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation;
 - d. The permittee must keep records of the type(s) and amount(s) of fuel used during each startup or shutdown.

The permittee shall keep the records on file at the facility and make them available to the Department upon request.² **(40 CFR 63.10032(d))**

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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 must submit all of the notifications required; according to 40 CFR Part 63 Subpart UUUUU.² **(40 CFR 63.10030, 40 CFR 63.10031)**
5. The permittee must report each instance in which FG-DSI/ACI-SC did not meet an applicable emission limit or operating limit in Tables 1 through 4 of 40 CFR Part 63 Subpart UUUUU or failed to conduct a required tune-up. These instances are deviations from the requirements of 40 CFR Part 63 Subpart UUUUU.² **(40 CFR 63.10021(g), 40 CFR 63.10031)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart UUUUU, for Coal and Oil-fired Electric Utility Steam Generating Units, as it applies to FG-DSI/ACI-SC.² **(40 CFR Part 63, Subparts A and UUUUU)**

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).

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FG-ISLANDS-SC FLEXIBLE GROUP CONDITIONS

DESCRIPTION

DSI and ACI sorbents delivered and conveyed pneumatically to the appropriate storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on each silo. (PTI No. 18-14)

Emission Unit: EU-STC12-DSI_SILO1, EU-STC12-DSI_SILO2, EU-STC34-DSI_SILO1, EU-STC34-DSI_SILO2, EU-STC06-DSI_SILO1, EU-STC06-DSI_SILO2, EU-STC07-DSI_SILO1, EU-STC07-DSI_SILO2

ACI: EU-STC12-ACI_SILO, EU-STC34-ACI_SILO, EU-STC06-ACI_SILO, and EU-STC07-ACI_SILO.

POLLUTION CONTROL EQUIPMENT

Bin vent filters or dust collectors on each emission unit

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Opacity	7 percent ²	Test Protocol will determine averaging time	Each individual bin vent filter or dust collector for FG-ISLANDS-SC	SC V.3	R 336.1301
2. PM	0.004 gr/dscf ²	Test Protocol will determine averaging time	Each individual bin vent filter or dust collector for FG-ISLANDS-SC	SC V.1	R 336.1331
3. PM10	0.034 pph ²	Test Protocol will determine averaging time	Each individual bin vent filter or dust collector for EU-STC12-DSI_SILO1, EU-STC12-DSI_SILO2, EU-STC34-DSI_SILO1, EU-STC34-DSI_SILO2, EU-STC06-DSI_SILO1, EU-STC06-DSI_SILO2, EU-STC07-DSI_SILO1, EU-STC07-DSI_SILO2	SC V.2	R 336.2803, R 336.2804
4. PM10	0.068 pph ²	Test Protocol will determine averaging time	Each individual bin vent filter or dust collector for EU-STC12-ACI_SILO, EU-STC34-ACI_SILO, EU-STC06-ACI_SILO, EU-STC07-ACI_SILO	SC V.2	R 336.2803, R 336.2804
5. PM2.5	0.017 pph ²	Test Protocol will determine averaging time	Each individual bin vent filter or dust collector for included in FG-ISLANDS-SC	SC V.2	R 336.2803, R 336.2804

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II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FG-ISLANDS-SC unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(R 336.1371, R 336.1372, R 336.2803, R 336.2804, 40 CFR 60.672)**
2. The permittee shall not operate FG-ISLANDS-SC unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804)**
3. The permittee shall not operate FG-ISLANDS-SC for more than 12 hours per day, as determined on a daily basis.² **(R 336.2803, R 336.2804)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any portion of FG-ISLANDS-SC unless the associated enclosures or fabric filters are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for FG-ISLANDS-SC as required in SC III.2.² **(R 336.1910, R 336.1911, R 336.2803, R 336.2804)**

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 verify the PM emission rates from each emission unit of FG-ISLANDS-SC or a representative emission unit by testing at owner's expense, in accordance with Department requirements, as requested by the AQD District Supervisor. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. 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 Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1301, R 336.1331, R 336.2001, R 336.2003, R 336.2004, R 336.2801)**
2. The permittee shall verify the PM10 and PM2.5 emission rates from each emission unit of FG-ISLANDS-SC or a representative emission unit by testing at owner's expense, in accordance with Department requirements, as requested by the AQD District Supervisor. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. 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

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results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.2001, R 336.2003, R 336.2004, R 336.2801, R 336.2803, R 336.2804)

- Annually, the permittee shall conduct a Reference Method 9 visible emissions readings of each emission unit of FG-ISLANDS-SC, at a minimum of once per calendar year, during maximum routine operating conditions.² (R 336.1301, R 336.1910, R 336.1911)

VI. MONITORING/RECORDKEEPING

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

- The permittee shall perform and document non-certified visible emissions observations as required in Emission Limit SC I.1 on a daily basis when FG-ISLANDS-SC is operating. If during the observation there are any visible emissions detected from an emission point, an EPA Method 9 certified visible emissions observation shall be performed. Records of the non-certified visible emissions observations, EPA Method 9 observations that are performed, the reason for any visible emissions observed, and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1910, R 336.1911)
- The permittee shall monitor and record, the hours of operation for FG-ISLANDS-SC on a daily basis.² (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1602, R 336.1702, R 336.1901, R 336.1910, R 336.2802, 40 CFR 52.21)

VII. REPORTING

- Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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))
- 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))
- Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of FG-ISLANDS-SC authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of FG-ISLANDS-SC.² (R 336.1201(7)(a))

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 Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
5. SV-STC12-DSI_SILO1*	15.6 x 15.6 ²	80.5 ²	
6. SV-STC12-DSI_SILO2*	15.6 x 15.6 ²	80.5 ²	
7. SV-STC34-DSI_SILO1*	15.6 x 15.6 ²	80.5 ²	
8. SV-STC34-DSI_SILO2*	15.6 x 15.6 ²	80.5 ²	
9. SV-STC06-DSI_SILO1*	15.6 x 15.6 ²	80.5 ²	
10. SV-STC06-DSI_SILO2*	15.6 x 15.6 ²	80.5 ²	
11. SV-STC07-DSI_SILO1*	15.6 x 15.6 ²	80.5 ²	

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Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
12. SV-STC07-DSI_SILO2*	15.6 x 15.6 ²	80.5 ²	
15. SV-STC12-ACI_SILO*	15.6 x 15.6 ²	57.7 ²	
16. SV-STC34-ACI_SILO*	15.6 x 15.6 ²	57.7 ²	
17. SV-STC06-ACI_SILO*	15.6 x 15.6 ²	57.7 ²	
18. SV-STC07-ACI_SILO*	15.6 x 15.6 ²	57.7 ²	

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

FG-MATSPROJECT-SC FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI) air quality control systems on the St. Clair Units 1, 2, 3, 4, 6, and 7 as part of the proposed MATS Compliance Project (the project). (PTI No. 18-14)

Emission Unit: EU-BOILER1-SC, EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER4-SC, EU-BOILER6-SC, EU-BOILER7-SC, EU-STC12-DSI_SILO1, EU-STC12-DSI_SILO2, EU-STC34-DSI_SILO1, EU-STC34-DSI_SILO2, EU-STC06-DSI_SILO1, EU-STC06-DSI_SILO2, EU-STC07-DSI_SILO1, EU-STC07-DSI_SILO2, EU-STC12-ACI_SILO, EU-STC34-ACI_SILO, EU-STC06-ACI_SILO, and EU-STC07-ACI_SILO.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall calculate and keep records of PM, PM10, CO2, and CO2e emission rates from each emission unit of FG-MATSPROJECT-SC, in tons per year on a calendar year basis. The recordkeeping period shall begin on the first day of the month during which each emission unit of FG-MATSPROJECT-SC and any of the affected emission units commence operation and shall continue for 5 years. The calculations and records shall be kept in a format acceptable to the Department. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205, R 336.2802(4)(e), R 336.2818)

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))

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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. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity.² **(R 336.1201(7)(a))**
5. The permittee shall submit records of PM, PM10, CO₂, and CO_{2e} emissions from FG-MATSPROJECT-SC and FG-MATSPROJECT-BR in tons per calendar year to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of each calendar year identified in FG-MATSPROJECT-SC SC VI.1 and FG-MATSPROJECT-BR SC VI.1 if both of the following apply:
 - a. The calendar year combined actual emissions of either PM, PM10, CO₂, and CO_{2e} exceed the combined baseline actual emissions (BAE) by a significant amount, and
 - b. The calendar year combined actual emissions differ from the combined pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each emission unit included in the Hybrid Test used for FG-MATSPROJECT-SC and FG-MATSPROJECT-BR.

The report shall contain the name, address, and telephone number of the facility; the annual emissions as calculated pursuant to FG-MATSPROJECT-SC and FG-MATSPROJECT-BR; and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² **(R 336.2818)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

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Appendix 2-SC. 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-SC. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-BLR_GEN-SC and FG-BLRS1-4-SC.

3.1 Continuous Emission Monitoring Systems (SO₂)

The Continuous Emissions Monitoring Systems (CEMS) performance specifications defined in 40 CFR Part 75, Appendix B are adopted. The Certified SO₂ monitors will be used to determine sulfur dioxide emissions. The data reduction procedures defined in R 336.2175 will be used to convert SO₂ emission monitoring data in parts per million to pounds of SO₂/MM Btu. After the last day of each calendar month, the permittee shall generate and record from the CEMS data recording system a monthly average SO₂ emission rate (lbs. SO₂/MM Btu) from validated data reported for Part 75 for the previous month.

3.2 Continuous Emission Monitoring Systems (Title IV)

The CEMS performance specifications defined in 40 CFR Part 75, Appendix B are adopted.

Methods of measurement, frequency of measurement and recordkeeping methods for CEMS required under 40 CFR 75 are outlined in the most recent version of the Acid Rain Program - DTE Electric St. Clair Power Plant Monitoring Plan.

Data Reporting: AQD may approve alternative data reporting or reduction procedures if it can be demonstrated that such procedures are at least as accurate as the procedures identified in R 336.2175.

3.3 Continuous Opacity Monitoring Systems

The permittee shall conduct an annual audit of the Continuous Opacity Monitoring System (COMS) The COMS performance specifications defined in 40 CFR Part 60, Appendix B are adopted. **(R 336.1213(3))**

Cycling time for opacity: complete a minimum of one cycle of sampling/analysis for each successive 10-second period and one cycle of data recording for each successive 6-minute period. **(R 336.2152)**

Zero and Drift: The COMS must be subject to the manufacturer's zero and span check at least once daily. **(R 336.2153)**

Location: The location of the COMS or the monitoring devices must be such that representative measurement of emissions or process parameters are obtained. **(R 336.2155)**

Alternative Systems: AQD may approve the use of an alternative monitoring system if one is available that meets COMS objectives and if, because of physical limitations or other reasons, COMS cannot be installed or give accurate measurements. **(R 336.2159)**

Monitoring and reporting requirements shall not apply during any period of monitoring system malfunction if it can be demonstrated to the satisfaction of AQD that: the cause of the malfunction could not have been avoided by any reasonable action and necessary repairs are being made as expeditiously as practicable. **(R 336.2190)**

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3.4 Off-Specification Recycled Used Oil Monitoring

The permittee shall follow specific written procedures for receipt and off-loading of off-specification used oil from other DTE Energy facilities and outside vendors. This document, identified as St. Clair Plant Order 007, and any modifications, must be submitted to the District Supervisor.

The permittee shall obtain & maintain a complete record of the Off-Specification Used Oil fuel oil analysis for each batch delivery accepted into the facility.

The permittee shall not combust hazardous waste subject to Subpart H, 40 CFR 266. **(R 336.1213(3))**

Appendix 4-SC. Recordkeeping

4.1

Recordkeeping Provisions for PSD Source Using Hybrid Applicability Test

All information in this Appendix shall be maintained pursuant to R 336.2818 and 40 CFR 52.21 (r)(6)(i) for 10 years after the REF system becomes operational (December 31, 2019), and shall be made available to the Department upon request.

A. Project Description:

The project is to install new sorbent technology which uses REF sorbent solution as a fuel additive to reduce mercury, nitrogen oxides and sulfur dioxide emissions. These changes include installation of liquid storage tanks, solid storage silo, partially enclosed chutes, day bins, screw feeders and pug mills, existing partially enclosed and new conveyors and other material handling equipment so that coal can be treated with this sorbent material processed in FG-REFSC-FC and before being burned in EU-BOILER-6-SC, EU-BOILER-7-SC, and FG-BLRS-1-4-SC at Saint Clair Power Plant. In addition, these changes include installation of liquid storage tanks, solid storage silo, day bins, screw feeders and pug mills, existing and new conveyors and other material handling equipment so that coal can be treated with this sorbent material processed in FG-REF-BRFC and before being burned in FG-BOILERS-BR at Belle River Power Plant.

B. Applicability Test Description: Minor modifications are not subject to PSD. Actual to projected actual hybrid applicability test as described in the table below will be used to demonstrate that PSD does not apply to these modifications.

C. Emission Limitations: Saint Clair Power Plant

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions*	Excluded Emissions	
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC	PM	470	537.03	60	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 60 TPY. The projected emission increase of 7.03 tpy is less than significant level of 22.5 tpy (90% of the significant level of 25 tpy).

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Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions*	Excluded Emissions	
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC	PM10	314.9	358.94	40.18	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 40.18 TPY. The projected emission increase of 3.94 tpy is less than significant level of 13.5 tpy (90% of the significant level of 15 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC	PM2.5	136.3	156.26	17.4	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 17.4 TPY. The projected emission increase of 2.56 tpy is less than significant level of 9 tpy (90% of the significant level of 10 tpy).

*Projected actual emissions = projected actual emissions from the boilers + REF material handling, storage and conveyance operations

Combined Saint Clair and Belle River Power Plants

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions (tpy)	Projected Actual Emissions (tpy)*	Excluded Emissions (tpy)	
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM	680	767.66	72.3	It was capable of accommodating emissions up to 72.3 TPY. The projected emission increase of 15.36 tpy < significant level of 22.5 tpy (90% of the significant level of 25 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM-10	455.9	513.1	48.1	It was capable of accommodating emissions up to 48.1 TPY. The projected emission increase of 10.32 tpy < significant level of 13.5 tpy (90% of the significant level of 15 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM2.5	197.3	226.12	20.9	It was capable of accommodating emissions up to 20.9 TPY. The projected emission increase of 7.92 tpy < significant level of 9 tpy (90% of the significant level of 10 tpy).

*Projected actual emissions = projected actual emissions from the boilers + REF material handling, storage and conveyance operations

D. Netting Calculations and Discussion: NA

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4.2

Recordkeeping Provisions for PSD Source Using Actual to Actual Applicability Test

All information in this Appendix shall be maintained pursuant to R 336.2818 and 40 CFR 52.21 (r)(6)(i) for 10 years after the use of biodiesel fuel in Unit 7 becomes operational and shall be provided for the first year and all the years made available to the Department upon request.

A. Project Description:

The project involves the replacement of distillate oil used in Unit 7 with biodiesel fuel. The distillate (No. 2) oil currently being used in Unit 7 is used for boiler startup and for heating the primary air duct heaters for Unit 7. Biodiesel fuel is comparable to distillate oil for combustion purposes and has lower emissions of SO₂, CO, PM, PM-10, PM-2.5, VOC, and slightly larger NO_x emissions. The use of biodiesel will assist the permittee in achieving compliance with the requirements of Michigan's requirements for utility Renewable Portfolio Standards (RPS).

B. Applicability Test Description: Minor modifications are not subject to PSD. Actual to projected actual applicability test as described in the table below will be used to demonstrate that PSD does not apply to these modifications.

C. Emission Limitations: Saint Clair Power Plant

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions*	Excluded Emissions	
EU-BOILER-7-SC	PM	297	278.2	0	NA
EU-BOILER-7-SC	PM10	199	188.5	0	NA
EU-BOILER-7-SC	PM2.5	86.1	81.4	0	NA
EU-BOILER-7-SC	NO _x	2,527	2,186.9	0	NA
EU-BOILER-7-SC	SO ₂	16,030	13,598	0	NA

*Projected actual emissions = projected actual emissions from the boiler

D. Netting Calculations and Discussion: NA

4.3

Project Emissions for FG-MATSPROJECT-SC

All information in this Appendix shall be maintained pursuant to R 336.2818(3) for 5 years after the emission units identified in Table C resume normal operation.

A. Project Description

DTE Energy is proposing to install Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI) air quality control systems on the Belle River Units 1 and 2, and on the St. Clair Units 1, 2, 3, 4, 6, and 7 as part of the proposed MATS Compliance Project (the project). The use of DSI to control acid gas emissions is also expected to reduce PM, PM10, PM2.5, and NO_x emissions from these units. However, the reaction products from the use of DSI will include carbon dioxide (CO₂) which is a greenhouse gas (GHG) and a regulated pollutant under the Michigan New Source Review (NSR) program.

B. Applicability Test Description

DTE Energy has demonstrated that the proposed project will not cause a significant emissions increase to the source using the Hybrid Test. The Combined St. Clair and Belle River Project Emissions Change equals the Combined St. Clair and Belle River Projected Actual Emissions (PAE) minus the existing units Combined Baseline Actual Emissions (BAE) plus new units Potential Emissions, as described in R 336.2802(4)(e).

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Existing emission units are included in FG-DSI/ACI-SC and FG-DSI/ACI-BR, and new emissions units are included in FG-ISLANDS-SC and FG-ISLANDS-BR.

C. Emissions Table

Pollutant	FG-DSI/ACI-SC, FG-DSI/ACI-BR and Effected Emission Units			FG-ISLANDS-SC, FG-ISLANDS-BR
	Combined Baseline Actual Emissions (tpy)	Combined Projected Actual Emissions (tpy)	Combined Excluded Emissions (tpy)	Combined Potential Emissions (tpy)
PM	735.1	739.1	0	9.7
PM10	1,362.7	1,364.7	1.0	8.8
CO2	16,189,473.3	16,237,089.0	47,615.7	0
CO2e	16,312,916.3	16,360,532.0	47,615.7	0

D. Netting Calculations and Discussion:

NA

Appendix 5-SC. 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-SC. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B2796-2009a is being reissued as Source-Wide PTI No. MI-PTI-B2796-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
176-09A	201500008*	Refined emissions fuel project	EU-BOILER6-SC EU-BOILER7-SC FG-BLRS1-4-SC
89-10	201100092*	Replacement of No. 2 fuel oil with biodiesel	EU-BOILER7-SC
133-11A	201300147*	Recovered paint solids as supplemental fuel	FG-BLRS1-4-SC

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B2796-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
18-14	201500074/ December 15, 2015	Incorporate PTI No. 18-14 into Sections 1 (St. Clair Power Plant) and 3 (Belle River Power Plant). This PTI is for installation of air emission control systems, Dry Sorbent Injection (DSI) and	FG-DSI/ACI-SC FG-ISLANDS-SC FG-MATSPROJECT-SC

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PTI No.: MI-PTI-B2796-2015c

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
		Activated Carbon Injection (ACI), on Belle River Units 1 and 2, and on St. Clair Units 1, 2, 3, 4, 6, and 7 as part of the proposed Mercury and Air Toxics Standards (MATS) in accordance with 40 CFR Part 63, Subpart UUUUU. Existing EGUs must comply with this subpart not later than April 16, 2015, unless they receive an extension (which DTE has received), then they must comply no later than April 16, 2016. DTE has received an extension and have also received a waiver to construct and have started construction.	
NA	201500129/ December 15, 2015	Application No. 201500129: The application is to remove EU-BURNHAM-SC from the flexible group FG-IBMACT-SC. The unit has received a determination from USEPA dated October 9, 2015 that the unit is not subject to Subpart DDDDD. The unit does not heat water, it heats glycol for space heating and therefore does not meet the definition of process heater under the Subpart DDDDD. FG-IBMACT-SC has been removed and emission unit conditions are now under EU-FULTON-SC. EU-BURNHAM-SC is exempt under Rule 336.1282(b)(i).	EU-IBMACT-SC
NA	201500148/ June 16, 2016	Reopening to update from CAIR to CSAPR.	FG-BLR_GEN-SC

Appendix 7-SC. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible group Special Conditions. Therefore, this appendix is not applicable.

Appendix 8-SC. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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

Appendix 9-SC. Phase Two Acid Rain Permit



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

PHASE II ACID RAIN PERMIT
Permit No. MI-AR-1743-2015

Permittee	St. Clair Power Plant
Address	4901 Pointe Drive, East China Township, MI
SRN	B2796
ORIS code	1743
Issue Date	July 15, 2015
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-B2796-2015

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.

Section 1 – St. Clair Power Plant

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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 Environment, Great Lakes, and Energy, 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 Environment, Great Lakes, and Energy
Air Quality Division, Jackson District Office
301 East Louis Glick Highway
Jackson, Michigan 49201-1556
Telephone: (517) 780-7843
Facsimile: (517) 780-7855

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

Section 1 – St. Clair Power Plant

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Terms and Conditions:

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

		2015	2016	2017	2018	2019
Unit 1	SO ₂ allowances	3,672	3,672	3,672	3,672	3,672
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective from calendar years 2011 through 2020. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.59 lb/mmBtu. In addition, this unit shall not have an annual heat input greater than 11,366,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

Section 1 – St. Clair Power Plant

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Terms and Conditions: (continued)

		2015	2016	2017	2018	2019
Unit 2	SO ₂ allowances	3,549	3,549	3,549	3,549	3,549
	NOx Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective from calendar years 2011 through 2020. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.68 lb/mmBtu. In addition, this unit shall not have an annual heat input greater than 10,469,00 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

Section 1 – St. Clair Power Plant

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Terms and Conditions: (continued)

		2015	2016	2017	2018	2019
Unit 3	SO ₂ allowances	3,530	3,530	3,530	3,530	3,530
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective from calendar years 2011 through 2020. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.65 lb/mmBtu. In addition, this unit shall not have an annual heat input greater than 11,782,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

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Terms and Conditions: (continued)

		2015	2016	2017	2018	2019
Unit 4	SO ₂ allowances	3,402	3,402	3,402	3,402	3,402
	NOx Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective from calendar years 2008 through 2012. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.59 lb/mmBtu. In addition, this unit shall not have an annual heat input greater than 9,425,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

Section 1 – St. Clair Power Plant

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Terms and Conditions: (continued)

		2015	2016	2017	2018	2019
Unit 6	SO ₂ allowances	7,355	7,355	7,355	7,355	7,355
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective from calendar years 2008 through 2012. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.46 lb/mmBtu. In addition, this unit shall not have an annual heat input greater than 16,877,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

Section 1 – St. Clair Power Plant

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Terms and Conditions: (continued)

		2015	2016	2017	2018	2019
Unit 7	SO ₂ allowances	13,482	13,482	13,482	13,482	13,482
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective from calendar years 2008 through 2012. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.36 lb/mmBtu. In addition, this unit shall not have an annual heat input less than 30,308,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

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 December 11, 2013

Phase II NO_x Compliance Plan submitted December 11, 2013

Phase II NO_x Averaging Plan submitted March 29, 2013

Section 1 – St. Clair Power Plant

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Facility (Source) Name (from STEP 1) St Clair Power Plant

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Permit Requirements

STEP 3

Read the standard 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 source or unit, as appropriate, 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 source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; 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).

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Facility (Source) Name (from STEP 1) St Clair Power Plant

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Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

(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.

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 source 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 source 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;

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Facility (Source) Name (from STEP 1) St Clair Power Plant

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Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

- (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.
- (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.
- (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

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Facility (Source) Name (from STEP 1) St Clair Power Plant

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Effect on Other Authorities, Cont'd.

STEP 3, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source 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;

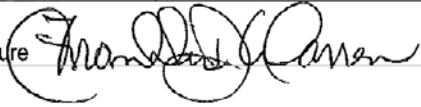
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4
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 Frank Warren, Vice President Fossil Generation	
Signature 	Date 11-1-2013

Section 1 – St. Clair Power Plant

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Expiration Date: July 15, 2020

PTI No.: MI-PTI-B2796-2015c



United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 11/30/2012

Phase II NO_x Compliance Plan

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

Page **1** of **2**

This submission is: New Revised

STEP 1

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

Plant Name St Clair Power Plant	State MI	ORIS Code 1743
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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# 1	ID# 2	ID# 3	ID# 4	ID# 6	ID# 7
Type DBW	Type DBW	Type DBW	Type DBW	Type T	Type T

(a) Standard annual average emission limitation of 0.60 lb/mmBtu (for Phase I dry bottom wall-fired boilers)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(d) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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(g) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(j) NO_x Averaging Plan (include NO_x Averaging form)

<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
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(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)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(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)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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EPA Form 7610-28 (Revised 12-2009)

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Plant Name (from Step 1) **St Clair Power Plant**

NO_x Compliance - Page 2
Page **2** of **2**

STEP 2, cont'd.

ID# 1	ID# 2	ID# 3	ID# 4	ID# 6	ID# 7
Type DBW	Type DBW	Type DBW	Type DBW	Type I	Type I
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(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

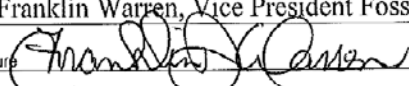
Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).

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 Franklin Warren, Vice President Fossil Generation	
Signature 	Date 11-1-2013

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United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 11/30/2012

Phase II NO_x Averaging Plan

For more information, see instructions and refer to 40 CFR 76.11 Page 1

This submission is: New Revised Page 1 of 3

STEP 1

Identify the units participating in this averaging plan by plant name, State, and boiler ID# from NADB. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. In column (b), assign an alternative contemporaneous annual emissions limitation (ACEL) in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue to page 3 if necessary.

Plant Name	State	ID#	(a) Emission Limitation	(b) ACEL	(c) Annual Heat Input Limit
BELLE RIVER	MI	1	0.46	0.27	47,540,000
BELLE RIVER	MI	2	0.46	0.27	42,597,000
HARBOR BEACH	MI	1	0.46	0.87	2,259,000
MONROE	MI	1	0.68	0.51	39,094,000
MONROE	MI	2	0.68	0.51	50,700,000
MONROE	MI	3	0.68	0.51	54,404,000
MONROE	MI	4	0.68	0.51	54,418,000
RIVER ROUGE	MI	2	0.40	0.39	17,392,000
RIVER ROUGE	MI	3	0.46	0.83	19,201,000

STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter.

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan

$$\frac{\sum_{i=1}^n (R_{it} \times HI_i)}{\sum_{i=1}^n HI_i}$$

Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7

$$\frac{\sum_{i=1}^n [R_{it} \times HI_i]}{\sum_{i=1}^n HI_i}$$

≤

Where,

- R_{it} = Alternative contemporaneous annual emission limitation for unit i, in lb/mmBtu, as specified in column (b) of Step 1;
- R_{it} = Applicable emission limitation for unit i, in lb/mmBtu, as specified in column (a) of Step 1;
- HI_i = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;
- n = Number of units in the averaging plan

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Plant Name (from Step 1) DTE Electric Company

NO_x Averaging - Page 2

STEP 3

Mark one of the two options and enter dates.

[X] This plan is effective for calendar year 2011 through calendar year 2020 unless notification to terminate the plan is given.

[] Treat this plan as [] identical plans, each effective for one calendar year for the following calendar years; [] and [] unless notification to terminate one or more of these plans is given.

STEP 4

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Special Provisions

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO_x under the plan only if the following requirements are met:

- (i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and (a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan, (b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or (ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7. (iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

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.

Form with fields for Name (FRANKLIN D. WARREN, DESIGNATED REPRESENTATIVE), Signature (Franklin D. Warren), and Date (3/20/2013)

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Appendix 10-SC. Transport Rule (TR) Trading Program Title V Requirements

Description of TR Monitoring Provisions

The TR subject units, and the unit-specific monitoring provisions, at this source are identified in the following tables. These units are subject to the requirements for the TR NO_x Annual Trading Program, TR NO_x Ozone Season Trading Program, and TR SO₂ Group 1 Trading Program, which are included below as Sections I, II, and III, respectively.

Each unit will use one of the following as the monitoring methodology for each parameter as provided below and shall comply with the general monitoring, recordkeeping, reporting and other requirements in conditions 1 through 5 below and in paragraph (b) of Sections I, II, and III:

- Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO₂ monitoring) and 40 CFR part 75, subpart H (for NO_x monitoring)
- Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
- Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E
- Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19
- EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E

Unit ID: 1	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B
NO _x	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart H
Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO ₂ monitoring) and 40 CFR part 75, subpart H (for NO _x monitoring)

Unit ID: 2	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B
NO _x	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart H
Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO ₂ monitoring) and 40 CFR part 75, subpart H (for NO _x monitoring)

Unit ID: 3	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B
NO _x	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart H
Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO ₂ monitoring) and 40 CFR part 75, subpart H (for NO _x monitoring)

Unit ID: 4	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B
NO _x	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart H
Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR

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	part 75, subpart B (for SO ₂ monitoring) and 40 CFR part 75, subpart H (for NO _x monitoring)
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Unit ID: 6	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B
NO _x	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart H
Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO ₂ monitoring) and 40 CFR part 75, subpart H (for NO _x monitoring)

Unit ID: 7	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B
NO _x	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart H
Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO ₂ monitoring) and 40 CFR part 75, subpart H (for NO _x monitoring)

1. The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (TR NO_x Annual Trading Program), 97.530 through 97.535 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.635 (TR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable TR trading programs.
2. Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <http://www.epa.gov/airmarkets/emissions/monitoringplans.html>.
3. Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR part 75, subpart E and 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
4. Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and/or 97.630 through 97.634 (TR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
5. The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.634 (TR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.

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SECTION I: TR NO_x Annual Trading Program requirements (40 CFR 97.406)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of TR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the TR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_x emissions requirements.

- (1) TR NO_x Annual emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall hold, in the source's compliance account, TR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR NO_x Annual units at the source.
 - (ii). If total NO_x emissions during a control period in a given year from the TR NO_x Annual units at a TR NO_x Annual source are in excess of the TR NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each TR NO_x Annual unit at the source shall hold the TR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and
 - (B). The owners and operators of the source and each TR NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.
- (2) TR NO_x Annual assurance provisions.
 - (i). If total NO_x emissions during a control period in a given year from all TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated

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representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.

- (ii). The owners and operators shall hold the TR NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the State and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).
 - (iv). It shall not be a violation of 40 CFR part 97, subpart AAAAA or of the Clean Air Act if total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold TR NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.
- (3) Compliance periods.
- (i). A TR NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - (ii). A TR NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
- (i). A TR NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR NO_x Annual allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each TR NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart AAAAA.
- (6) Limited authorization. A TR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
- (i). Such authorization shall only be used in accordance with the TR NO_x Annual Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A TR NO_x Annual allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_x Annual allowances in accordance with 40 CFR part 97, subpart AAAAA.
- (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system

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(pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each TR NO_x Annual 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart AAAAA.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_x Annual Trading Program.
- (2) The designated representative of a TR NO_x Annual source and each TR NO_x Annual unit at the source shall make all submissions required under the TR NO_x Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.

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

(g) Effect on other authorities.

No provision of the TR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NO_x Annual source or TR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION II: TR NO_x Ozone Season Trading Program Requirements (40 CFR 97.506)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.513 through 97.518.

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(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.530 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.531 (initial monitoring system certification and recertification procedures), 97.532 (monitoring system out-of-control periods), 97.533 (notifications concerning monitoring), 97.534 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.535 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.530 through 97.535 shall be used to calculate allocations of TR NO_x Ozone Season allowances under 40 CFR 97.511(a)(2) and (b) and 97.512 and to determine compliance with the TR NO_x Ozone Season emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.530 through 97.535 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_x emissions requirements.

- (1) TR NO_x Ozone Season emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, TR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.524(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR NO_x Ozone Season units at the source.
 - (ii). If total NO_x emissions during a control period in a given year from the TR NO_x Ozone Season units at a TR NO_x Ozone Season source are in excess of the TR NO_x Ozone Season emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each TR NO_x Ozone Season unit at the source shall hold the TR NO_x Ozone Season allowances required for deduction under 40 CFR 97.524(d); and
 - (B). The owners and operators of the source and each TR NO_x Ozone Season unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBB and the Clean Air Act.
- (2) TR NO_x Ozone Season assurance provisions.
 - (i). If total NO_x emissions during a control period in a given year from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.525(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.525(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and
 - (B). The amount by which total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.

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- (ii). The owners and operators shall hold the TR NO_x Ozone Season allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season trading budget under 40 CFR 97.510(a) and the state's variability limit under 40 CFR 97.510(b).
 - (iv). It shall not be a violation of 40 CFR part 97, subpart BBBBB or of the Clean Air Act if total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold TR NO_x Ozone Season allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR NO_x Ozone Season allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBB and the Clean Air Act.
- (3) Compliance periods.
- (i). A TR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.
 - (ii). A TR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
- (i). A TR NO_x Ozone Season allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR NO_x Ozone Season allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR NO_x Ozone Season allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR NO_x Ozone Season allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each TR NO_x Ozone Season allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart BBBBB.
- (6) Limited authorization. A TR NO_x Ozone Season allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
- (i). Such authorization shall only be used in accordance with the TR NO_x Ozone Season Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, subpart BBBBB, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A TR NO_x Ozone Season allowance does not constitute a property right.

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(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_x Ozone Season allowances in accordance with 40 CFR part 97, subpart BBBBB.
- (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.530 through 97.535, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.506(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.516 for the designated representative for the source and each TR NO_x Ozone Season 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.516 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart BBBBB.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_x Ozone Season Trading Program.
- (2) The designated representative of a TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall make all submissions required under the TR NO_x Ozone Season Trading Program, except as provided in 40 CFR 97.518. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.

- (1) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season source or the designated representative of a TR NO_x Ozone Season source shall also apply to the owners and operators of such source and of the TR NO_x Ozone Season units at the source.
- (2) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season unit or the designated representative of a TR NO_x Ozone Season unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the TR NO_x Ozone Season Trading Program or exemption under 40 CFR 97.505 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NO_x Ozone Season source or TR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

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SECTION III: TR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of TR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the TR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) SO₂ emissions requirements.

- (1) TR SO₂ Group 1 emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all TR SO₂ Group 1 units at the source.
 - (ii). If total SO₂ emissions during a control period in a given year from the TR SO₂ Group 1 units at a TR SO₂ Group 1 source are in excess of the TR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each TR SO₂ Group 1 unit at the source shall hold the TR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and
 - (B). The owners and operators of the source and each TR SO₂ Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR part 97, subpart CCCC and the Clean Air Act.
- (2) TR SO₂ Group 1 assurance provisions.
 - (i). If total SO₂ emissions during a control period in a given year from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such

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- control period, by which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and
- (B). The amount by which total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - (ii). The owners and operators shall hold the TR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
 - (iv). It shall not be a violation of 40 CFR part 97, subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold TR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR SO₂ Group 1 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart CCCCC and the Clean Air Act.
- (3) Compliance periods.
- (i). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
 - (ii). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
- (i). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each TR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart CCCCC.
- (6) Limited authorization. A TR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:
- (i). Such authorization shall only be used in accordance with the TR SO₂ Group 1 Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A TR SO₂ Group 1 allowance does not constitute a property right.

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(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR SO₂ Group 1 allowances in accordance with 40 CFR part 97, subpart CCCCC.
- (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR part 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each TR SO₂ Group 1 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart CCCCC.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR SO₂ Group 1 Trading Program.
- (2) The designated representative of a TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall make all submissions required under the TR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.

- (1) Any provision of the TR SO₂ Group 1 Trading Program that applies to a TR SO₂ Group 1 source or the designated representative of a TR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the TR SO₂ Group 1 units at the source.
- (2) Any provision of the TR SO₂ Group 1 Trading Program that applies to a TR SO₂ Group 1 unit or the designated representative of a TR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the TR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR SO₂ Group 1 source or TR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

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SECTION 2 – ST. CLAIR – DIESEL GENERATOR – PEAKERS

LOCATED AT

4901 Pointe Drive
St. Clair, Michigan 48054

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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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. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following: **(R 336.1301(1))**
 - 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.

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

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(5))**

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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.

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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))**

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- 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))**

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Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaiming, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

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

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

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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 C-2

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-CTG11-1-SP	CTG 11-1. St. Clair 23 MW natural gas-fired peaking combustion turbine generator	01-01-1968	FG-PEAKERS-SP
EU-DG12-1-SP	DG 12-1. St. Clair 2.75 MW peaking diesel oil fired generator, equipped with oxidation catalyst	01-01-1970	FG-PEAKERS-SP
EU-DG12-2-SP	DG-12-2. St. Clair 2.75 MW peaking diesel oil-fired generator, equipped with oxidation catalyst	01-01-1970	FG-PEAKERS-SP

**EU-CTG11-1-SP
EMISSION UNIT CONDITIONS**

DESCRIPTION

St. Clair Peaking Unit consisting of a 23 MW natural gas-fired combustion turbine generator.

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 permittee shall only fire pipeline quality natural gas, as defined in 40 CFR 72.2, in the combustion turbines. (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall keep a record of the dates when the unit is in use. (R 336.1213(3))

VII. REPORTING

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

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- 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 appropriate the AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8-SP

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)

NA

Footnotes:

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

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

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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 D-2

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-MACT-ZZZZ-SP	Applicable requirements from 40 CFR 63 Subpart ZZZZ associated with St. Clair Peaking Units consisting of two (2) 2.75 MW diesel oil-fired generators equipped with oxidation catalysts	EU-DG12-1-SP EU-DG12-2-SP

**FG-MACT-ZZZZ-SP
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Applicable requirements as defined in Title 40 of the Code of Federal Regulations (CFR), Part 63, Subpart ZZZZ associated with two (2) 2.75 MW compression ignition (CI) stationary reciprocating internal combustion engines (RICE) peaking units. Existing RICE > 500 HP non-emergency compression ignition engine constructed before December 19, 2002.

Emission Units: EU-DG12-1-SP: DG 12-1, St. Clair 2.75 MW peaking diesel oil-fired generator

EU-DG12-2-SP: DG 12-2, St. Clair 2.75 MW peaking diesel oil-fired generator

POLLUTION CONTROL EQUIPMENT

Diesel generators equipped with oxidation catalysts

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Carbon Monoxide	23 ppmvd @ 15% O ₂ -OR- 70% reduction in CO emissions	Stack Test Plan	DG 12-1-SP DG 12-2-SP	SC V and VI	40 CFR 63.6600(d)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. # 2 Fuel Oil	15 ppm maximum sulfur content	As-fired	DG 12-1-SP DG 12-2-SP	Section VI.7	40 CFR 63.6604(a)
2. # 2 Fuel Oil	Minimum Cetane Index of 40 or maximum aromatic content of 35%	As-fired	DG 12-1-SP DG 12-2-SP	Section VI.7	40 CFR 63.6604(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall be in compliance with the applicable emission and operating limitations at all times. **(40 CFR 63.6605(a))**
- By May 3, 2013, the permittee shall implement and maintain a plan that describes how emissions will be minimized during Diesel Generator startups, shutdowns, and malfunctions. The Continuous Parameter Monitoring System and Startup, Shutdown Malfunction Plan (CPMS) shall incorporate requirements listed in 40 CFR 63.6(e)(3). Deviations from emission or operating limitations that occur during a period of startup, shutdown, or malfunction are not violations if it is demonstrated that the startup, shutdown and malfunction plan was implemented. **(40 CFR 63.6605(b), 40 CFR 63.6625(b), 40 CFR 63.6595(a))**
- The pressure drop across the oxidation catalyst shall not change by more than 2 inches of water at 100% load plus or minus 10% from the pressure drop across the catalyst that was measured during the initial performance test. **(40 CFR 63.6600(d), Table 2b to Subpart ZZZZ of 40 CFR 63)**

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4. The catalyst inlet temperature shall be greater than or equal to 450 °F and less than or equal to 1350 °F. **(40 CFR 63.6600(d), Table 2b to Subpart ZZZZ of 40 CFR 63)**
5. The permittee shall minimize time spent at idle during startup and minimize engine's startup time to a period needed for safe loading of engine, not to exceed 30 minutes. **(40 CFR 63.6625(h))**
6. For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. Rebuilt stationary RICE means a stationary RICE that has been rebuilt as that term is defined in 40 CFR 94.11(a). **(40 CFR 63.6640(d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. After May 3, 2013, the permittee shall not operate EU-DG12-1-SP or EU-DG12-2-SP unless the oxidation catalyst system is installed, maintained, and operated in a satisfactory manner. **(40 CFR 63.6640, 40 CFR 63.6595(a))**
2. By May 3, 2013, the permittee must install an open crankcase filtration emission control system to reduce crankcase emissions by filtering the exhaust stream. The permittee must follow the manufacturer's specified maintenance requirements for operating, maintaining, and replacing crankcase filters or can request the Administrator to approve different maintenance requirements that are as protective as manufacturer requirements. **(40 CFR 63.6625(g)(2), 40 CFR 63.6595(a))**

V. TESTING/SAMPLING

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

1. For each unit with oxidation catalyst control, the permittee shall conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, (except as provided in 40 CFR 63.7(a)(2)(ix)). If the catalyst is changed, the permittee shall reestablish the operating parameters measured during the last test and conduct a subsequent test to demonstrate compliance with applicable emission limitation. The permittee shall determine compliance with the percent reduction requirement using the equation in 40 CFR 63.6620(e). No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD, as required in 63.7(b)(1). The final plan must be approved by the AQD prior to testing. **(40 CFR 63.6610(a), 40 CFR 63.6615, 40 CFR 63.6620(a), 40 CFR 63.6640(b))**
2. The permittee does not need to start up a non-operational engine solely to conduct the performance test. The performance test of the non-operational engine can be performed when the engine is started up again. **(40 CFR 63.6620(b))**

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 conduct visible emissions observation of the diesel generators at least once a day when the generators are operating continuously for 24 hours or more. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall keep a written record of each required observation and corrective action. **(R 336.1213(3))**
2. After May 3, 2013, the permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record, on a continuous basis and according to the requirements in 40 CFR 63.6625(b) and 40 CFR 63.6635, the temperature at the inlet of the catalyst for the/each stationary RICE. Continuous monitoring must be done at all times except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities. The permittee may not use data recorded during these times in data averages and calculations used to report emission or operating levels. Valid data collected during all other periods must be used. **(40 CFR 63.6625(b), 40 CFR 63.6635(a), 40 CFR 63.6635(b), 40 CFR 63.6635(c), 40 CFR 63.6640)**

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3. After May 3, 2013, the permittee shall measure the pressure drop across the catalyst for the/each stationary RICE once per month and demonstrate that the pressure drop is within the operating limitation established during the performance test. **(40 CFR 63.6625(b), 40 CFR 63.6640), 40 CFR 63.6635(a), 40 CFR 63.6595(a))**
4. After May 3, 2013, the permittee shall keep, in a satisfactory manner, records of the 4-hour rolling average for each catalyst inlet temperature and the monthly pressure drop for each catalyst, as required by SC VI.2 and VI.3. All records shall be kept on file for a period of at least five years (at least two years at the site) and made available to the Department upon request. **(40 CFR 63.6655, 40 CFR 63.6660)**
5. After the compliance date specified in 40 CFR 63.6595, the permittee shall keep the following records:
 - a. A copy of each notification and report submitted to comply with Subpart ZZZZ, and the documentation supporting any notification. **(40 CFR 63.6655(a)(1))**
 - b. Records specified in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. **(40 CFR 63.6655(a)(2))**
 - c. Records of performance tests and evaluations as required in 40 CFR 63.10(b)(2)(viii). **(40 CFR 63.6655(a)(3))**
 - d. For each CPMS, records described in 40 CFR 63.10(b)(2)(vi) through (xi). **(40 CFR 63.6655(b)(1))**
 - e. For each CPMS, previous versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3). **(40 CFR 63.6655(b)(2))**
 - f. For each CPMS, requests for alternatives to the relative accuracy test as required in 40 CFR 63.8(f)(6)(i) if applicable. **(40 CFR 63.6655(b)(3))**
 - g. Records of all required maintenance performed on the air pollution control and monitoring equipment. **(40 CFR 63.6555(a))**
 - h. Records of actions taken during periods of malfunction to minimize emissions in accordance with 63.6605(b). **(40 CFR 63.6655(a))**

All records shall be kept on file for a period of at least five years (at least two years at the site) and made available to the Department upon request. **(40 CFR 63.6655, 40 CFR 63.6660)**
6. After May 3, 2013, the permittee shall demonstrate continuous compliance with each applicable emission and operating limitation as specified in Table 6 to 40 CFR, Part 63, Subpart ZZZZ, using the method(s) described below. **(40 CFR 63.6640(a), 40 CFR 63.6595, Table 6 to 40 CFR 63 Subpart ZZZZ)**

For each	Complying with requirement to	You must demonstrate continuous compliance by
1. CI stationary RICE.	a. Reduce CO emissions and limit the concentration of CO in the stationary RICE exhaust using an oxidation catalyst.	i. Conducting performance tests every 8,760 hours or 3 years, whichever comes first, to demonstrate that the required CO percent reduction is achieved or you're your emissions remain at or below the CO concentration limit. ii. Collecting the catalyst inlet temperature data according to 40 CFR 63.6625(b); and iii. Reducing these data to 4-hour rolling averages; and iv. Maintaining the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and v. Measuring the pressure drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the performance test.

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7. For sulfur content of fuel oil, the permittee shall maintain a complete record of fuel oil specifications and/or fuel analysis for each delivery, or storage tank, of fuel oil used for the diesel generators. Records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. **(40 CFR 63.6604, 336.1213(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. After May 3, 2013, the permittee shall submit to AQD District Supervisor and EPA a semi-annual compliance report, as specified in 40CFR 63.6650 which contains all deviations during the reporting period from any applicable emission limitation or operating limitation and all periods during which the CPMS was out of control as defined in 40 CFR 63.8(c)(7). If there were no deviations from any applicable emission limitations or operating limitations or no periods that the CPMS was out of control, report shall contain a statement for reporting period attesting to these facts. Report covers the semi-annual period from January 1 - June 30, or from July 1 - December 31, and must either be postmarked July 31 / January 31 following the end of the semiannual reporting period or sent with the ROP semiannual certification reports, Sept 15 / March 15 (per 63.6650(b)(5)). Compliance report must also contain the following information, as specified in 40 CFR 63.6650 (c) and (e):
 - a. Company name and address
 - b. Certification of the report by a responsible official
 - c. Date of report and beginning and ending dates of the reporting period
 - d. Number of startups, shutdowns, and malfunctions that occurred during reporting period and demonstration that the Startup/Shutdown/Malfunction Plan was followed during such events
 - e. A brief description of the stationary RICE
 - f. A brief description of the CPMS
 - g. Date of the latest CPMS certification or audit
 - h. A description of any changes in the CPMS, processes or controls since the last reporting period
 - i. An identification of each parameter monitored and whether CO or formaldehyde was monitored
 - j. Date and time that each malfunction started and stopped
 - k. Date, time and duration that each CPMS was out of control (as defined in 40 CFR 63.8(c)(7)) and the corrective actions taken
 - l. Date, time and duration that each CPMS was inoperative, except for low-level and high-level checks
 - m. Date and time that each deviation started and stopped and whether each deviation occurred during a period of malfunction or during another period
 - n. A summary of the total duration of the deviations during the reporting period and percent of the total duration during the total source operating time of that reporting period
 - o. A breakdown of the total duration of deviations due to control equipment problems, process problems, other known causes and any unknown causes
 - p. A summary of the total duration of CPMS downtime during the reporting period and the percent of the total duration of downtime during the total source operating time of that reporting period

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A copy of the compliance report shall be kept on file for a period of at least five years (at least two years at the site) and made available to the Department upon request. **(40 CFR 63.6640(b), 40 CFR 63.6650, 40 CFR 63.6660)**

5. The permittee shall submit all applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8 (e), (f)(4), and (f)(6), and 63.9(b) through (e), (g), and (h) by the dates specified. **(40 CFR 63.6645(a))**
6. For an initial compliance demonstration that includes a performance test, the permittee shall submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii), before the close of the 60th business day following completion of the performance test according to 63.10(d)(2) and shall include the following:
 - a. RICE manufacturer, model number, year of purchase, and site-rated brake horsepower. **(40 CFR 63.6620(i), 40 CFR 63.6630(c), 40 CFR 63.6645(h)(2))**
 - b. Ambient temperature, pressure, and humidity during the performance test. **(40 CFR 63.6620(i), 40 CFR 63.6630(c), 40 CFR 63.6645(h)(2))**
 - c. Average percent load for the RICE and assumptions made to estimate or calculate percent load during the performance test. **(40 CFR 63.6620(i), 40 CFR 63.6630(c), 40 CFR 63.6645(h)(2))**
 - d. The model number of any measuring devices used during the test and the percent accuracy. **(40 CFR 63.6620(i), 40 CFR 63.6630(c), 40 CFR 63.6645(h)(2))**
 - e. Performance test results **(40 CFR 63.6630(c), 40 CFR 63.6645(h)(2))**
7. After May 3, 2013, the permittee shall report each instance in which requirements of Table 8 of Subpart ZZZZ are not met. **(40 CFR 63.6640(e), 40 CFR 63.6595(a))**

See Appendix 8-SP

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. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date. **(40 CFR, Part 63, Subparts A and ZZZZ)**

Footnotes:

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

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

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

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Appendix 2-SP. 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-SP. Monitoring Requirements

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

Appendix 4-SP. 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-SP. 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-SP. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B2796-2009a is being reissued as Source-Wide PTI No. MI-PTI-B2796-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201200055*	Incorporate RICE MACT special conditions	EU-DG12-1-SP EU-DG12-2-SP

Appendix 7-SP. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

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Appendix 8-SP. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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

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SECTION 3 – BELLE RIVER POWER PLANT

LOCATED AT

4505 King Road
China Township, Michigan 48054

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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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. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following: **(R 336.1301(1))**
 - 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.

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

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(5))**

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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.

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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))**

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- 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))**

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Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaiming, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

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

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

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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 C-3

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-BOILER1-BR	Belle River Boiler No. 1. 697 MW nominally rated, dry bottom coal-fired boiler equipped with low NOx burners, over-fire air, dry cold-side ESP, DSI, and ACI. (PTI No. 18-14)	03-01-1984/ 09-05-2008/ 07-25-2014	FG-BOILERS-BR FG-DSI/ACI-BR FG-MATSPROJECT-BR
EU-BOILER2-BR	Belle River Boiler No. 2. 697 MW nominally rated, dry bottom coal-fired boiler equipped with low NOx burners, over-fire air, dry cold-side ESP, DSI, and ACI. (PTI No. 18-14)	01-01-1984/ 02-01-2002/ 12-29-2009/ 07-25-2014	FG-BOILERS-BR FG-DSI/ACI-BR FG-MATSPROJECT-BR
EU-NAUXBLR-BR	Belle River North Auxiliary Boiler. 205 mmBtu heat input boiler, fired by #2 fuel oil.	01-01-1984	FG-AUXBLRS-BR
EU-SAUXBLR-BR	Belle River South Auxiliary Boiler. 205 mmBtu heat input boiler, fired by #2 fuel oil.	01-01-1984	FG-AUXBLRS-BR
EU-ASHSILO#1-BR	Flyash handling activity in Flyash Silo #1 where emissions are limited by enclosures, water sprays, and direct venting into ESP's.	01-01-1984	FG-ASH_HAND-BR
EU-ASHSILO#2-BR	Flyash handling activity in Flyash Silo #2 where emissions are limited by enclosures, water sprays, and direct venting into ESP's.	01-01-1984	FG-ASH_HAND-BR
EU-ECONSILO-BR	Economizer ash collection and handling from both boilers where emissions are limited by enclosures, water sprays, or dust collectors.	01-01-1984	FG-ASH_HAND-BR
EU-TRANS_HS-BR	Coal handling activity in Transfer Houses, where emissions are limited by enclosures, sprays, or baghouse dust collectors.	10-17-1978	FG-COALHAND-BR
EU-COALSILOS-BR	Coal handling activity in Unit 1 & 2 Coal silos, where emissions are limited by enclosures, sprays, or baghouse dust collectors.	10-17-1978	FG-COALHAND-BR
EU-CASCADES-BR	Coal handling activity in Cascade Rooms, where emissions are limited by enclosures, sprays, or baghouse dust collectors.	10-17-1978	FG-COALHAND-BR
EU-PARTSCLN-BR	Cold solvent parts cleaners located at Belle River Power Plant.	08-01-1984	FG-COLDCLNR-BR
EU-FIREPUMP-BR	Rule 285(g) exempt, <300 BHp, emergency diesel engine for Fire Pump House.	1984	FG-EMERGENS-BR

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-BLR01-DSI_SILO1	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 1 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR
EU-BLR01-DSI_SILO2	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 1 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR
EU-BLR02-DSI_SILO1	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 2 DSI Silo 1. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR
EU-BLR02-DSI_SILO2	DSI sorbent delivered by enclosed tanker truck or railcar tanker and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 2 DSI Silo 2. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR
EU-BLR01-ACI_SILO	ACI sorbent delivered by enclosed dry bulk semi-trailer trucks and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 1 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR
EU-BLR02-ACI_SILO	ACI sorbent delivered by enclosed dry bulk semi-trailer trucks and conveyed pneumatically to the storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on the Belle River Unit 2 ACI Silo. (PTI No. 18-14)	07-25-2014	FG-ISLANDS-BR, FG-MATSPROJECT-BR

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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 D-3

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-BOILERS-BR	Applicable requirements associated with Belle River Power Plant Boiler Nos. 1 and 2.	EU-BOILER1-BR EU-BOILER2-BR
FG-AUXBLRS-BR	Applicable requirements associated with the Belle River North and South Auxiliary Boilers.	EU-NAUXBLR-BR EU-SAUXBLR-BR
FG-ASH_HAND-BR	Emission units representing flyash collection and handling at Belle River Power Plant.	EU-ASH_SILO#1-BR EU-ASH_SILO#2-BR EU-ECONSILO-BR
FG-COALHAND-BR	Emission units representing coal handling at Belle River Power Plant.	EU-TRANS_HS-BR EU-COALSILOS-BR EU-CASCADES-BR
FG-COLDCLNR-BR	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv).	EU-PARTSCLN-BR
FG-EMERGENS-BR	Onsite, stationary, emergency engines exempt from Rule 201 pursuant to Rule 278 and Rule 285(g). Emergency engines are subject to 40 CFR 63 Subpart ZZZZ.	EU-FIREPUMP-BR
FG-DSI/ACI-BR	Installation of dry sorbent injection (DSI) and activated carbon injection (ACI) systems on Belle River Units 1 and 2. (PTI No. 18-14)	EU-BOILER1-BR, EU-BOILER2-BR
FG-ISLANDS-BR	DSI and ACI sorbents delivered and conveyed pneumatically to the appropriate storage silo. (PTI No. 18-14)	EU-BLR01-DSI_SILO1, EU-BLR01-DSI_SILO2, EU-BLR02-DSI_SILO1, EU-BLR02-DSI_SILO2, EU-BLR01-ACI_SILO, EU-BLR02-ACI_SILO,
FG-MATSPROJECT-BR	Hybrid Analysis recordkeeping and reporting used for MATS project. (PTI No. 18-14)	FG-DSI/ACI-BR, FG-ISLANDS-BR,

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**FG-BOILERS-BR
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Applicable requirements associated with Belle River Power Plant Boiler Nos. 1 and 2.

Emission Units:

EU-BOILER1-BR Belle River Boiler No. 1. 697 MW nominally rated, dry bottom coal-fired boiler (#2 fuel oil for ignition) with electrostatic precipitators, low-NOx burners, overfire air, DSI and ACI

EU-BOILER2-BR Belle River Boiler No. 2. 697 MW nominally rated, dry bottom coal-fired boiler (#2 fuel oil for ignition) with electrostatic precipitators, low-NOx burners overfire air, DSI and ACI

POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitators, Low-NOx burners, overfired air, DSI and ACI

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.10 pound per MM BTU heat input ²	Test Protocol will specify averaging time	Boiler No. 1 Boiler No. 2	SC V.1	40 CFR Part 60, Subpart D; 40 CFR 60.42a(1)
2. Opacity	20% ^{2, a}	6-minute period	Boiler No. 1 Boiler No.2	SC VI.3	40 CFR Part 60, Subpart D; 40 CFR 60.42a(2)
3. SO ₂	1.2 pounds per MM BTU ^{2, b}	Based upon any 3-hour average	Boiler No. 1 Boiler No. 2	SC VI.1	40 CFR Part 60, Subpart D; 40 CFR 60.43a(2)
4. NO _x	0.70 pound per MM BTU ^{2, b}	Based upon any 3-hour average	Boiler No. 1 Boiler No. 2	SC VI.2	40 CFR Part 60, Subpart D; 40 CFR 60.44a(3)

^aExcept for one 6-minute period per hour of not more than 27%.²

^bExcess emissions for SO₂ and NO_x are defined as any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods, as measured by the continuous monitoring system) exceed the emission limit.² **(40 CFR 60.45(g)(2) & (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)

- The electrostatic precipitators shall be installed and operated in a satisfactory manner.² **(R 336.1910)**
- The permittee shall maintain and operate EU-BOILER1-BR in a satisfactory manner using efficient combustion practices. Satisfactory operation includes operating EU-BOILER1-BR according to the procedures outlined in the malfunction abatement/preventative maintenance plan specified in SC IX.11 and the Carbon Monoxide Minimization Protocol specified in SC IX.12.² **(R 336.1910, R 336.1911, R 336.2804, R 336.2810(3), 40 CFR 52.21(d) and (j))**

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IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-BOILER1-BR unless the upgraded low-NOx burner system is installed, maintained, and operated in a satisfactory manner.² **(R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. Once every three years or more frequently upon the request of the AQD District Supervisor, the permittee shall verify and quantify particulate matter emission rates from Boiler Nos. 1 and 2 by testing at owner's expense in accordance with EGLE requirements. **(R 336.1201(3), R 336.1213(3))**
2. Annually, the permittee shall verify and quantify Carbon Monoxide (CO) emission rates from Boiler No. 1 by testing at owner's expense in accordance with EGLE requirements. Testing must be completed at maximum and an intermediate load. Combustion parameters shall be monitored and recorded during test to determine efficient combustion practices.² **(R 336.2804, R 336.2810(3), 40 CFR 52.21(d) & (j))**
3. Within 180 days of commencement of trial operation, the permittee shall verify PM, PM10, and PM2.5 emission rates from EU-BOILER1-BR and EU-BOILER2-BR in FG-BOILERS-BR by testing at owner's expense, in accordance with Department requirements. The permittee must complete the test once every three years, thereafter for the next 10 years of operation after the FG-REF-BRFC modification.² (NOTE: EU-BOILERS-BR was modified on December 7, 2009) **(R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S))**
4. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. AQD must approve the final plan prior to testing. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. 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 336.1331, R 336.2001, R 336.2003, R 336.2004, R 336.2804, R 336.2810(3), 40 CFR 52.21(d) & (j))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 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 SO₂ emissions on a continuous basis and in accordance with the Emission and Fuel Monitoring section of 40 CFR 60 and/or 75.² **See Appendix 3.1-BR and 3.2-BR. (40 CFR 60 & 75, Appendix B)**
2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the gas flow, CO₂, and NO_x emissions on a continuous basis and in accordance with the Emission and Fuel Monitoring section of Part 60 and/or 40 CFR 75.² **See Appendix 3.2 BR. (40 CFR Part 60, Subpart D; 40 CFR Part 60 & 75, Appendix B)**
3. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the visible emissions on a continuous basis and in accordance with 40 CFR 60.² **See Appendix 3.3-BR. (R 336.1201, 40 CFR Part 60 Subpart D, 40 CFR 60.13, 40 CFR 60 Appendix B)**
4. The permittee shall develop a QA/QC program for the CEM systems. At a minimum, include in each QA/QC program a written plan that describes in detail complete, step-by-step procedures and operations for the activities specified in Appendix B to 40 CFR 75.² **(40 CFR 75 Appendix B.1)**
5. For each electrostatic precipitator, the permittee shall monitor the parameters specified in the malfunction abatement/preventative maintenance program.² **(R 336.1213(3))**
6. The permittee shall utilize COMS-recorded opacity as an indicator of the emission unit's compliance with the particulate matter emission limit. An excursion of the PM emission limit is defined as two consecutive 1-hour

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block average opacity values greater than 20%. This condition does not affect compliance with R 336.1301. **(40 CFR 64.6(c)(1)(i & ii), c(2), c(3), and 64.7(c))**

7. The permittee shall operate the COMS during all required periods when the coal-fired boiler is operating. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for 40 CFR Part 64 compliance, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, in frequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 64.7(c))**
8. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). CAM exceedances/excursions trigger initial inspections, corrective actions and recordkeeping of the probable cause and corresponding resolution. **(40 CFR 64.7(d))**
9. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**
10. The permittee shall perform an annual COMS audit using certified filters to ensure accurate opacity readings.² **(40 CFR 64.6(c)(1)(iii))**
11. The permittee shall keep monthly and previous 12-month CO mass emission calculation records for Boiler No. 1. After five years of operation of the low-NOx burner system, the permittee may submit a written request to change the CO emission calculation recordkeeping, to the AQD District Supervisor for review and approval. The permittee may only change the CO emission calculation recordkeeping with written approval of the AQD District Supervisor.² **(R 336.2804, R 336.2810(3), 40 CFR 52.21(d) & (j))**
12. The permittee shall conduct monitoring and keep written records, as required in the approved Carbon Monoxide Minimization Protocol to demonstrate that CO is being minimized on an ongoing basis. After five years of operation of the low-NOx burner system, the permittee may submit a written request to change the monitoring and recordkeeping to the AQD District Supervisor for review and approval. The permittee may only change the monitoring and recordkeeping with the written approval of the AQD District Supervisor. ² **(R 336.1213(3), R 336.2804, R 336.2810(3), 40 CFR 52.21(d) & (j))**
13. The permittee shall calculate and keep records of PM, PM10 and PM2.5 emissions from each boiler in FG-BOILERS-BR, in tons per calendar year. The annual recordkeeping period shall begin on the first day of the month during which REF refined coal combustion commences. Calculations and records shall be kept in the format described in Appendix 4.1-BR, or an alternative format acceptable to AQD Permit Section Supervisor. Requirement to conduct calculations for records shall end 10 calendar years (December 31, 2019) after REF refined coal combustion commences, 12-31-2019. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)**

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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. For the continuous monitoring system for the measurement of opacity, the permittee shall submit to the District Supervisor and Compliance Support Unit Supervisor, Air Quality Division and to the Chief of the Air Compliance Branch, U.S. Environmental Protection Agency, within 30 days of the end of the calendar quarter, a written report for each calendar quarter which shall include all of the following information:²
 - a. Excess emissions, corrective action taken and the nature and cause of excess emissions. For opacity measurements, the report shall consist of the magnitude, in actual percent opacity, of all 6-minute averages of opacity more than the applicable opacity standard for each hour of operation (all allowable exceptions are to be deducted prior to determining the excess averages of opacity). Average values shall be obtained by integration over the averaging period of by arithmetically averaging a minimum of 24 equally spaced, instantaneous opacity measurements per 6 minutes.²
 - b. 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 repairs or adjustments made.²
 - c. If the monitoring system has not been inoperative, repaired, or adjusted, and if no excess emissions occurred, a statement attesting to this fact.² **(R 336.2170(1)(a), (b) & (c); Title I (Air Pollution Prevention and Control) of the Clean Air Act, Section 114(a))**
5. The permittee shall submit to the Chief of the Air Compliance Branch, U.S. Environmental Protection Agency and the District Supervisor of the Air Quality Division, within 30 days of the end of the calendar quarter, a written report for each calendar quarter which shall include sulfur dioxide monthly emission rate averages.² **(Title I (Air Pollution Prevention and Control) of the Clean Air Act, Section 114(a)) (Rule 336.1213(3))**
6. The permittee shall report sulfur dioxide, nitrogen oxide and carbon dioxide emissions, volumetric flow, and opacity data in accordance with 40 CFR, Part 75 (Continuous Emission monitoring).² **(40 CFR 75)**
7. The permittee shall submit quarterly Excess Emission and Monitoring System Performance (MPS) reports and operating information pursuant to 40 CFR 60, Subpart D, 30 days following the end of the quarter in which data were collected.² **See Appendix 8.B-BR, (40 CFR 60, Subpart D)**
8. Semiannually or more frequently report Compliance Assurance Monitoring (CAM) summary information on the number, duration, and cause of exceedances/excursions in the reporting period, and the corrective actions taken in response. If there were no exceedances/excursions in the reporting period, then this report shall include a statement that there were no exceedances/excursions. **(40 CFR 64.9(a)(2)(i), R 336.1213(3)(c))**
9. Semiannually or more frequently report Compliance Assurance Monitoring (CAM) summary information on the monitor downtime in the reporting period. 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. **(40 CFR 64.9(a)(2)(ii), R 336.1213(3)(c))**

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10. The permittee shall submit records of the annual emission of PM, PM10, and PM2.5 from FG-BOILERS-BR, in tons per year on a calendar year basis, to both AQD Permit Section Supervisor and AQD District Supervisor within 60 days following the end of each recordkeeping year thru 10 calendar years (December 31, 2019), if either of the following occur:
 - a. The yearly actual emission of PM, PM10, and/or PM2.5 exceed the baseline actual emissions (BAE) by a significant amount, and/or
 - b. The year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test.

The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to FG-BOILERS-BR, Condition VI.12, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection). (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))

See Appendix 8-BR

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. SV-BOILER1-BR	306	660	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SV-BOILER2-BR	306	660	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

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-6034-2015 is hereby incorporated into this ROP as Appendix 9-BR. (R 336.1299(2)(a))
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(2)(d) and 40 CFR Part 72.9(c)(1)(l). (R 336.1299(2)(a), 40 CFR 72.9(c)(1)(i))
3. The permittee shall comply with the provisions of the Transport Rule SO2 Group 1 Trading Program, as specified in 40 CFR, Part 97, Subpart CCCCC, as they apply to EU-BOILER1-BR and EU-BOILER2-BR. (40 CFR Part 97 Subpart CCCCC)
4. The permittee shall comply with the provisions of the Transport Rule NOx Annual Trading Program, as specified in 40 CFR, Part 97, Subpart AAAAA, as they apply to EU-BOILER1-BR and EU-BOILER2-BR. (40 CFR Part 97 Subpart AAAAA)
5. The permittee shall comply with the provisions of the Transport Rule NOx Ozone Program, as specified in 40 CFR, Part 97, Subpart BBBB, as they apply to EU-BOILER1-BR and EU-BOILER2-BR. (40 CFR Part 97 Subpart BBBB)
6. The permittee shall comply with the NOx standards which have been promulgated in a federal implementation plan under section 110(c) or required under section 126 of the CAA. (R 336.1801(14))

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7. As would apply to any other condition in this permit, nothing in this permit shall preclude the use, including exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.² **(40CFR60.11(g))**
8. The permittee shall maintain and implement the approved Startup/ Shutdown and Preventative Maintenance, Malfunction Abatement Plan (SS & PM-MAP) for FG-BOILERS-BR and the electrostatic precipitators. Alternate formats or revisions to the approved Program must be approved by the AQD District Supervisor. If the Plan inadequately addresses an event, the permittee shall revise the Plan within 45 days of such an event and submit the revised Plan for approval of AQD District Supervisor. The alternate plan shall be deemed approved unless notified by the District Supervisor within 45 days of plan submittal.² **(R 336.1201(3))**
9. The permittee shall use and implement and maintain the AQD approved Carbon Monoxide Minimization Protocol describing reasonable measures to minimize carbon monoxide emissions. Alternate formats or revisions to the approved protocol must be approved by AQD District Supervisor. The alternate plan shall be deemed approved unless notified by the District Supervisor within 45 days of plan submittal.² **(R 336.2804, R 336.2810(3), 40CFR52.21(d) & (j))**
10. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.² **40 CFR 64.7(e)**
11. The permittee shall properly maintain the monitoring system, including maintaining necessary parts for routine repairs of the monitoring equipment. **(40 CFR 64.7(b))**
12. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**
13. The permittee shall comply with applicable requirements of the federal National Emissions Standards for Hazardous Air Pollutants as set forth in 40 CFR 63, Subparts A and UUUUU (Coal- and Oil-Fired Electric Utility Steam Generating Units) for FG-BOILERS-BR. The permittee shall comply with all notice requirements, emissions standards and continuous emissions monitoring, recordkeeping, and reporting requirements as required in 40 CFR 63, Subparts A and UUUUU. All emission and operating data shall be kept on file for a period of at least five years and made available to the AQD upon request. **(40 CFR 63 Subparts A and UUUUU)**

Footnotes:

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

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

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**FG-AUXBLRS-BR
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Applicable requirements associated with the Belle River North and South Auxiliary Boilers.

Limited-use boilers means any boiler that burns any amount of solid, liquid, or gaseous fuels and has a federally enforceable average annual capacity factor of no more than 10 percent.

Emission Unit:

EU-NAUXBLR-BR Belle River North Auxiliary Boiler. 205 MM BTU heat input boiler, fired by #2 fuel oil

EU-SAuxBLR-BR Belle River South Auxiliary Boiler. 205 MM BTU heat input boiler, fired by #2 fuel oil

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. SO ₂	0.51 pounds per million BTU of heat input ²	Instantaneous	FG-AUXBLRS-BR	VI.1 and VI.3	R 336.1201(3)
The SO ₂ limit is based on a 0.5% sulfur content with a heat value of 18,000 BTU/lb for the liquid fuel oil. ²					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. #2 Fuel Oil (Note A)	10 % annual capacity factor on oil (Note B)	Calendar Year	EU-NAUXBLR-BR EU-SAuxBLR-BR	VI.1	40 CFR 63.7555(d)(3)

Note A: This limit is to satisfy the Federally Enforceable capacity factor limit associated with the limited use designation under 40 CFR 63 Subpart DDDDD, § 63.7555(d)(3). The No. 2 fuel oil limit takes effect on January 1, 2016 to assure compliance with the MACT compliance date, January 31, 2016, specified in 40 CFR 63.7495(b) .

Note B: Annual capacity factor means the ratio between the actual heat input to a boiler from the fuels burned during a calendar year to the potential heat input to the boiler had it been operated for 8,760 hours during a year at the maximum steady state design heat input capacity. **(40 CFR 63 Subpart 63.7575)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must complete an initial tune-up of the boilers by following the procedures described in 40 CFR 63.7540(a)(10)(i) through (vi) no later than January 31, 2016. **(40 CFR 63.7510(e))**
2. To demonstrate continuous compliance, the permittee must conduct a tune-up of the boilers every 5 years (within 61 months). If the boiler is not operating on the required date for tune-up, the tune-up must be conducted within 30 calendar days of startup. **(40 CFR 63.7500(a), 40 CFR 63.7515(d), 40 CFR 63.7540(12) & (13))**

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3. The permittee shall conduct tune up of the boilers as specified in the following:
 - a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next unit shutdown).
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern.
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next unit shutdown).
 - d. Optimize total emissions of CO.
 - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made. **(40 CFR 63.7540(a)(12))**
4. The permittee, at all times, must operate and maintain any affected source (as defined in § 63.7490) in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.7500)(a)(3)**
5. The permittee must install a fuel meter or may share a fuel meter for each boiler. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep a record of the following on a monthly basis:
 - a. Total fuel usage
 - b. Sulfur content of fuel oil
 - c. Hours of operation for equipment
 - d. Heat value of fuel oil **(R 336.1213(3))**
2. The permittee shall calculate and record the annual capacity factor for EU-NAUXBLR-BR and EU-S AUXBLR-BR based on a calendar year basis. **(40 CFR 63.7575)**
3. The permittee must keep fuel use records for the days the boiler was operating. **(40 CFR 63.7525(k))**
4. The permittee shall perform visible emissions observation of each auxiliary boiler at least once a day when the boilers are operating continuously for 24 hours or more. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall keep a written record of each required observation and corrective action. **(R 336.1213(3))**

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5. The permittee shall maintain a complete record of fuel oil specifications and/or fuel analysis for each delivery, or storage tank, of fuel oil used for the auxiliary boilers. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. **(R 336.1213(3))**
6. The permittee shall keep a copy of each notification and report submitted to comply with 40 CFR 63 Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report submitted according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.7555(a))**
7. The permittee shall keep records of compliance demonstrations. **(R°336.1213(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 applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), as specified in 40 CFR 63.7545. **(40 CFR 63.7545)(a)**
5. The permittee must submit a signed statement in the Notification of Compliance Status report that contains the results of the initial compliance demonstration according to the requirements in 40 CFR 63.7545(e), indicating that an initial tune-up has been conducted. The permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration before the close of business on the 60th day following the completion of the initial compliance demonstration. The Notification of Compliance Status report must contain all information specified in 40 CFR 63.7575(e)(1) and (8), as applicable. **(40 CFR 63.7545(e), 40 CFR 63.9(h)(2)(ii))**
6. As specified in 40 CFR 63.7550(b)(1) through (4), the permittee must submit a 5-year compliance report based on a requirement to conduct a tune-up every 5 years. The first 5-year compliance report must cover the period beginning on the compliance date and ending 5 years after the compliance date. The first 5-year compliance report must be postmarked or submitted no later than March 15 after the 5-year period. Each subsequent 5-year compliance report must cover the 5-year periods from January 1 to December 31 and must be postmarked or submitted no later than March 15 following the 5-year period. **(40 CFR 63.7550(b))**
NOTE: In accordance with 40 CFR 63.9, the permittee may request, in writing, to change the deadline for the compliance reports. The deadline for the compliance reports is changed from January 31 to March 15 to coincide with the deadline for the ROP Certification Reports.
7. The permittee must maintain on-site and submit, if requested by the Administrator, a 5-year report containing the following information associated with performance to the compliance tune-ups:
 - a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler;
 - b. A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10) & (12))**

See Appendix 8-BR

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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. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters as specified in 40 CFR Part 63, Subparts A and DDDDD (Boiler MACT) no later than January 31, 2016. **(R 336.1213(3), 40 CFR 63 Subparts, A and DDDDD)**

Footnotes:

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

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

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FG-ASH_HAND-BR FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Emission units representing flyash collection and handling at Belle River Power Plant, including the flyash load-out facilities

Flyash collection from Boiler Nos. 1 and 2; handling in flyash silo #1 & #2; collection of economizer ash & handling in economizer ash silo; and ash load-out facilities. Flyash silo #1 and #2 have dust collectors that vent to the ESPs.

Emission Unit:

- EU-ASHSILO#1-BR Flyash collection from Boiler No. 1, handling in flyash silo #1, and loadout facilities where emissions are limited by enclosures and water sprays. Dust collector is directly vented into the ESPs.
- EU-ASHSILO#2-BR Flyash collection from Boiler No. 2, handling in flyash silo #1, and loadout facilities where emissions are limited by enclosures and water sprays. Dust collector is directly vented into the ESPs.
- EU-ECONSILO-BR Economizer ash collection and handling from both boilers where emissions are limited by enclosures, water sprays, or dust collectors.

POLLUTION CONTROL EQUIPMENT

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.10 pounds per 1000 pounds of exhaust gases, on a wet basis ²	Instantaneous	Flyash Handling System	SC V.1 & VI.1	R 336.1331

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)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the ash silos unless the respective dust collection system is installed and operating properly. (R 336.1910)

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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 the economizer ash silo dust collector exhaust stack, at a minimum of once per calendar year, during maximum routine operating conditions. (R 336.1213(3))

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 visible emission observation during flyash loading of trucks and railroad cars from the silo, at least once every seven days during routine operating conditions. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall maintain a record of each required observation and corrective action. (R 336.1213(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))

See Appendix 8-BR

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. The permittee shall maintain and implement the approved fugitive flyash dust control program. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor. (R 336.1213(3))

Footnotes:

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

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

**FG-COALHAND-BR
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Emission units representing coal handling at Belle River Power Plant.

Includes transfer houses, coal silos, cascades rooms, and coal storage piles.

The following are among the emission points included: Cascades Room 3DC102, Cascades Room 3DC103, Cascades Room 3DC107, Cascades Room 3DC109, Cascades Room 3DC110, Transfer House 3TH7-3DC009, Transfer House 3TH7-3DC010, Transfer House 3TH7-3DC014, Transfer House 3TH8-3DC011, Transfer House 3TH9-3DC013, Transfer House 3TH9-3DC015, Boiler No. 1 Coal Silo 3DC101, Boiler No. 1 Coal Silo 3DC104, Boiler No. 2 Coal Silo 3DC108, and Boiler No. 2 Coal Silos Wet Dust Collection System 3DC113.

Emission Unit:

- EU-TRANS_HS-BR Coal handling activity in Transfer Houses, where emissions are limited by enclosures, sprays, or baghouse dust collectors
- EU-COALSILOS-BR Coal handling activity in Unit 1 & 2 Coal Silos, where emissions are limited by enclosures, sprays, or baghouse dust collectors
- EU-CASCADES-BR Coal handling activity in Cascade Rooms, where emissions are limited by enclosures, sprays, or baghouse dust collectors

POLLUTION CONTROL EQUIPMENT

Enclosures, Sprays, or Dust Collectors

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.038 grains per dry standard cu.ft. of exhaust gases ²	Instantaneous	Coal Handling System	Section VI.1	R 336.1331(c)

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. Stackers, reclaimers, and dust suppression equipment shall be operated in a manner which will minimize the fugitive particulate emissions.² (R 336.1201(3))
2. The coal handling system Pollution Control Equipment shall be installed and operated properly. (R 336.1910)

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IV. DESIGN/EQUIPMENT PARAMETER(S)

1. All conveyor belting shall be totally enclosed to control particulate fallout either on public or company property or into the water.² (R 336.1201(3))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall perform a visible emission observation of the coal handling pollution control equipment stacks, reclaimers, and stacker drop points, at least once every seven days during routine operating conditions. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall maintain a written record of each required observation and corrective action. (R 336.1213(3))
2. The permittee shall inspect all conveyor belting enclosures to determine and record conditions, once per calendar year. (R 336.1213(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))

See Appendix 8-BR

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. The permittee shall implement and maintain an approved fugitive dust control program for the coal storage piles. Alternate formats or revisions to the approved program must be approved by the AQD District Supervisor. (R 336.1213(3))

Footnotes:

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

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

FG-COLDCLNR-BR FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EU-PARTSCLN-SC, Cold cleaners located at Belle River Power Plant

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than 5 percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. **(R 336.1213(2))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. **(R 336.1611(2)(b), R 336.1707(3)(b))**
2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than 10 square feet. **(R 336.1281(h))**
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**
2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**
4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:

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- a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**
4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20%, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. **(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of compliance 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. Due annually by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8-SC

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

**FG-EMERGENS-BR
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Existing, exempt, emergency engines, ≤ 500 HP, subject to 40CFR63, Subpart ZZZZ (RICE MACT). Existing engines are engines constructed before June 12, 2006

Emission Units: EU-FIREPUMP-BR located at the Fire Pump House.

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)

1. The permittee shall meet fuel limits specified in 40 CFR 63.6604(b). Beginning January 1, 2015, permittee must use nonroad diesel fuel in accordance with 40 CFR 80.510(b): maximum sulfur content of 15 ppm, and either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. Any existing diesel fuel purchased prior to January 1, 2015 may be used until depleted. **(40 CFR 63.6604(b), 40 CFR 80.510(b))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. In order for the engine to be considered an emergency stationary RICE, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 63.6640(f)(1) through (3) is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) to (3), the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.
 - a. There is no time limit in emergency situations. **(40 CFR 63.6640(f)(1))**
 - b. Operate up to 100 hours per year for maintenance testing. **(40 CFR 63.6640(f)(2))**
 - c. Operate up to 50 hours per year in non-emergency situations (counted towards the 100 hours per calendar year for maintenance and testing). **(40 CFR 63.6640(f)(3))**
2. The permittee shall meet the following operating requirements specified per §63.6602, applicable to each emission unit:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in Process/Operational Restriction III.3;
 - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. **(40 CFR 63.6602, Table 2c to Subpart ZZZZ of Part 63)**
3. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in §63.6602. The oil analysis program must be performed at same frequency as oil changes are required. Analysis program must test the parameters and keep records per §63.6625(i). **(40 CFR 63.6625(i))**

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4. The permittee shall not operate emission unit's subject to Subpart ZZZZ unless operation and maintenance is performed according to manufacturer's emission-related written instructions or the permittee's maintenance plan. To the extent practicable, the permittee's plan must provide for maintenance and operation of engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6625(e), 40 CFR 63.6640(a))**
5. The permittee shall minimize time spent at idle during startup and minimize engine's startup time to a period needed for safe loading of engine, not to exceed 30 minutes. **(40 CFR 63.6625(h))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Emission unit shall be equipped with a non-resettable hour meter to track operating hours. **(40 CFR 63.6625(f))**

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. If using oil analysis program, the permittee shall test for and record and maintain the Total Base Number, viscosity and percent water content every 500 hours and maintain within acceptable limits in (40 CFR 63.6625(i)). **(40 CFR 63.6625(i))**
2. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the engine was operated and maintained according to the maintenance plan. **(40 CFR 63.6655(e))**
3. The permittee shall record the number of hours the engine operated from the non-resettable hour meter and document the hours spent for emergency, including what classified the operation as emergency, and non-emergency operation. **(40 CFR 63.6655(f))**
4. The permittee must keep records of the occurrence and duration of each malfunction of operation of each engine. **(40 CFR 63.6655(a)(2))**
5. The permittee shall keep in a satisfactory manner, records of action taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process to its normal or usual manner of operation. **(40 CFR 63.6655(a)(5))**

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))**

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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. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) as they apply to emission units subject to Subpart ZZZZ. **(R 336.1213(3), 40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:

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

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

**FG-DSI/ACI-BR
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

MATS Compliance Project (40 CFR Part 63, Subpart UUUUU) for each boiler that is an Electric Generating Unit (EGU) at the Belle River Power Plant. Installation of dry sorbent injection (DSI) and activated carbon injection (ACI) systems on Belle River Units 1 and 2. (PTI No. 18-14)

Emission Unit: EU-BOILER1-BR, and EU-BOILER2-BR

POLLUTION CONTROL EQUIPMENT

Each EGU is equipped with low NOx burners, overfire air, ESP, DSI, and ACI

I. EMISSION LIMIT(S)

Pollutant	Limit ^a	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1a. PM	0.03 lb/MMBtu or 0.3 lb/MW ² hr ²	Test Protocol shall determine time period	Each EGU of FG-DSI/ACI- BR	SC VI.1 -4	40 CFR 63.9991 Table 2, 40 CFR 63.10000(a)
AND					
2a. Hydrogen Chloride (HCl)	0.002 lb/MMBtu or 0.02 lb/MW ² hr ²	Test Protocol shall determine time period	Each EGU of FG-DSI/ACI- BR	SC VI.1 -4	40 CFR 63.9991 Table 2, 40 CFR 63.10000(a)
AND					
3a. Mercury (Hg)	1.2 lb/TBtu or 0.013 lb/GW ² hr ²	Test Protocol shall determine time period	Each EGU of FG-DSI/ACI- BR	SC VI.1 -4	40 CFR 63.9991 Table 2, 40 CFR 63.10000(a)

^aThese limits apply starting April 16, 2016, applying at all times except during periods of startup and shutdown, as defined by 40 CFR Part 60, Subpart UUUUU.

II. MATERIAL LIMIT(S)

1. The permittee must comply with initial compliance standards for material limits in accordance with 40 CFR Part 63, Subpart UUUUU for each EGU of FG-DSI/ACI-BR.² **(40 CFR 63.10011)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

4. The permittee must meet the work practice standards and operating limits for each EGU in FG-DSI/ACI-BR, according to 40 CFR Part 63, Subpart UUUUU, Tables 3 and 4.² **(40 CFR 63.9991, 40 CFR 63.10000, 40 CFR 63.10011)**
5. The permittee shall operate and maintain each EGU of FG-DSI/ACI-BR, including associated air pollution control equipment and monitoring equipment in satisfactory manner.² **(40CFR63.100000)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. All air pollution control equipment necessary for compliance with any newly applicable emissions limits which apply as a result of the cessation or commencement or recommencement of operations that cause each EGU of FG-DSI/ACI-BR to meet the definition of an EGU subject to this subpart must be installed and operational as

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of the date your source ceases to be or becomes subject to 40 CFR Part 63 Subpart UUUUU.² **(40 CFR 63.10000(j))**

2. All monitoring systems necessary for compliance with any newly applicable monitoring requirements which apply as a result of the cessation or commencement or recommencement of operations that cause each EGU of FG-DSI/ACI-BR to meet the definition of an EGU subject to 40 CFR Part 63 Subpart UUUUU must be installed and operational as of the date your source ceases to be or becomes subject to 40 CFR Part 63 Subpart UUUUU.² **(40 CFR 63.10000(k))**

V. TESTING/SAMPLING

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

1. For each EGU of FG-DSI/ACI-BR, the permittee must demonstrate initial compliance with each applicable emissions limit through performance testing by testing at owner's expense, in accordance with Department requirements. Where two emissions limits are specified for a particular pollutant (e.g., a heat input-based limit in lb/MMBtu and an electrical output-based limit in lb/MWh), the permittee may demonstrate compliance with either emission limit. All subsequent performance tests will be required according to 40 CFR 63.10006. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. 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 Technical Programs Unit and District Office within 60 days following the last date of the test. The permittee must demonstrate initial compliance no later than April 16, 2016.² **(40 CFR 63.9984, 40 CFR 63.10000, 40 CFR 63.10005(a), 40 CFR 63.10006, 40 CFR 63.10007, 40 CFR 63.10011)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record, as applicable according to 40 CFR Part 63, Subpart UUUUU.² **(40 CFR 63.10033)**
2. The permittee must develop a site-specific monitoring plan and submit this site-specific monitoring plan, if requested, at least 60 days before your initial performance evaluation (where applicable) of your continuous monitoring system (CMS).² **(40 CFR 63.10000(d))**
3. The permittee shall maintain on-site and submit, if requested by the AQD District Supervisor, an annual report containing the information for all periodic tune-ups that are performed for each EGU of FG-DSI/ACI-BR, as specified in 40 CFR 63.10021(e).² **(40 CFR 63.10000(e), 40 CFR 63.10021(e))**
4. The permittee shall keep records of the following information for startups, shutdowns, and malfunctions:
 - a) Each occurrence and duration of each startup and/or shutdown;
 - b) The permittee must keep records of the occurrence and duration of each malfunction of an operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment;
 - c) The permittee must keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.10000(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation;
 - d) The permittee must keep records of the type(s) and amount(s) of fuel used during each startup or shutdown.

The permittee shall keep the records on file at the facility and make them available to the Department upon request.² **(40 CFR 63.10032(d))**

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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 must submit all of the notifications required; according to 40 CFR Part 63 Subpart UUUUU.² **(40 CFR 63.10030, 40 CFR 63.10031)**
5. The permittee must report each instance in which FG-DSI/ACI-BR did not meet an applicable emission limit or operating limit in Tables 1 through 4 of 40 CFR Part 63 Subpart UUUUU or failed to conduct a required tune-up. These instances are deviations from the requirements of 40 CFR Part 63 Subpart UUUUU.² **(40 CFR 63.10021(g), 40 CFR 63.10031)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart UUUUU, for Coal and Oil-fired Electric Utility Steam Generating Units, as it applies to FG-DSI/ACI-BR.² **(40 CFR Part 63, Subparts A and UUUUU)**

Footnotes:

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

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

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FG-ISLANDS-BR FLEXIBLE GROUP CONDITIONS

DESCRIPTION

DSI and ACI sorbents delivered and conveyed pneumatically to the appropriate storage silo. The load-in conveying air discharges through a high efficiency bin vent filter or dust collector on each silo. (PTI No. 18-14)

Emission Unit: EU-BLR01-DSI_SILO1, EU-BLR01-DSI_SILO2, EU-BLR02-DSI_SILO1, EU-BLR02-DSI_SILO2,

ACI: EU-BLR01-ACI_SILO, EU-BLR02-ACI_SILO

POLLUTION CONTROL EQUIPMENT

Bin vent filters or dust collectors on each emission unit

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Opacity	7 percent ²	Test Protocol will determine averaging time	Each individual bin vent filter or dust collector for FG-ISLANDS-BR	SC V.3	R 336.1301
2. PM	0.004 gr/dscf ²	Test Protocol will determine averaging time	Each individual bin vent filter or dust collector for FG-ISLANDS-BR	SC V.1	R 336.1331
3. PM10	0.034 pph ²	Test Protocol will determine averaging time	Each individual bin vent filter or dust collector for EU-BLR01-DSI_SILO1, EU-BLR01-DSI_SILO2, EU-BLR02-DSI_SILO1, EU-BLR02-DSI_SILO2	SC V.2	R 336.2803, R 336.2804
4. PM10	0.068 pph ²	Test Protocol will determine averaging time	Each individual bin vent filter or dust collector for EU-BLR01-ACI_SILO, EU-BLR02-ACI_SILO	SC V.2	R 336.2803, R 336.2804
5. PM2.5	0.017 pph ²	Test Protocol will determine averaging time	Each individual bin vent filter or dust collector for included in FG-ISLANDS-BR	SC V.2	R 336.2803, R 336.2804

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FG-ISLANDS-BR unless a program for continuous fugitive dust control for all material handling operations is implemented, updated as necessary, and kept at the facility. If at any time the fugitive dust control program fails to address or inadequately addresses an event, the permittee shall amend the fugitive dust control program within 45 days after such an event occurs. The permittee shall also amend the fugitive dust control program within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the fugitive dust control program and any amendments to the fugitive dust control program to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the fugitive dust control program or amended fugitive dust control program shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(R 336.1371, R 336.1372, R 336.2803, R 336.2804, 40 CFR 60.672)**
2. The permittee shall not operate FG-ISLANDS-BR unless a MAP as described in Rule 911(2), for operation of the process and emission control equipment is implemented, updated as necessary, and kept at the facility. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804)**
3. The permittee shall not operate FG-ISLANDS-BR for more than 12 hours per day, as determined on a daily basis.² **(R 336.2803, R 336.2804)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any portion of FG-ISLANDS-BR unless the associated enclosures or fabric filters are installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for FG-ISLANDS-BR as required in SC III.2.² **(R 336.1910, R 336.1911, R 336.2803, R 336.2804)**

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 verify the PM emission rates from each emission unit of FG-ISLANDS-BR or a representative emission unit by testing at owner's expense, in accordance with Department requirements, as requested by the AQD District Supervisor. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. 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 Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1301, R 336.1331, R 336.2001, R 336.2003, R 336.2004, R 336.2801)**
2. The permittee shall verify the PM10 and PM2.5 emission rates from each emission unit of FG-ISLANDS-BR or a representative emission unit by testing at owner's expense, in accordance with Department requirements, as requested by the AQD District Supervisor. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. 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 Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.2001, R 336.2003, R 336.2004, R 336.2801, R 336.2803, R 336.2804)**

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- Annually, the permittee shall conduct a Reference Method 9 visible emissions readings of each emission unit of FG-ISLANDS-BR, at a minimum of once per calendar year, during maximum routine operating conditions.² **(R 336.1301, R 336.1910, R 336.1911)**

VI. MONITORING/RECORDKEEPING

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

- The permittee shall perform and document non-certified visible emissions observations as required in Emission Limit SC I.1 on a daily basis when FG-ISLANDS-BR is operating. If during the observation there are any visible emissions detected from an emission point, an EPA Method 9 certified visible emissions observation shall be performed. Records of the non-certified visible emissions observations, EPA Method 9 observations that are performed, the reason for any visible emissions observed, and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² **(R 336.1910, R 336.1911)**
- The permittee shall monitor and record, the hours of operation for FG-ISLANDS-BR on a daily basis.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1602, R 336.1702, R 336.1901, R 336.1910, R 336.2802, 40 CFR 52.21)**

VII. REPORTING

- Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
- 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))**
- 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))**
- Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of FG-ISLANDS-BR authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of FG-ISLANDS-BR.² **(R 336.1201(7)(a))**

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 Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-BLR01-DSI_SILO1*	15.6 x 15.6 ²	80.5 ²	R 336.2803, R 336.2804
2. SV-BLR01-DSI_SILO2*	15.6 x 15.6 ²	80.5 ²	
3. SV-BLR02-DSI_SILO1*	15.6 x 15.6 ²	80.5 ²	
4. SV-BLR02-DSI_SILO2*	15.6 x 15.6 ²	80.5 ²	
13. SV-BLR01-ACI_SILO*	15.6 x 15.6 ²	57.7 ²	
14. SV-BLR02-ACI_SILO*	15.6 x 15.6 ²	57.7 ²	

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IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

**FG-MATSPROJECT-BR
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI) air quality control systems on the Belle River Units 1 and 2 as part of the proposed MATS Compliance Project (the project). (PTI No. 18-14)

Emission Unit: EU-BOILER1-BR, EU-BOILER2-BR, EU-BLR01-DSI_SILO1, EU-BLR01-DSI_SILO2, EU-BLR02-DSI_SILO1, EU-BLR02-DSI_SILO2, , EU-BLR01-ACI_SILO, EU-BLR02-ACI_SILO

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall calculate and keep records of PM, PM10, CO2, and CO2e emission rates from each emission unit of FG-MATSPROJECT-BR, in tons per year on a calendar year basis. The recordkeeping period shall begin on the first day of the month during which each emission unit of FG-MATSPROJECT-BR and any of the affected emission units commence operation and shall continue for 5 years. The calculations and records shall be kept in a format acceptable to the Department. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205, R 336.2802(4)(e), R 336.2818)

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))

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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. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity.² **(R 336.1201(7)(a))**
5. The permittee shall submit records of PM, PM10, CO2, and CO_{2e} emissions from FG-MATSPROJECT-BR and FG-MATSPROJECT-SC in tons per calendar year to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of each calendar year identified in FG-MATSPROJECT-BR SC VI.1 and FG-MATSPROJECT-SC SC VI.1 if both of the following apply:
 - a. The calendar year combined actual emissions of either PM, PM10, CO2, and CO_{2e} exceed the baseline actual emissions (BAE) by a significant amount, and
 - b. The calendar year combined actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each emission unit included in the Hybrid Test used for FG-MATSPROJECT-BR and FG-MATSPROJECT-SC.

The report shall contain the name, address, and telephone number of the facility; the annual emissions as calculated pursuant to FG-MATSPROJECT-BR and FG-MATSPROJECT-SC; and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² **(R 336.2818)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

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E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQs	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

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Appendix 2-BR. 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-BR. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-BOILERS-BR.

1. Continuous Emission Monitoring Systems (SO₂)

The Continuous Emissions Monitoring Systems (CEMS) performance specifications defined in 40 CFR Part 75, Appendix B are adopted. The Certified SO₂ monitors will be used to determine sulfur dioxide emissions. The data reduction procedures defined in R 336.2175 will be used to convert SO₂ emission monitoring data in parts per million to pounds SO₂/MM BTU. After the last day of each calendar month, the CEMS data recording system will generate and record a monthly average (pounds SO₂/MM BTU) from validated data reported for Part 75 for the previous month.

2. Continuous Emissions Monitoring System (Title IV)

The CEMS performance specifications defined in 40 CFR Part 75, Appendix B are adopted.

Methods of measurement, frequency of measurement and record keeping methods for CEMS required under 40 CFR 75 are outlined in the most recent version of the Acid Rain Program - Belle River Monitoring Plan.

Data Reporting: AQD may approve alternative data reporting or reduction procedures if it can be demonstrated that such procedures are at least as accurate as the procedures identified in R 336.2175.

3. Continuous Opacity Monitoring Systems

The permittee shall conduct an annual audit of the Continuous Opacity Monitoring System (COMS) The COMS performance specifications defined in 40 CFR Part 60, Appendix B are adopted. **(R 336.1213(3))**

Cycling time for opacity: complete a minimum of one cycle of sampling/analysis for each successive 10-second period and one cycle of data recording for each successive 6-minute period. **(R 336.2152)**

Zero and Drift: The COMS must be subject to the manufacturer's zero and span check at least once daily. **R 336.2153)**

Location: The location of the COMS or the monitoring devices must be such that representative measurement of emissions or process parameters are obtained. **(R 336.2155)**

Alternative Systems: AQD may approve the use of an alternative monitoring system if one is available that meets COMS objectives and if, because of physical limitations or other reasons, COMS cannot be installed or give accurate measurements. **(R 336.2159)**

Monitoring and reporting requirements shall not apply during any period of monitoring system malfunction if it can be demonstrated to the satisfaction of AQD that the cause of the malfunction could not have been avoided by any reasonable action and necessary repairs are being made as expeditiously as practicable. **(R 336.2190)**

Appendix 4-BR. Recordkeeping

4.1

Recordkeeping Provisions for PSD Source Using

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Expiration Date: July 15, 2020

PTI No.: MI-PTI-B2796-2015c

Hybrid Applicability Test

All information in this Appendix shall be maintained pursuant to R 336.2818 and 40 CFR 52.21 (r)(6)(i) for 10 years after the REF Technology becomes operational, and shall be provided to both the AQD Permit Section Supervisor and the AQD District Supervisor for the first year and thereafter made available to the Department upon request.

A. Project Description:

The project is to install new sorbent technology which uses REF sorbent solution as a fuel additive to reduce mercury, nitrogen oxides and sulfur dioxide emissions. These changes include installation of liquid storage tanks, solid storage silo, day bins, screw feeders and pug mills, existing and new conveyors and other material handling equipment so that coal can be treated with this sorbent material processed in FG-REF-BRFC and before being burned in FG-BOILERS-BR at Belle River Power Plant.

B. Applicability Test Description: Minor modifications are not subject to PSD. Actual to projected actual hybrid applicability test as described in the table below will be used to demonstrate that PSD does not apply to these modifications.

C. Emission Limitations

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions	Excluded Emissions	
FG-REF-BRFC and FG-BOILERS-BR	PM	210	230.63	12.3	FG-REF-BRFC and FG-BOILERS-BR were capable of accommodating emissions up to 12.3 TPY. The projected emission increase of 8.33 tpy is less than significant level of 22.5 tpy (90% of the significant level of 25 tpy).
FG-REF-BRFC and FG-BOILERS-BR	PM10	141	155.38	8	FG-REF-BRFC and FG-BOILERS-BR were capable of accommodating emissions up to 8 TPY. The projected emission increase of 6.38 tpy is less than significant level of 13.5 tpy (90% of the significant level of 15 tpy).
FG-REF-BRFC and FG-BOILERS-BR	PM2.5	61	69.86	3.5	FG-REF-BRFC and FG-BOILERS-BR were capable of accommodating emissions up to 3.5 TPY. The projected emission increase of 5.36 tpy is less than significant level of 9 tpy (90% of the significant level of 10 tpy).

D. Netting Calculations and Discussion: NA

4.2

Project Emissions for FG-MATSPROJECT

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All information in this Appendix shall be maintained pursuant to R 336.2818(3) for 5 years after the emission units identified in Table C resume normal operation.

A. Project Description

DTE Energy is proposing to install Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI) air quality control systems on the Belle River Units 1 and 2, and on the St. Clair Units 1, 2, 3, 4, 6, and 7 as part of the proposed MATS Compliance Project (the project). The use of DSI to control acid gas emissions is also expected to reduce PM, PM10, PM2.5, and NOx emissions from these units. However, the reaction products from the use of DSI will include carbon dioxide (CO2) which is a greenhouse gas (GHG) and a regulated pollutant under the Michigan New Source Review (NSR) program.

B. Applicability Test Description

DTE Energy has demonstrated that the proposed project will not cause a significant emissions increase to the source using the Hybrid Test. The Combined St. Clair and Belle River Project Emissions Change equals the Combined St. Clair and Belle River Projected Actual Emissions (PAE) minus the existing units Combined Baseline Actual Emissions (BAE) plus new units Potential Emissions, as described in R 336.2802(4)(e). Existing emission units are included in FG-DSI/ACI-BR and FG-DSI/ACI-SC and new emissions units are included in FG-ISLANDS-BR and FG-ISLANDS-SC.

C. Emissions Table

Pollutant	FG-DSI/ACI-BR, FG-DSI/ACI-SC and Effected Emission Units			FG-ISLANDS-BR, FG-ISLANDS-SC
	Combined Baseline Actual Emissions (tpy)	Combined Projected Actual Emissions (tpy)	Combined Excluded Emissions (tpy)	Combined Potential Emissions (tpy)
PM	735.1	739.1	0	9.7
PM10	1,362.7	1,364.7	1.0	8.8
CO2	16,189,473.3	16,237,089.0	47,615.7	0
CO2e	16,312,916.3	16,360,532.0	47,615.7	0

D. Netting Calculations and Discussion:

NA

Appendix 5-BR. 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.

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Appendix 6-BR. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B2796-2009a is being reissued as Source-Wide PTI No. MI-PTI-B2796-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
164-08C	201500008*	Refined emissions fuel project	EU-BOILER1-BR EU-BOILER2-BR

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B2796-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
18-14	201500074/ December 15, 2015	Incorporate PTI No. 18-14 into Sections 1 (St. Clair Power Plant) and 3 (Belle River Power Plant). This PTI is for installation of air emission control systems, Dry Sorbent Injection (DSI) and Activated Carbon Injection (ACI), on Belle River Units 1 and 2, and on St. Clair Units 1, 2, 3, 4, 6, and 7 as part of the proposed Mercury and Air Toxics Standards (MATS) in accordance with 40 CFR Part 63, Subpart UUUUU. Existing EGUs must comply with this subpart not later than April 16, 2015, unless they receive an extension (which DTE has received), then they must comply no later than April 16, 2016. DTE has received an extension and have also received a waiver to construct and have started construction.	FG-DSI/ACI-BR FG-ISLANDS-BR FG-MATSPROJECT-BR
NA	201500148/ June 16, 2016	Reopening to update from CAIR to CSAPR.	FG-BOILERS-BR

Appendix 7-BR. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 8-BR. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

For Belle River Boiler Nos. 1 and 2, the permittee shall comply with the reporting requirements of the Standards of Performance for New Sources (NSPS), Subparts A and D. The notification requirements are in addition to the monitoring requirements identified and referenced in FG-BOILERS-BR.

1. Notification requirements, per Section 60.7 of 40 CFR, Part 60, Subpart A:

- 60.7(a)(1) Notification of the date of construction or reconstruction of an affected facility is commenced, postmarked no later than 30 days after such date.
- 60.7(a)(2) Notification of the date or anticipated date of the initial startup of an affected facility, postmarked not more than 60 nor less than 30 days prior to such date.
- 60.7(a)(3) Notification of the actual date of the initial startup of an affected facility, postmarked within 15 days after such date.
- 60.7(a)(4) Notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in Section 60.14(e). This notice shall be postmarked 60 days (or as soon as practicable) before the change is commenced.

Notification of reconstruction activities per Section 60.15 of 40 CFR, Part 60, Subpart A:

- 60.15(d) If an owner or operator of an existing facility proposes to replace components and the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, notification of the proposed replacements, postmarked 60 days (or as soon as practicable) before the construction of the replacements is commenced.

2. Reporting requirements per 40 CFR, Part 60, Subpart D:

Excess emission (EE) reports and monitoring system performance (MPS) reports shall be submitted every quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter. Each EE and MPS report shall include the information required in 60.7(c). Periods of excess emission and monitoring system downtime shall be reported for the following:

- 1. Opacity: EE are defined as any 6-minute period during which the average opacity of emissions exceed 20% opacity, except that one 6-minute average per hour of up to 27% need not be reported.
- 2. SO₂: EE 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.
- 3. NO_x: EE are defined as any 3-hour period during which the average emissions (arithmetic average of 3 contiguous one-hour periods) of NO_x as measured by a CEMS exceeded the applicable standard under 60.44.

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Appendix 9-BR. Phase Two Acid Rain Permit



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

PHASE II ACID RAIN PERMIT Permit No. MI-AR-6034-2015

Permittee	Belle River Power Plant
Address	4505 King Road, East China Township, MI
SRN	B2796
ORIS code	6034
Issue Date	July 15, 2016
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-B2796-2015

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.

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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 Environment, Great Lakes, and Energy, 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 Environment, Great Lakes, and Energy
Air Quality Division, Jackson District Office
301 East Louis Glick Highway
Jackson, Michigan 49201-1556
Telephone: (517) 780-7843
Facsimile: (517) 780-7855

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

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Terms and Conditions:

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

		2015	2016	2017	2018	2019
Unit 1	SO ₂ allowances	18,536	18,536	18,536	18,536	18,536
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective from calendar years 2008 through 2012. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.27 lb/mmBtu. In addition, this unit shall not have an annual heat input less than 47,540,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

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Expiration Date: July 15, 2020

PTI No.: MI-PTI-B2796-2015c

Terms and Conditions: (continued)

		2015	2016	2017	2018	2019
Unit 2	SO ₂ allowances	18,801	18,801	18,801	18,801	18,801
	NO _x Emission Limits	<p>NO_x limit Pursuant to 40 CFR 76.11, the State of Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division approves a NO_x emissions averaging plan for this unit, effective from calendar years 2011 through 2020. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.27 lb/mmBtu. In addition, this unit shall not have an annual heat input less than 42,597,000 mmBtu.</p> <p>Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.</p> <p>In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.</p>				

		2015	2016	2017	2018	2019
Unit CTG 12-1	SO ₂ allowances	<p>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).</p>				

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Terms and Conditions: (continued)

		2015	2016	2017	2018	2019
Unit CTG 12-2	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).				

		2015	2016	2017	2018	2019
Unit CTG 13-1	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).				

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 December 11, 2013

Phase II NOx Compliance Plan submitted December 11, 2013

Phase II NOx Averaging Plan submitted March 29, 2013

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Facility (Source) Name (from STEP 1) Belle River Power Plant

Permit Requirements

STEP 3

Read the standard 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 source or unit, as appropriate, 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 source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; 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).

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Facility (Source) Name (from STEP 1) Belle River Power Plant

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Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

(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.

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 source 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 source 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

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Acid Rain - Page 4

Facility (Source) Name (from STEP 1) Belle River Power Plant

period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

- (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.
- (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.
- (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

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Facility (Source) Name (from STEP 1) Belle River Power Plant

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

Effect on Other Authorities, Cont'd.

STEP 3, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source 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;

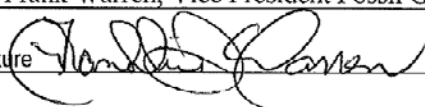
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4
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 Frank Warren, Vice President Fossil Generation	
Signature 	Date 11-1-2013

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United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 11/30/2012

Phase II NO_x Compliance Plan

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

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This submission is: New Revised

STEP 1

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

Plant Name Belle River Power Plant	State MI	ORIS Code 6034
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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# 1	ID# 2	ID#	ID#	ID#	ID#
Type DBW	Type DBW	Type	Type	Type	Type

(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(g) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(j) NO _x Averaging Plan (include NO _x Averaging form)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(k) Common stack pursuant to 40 CFR 76.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(l) Common stack pursuant to 40 CFR 76.17(a)(2)(i)(B) with NO _x Averaging (check the NO _x Averaging Plan box and include NO _x Averaging form)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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NO_x Compliance - Page 2
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Plant Name (from Step 1) Belle River Power Plant

STEP 2, cont'd.

ID# 1	ID# 2	ID#	ID#	ID#	ID#
Type DBW	Type DBW	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

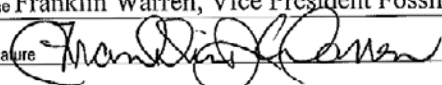
Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).

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 Franklin Warren, Vice President Fossil Generation	
Signature 	Date 11-1-2013

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Expiration Date: July 15, 2020

PTI No.: MI-PTI-B2796-2015c

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 11/30/2012



Phase II NO_x Averaging Plan

For more information, see instructions and refer to 40 CFR 76.11

Page 1

This submission is: New Revised

Page 1 of 3

STEP 1

Identify the units participating in this averaging plan by plant name, State, and boiler ID# from NADB. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. In column (b), assign an alternative contemporaneous annual emissions limitation (ACEL) in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue to page 3 if necessary.

Plant Name	State	ID#	(a) Emission Limitation	(b) ACEL	(c) Annual Heat Input Limit
BELLE RIVER	MI	1	0.46	0.27	47,540,000
BELLE RIVER	MI	2	0.46	0.27	42,597,000
HARBOR BEACH	MI	1	0.46	0.87	2,259,000
MONROE	MI	1	0.68	0.51	39,094,000
MONROE	MI	2	0.68	0.51	50,700,000
MONROE	MI	3	0.68	0.51	54,404,000
MONROE	MI	4	0.68	0.51	54,418,000
RIVER ROUGE	MI	2	0.40	0.39	17,392,000
RIVER ROUGE	MI	3	0.46	0.83	19,201,000

STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter.

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan

$$\frac{\sum_{i=1}^n (R_{ai} \times HI_i)}{\sum_{i=1}^n HI_i}$$

Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7

$$\frac{\sum_{i=1}^n (R_{bi} \times HI_i)}{\sum_{i=1}^n HI_i}$$

≤

Where,

- R_{ai} = Alternative contemporaneous annual emission limitation for unit i, in lb/mmBtu, as specified in column (b) of Step 1;
- R_{bi} = Applicable emission limitation for unit i, in lb/mmBtu, as specified in column (a) of Step 1;
- HI_i = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;
- n = Number of units in the averaging plan

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ROP No: MI-ROP-B2796-2015c

Expiration Date: July 15, 2020

PTI No.: MI-PTI-B2796-2015c

Plant Name (from Step 1) DTE Electric Company NO_x Averaging - Page 2

STEP 3

Mark one of the two options and enter dates.

[X] This plan is effective for calendar year 2011 through calendar year 2020 unless notification to terminate the plan is given.

[] Treat this plan as [] identical plans, each effective for one calendar year for the following calendar years: _____ and _____ unless notification to terminate one or more of these plans is given.

STEP 4

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Special Provisions

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO_x under the plan only if the following requirements are met:

- (i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and (a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan, (b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or (ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7. (iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

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.

Form with fields for Name (FRANKLIN D. WARREN, DESIGNATED REPRESENTATIVE), Signature (Franklin D. Warren), and Date (3/20/2013).

Section 3 – Belle River Power Plant

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 Expiration Date: July 15, 2020
 PTI No.: MI-PTI-B2796-2015c

United States
 Environmental Protection Agency
 Acid Rain Program

OMB No. 2060-0258
 Approval expires 11/30/2012



Phase II NO_x Averaging Plan

For more information, see instructions and refer to 40 CFR 76.11 Page 1

This submission is: New Revised Page 1 of 3

STEP 1

Identify the units participating in this averaging plan by plant name, State, and boiler ID# from NADB. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. In column (b), assign an alternative contemporaneous annual emissions limitation (ACEL) in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue to page 3 if necessary.

Plant Name	State	ID#	(a) Emission Limitation	(b) ACEL	(c) Annual Heat Input Limit
BELLE RIVER	MI	1	0.46	0.27	47,540,000
BELLE RIVER	MI	2	0.46	0.27	42,597,000
HARBOR BEACH	MI	1	0.46	0.87	2,259,000
MONROE	MI	1	0.68	0.51	39,094,000
MONROE	MI	2	0.68	0.51	50,700,000
MONROE	MI	3	0.68	0.51	54,404,000
MONROE	MI	4	0.68	0.51	54,418,000
RIVER ROUGE	MI	2	0.40	0.39	17,392,000
RIVER ROUGE	MI	3	0.46	0.83	19,201,000

STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter.

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan

$$\frac{\sum_{i=1}^n (R_{ai} \times HI_i)}{\sum_{i=1}^n HI_i}$$

Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7

$$\frac{\sum_{i=1}^n (R_{pi} \times HI_i)}{\sum_{i=1}^n HI_i}$$

≤

Where,

- R_{ai} = Alternative contemporaneous annual emission limitation for unit i, in lb/mmBtu, as specified in column (b) of Step 1;
- R_{pi} = Applicable emission limitation for unit i, in lb/mmBtu, as specified in column (a) of Step 1;
- HI_i = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;
- n = Number of units in the averaging plan

Section 3 – Belle River Power Plant

ROP No: MI-ROP-B2796-2015c

Expiration Date: July 15, 2020

PTI No.: MI-PTI-B2796-2015c

Plant Name (from Step 1) DTE Electric Company NO_x Averaging - Page 2

STEP 3

Mark one of the two options and enter dates.

[X] This plan is effective for calendar year 2011 through calendar year 2020 unless notification to terminate the plan is given.

[] Treat this plan as [] identical plans, each effective for one calendar year for the following calendar years; [] and [] unless notification to terminate one or more of these plans is given.

STEP 4

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Special Provisions

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO_x under the plan only if the following requirements are met:

- (i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and
(a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,
(b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or
(ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.
(iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

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.

FRANKLIN D. WARREN, DESIGNATED REPRESENTATIVE
Name
Signature Franklin D. Warren Date 3/20/2013

Appendix 10-BR. Transport Rule (TR) Trading Program Title V Requirements

Description of TR Monitoring Provisions

The TR subject units, and the unit-specific monitoring provisions, at this source are identified in the following tables. These units are subject to the requirements for the TR NO_x Annual Trading Program, TR NO_x Ozone Season Trading Program, and TR SO₂ Group 1 Trading Program, which are included below as Sections I, II, and III, respectively.

Each unit will use one of the following as the monitoring methodology for each parameter as provided below and shall comply with the general monitoring, recordkeeping, reporting and other requirements in conditions 1 through 5 below and in paragraph (b) of Sections I, II, and III:

- Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO₂ monitoring) and 40 CFR part 75, subpart H (for NO_x monitoring)
- Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
- Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E
- Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19
- EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E

Unit ID: 1	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B
NO _x	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart H
Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO ₂ monitoring) and 40 CFR part 75, subpart H (for NO _x monitoring)

Unit ID: 2	
Parameter	Monitoring Methodology
SO ₂	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B
NO _x	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart H
Heat Input	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO ₂ monitoring) and 40 CFR part 75, subpart H (for NO _x monitoring)

1. The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (TR NO_x Annual Trading Program), 97.530 through 97.535 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.635 (TR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable TR trading programs.
2. Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <http://www.epa.gov/airmarkets/emissions/monitoringplans.html>.
3. Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR part 75, subpart E and 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.

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4. Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and/or 97.630 through 97.634 (TR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
5. The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.634 (TR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.

SECTION I: TR NO_x Annual Trading Program requirements (40 CFR 97.406)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of TR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the TR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_x emissions requirements.

- (1) TR NO_x Annual emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall hold, in the source's compliance account, TR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR NO_x Annual units at the source.
 - (ii). If total NO_x emissions during a control period in a given year from the TR NO_x Annual units at a TR NO_x Annual source are in excess of the TR NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each TR NO_x Annual unit at the source shall hold the TR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and
 - (B). The owners and operators of the source and each TR NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.
- (2) TR NO_x Annual assurance provisions.

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- (i). If total NO_x emissions during a control period in a given year from all TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - (ii). The owners and operators shall hold the TR NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the State and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).
 - (iv). It shall not be a violation of 40 CFR part 97, subpart AAAAA or of the Clean Air Act if total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold TR NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.
- (3) Compliance periods.
- (i). A TR NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - (ii). A TR NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
- (i). A TR NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR NO_x Annual allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each TR NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart AAAAA.

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- (6) Limited authorization. A TR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the TR NO_x Annual Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A TR NO_x Annual allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_x Annual allowances in accordance with 40 CFR part 97, subpart AAAAA.
- (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each TR NO_x Annual 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart AAAAA.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_x Annual Trading Program.
- (2) The designated representative of a TR NO_x Annual source and each TR NO_x Annual unit at the source shall make all submissions required under the TR NO_x Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.

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

(g) Effect on other authorities.

No provision of the TR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NO_x Annual source or TR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

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Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION II: TR NO_x Ozone Season Trading Program Requirements (40 CFR 97.506)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.513 through 97.518.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.530 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.531 (initial monitoring system certification and recertification procedures), 97.532 (monitoring system out-of-control periods), 97.533 (notifications concerning monitoring), 97.534 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.535 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.530 through 97.535 shall be used to calculate allocations of TR NO_x Ozone Season allowances under 40 CFR 97.511(a)(2) and (b) and 97.512 and to determine compliance with the TR NO_x Ozone Season emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.530 through 97.535 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_x emissions requirements.

- (1) TR NO_x Ozone Season emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, TR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.524(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR NO_x Ozone Season units at the source.
 - (ii). If total NO_x emissions during a control period in a given year from the TR NO_x Ozone Season units at a TR NO_x Ozone Season source are in excess of the TR NO_x Ozone Season emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each TR NO_x Ozone Season unit at the source shall hold the TR NO_x Ozone Season allowances required for deduction under 40 CFR 97.524(d); and
 - (B). The owners and operators of the source and each TR NO_x Ozone Season unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBB and the Clean Air Act.
- (2) TR NO_x Ozone Season assurance provisions.
 - (i). If total NO_x emissions during a control period in a given year from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.525(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.525(b), of multiplying—

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- (A). The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and
- (B). The amount by which total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
- (ii). The owners and operators shall hold the TR NO_x Ozone Season allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season trading budget under 40 CFR 97.510(a) and the state's variability limit under 40 CFR 97.510(b).
- (iv). It shall not be a violation of 40 CFR part 97, subpart BBBBBB or of the Clean Air Act if total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
- (v). To the extent the owners and operators fail to hold TR NO_x Ozone Season allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR NO_x Ozone Season allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBBB and the Clean Air Act.
- (3) Compliance periods.
 - (i). A TR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.
 - (ii). A TR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
 - (i). A TR NO_x Ozone Season allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR NO_x Ozone Season allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR NO_x Ozone Season allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR NO_x Ozone Season allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each TR NO_x Ozone Season allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart BBBBBB.
- (6) Limited authorization. A TR NO_x Ozone Season allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the TR NO_x Ozone Season Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, subpart BBBBBB, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

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(7) Property right. A TR NO_x Ozone Season allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_x Ozone Season allowances in accordance with 40 CFR part 97, subpart BBBBB.
- (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.530 through 97.535, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.506(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.516 for the designated representative for the source and each TR NO_x Ozone Season 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.516 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart BBBBB.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_x Ozone Season Trading Program.
- (2) The designated representative of a TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall make all submissions required under the TR NO_x Ozone Season Trading Program, except as provided in 40 CFR 97.518. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.

- (1) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season source or the designated representative of a TR NO_x Ozone Season source shall also apply to the owners and operators of such source and of the TR NO_x Ozone Season units at the source.
- (2) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season unit or the designated representative of a TR NO_x Ozone Season unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the TR NO_x Ozone Season Trading Program or exemption under 40 CFR 97.505 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NO_x Ozone Season source or TR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION III: TR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)**(a) Designated representative requirements.**

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of TR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the TR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) SO₂ emissions requirements.

- (1) TR SO₂ Group 1 emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all TR SO₂ Group 1 units at the source.
 - (ii). If total SO₂ emissions during a control period in a given year from the TR SO₂ Group 1 units at a TR SO₂ Group 1 source are in excess of the TR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each TR SO₂ Group 1 unit at the source shall hold the TR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and
 - (B). The owners and operators of the source and each TR SO₂ Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR part 97, subpart CCCC and the Clean Air Act.
- (2) TR SO₂ Group 1 assurance provisions.
 - (i). If total SO₂ emissions during a control period in a given year from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—

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- (A). The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and
- (B). The amount by which total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
- (ii). The owners and operators shall hold the TR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
- (iv). It shall not be a violation of 40 CFR part 97, subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
- (v). To the extent the owners and operators fail to hold TR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR SO₂ Group 1 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart CCCCC and the Clean Air Act.
- (3) Compliance periods.
 - (i). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
 - (ii). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
 - (i). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each TR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart CCCCC.
- (6) Limited authorization. A TR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the TR SO₂ Group 1 Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A TR SO₂ Group 1 allowance does not constitute a property right.

(d) Title V permit revision requirements.

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- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR SO₂ Group 1 allowances in accordance with 40 CFR part 97, subpart CCCCC.
- (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR part 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each TR SO₂ Group 1 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart CCCCC.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR SO₂ Group 1 Trading Program.
- (2) The designated representative of a TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall make all submissions required under the TR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.

- (1) Any provision of the TR SO₂ Group 1 Trading Program that applies to a TR SO₂ Group 1 source or the designated representative of a TR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the TR SO₂ Group 1 units at the source.
- (2) Any provision of the TR SO₂ Group 1 Trading Program that applies to a TR SO₂ Group 1 unit or the designated representative of a TR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the TR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR SO₂ Group 1 source or TR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

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SECTION 4 – BELLE RIVER, PEAKERS

LOCATED AT

4505 King Road
China Township, Michigan 48054

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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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. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following: **(R 336.1301(1))**
 - 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.

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

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(5))**

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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.

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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))**

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- 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))**

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Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaiming, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

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

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

Footnotes:

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

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

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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.

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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 C-4

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-DG11-1-BP	DG 11-1, diesel fuel-fired, 2.5 MW peaking unit, "limited-use" per 40CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	11-01-1969	FG-DIESEL-BP
EU-DG11-2-BP	DG 11-2, diesel fuel-fired, 2.5 MW peaking unit, "limited-use" per 40CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	11-01-1969	FG-DIESEL-BP
EU-DG11-3-BP	DG 11-3, diesel fuel-fired, 2.5 MW peaking unit, "limited-use" per 40CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	11-01-1969	FG-DIESEL-BP
EU-DG11-4-BP	DG 11-4, diesel fuel-fired, 2.5 MW peaking unit, "limited-use" per 40CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	11-01-1969	FG-DIESEL-BP
EU-DG11-5-BP	DG 11-5, diesel fuel-fired, 2.5 MW peaking unit, "limited-use" per 40CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE)	11-01-1969	FG-DIESEL-BP
EU-CTG12-1-BP	CTG 12-1. Belle River 82.4 MW nominally rated natural gas-fired simple cycle peaking combustion turbine generator. Equipped with dry low-NOx burner. (PTI No. 177-07A)	01-01-1999 07-23-2001	FG-CTG-BP
EU-CTG12-2-BP	CTG 12-2. Belle River 82.4 MW nominally rated natural gas-fired simple cycle peaking combustion turbine generator. Equipped with dry low-NOx burner. (PTI No. 177-07A)	01-01-1999 07-23-2001	FG-CTG-BP
EU-CTG13-1-BP	CTG 13-1. Belle River 82.4 MW nominally rated natural gas-fired simple cycle peaking combustion turbine generator. Equipped with dry low-NOx burner. (PTI No. 177-07A)	01-01-1999 07-23-2001	FG-CTG-BP

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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 D-4

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-DIESEL-BP	(5) diesel fuel-fired. "limited-use", per 40CFR 63.6590(b)(3)(iv) stationary reciprocating internal combustion engine (RICE), peaking units each rated at 2.5 MW	EU-DG11-1-BP EU-DG11-2-BP EU-DG11-3-BP EU-DG11-4-BP EU-DG11-5-BP
FG-CTG-BP	Three (3) Belle River natural gas-fired, simple cycle combustion turbine generator peaking units. Each equipped with dry low-NOx burners nominally rated at 82.4 megawatts at ISO conditions. (PTI No. 177-07A)	EU-CTG12-1-BP EU-CTG12-2-BP EU-CTG13-1-BP

**FG-DIESEL-BP
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

(5) Diesel fuel-fired. “limited-use” per 40CFR 63.6590(b)(3)(iv), stationary reciprocating internal combustion engine (RICE), peaking units each rated at 2.5 MW

Emission Units:

- EU-DG11-1-BP DG 11-1. Peaking diesel generator located at Belle River Power Plant
- EU-DG11-2-BP DG 11-2. Peaking diesel generator located at Belle River Power Plant
- EU-DG11-3-BP DG 11-3. Peaking diesel generator located at Belle River Power Plant
- EU-DG11-4-BP DG 11-4. Peaking diesel generator located at Belle River Power Plant
- EU-DG11-5-BP DG 11-5. Peaking diesel generator located at Belle River Power Plant

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
1. #2 Fuel Oil	0.7% sulfur by weight with heat value of 19,502 BTUs/lb ² . *	As-fired	DG 11-1 to DG 11-5	SC VI.4	R 336.1201(3)

* This is equivalent to 0.72 lb SO₂/mmBTU of heat input.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. After May 3, 2013, the permittee shall not operate each diesel generator in FG-DIESEL-BP for more than 99 hours per calendar year. **(40 CFR 63.6590(b)(3)(iv), 40 CFR 63.6675)**
2. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. **(40 CFR 63.6605(b), R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

NA

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VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall keep a record of the dates when the peaking units are in use. (R 336.1213(3))
2. The permittee shall keep a record of the total operating hours for each of the diesel generators, based on a calendar year. (R 336.1213(3))
3. The permittee shall conduct visible emissions observation of the diesel generators at least once per day when the generators are operating continuously for 24 hours or more. The permittee shall initiate corrective action upon observation of excessive visible emissions and shall keep a written record of each required observation and corrective action. (R 336.1213(3))
4. The permittee shall maintain a complete record of fuel oil specifications and/or fuel analysis for each delivery, or storage tank, of fuel oil used for the diesel generators. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. (R 336.1213(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))

See Appendix 8-BP

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. SV507-031	32 ²	20 ²	R 336.1201(3)
2. SV507-027	32 ²	20 ²	R 336.1201(3)
3. SV507-023	32 ²	20 ²	R 336.1201(3)
4. SV507-019	32 ²	20 ²	R 336.1201(3)
5. SV507-015	32 ²	20 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40CFR Part 63, Subpart A and Subpart ZZZZ, for stationary reciprocating internal combustion engine (RICE), upon start-up. (40 CFR Part 63, Subparts A and ZZZZ)

Footnotes:

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

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

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FG-CTG-BP FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Three (3) natural gas-fired simple cycle combustion turbine generator (CTG) peaking units each nominally rated at 82.4 MW located at Belle River Power Plant. The combustion turbines are equipped with dry low-NOx burners.

Emission Unit:

EU-CTG12-1-BP CTG 12-1. Natural gas-fired combustion turbine generator located at Belle River Power Plant
 EU-CTG12-2-BP CTG 12-2. Natural gas-fired combustion turbine generator located at Belle River Power Plant
 EU-CTG13-1-BP CTG 13-1. Natural gas-fired combustion turbine generator located at Belle River Power Plant

POLLUTION CONTROL EQUIPMENT

Dry Low-NOx Burners

I. EMISSION LIMIT(S)

Pollutant	Limit ^a	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	9 ppm by volume at 15% oxygen & on a dry gas basis ²	Average of all operating hours in a calendar day	Each combustion turbine	SC V.1 and Appendix 7-BP	R 336.1205(1)(a) & (b), 40 CFR 52.21(j), 40 CFR 60.332(a)(1)
	230 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month	FG-CTG-BP	SC V.1 and Appendix 7-BP	R 336.1205(1)(a) & (b), 40 CFR 52.21(j)
2. CO	25 ppm by volume at 15% oxygen & on a dry gas basis ²	Average of all operating hours in a calendar day	Each combustion turbine	SC V.2 and Appendix 7-BP	R 336.1205(1)(a) & (b), 40 CFR 52.21(j)
	382 tons per year	Based on a rolling 12-month period, as determined at the end of each month	FG-CTG-BP	SC V.2 and Appendix 7-BP	R 336.1205(1)(a) & (b), 40 CFR 52.21(j)
3. PM-10	9 pounds per hour ²	Average of all operating hours in a calendar day ²	Each combustion turbine	SC V.3 and Appendix 7-BP	R 336.1205(1)(a) & (b), 40 CFR 52.21(j)
	50.4 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month	FG-CTG-BP	SC V.3 and Appendix 7-BP	R 336.1205(1)(a) & (b), 40 CFR 52.21(j)
4. Opacity	10%, except for uncombined water vapor ^{2, b}	6-minute average	Each combustion turbine	SC V.5	R 336.1301(1)(c), 40 CFR 52.21

^aLimits do not include startup, shutdown, and malfunction conditions.

^bOpacity limit shall not include periods of startup and shutdown.

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II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	13,600 MM Cu. Ft. ²	Based on a rolling 12- month period, as determined at the end of each month ²	FG-CTG-BP	SC VI.4	R 336.1205(1)(a) & (b), 40 CFR 52.21(j)
2. Sulfur in Natural Gas	0.8 grain per 100 standard cu. ft. ²	As-fired	FG-CTG-BP	SC III.1	R 336.1225, R 336.1702(a), 40 CFR 52.21, 40 CFR 60.333(b)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only burn pipeline quality natural gas in each turbine.² (R 336.1225, R 336.1702(a), 40 CFR 52.21, 40 CFR 60.333(b))
2. The total hours for startup and shutdown for FG-CTG-BP shall not exceed 500 hours per turbine per 12-month rolling time period as determined at the end of each calendar month. Startup is defined as the period of time from initiation of combustion firing until the unit reaches steady state operation (e.g., when premix operating mode is achieved). Shutdown is defined as that period of time from the initial lowering of the turbine output, with the intent to shut down, until the point at which the combustion process has stopped.² (40 CFR 52.21 (j))
3. The permittee shall not operate FG-CTG-BP unless all provisions of the Federal Prevention of Significant Deterioration regulations, 40 CFR 52.21, are met.² (40 CFR 52.21)
4. The permittee shall maintain and implement the approved “Emission Minimization Plan” describing how emissions will be minimized during startup(s), shutdown(s) and malfunction(s). The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. Alternative plans or modifications to the approved plan must be approved by the District Supervisor.² (R 336.1911, R 336.1912, 40 CFR 52.21)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each turbine with a dry low-NOx combustor.² (R 336.1910, 40 CFR 52.21(j))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. In accordance with 40 CFR 75, Appendix E, NOx emission rates (ppmv) from each turbine will be verified at least once every 20 calendar quarters. The permittee shall perform NOx testing for at least four (4) approximately equally spaced operating load points, ranging from the maximum operating load to the minimum operating load. Testing procedures shall be in accordance with the applicable federal Reference Methods, 40 CFR Part 60, Appendix A. This test satisfies the NOx performance test requirements of 40 CFR 60, Subparts A and GG.² (40 CFR 60.8 & 60.335, 40 CFR 75 Appendix E2.2)
2. The permittee shall conduct CO emission rate testing for each turbine in conjunction with NOx testing and under the same test averaging period requirements. CO emissions testing will be conducted at two operating load points, one at maximum load and one other mid load. (R 336.1213(3))
3. Verification of PM-10 emission rates from each turbine by testing, at owner’s expense, in accordance with Department requirements will be required. The permittee shall verify PM-10 emission rates from each turbine once every 5 years. Testing procedures shall be in accordance with the applicable federal Reference Methods,

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40 CFR 60, Appendix A. Testing must be done for each turbine at 70% and 100% of base load.² **(R 336.2001, R 336.2003, R 336.2004)**

4. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. 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 336.1331, R 336.2001, R 336.2003, R 336.2004)**
5. The permittee shall conduct federal Reference Method 9 visible emissions reading for each turbine at least once per 1200 hours of operation.² **(R 336.1301, 40 CFR 52.21)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. For each turbine, the permittee shall keep a record of federal Reference Method 9 visible emissions reading conducted at least once per 1200 hours of operation.² **(R 336.1301, 40 CFR 52.21)**
2. For each turbine, the permittee shall keep records of calendar day average (lbs/hr for PM-10, and ppmv for NOx and CO), monthly and previous 12-month NOx, CO and PM-10 emission calculations.² **See Appendix 7-BP. (R 336.1205((1)(a) & (b)), 40 CFR 52.21, 40 CFR 60 Subpart GG)**
3. The permittee shall monitor the nitrogen content in the fuel in accordance with 40 CFR 60.334(h)(2) if an allowance for fuel bound nitrogen is claimed.² **(40 CFR 60.334(h)(2))**
4. For each turbine, the permittee shall continuously monitor and record hourly the natural gas usage in a manner and with instrumentation acceptable to the AQD District Supervisor.² **(R 336.1205(1)(a) & (b), 40 CFR 52.21)**
5. For each turbine, the permittee shall keep records of hours of startup and shutdown.² **(40 CFR 52.21(j))**
6. For each turbine, the permittee shall monitor and record the capacity factor for each calendar year. If the capacity factor for each individual turbine exceeds 20% in any calendar year or exceeds 10% averaged over the three previous calendar years, a continuous monitor for nitrogen dioxide must be installed, certified, and operated no later than December 31 of the following calendar year.² **(40 CFR 75.12(d)(2))**
7. Monitoring and recording of emissions and operating information for FG-CTG-BP is required to comply with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A, and Subpart GG, 60.334.² **(40 CFR 60.334)**
8. On or before December 31, 2019, the permittee shall install, calibrate, maintain, and operate devices or equipment to monitor and record the NOx emissions and oxygen (O₂) or (CO₂) content of the exhaust gas from each turbine in FG-CTG-BP on a continuous basis, and to meet the timelines and reporting requirements as described in Appendix 3-BP. **(R 336.1213(3), 40 CFR 75.12(d)(2), 40 CFR 72.12(c), 40 CFR Part 75 Appendix F)**
9. The Continuous Emission Monitoring System (CEMS) shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 2 for NOx and PS 3 for O₂ or CO₂ of Appendix B to 40 CFR Part 60. **(R 336.1213(3), R 336.2150(1)(b), (d), and (e), 40 CFR 60.13)**

See Appendix 3-BP

VII. REPORTING

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

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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. Once CEMS are installed, the permittee shall report NO_x and either O₂ or CO₂ emissions in accordance with 40 CFR Part 75 within 30 days following the end of each calendar quarter. **(R 336.1213(3), 40 CFR 75.64)**
 5. Once CEMS are installed, in accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and the monitoring system performance summary report in an acceptable format to the AQD Technical Programs Unit and District Office – AQD District Supervisor, within 30 days following the end of each calendar quarter. The Monitoring System Performance Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:
 - a. A report of each exceedance above specified permit limits for NO_x. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b. A report of all periods of CEMS downtime and corrective action.
 - c. A report of the total operating time of each combustion turbine in FG-CTG-BP during the reporting period.
 - d. A report of any periods that the CEMS exceeds the instrument range.
 - e. If no exceedances or CEMS downtime occurred during the reporting period, the permittee shall report that fact.
- The permittee shall keep all monitoring data on file for a period of at least five years and make them available to the AQD upon request. **(R 336.1213(3), 40 CFR Part 60.7(c) and (d), 40 CFR 60.334)**
6. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CEMS set forth in Part 75, Appendix A and B. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD Technical Programs Unit and District Supervisor in a format acceptable to AQD. **(R 336.1213(3), 40 CFR Part 75 Appendix A and B)**
 7. Within 30 calendar days after commencement of trial operation of the CEMS, the permittee shall submit two copies of a Monitoring Plan to the AQD Technical Programs Unit and District Office, for review and approval. The Monitoring Plan shall include drawings or specifications showing proposed locations and descriptions of the required CEMS. **(R 336.1213(3), 40 CFR Part 75)**
 8. Within 150 calendar days after commencement of trial operation of the CEMS, the permittee shall submit two copies of a complete test plan for the CEMS to the AQD Technical Programs Unit and AQD District Supervisor for approval. **(R 336.1213(3))**
 9. Within 180 calendar days after commencement of trial operation, the permittee shall complete the installation and testing of the CEMS. **(R 336.1213(3))**
 10. Within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating the NO_x CEMS complies with the requirements of Performance Specification (PS) 2. **(R 336.1213(3), R 336.2156)**
 11. The permittee shall submit any performance test reports, including RATA reports, to the AQD Technical Programs Unit and AQD District Supervisor, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 3-BP, 7-BP and 8-BP

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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. SV-CTG13-1	228 x 108 ²	56 ²	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-CTG12-1	228 x 108 ²	56 ²	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-CTG12-2	228 x 108 ²	56 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR 60, Subparts A and GG, as they apply to FG-CTG-BP.² **(40 CFR 60, Subparts A and GG)**
2. The permittee shall conduct a visual inspection of the silencer elements associated with each turbine once each quarter that the turbine is operated. The visual inspection will evaluate whether or not silencer material has been lost due to operation of the turbines. If there is evidence that silencer material has been lost, the permittee shall notify the District Office of the positive results and take immediate action to replace the silencer elements. Records of the quarterly visual inspections shall be kept on file for a period of at least five years and made available to the AQD upon request. **(R 336.1213(3))**
3. 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-6034-2015 is hereby incorporated into this ROP as **Appendix 9-BP. (R 336.1299(2)(a))**
4. 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(2)(d) and 40 CFR Part 72.9(c)(1)(i). **(R 336.1299(2)(a), 40 CFR 72.9(c)(1)(i))**
5. The permittee shall comply with the provisions of the Transport Rule SO₂ Group 1 Trading Program, as specified in 40 CFR, Part 97, Subpart CCCCC, as they apply to EU-CTG12-1-BP, EU-CTG12-2-BP, and EU-CTG13-1-BP. **(40 CFR Part 97 Subpart CCCCC)**
6. The permittee shall comply with the provisions of the Transport Rule NO_x Annual Trading Program, as specified in 40 CFR, Part 97, Subpart AAAAA, as they apply to EU-CTG12-1-BP, EU-CTG12-2-BP, and EU-CTG13-1-BP. **(40 CFR Part 97 Subpart AAAAA)**
7. The permittee shall comply with the provisions of the Transport Rule NO_x Ozone Trading Program, as specified in 40 CFR, Part 97, Subpart BBBBB, as they apply to EU-CTG12-1-BP, EU-CTG12-2-BP, and EU-CTG13-1-BP. **(40 CFR Part 97 Subpart BBBBB)**

Footnotes:

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

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

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E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

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Appendix 2-BP. 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-BP. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-BR-CTG.

Continuous Emission Monitoring System

The CEMS performance specifications defined in 40 CFR Part 75, Appendix B are adopted.

Methods of measurement, frequency of measurement and recordkeeping methods for CEMS required under 40 CFR 75 are outlined in the most recent version of the Acid Rain Program – Belle River Peakers Monitoring Plan.

The data reduction procedures defined in 40 CFR 75.12(c) will calculate hourly, quarterly, and annual NOx emission rates (in lb/MMBtu) by combining the NOx concentration (in ppm), diluent concentration (in percent O₂ or CO₂), and percent moisture (if applicable) measurements according to the procedures in Appendix F of 40 CFR Part 75. Additionally, the CEMS shall ensure that the data obtained is directly correlated with the emission limits established in FGCTG-BP SC I.1.

The data conversion procedures defined in Appendix F in 40 CFR Part 75 will calculate the hourly heat input, MMBtu.

Appendix 4-BP. 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-BP. 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-BP. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

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Source-Wide PTI No MI-PTI-B2796-2009a is being reissued as Source-Wide PTI No. MI-PTI-B2796-2015.

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

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B2796-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
177-07A	201500058/ December 15, 2015	Incorporate PTI No. 177-07A into Section 4 (Belle River Peakers). The focus of this PTI relates to load ranges between 50 and 70 percent. The existing ROP (MI-ROP-B2796-2015) treats these loads as Startup/Shutdown/Malfunction (SSM) operating hours, with a maximum of 500 per year, per unit. Recent installation of automated governor controlled (AGC) systems on these generators provides control to the regional electrical system operator (MISO) to, likely, operate these units in this critical load range more frequently. DTE believes this supporting material justifies the operating conditions as steady state, not SSM.	EU-CTG12-1-BP EU-CTG12-2-BP EU-CTG13-1-BP FG-CTG-BP
NA	201500148/ June 16, 2016	Reopening to update from CAIR to CSAPR.	FG-CTG-BP

Appendix 7-BP. 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 FG-CTG-BP:

Natural gas usage is monitored continuously but recorded once per hour and tracked on a monthly basis.

The NO_x and CO calendar day ppmv limits are assured by the latest stack testing results. The worst-case concentration data (in ppmv) from the tested operating loads are compared to permit limits.

From stack testing, emission factors for CO and PM-10 are developed in lbs pollutant/million cubic feet of natural gas, for the corresponding loads specified in FG-CTG-BP SC V.2 (CO) and V.3 (PM-10). Emission factors for each pollutant are calculated using the worst-case emissions recorded during the last representative stack test on a pollutant-specific basis. The emission factors, along with the fuel monitoring requirement, shall be applied to each hour to ensure compliance with PM-10's calendar day average, and CO's and PM-10's rolling 12-month period emission limits.

From stack testing at the four load points, correlation curves are developed from NO_x emissions (lb/MM BTU) and heat input (MM BTU/hr) for each CTG. Consistent with Part 75, Appendix E, an hourly NO_x emission rate (lb/MM BTU) is applied to each operating hour. Each QA-QC validated hour either has the NO_x emission rate from the correlation curve applied or the appropriate substitute NO_x emission rate applied if the hour is outside operational and control equipment parameters, per Appendix E, section 2.5.2. The product of the hourly NO_x emission rates and heat inputs are aggregated monthly to report the tons of NO_x on a rolling 12-month basis.

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Once CEMS are installed, compliance with the NOx 12-month rolling time period will be determined using the hourly NOx emission rate (lb/MMBtu) and hourly heat rate (MMBtu/hr) values, described in Appendix 3-BP and 40 CFR Part 75 Appendix F indicated below:

Use the following procedures to convert continuous emission monitoring system measurements of NOX concentration (ppm) and diluent concentration (percentage) into NOX emission rates (in lb/mmBtu). Perform measurements of NOX and diluent (O2 or CO2) concentrations on the same moisture (wet or dry) basis.

When the NOX continuous emission monitoring system uses O2 as the diluent, and measurements are performed on a dry basis, use the following conversion procedure:

$$E = K C_h F \frac{20.9}{20.9 - \%O_2}$$

When the NOX continuous emission monitoring system uses CO2 as the diluent, use the following conversion procedure:

$$E = K C_h F_c \frac{100}{\%CO_2}$$

where:

K = 1.194×10^{-7} (lb/dscf)/ppm NOX.

E = Pollutant emissions during unit operation, lb/mmBtu.

Ch = Hourly average pollutant concentration during unit operation, ppm.

%O2, %CO2 = Oxygen or carbon dioxide volume during unit operation (expressed as percent O2 or CO2).

Appendix 8-BP. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, Part B of this appendix is not applicable.

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Appendix 9-BP. Phase Two Acid Rain Permit

The Acid Rain Permit No. MI-AR-6034-2015 for Section 4 Belle River, Peakers is included in Appendix 9-BR, Section 3 Belle River Power Plant.

Appendix 10-BP. Transport Rule (TR) Trading Program Title V Requirements

Description of TR Monitoring Provisions

The TR subject units, and the unit-specific monitoring provisions, at this source are identified in the following tables. These units are subject to the requirements for the TR NO_x Annual Trading Program, TR NO_x Ozone Season Trading Program, and TR SO₂ Group 1 Trading Program, which are included below as Sections I, II, and III, respectively.

Each unit will use one of the following as the monitoring methodology for each parameter as provided below and shall comply with the general monitoring, recordkeeping, reporting and other requirements in conditions 1 through 5 below and in paragraph (b) of Sections I, II, and III:

- Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO₂ monitoring) and 40 CFR part 75, subpart H (for NO_x monitoring)
- Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
- Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E
- Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19
- EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E

Unit ID: CTG121	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D

Unit ID: CTG122	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D

Unit ID: CTG131	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D

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1. The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (TR NO_x Annual Trading Program), 97.530 through 97.535 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.635 (TR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable TR trading programs.
2. Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <http://www.epa.gov/airmarkets/emissions/monitoringplans.html>.
3. Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR part 75, subpart E and 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
4. Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and/or 97.630 through 97.634 (TR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
5. The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.634 (TR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.

SECTION I: TR NO_x Annual Trading Program requirements (40 CFR 97.406)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of TR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the TR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430 through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

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(c) NO_x emissions requirements.

(1) TR NO_x Annual emissions limitation.

- (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall hold, in the source's compliance account, TR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR NO_x Annual units at the source.
- (ii). If total NO_x emissions during a control period in a given year from the TR NO_x Annual units at a TR NO_x Annual source are in excess of the TR NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each TR NO_x Annual unit at the source shall hold the TR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and
 - (B). The owners and operators of the source and each TR NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.

(2) TR NO_x Annual assurance provisions.

- (i). If total NO_x emissions during a control period in a given year from all TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
- (ii). The owners and operators shall hold the TR NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the State and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).
- (iv). It shall not be a violation of 40 CFR part 97, subpart AAAAA or of the Clean Air Act if total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
- (v). To the extent the owners and operators fail to hold TR NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control

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period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.

- (3) Compliance periods.
 - (i). A TR NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - (ii). A TR NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - (4) Vintage of allowances held for compliance.
 - (i). A TR NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR NO_x Annual allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
 - (5) Allowance Management System requirements. Each TR NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart AAAAA.
 - (6) Limited authorization. A TR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the TR NO_x Annual Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
 - (7) Property right. A TR NO_x Annual allowance does not constitute a property right.
- (d) Title V permit revision requirements.**
- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_x Annual allowances in accordance with 40 CFR part 97, subpart AAAAA.
 - (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).
- (e) Additional recordkeeping and reporting requirements.**
- (1) Unless otherwise provided, the owners and operators of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each TR NO_x Annual 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart AAAAA.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_x Annual Trading Program.
 - (2) The designated representative of a TR NO_x Annual source and each TR NO_x Annual unit at the source shall make all submissions required under the TR NO_x Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the

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responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.

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

(g) Effect on other authorities.

No provision of the TR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NO_x Annual source or TR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION II: TR NO_x Ozone Season Trading Program Requirements (40 CFR 97.506)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.513 through 97.518.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.530 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.531 (initial monitoring system certification and recertification procedures), 97.532 (monitoring system out-of-control periods), 97.533 (notifications concerning monitoring), 97.534 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.535 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.530 through 97.535 shall be used to calculate allocations of TR NO_x Ozone Season allowances under 40 CFR 97.511(a)(2) and (b) and 97.512 and to determine compliance with the TR NO_x Ozone Season emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.530 through 97.535 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_x emissions requirements.

- (1) TR NO_x Ozone Season emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, TR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.524(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR NO_x Ozone Season units at the source.
 - (ii). If total NO_x emissions during a control period in a given year from the TR NO_x Ozone Season units at a TR NO_x Ozone Season source are in excess of the TR NO_x Ozone Season emissions limitation set forth in paragraph (c)(1)(i) above, then:

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- (A). The owners and operators of the source and each TR NO_x Ozone Season unit at the source shall hold the TR NO_x Ozone Season allowances required for deduction under 40 CFR 97.524(d); and
 - (B). The owners and operators of the source and each TR NO_x Ozone Season unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBB and the Clean Air Act.
- (2) TR NO_x Ozone Season assurance provisions.
- (i). If total NO_x emissions during a control period in a given year from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.525(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.525(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and
 - (B). The amount by which total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - (ii). The owners and operators shall hold the TR NO_x Ozone Season allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season trading budget under 40 CFR 97.510(a) and the state's variability limit under 40 CFR 97.510(b).
 - (iv). It shall not be a violation of 40 CFR part 97, subpart BBBB or of the Clean Air Act if total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold TR NO_x Ozone Season allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR NO_x Ozone Season allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBB and the Clean Air Act.
- (3) Compliance periods.
- (i). A TR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.

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- (ii). A TR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
 - (i). A TR NO_x Ozone Season allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR NO_x Ozone Season allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR NO_x Ozone Season allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR NO_x Ozone Season allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each TR NO_x Ozone Season allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart BBBB.
- (6) Limited authorization. A TR NO_x Ozone Season allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the TR NO_x Ozone Season Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, subpart BBBB, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A TR NO_x Ozone Season allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_x Ozone Season allowances in accordance with 40 CFR part 97, subpart BBBB.
- (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.530 through 97.535, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.506(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.516 for the designated representative for the source and each TR NO_x Ozone Season 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.516 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart BBBB.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_x Ozone Season Trading Program.
- (2) The designated representative of a TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall make all submissions required under the TR NO_x Ozone Season Trading Program, except as provided in 40 CFR 97.518. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

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(f) Liability.

- (3) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season source or the designated representative of a TR NO_x Ozone Season source shall also apply to the owners and operators of such source and of the TR NO_x Ozone Season units at the source.
- (4) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season unit or the designated representative of a TR NO_x Ozone Season unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the TR NO_x Ozone Season Trading Program or exemption under 40 CFR 97.505 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NO_x Ozone Season source or TR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION III: TR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of TR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the TR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) SO₂ emissions requirements.

- (1) TR SO₂ Group 1 emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all TR SO₂ Group 1 units at the source.
 - (ii). If total SO₂ emissions during a control period in a given year from the TR SO₂ Group 1 units at a TR SO₂ Group 1 source are in excess of the TR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each TR SO₂ Group 1 unit at the source shall hold the TR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and
 - (B). The owners and operators of the source and each TR SO₂ Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same

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violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR part 97, subpart CCCCC and the Clean Air Act.

- (2) TR SO₂ Group 1 assurance provisions.
 - (i). If total SO₂ emissions during a control period in a given year from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and
 - (B). The amount by which total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - (ii). The owners and operators shall hold the TR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
 - (iv). It shall not be a violation of 40 CFR part 97, subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold TR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR SO₂ Group 1 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart CCCCC and the Clean Air Act.
- (3) Compliance periods.
 - (i). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
 - (ii). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
 - (i). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.

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- (ii). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each TR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart CCCCC.
- (6) Limited authorization. A TR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the TR SO₂ Group 1 Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A TR SO₂ Group 1 allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR SO₂ Group 1 allowances in accordance with 40 CFR part 97, subpart CCCCC.
- (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR part 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E), Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each TR SO₂ Group 1 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart CCCCC.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR SO₂ Group 1 Trading Program.
- (2) The designated representative of a TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall make all submissions required under the TR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

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Liability.

- (1) Any provision of the TR SO₂ Group 1 Trading Program that applies to a TR SO₂ Group 1 source or the designated representative of a TR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the TR SO₂ Group 1 units at the source.
- (2) Any provision of the TR SO₂ Group 1 Trading Program that applies to a TR SO₂ Group 1 unit or the designated representative of a TR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.

(f) Effect on other authorities.

No provision of the TR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR SO₂ Group 1 source or TR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

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SECTION 5 – DTE Electric Company – Dean Peakers

LOCATED AT

4490 North River Road
East China, Michigan 48054

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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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. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following: **(R 336.1301(1))**
 - 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.

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

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(5))**

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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.

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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))**

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- 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))**

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Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

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

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

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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 C-5

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-CTG01-DP	CTG Unit 1. DTE Energy Services (DTEES) natural gas-fired, simple-cycle combustion turbine generator with dry low-NOx burner peaking unit nominally rated at 82.4 megawatts at ISO conditions.	04-21-2002	FG-CTG-DP
EU-CTG02-DP	CTG Unit 2. DTEES natural gas- fired, simple-cycle combustion turbine generator with dry low-NOx burner peaking unit nominally rated at 82.4 megawatts at ISO conditions.	05-04-2002	FG-CTG-DP
EU-CTG03-DP	CTG Unit 3. DTEES natural gas- fired, simple-cycle combustion turbine generator with dry low-NOx burner peaking unit nominally rated at 82.4 megawatts at ISO conditions.	05-10-2002	FG-CTG-DP
EU-CTG04-DP	CTG Unit 4. DTEES natural gas- fired, simple-cycle combustion turbine generator with dry low-NOx burner peaking unit nominally rated at 82.4 megawatts at ISO conditions	05-13-2002	FG-CTG-DP

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 D-5

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-CTG-DP	Four (4) DTE Energy Services natural gas-fired, simple cycle combustion turbine generator with dry low-NOx burner peaking units rated nominally at 82.4 megawatts at ISO conditions.	EU-CTG01-DP EU-CTG02-DP EU-CTG03-DP EU-CTG04-DP

**FG-CTG-DP
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Four (4) DTE Energy Services (DTEES) natural gas-fired simple cycle combustion turbine generator peaking units each nominally rated at 82.4 MW at ISO conditions. Peak mode means operation is above the nominally rated capacity of the turbine, as specified by equipment manufacturer, to supply additional output on a short-term basis with the potential for greater than normal wear on the turbine and increased frequency for periodic inspection and maintenance of the turbine. Base mode means operating at 100 percent load based on ambient temperature conditions. Combustion turbines are equipped with dry low-NOx burners.

Emission Unit:

EU-CTG01-DP CTG Unit 1. DTEES natural gas-fired combustion turbine generator
 EU-CTG02-DP CTG Unit 2. DTEES natural gas-fired combustion turbine generator
 EU-CTG03-DP CTG Unit 3. DTEES natural gas-fired combustion turbine generator
 EU-CTG04-DP CTG Unit 4. DTEES natural gas-fired combustion turbine generator

POLLUTION CONTROL EQUIPMENT

Dry Low-NOx Burners.

I. EMISSION LIMIT(S)

Pollutant	Limit ^a	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	9 ppm by volume at 15% oxygen & on a dry gas basis ²	Base load, average of all operating hours in a calendar day	Each turbine	SC V.1 & V.2, and Appendix 7-DP	R 336.1205(1(a) & (b), 40 CFR 52.21(j), 40 CFR 60.332(a)(1)
	21 ppm by volume at 15% oxygen & on a dry gas basis ²	Peak mode, average of all operating hours in a calendar day	Each turbine	SC V.1 & V.2, and Appendix 7-DP	R 336.1205(1(a) & (b), 40 CFR 52.21(j), 40 CFR 60.332(a)(1)
	230 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month	FG-CTG-DP	SC V.1 & V.2 and Appendix 7-DP	R 336.1205(1(a) & (b), 40 CFR 52.21(j)
2. CO	25 ppm by volume at 15% oxygen & on a dry gas basis ²	Average of all operating hours in a calendar day ²	Each turbine	SC V.3 and Appendix 7-DP	R 336.1205(1((a) & (b), 40 CFR 52.21(j)
	350 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month	FG-CTG-DP	SC V.3 and Appendix 7-DP	R 336.1205(1((a) & (b), 40 CFR 52.21(j)
3. PM-10	9.0 pounds per hour ²	Average of all operating hours in a calendar day	Each turbine	SC V.4 and Appendix 7-DP	R 336.1205(1((a) & (b), 40 CFR 52.21(j)
	46.4 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month	FG-CTG-DP	SC V.4 and Appendix 7-DP	R 336.1205(1((a) & (b), 40 CFR 52.21(j)

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Pollutant	Limit ^a	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
4. HCOH	4.5 tons per year ²	Based on a rolling 12-month period, as determined at the end of each month	FG-CTG-DP	SC V.5	R 336.1205(2)
5. Opacity	10%, except for uncombined water vapor ^{2, b}	6-minute average	Each turbine	SC V.7	R 336.1301 40 CFR 52.21
6. Sulfur in Natural Gas	0.8 grain per 100 standard cu. ft. ²	As-fired	FG-CTG-DP	SC III.1	R 336.1225, R 336.1702(a) 40 CFR 52.21 40 CFR 60.333(b)

^a Limits do not include startup, shutdown, and malfunction conditions.²
^b Opacity limit shall not include periods of startup and shutdown.²

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	12,400 MMCF ²	Based on a rolling 12-month period, as determined at the end of each month	FG-CTG-DP	Section VI.10	R 336.1205(1(a) & (b), 40 CFR 52.21(j))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only burn pipeline quality natural gas in each turbine.² **(R 336.1225, R 336.1702(a), 40 CFR 52.21, 40 CFR 60.333(b))**
2. The permittee shall operate not the turbines at base load for more than a total of 12,400 hours per 12-month rolling time period as determined at the end of each calendar month.² **(R 336.1205(1)(a) & (b), 40 CFR 52.21(j))**
3. The permittee shall not operate the turbines at peak load for more than a total of 800 hours per 12-month rolling time period as determined at the end of each calendar month.² **(R 336.1205(1)(a) & (b), 40 CFR 52.21(j))**
4. The permittee must minimize the NOx, CO and PM-10 emission rates during startup and shutdown in accordance with the turbine manufacturer recommendations.² **(R 336.1912, 40 CFR 52.21(j))**
5. The total hours for startup and shutdown for FG-CTG DP shall not exceed 500 hours per turbine per 12-month rolling time period as determined at the end of each calendar month. Startup is defined as the period of time from initiation of combustion firing until the unit reaches steady state operation (i.e., loads greater than 65%). Shutdown is defined as that period of time from the initial lowering of the turbine output, with the intent to shut down, until the point at which the combustion process has stopped.² **(40 CFR 52.21(j))**
6. The permittee shall not operate FG-CTG-DP unless all provisions of the Federal Prevention of Significant Deterioration regulations, 40 CFR 52.21, are met.² **(40 CFR 52.21)**
7. The permittee shall maintain and implement the EGLE approved plan describing how emissions are minimized during startup(s), shutdown(s) and malfunction(s). The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. Alternative plans or modifications to the approved plan must be approved by the District Supervisor. Unless notified by the District Supervisor within 30 business days after plan submittal, the plan shall be deemed approved.² **(R 336.1911, R 336.1912, 40 CFR 52.21)**

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IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each turbine with a dry low-NOx combustor.² **(R 336.1910, 40 CFR 52.21(j))**

V. TESTING/SAMPLING

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

1. NOx emission rates (ppmv) from each turbine will be verified in accordance with 40 CFR 60, Subparts A and GG. Testing procedures shall be in accordance with the applicable federal Reference Methods, 40 CFR Part 60, Appendix A.² **(40 CFR 60.8 & 60.335)**
2. In accordance with 40 CFR 75, Appendix E, the permittee shall retest the NOx emission rate of each turbine at least once every 20 calendar quarters. The permittee shall perform NOx testing for at least four (4) approximately equally spaced operating load points, ranging from the maximum operating load to the minimum operating load. **(40 CFR 75, Appendix E2.2)**
3. CO emission rates from each turbine will be verified in accordance with Department requirements. Testing must be done for each turbine in conjunction with NOx testing and under the same operating load and test averaging period requirements.² **(R 336.2001, R 336.2003, R 336.2004)**
4. The permittee shall test PM-10 once every 3000 hours of operation per turbine during the first five years of operation, or at the anniversary mark, whichever comes first, and once every five years thereafter. Testing must be done for each turbine at 100% load conditions.² **(R 336.2001, R 336.2003, R 336.2004)**
5. Emission factors developed from previous stack tests at 65%, 100% and peak load conditions will be used along with hourly fuel usage data to demonstrate compliance with annual HCOH limits. **(R 336.2001, R 336.2003, R 336.2004, R 336.1213(3))**
6. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. 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 336.1331, R 336.2001, R 336.2003, R 336.2004)**
7. The permittee shall conduct federal Reference Method 9 visible emissions reading for each turbine at least once per 825 hours of operation.² **(R 336.1301, 40 CFR 52.21)**

VI. MONITORING/RECORDKEEPING

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

1. For each turbine, the permittee shall keep a record of federal Reference Method 9 visible emissions reading conducted at least once per 825 hours of operation.² **(R 336.1301, 40 CFR 52.21)**
2. The permittee shall keep records for each turbine operating in base mode, of the calendar day NOx emission calculations (ppmv NOx). All such records and calculations are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the AQD upon request. **See Appendix 7-DP. (R 336.1205(1)(a) & (b), 40 CFR 52.21(j), 40 CFR 60 Subpart GG)**
3. The permittee shall keep records for each turbine operating in peak mode, of the calendar day NOx emission calculations (ppmv NOx). All such records and calculations are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the AQD upon request. **See Appendix 7-DP. (R 336.1205(1)(a) & (b), 40 CFR 52.21(j), 40 CFR 60 Subpart GG)**
4. For each turbine, the permittee shall keep monthly records of hours of operation at base and peak loads.² **(R 336.1205(1)(a) & (b), 40 CFR 52.21(j))**

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5. For each turbine, the permittee shall keep records of the monthly and previous 12-month NOx emission calculations.² **See Appendix 7-DP. (R 336.1205((1)(a) & (b), 40 CFR 52.21, 40 CFR 60 Subpart GG)**
6. The permittee shall monitor the nitrogen content in the fuel in accordance with 40 CFR 60.334(h)(2) if an allowance for fuel bound nitrogen is claimed.² **(40 CFR 60.334(h)(2))**
7. For each turbine, the permittee shall keep records of the calendar day average (ppmv), monthly and previous 12-month CO emission calculations.² **See Appendix 7-DP. (R 336.1205(1)(a) & (b), 40 CFR 52.21)**
8. For each turbine, the permittee shall keep records of the calendar day average, monthly and previous 12-month PM-10 emission calculations.² **(R 336.1205(1)(a) & (b), 40 CFR 52.21)**
9. For each turbine, the permittee shall keep records of the monthly and previous 12-month HCOH emission calculations.² **(R 336.1205(2))**
10. For each turbine, the permittee shall continuously monitor and record the hourly natural gas usage in a manner and with instrumentation acceptable to the AQD District Supervisor.² **(R 336.1205(1)(a) & (b), 40 CFR 52.21)**
11. For each turbine, the permittee shall keep records of hours of startup and shutdown.² **(40 CFR 52.21(j))**
12. For each turbine, the permittee shall monitor and record the capacity factor for each calendar year. If the capacity factor for each individual turbine exceeds 20% in any calendar year or exceeds 10% averaged over the three previous calendar years, a continuous monitor for nitrogen dioxide must be installed, certified, and operated no later than December 31 of the following calendar year.² **(40 CFR 75.12(c)(2))**
13. Monitoring and recording of emissions and operating information for each turbine is required to comply with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A, and Subpart GG, 60.334. **(40 CFR 60.334 & CFR 75, Appendix E)**

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-DP

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. SV-TURBINE1	108 x 228 ²	56 ²	R 336.1225, 40CFR52.21(c) & (d)
2. SV-TURBINE2	108 x 228 ²	56 ²	R 336.1225, 40CFR52.21(c) & (d)
3. SV-TURBINE3	108 x 228 ²	56 ²	R 336.1225, 40CFR52.21(c) & (d)
4. SV-TURBINE4	108 x 228 ²	56 ²	R 336.1225, 40CFR52.21(c) & (d)

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IX. OTHER REQUIREMENT(S)

1. The permittee shall conduct a visual inspection of the silencer elements associated with each turbine once each quarter that the turbine is operated. The visual inspection will evaluate whether or not silencer material has been lost due to operation of the turbines. If there is evidence that silencer material has been lost, the permittee shall notify the District Office of the positive results and take immediate action to replace the silencer elements. Records of the quarterly visual inspections shall be kept on file for a period of at least five years and made available to the AQD upon request.² **(R 336.1213(3))**
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-55718-2015 is hereby incorporated into this ROP as **Appendix 9-DP. (R 336.1299(2)(a))**
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(2)(d) and 40 CFR Part 72.9(c)(1)(i). **(R 336.1299(2)(a), 40 CFR 72.9(c)(1)(i))**
4. The permittee shall comply with the provisions of the Transport Rule SO₂ Group 1 Trading Program, as specified in 40 CFR, Part 97, Subpart CCCCC, as they apply to EU-CTG01-DP, EU-CTG02-DP, EU-CTG03-DP, and EU-CTG04-DP. **(40 CFR Part 97 Subpart CCCCC)**
5. The permittee shall comply with the provisions of the Transport Rule NO_x Annual Trading Program, as specified in 40 CFR, Part 97, Subpart AAAAA, as they apply to EU-CTG01-DP, EU-CTG02-DP, EU-CTG03-DP, and EU-CTG04-DP. **(40 CFR Part 97 Subpart AAAAA)**
6. The permittee shall comply with the provisions of the Transport Rule SO₂ Nox Ozone Trading Program, as specified in 40 CFR, Part 97, Subpart BBBBB, as they apply to EU-CTG01-DP, EU-CTG02-DP, EU-CTG03-DP, and EU-CTG04-DP. **(40 CFR Part 97 Subpart BBBBB)**
7. The permittee shall comply with all the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and GG, as they apply to FG-CTG-DP.² **(40 CFR 60, Subparts A and GG)**

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. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

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Appendix 2-DP. 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-DP. Monitoring Requirements

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

Appendix 4-DP. 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-DP. 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-DP. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B2796-2009a is being reissued as Source-Wide PTI No. MI-PTI-B2796-2015.

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

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B2796-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201500180/ November 4, 2015	Name change for Section 5 from DTE East China, LLC to DTE Electric Company – Dean Peakers.	NA
NA	201500148/ June 16, 2016	Reopening to update from CAIR to CSAPR.	FG-CTG-DP

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Appendix 7-DP. 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 FG-CTG-DP:

Natural gas usage is monitored continuously but recorded once per hour and tracked on a monthly basis.

The NO_x and CO calendar day ppmv limits are assured by the latest stack testing results. The worst-case concentration data (in ppmv) from the tested operating loads are compared to permit limits.

From stack testing, emission factors for CO and PM-10 are developed in lbs pollutant/million cubic feet of natural gas, for the corresponding loads specified in FG-CTG-DP SC V.2 (CO) and V.3 (PM-10). Emission factors for each pollutant are calculated using the worst-case emissions recorded during the last representative stack test on a pollutant-specific basis. The emission factors, along with the fuel monitoring requirement, shall be applied to each hour to ensure compliance with PM-10's calendar day average, and CO's and PM-10's rolling 12-month period emission limits.

From stack testing at the four load points, correlation curves are developed from NO_x emissions (lb/MM BTU) and heat input (MM BTU/hr) for each CTG. Consistent with Part 75, Appendix E, an hourly NO_x emission rate (lb/MM BTU) is applied to each operating hour. Each QA-QC validated hour either has the NO_x emission rate from the correlation curve applied or the appropriate substitute NO_x emission rate applied if the hour is outside operational and control equipment parameters, per Appendix E, section 2.5.2. The product of the hourly NO_x emission rates and heat inputs are aggregated monthly to report the tons of NO_x on a rolling 12-month basis.

Appendix 8-DP. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, Part B of this appendix is not applicable.

Appendix 9-DP. Phase Two Acid Rain Permit



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

PHASE II ACID RAIN PERMIT
Permit No. MI-AR-55718-2015

Permittee	DTE Electric Company – Dean Peakers
Address	4901 Pointe Drive, St. Clair, MI
SRN	B2796
ORIS code	55718
Issue Date	July 15, 2015
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-B2796-2015

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.

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ROP No: MI-ROP-B2796-2015c

Expiration Date: July 15, 2020

PTI No: MI-PTI-B2796-2015c

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 Environment, Great Lakes, and Energy, 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 Environment, Great Lakes, and Energy
Air Quality Division, Jackson District Office
301 East Louis Glick Highway
Jackson, Michigan 49201-1556
Telephone: (517) 780-7843
Facsimile: (517) 780-7855

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

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Terms and Conditions:

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

		2015	2016	2017	2018	2019
Unit 1	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).				

		2015	2016	2017	2018	2019
Unit 2	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).				

		2015	2016	2017	2018	2019
Unit 3	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).				

		2015	2016	2017	2018	2019
Unit 4	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).				

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 December 11, 2013

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Facility (Source) Name (from STEP 1) DTE East China, LLC

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Permit Requirements

STEP 3

Read the standard 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 source or unit, as appropriate, 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 source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; 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).

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Facility (Source) Name (from STEP 1) DTE East China, LLC

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Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

(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.

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 source 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 source 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;

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Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

- (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.
- (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.
- (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

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Facility (Source) Name (from STEP 1) DTE East China, LLC

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Effect on Other Authorities, Cont'd.

STEP 3, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source 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.

Certification

STEP 4
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 Fadi Mourad, Director – Environmental Strategy	
Signature 	Date 11/1/2013

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Appendix 10-DP. Transport Rule (TR) Trading Program Title V Requirements

Description of TR Monitoring Provisions

The TR subject units, and the unit-specific monitoring provisions, at this source are identified in the following tables. These units are subject to the requirements for the TR NO_x Annual Trading Program, TR NO_x Ozone Season Trading Program, and TR SO₂ Group 1 Trading Program, which are included below as Sections I, II, and III, respectively.

Each unit will use one of the following as the monitoring methodology for each parameter as provided below and shall comply with the general monitoring, recordkeeping, reporting and other requirements in conditions 1 through 5 below and in paragraph (b) of Sections I, II, and III:

- Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO₂ monitoring) and 40 CFR part 75, subpart H (for NO_x monitoring)
- Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
- Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E
- Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19
- EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E

Unit ID: 1	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D

Unit ID: 2	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D

Unit ID: 3	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E
Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D

Unit ID: 4	
Parameter	Monitoring Methodology
SO ₂	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
NO _x	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E

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Heat Input	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D
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1. The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (TR NO_x Annual Trading Program), 97.530 through 97.535 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.635 (TR SO₂ Group 1 Trading Program). The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable TR trading programs.
2. Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <http://www.epa.gov/airmarkets/emissions/monitoringplans.html>.
3. Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR part 75, subpart E and 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
4. Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and/or 97.630 through 97.634 (TR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), 97.535 (TR NO_x Ozone Season Trading Program), and/or 97.635 (TR SO₂ Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
5. The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and 97.630 through 97.634 (TR SO₂ Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add or change this unit's monitoring system description.

SECTION I: TR NO_x Annual Trading Program requirements (40 CFR 97.406)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.413 through 97.418.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.430 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.431 (initial monitoring system certification and recertification procedures), 97.432 (monitoring system out-of-control periods), 97.433 (notifications concerning monitoring), 97.434 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.435 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of TR NO_x Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the TR NO_x Annual emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.430

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through 97.435 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_x emissions requirements.

(1) TR NO_x Annual emissions limitation.

- (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall hold, in the source's compliance account, TR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.424(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR NO_x Annual units at the source.
- (ii). If total NO_x emissions during a control period in a given year from the TR NO_x Annual units at a TR NO_x Annual source are in excess of the TR NO_x Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each TR NO_x Annual unit at the source shall hold the TR NO_x Annual allowances required for deduction under 40 CFR 97.424(d); and
 - (B). The owners and operators of the source and each TR NO_x Annual unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.

(2) TR NO_x Annual assurance provisions.

- (i). If total NO_x emissions during a control period in a given year from all TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such State exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_x Annual allowances available for deduction for such control period under 40 CFR 97.425(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.425(b), of multiplying— (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and (B) The amount by which total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
- (ii). The owners and operators shall hold the TR NO_x Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
- (iii). Total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the State and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the state NO_x Annual trading budget under 40 CFR 97.410(a) and the state's variability limit under 40 CFR 97.410(b).
- (iv). It shall not be a violation of 40 CFR part 97, subpart AAAAA or of the Clean Air Act if total NO_x emissions from all TR NO_x Annual units at TR NO_x Annual sources in the State and Indian country within the borders of such State during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR NO_x Annual units at TR NO_x Annual sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
- (v). To the extent the owners and operators fail to hold TR NO_x Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

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(B). Each TR NO_x Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.

- (3) Compliance periods.
 - (i). A TR NO_x Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
 - (ii). A TR NO_x Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
 - (i). A TR NO_x Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR NO_x Annual allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR NO_x Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR NO_x Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each TR NO_x Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart AAAAA.
- (6) Limited authorization. A TR NO_x Annual allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the TR NO_x Annual Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A TR NO_x Annual allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_x Annual allowances in accordance with 40 CFR part 97, subpart AAAAA.
- (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.406(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each TR NO_x Annual source and each TR NO_x Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each TR NO_x Annual 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart AAAAA.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_x Annual Trading Program.

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- (2) The designated representative of a TR NO_x Annual source and each TR NO_x Annual unit at the source shall make all submissions required under the TR NO_x Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.

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

(g) Effect on other authorities.

No provision of the TR NO_x Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NO_x Annual source or TR NO_x Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION II: TR NO_x Ozone Season Trading Program Requirements (40 CFR 97.506)**(a) Designated representative requirements.**

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.513 through 97.518.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.530 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.531 (initial monitoring system certification and recertification procedures), 97.532 (monitoring system out-of-control periods), 97.533 (notifications concerning monitoring), 97.534 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.535 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.530 through 97.535 shall be used to calculate allocations of TR NO_x Ozone Season allowances under 40 CFR 97.511(a)(2) and (b) and 97.512 and to determine compliance with the TR NO_x Ozone Season emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.530 through 97.535 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) NO_x emissions requirements.

- (1) TR NO_x Ozone Season emissions limitation.
- (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, TR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.524(a) in an amount not less than the tons of total NO_x emissions for such control period from all TR NO_x Ozone Season units at the source.

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- (ii). If total NO_x emissions during a control period in a given year from the TR NO_x Ozone Season units at a TR NO_x Ozone Season source are in excess of the TR NO_x Ozone Season emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A). The owners and operators of the source and each TR NO_x Ozone Season unit at the source shall hold the TR NO_x Ozone Season allowances required for deduction under 40 CFR 97.524(d); and
 - (B). The owners and operators of the source and each TR NO_x Ozone Season unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBB and the Clean Air Act.
- (2) TR NO_x Ozone Season assurance provisions.
 - (i). If total NO_x emissions during a control period in a given year from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.525(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.525(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and
 - (B). The amount by which total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - (ii). The owners and operators shall hold the TR NO_x Ozone Season allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season trading budget under 40 CFR 97.510(a) and the state's variability limit under 40 CFR 97.510(b).
 - (iv). It shall not be a violation of 40 CFR part 97, subpart BBBBB or of the Clean Air Act if total NO_x emissions from all TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the TR NO_x Ozone Season units at TR NO_x Ozone Season sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold TR NO_x Ozone Season allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR NO_x Ozone Season allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBB and the Clean Air Act.
- (3) Compliance periods.

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- (i). A TR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of May 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.
 - (ii). A TR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.
- (i). A TR NO_x Ozone Season allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR NO_x Ozone Season allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR NO_x Ozone Season allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR NO_x Ozone Season allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each TR NO_x Ozone Season allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart BBBBB.
- (6) Limited authorization. A TR NO_x Ozone Season allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:
- (i). Such authorization shall only be used in accordance with the TR NO_x Ozone Season Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, subpart BBBBB, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- (7) Property right. A TR NO_x Ozone Season allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (3) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NO_x Ozone Season allowances in accordance with 40 CFR part 97, subpart BBBBB.
- (4) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.530 through 97.535, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.506(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (3) Unless otherwise provided, the owners and operators of each TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.516 for the designated representative for the source and each TR NO_x Ozone Season 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.516 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart BBBBB.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO_x Ozone Season Trading Program.
- (4) The designated representative of a TR NO_x Ozone Season source and each TR NO_x Ozone Season unit at the source shall make all submissions required under the TR NO_x Ozone Season Trading Program, except as provided in 40 CFR 97.518. This requirement does not change, create an exemption from, or

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otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.

- (5) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season source or the designated representative of a TR NO_x Ozone Season source shall also apply to the owners and operators of such source and of the TR NO_x Ozone Season units at the source.
- (6) Any provision of the TR NO_x Ozone Season Trading Program that applies to a TR NO_x Ozone Season unit or the designated representative of a TR NO_x Ozone Season unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the TR NO_x Ozone Season Trading Program or exemption under 40 CFR 97.505 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NO_x Ozone Season source or TR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

SECTION III: TR SO₂ Group 1 Trading Program requirements (40 CFR 97.606)

(a) Designated representative requirements.

The owners and operators shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.613 through 97.618.

(b) Emissions monitoring, reporting, and recordkeeping requirements.

- (1) The owners and operators, and the designated representative, of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.635 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
- (2) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of TR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the TR SO₂ Group 1 emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) SO₂ emissions requirements.

- (1) TR SO₂ Group 1 emissions limitation.
 - (i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all TR SO₂ Group 1 units at the source.
 - (ii). If total SO₂ emissions during a control period in a given year from the TR SO₂ Group 1 units at a TR SO₂ Group 1 source are in excess of the TR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:

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- (A). The owners and operators of the source and each TR SO₂ Group 1 unit at the source shall hold the TR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and
 - (B). The owners and operators of the source and each TR SO₂ Group 1 unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation 40 CFR part 97, subpart CCCCC and the Clean Air Act.
- (2) TR SO₂ Group 1 assurance provisions.
- (i). If total SO₂ emissions during a control period in a given year from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such SO₂ emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.625(b), of multiplying—
 - (A). The quotient of the amount by which the common designated representative's share of such SO₂ emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state and Indian country within the borders of such state for such control period, by which each common designated representative's share of such SO₂ emissions exceeds the respective common designated representative's assurance level; and
 - (B). The amount by which total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state for such control period exceed the state assurance level.
 - (ii). The owners and operators shall hold the TR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii). Total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state's variability limit under 40 CFR 97.610(b).
 - (iv). It shall not be a violation of 40 CFR part 97, subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceed the state assurance level or if a common designated representative's share of total SO₂ emissions from the TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state and Indian country within the borders of such state during a control period exceeds the common designated representative's assurance level.
 - (v). To the extent the owners and operators fail to hold TR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,
 - (A). The owners and operators shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B). Each TR SO₂ Group 1 allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart CCCCC and the Clean Air Act.
- (3) Compliance periods.
- (i). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
 - (ii). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.
- (4) Vintage of allowances held for compliance.

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- (i). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.
 - (ii). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- (5) Allowance Management System requirements. Each TR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart CCCCC.
 - (6) Limited authorization. A TR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:
 - (i). Such authorization shall only be used in accordance with the TR SO₂ Group 1 Trading Program; and
 - (ii). Notwithstanding any other provision of 40 CFR part 97, subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
 - (7) Property right. A TR SO₂ Group 1 allowance does not constitute a property right.

(d) Title V permit revision requirements.

- (1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR SO₂ Group 1 allowances in accordance with 40 CFR part 97, subpart CCCCC.
- (2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.630 through 97.635, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR part 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of TR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using minor permit modification procedures in accordance with 40 CFR 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

- (1) Unless otherwise provided, the owners and operators of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
 - (i). The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each TR SO₂ Group 1 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.
 - (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart CCCCC.
 - (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR SO₂ Group 1 Trading Program.
- (2) The designated representative of a TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall make all submissions required under the TR SO₂ Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.

- (1) Any provision of the TR SO₂ Group 1 Trading Program that applies to a TR SO₂ Group 1 source or the designated representative of a TR SO₂ Group 1 source shall also apply to the owners and operators of such source and of the TR SO₂ Group 1 units at the source.

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(2) Any provision of the TR SO₂ Group 1 Trading Program that applies to a TR SO₂ Group 1 unit or the designated representative of a TR SO₂ Group 1 unit shall also apply to the owners and operators of such unit.

(g) Effect on other authorities.

No provision of the TR SO₂ Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR SO₂ Group 1 source or TR SO₂ Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

(h) Effect on units in Indian country.

Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regard to any source or unit, in Indian country within the borders of the state.

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SECTION 6 – BELLE RIVER FUELS COMPANY, LLC

LOCATED AT

4505 King Road
China, Michigan 48054

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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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. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following: **(R 336.1301(1))**
 - 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.

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

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(5))**

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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.

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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))**

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- 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))**

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Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaiming, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

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

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

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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 C-6

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU- PREREFEEED-BRFC	Coal handling activity consisting of existing coal handling equipment, including conveyors CV23 & 24 transferring coal to two new REF process feed conveyors TH-8A where emissions are controlled by dust collector No. 1 and enclosures.	12/29/2009	FG-REF-BRFC
EU-REF-BRFC	The REF process including coal handling. Consists of a 750 ton solid REF Additive (REFA) silo No. 1 controlled by silo dust collector; coal, liquid MerSorb and solid REFA mixing process consisting of two liquid storage tanks and two solid REFA day bins Nos. 1 & 2, each with a bin vent filter discharged into the building; two screw feeders and pug mills Nos. 1 & 2; and a common product (REF coal) conveyor where emissions are controlled by dust collector No. 2.	12/29/2009	FG-REF-BRFC
EU-REFCOAL-BRFC	All treated coal transferring from a common product conveyor to existing conveyors CV19 & CV20 where emissions are controlled by enclosures and dust collector No.1	12/29/2009	FG-REF-BRFC

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 D-6

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-REF-BRFC	Emission Units within the Belle River Fuels Company producing the "Reduced Emissions Fuel" refined coal.	EU- PREREFEEED-BRFC EU-REF-BRFC, EU-REFCOAL-BRFC

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FG-REF-BRFC FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group represents the REF refined coal production system including: coal handling activity consisting of existing coal conveyors CV23 & CV24 where emissions are controlled by enclosures or dust collectors; two REF process feed conveyors TH-8A where emissions are controlled by enclosures and dust collector #1; a 750 ton solid REFA silo controlled by silo dust collector; coal, liquid REFA and solid REFA mixing process consisting of two liquid storage tanks and two solid REFA day bins Nos. 1 & 2, each with a bin vent filter; two screw feeders & pug mills Nos. 1 and 2; and a common product (refined coal) conveyor where emissions are controlled by dust collector No. 2; all treated coal transferring from common product (refined coal) conveyor to existing coal conveyors CV19 & CV20 where emissions are controlled by enclosures and dust collector No. 2.

Emission Units: EU-PREREFEEED-BRFC, EU-REF-BRFC, EU-REFCOAL-BRFC

POLLUTION CONTROL EQUIPMENT

Enclosures and dust collectors

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.008 grains per dscf ²	Test protocol will specify averaging time.	Each individual REFA silo dust collector; solid REFA day bin dust collector Nos. 1 and 2, dust collector No. 1 and dust collector No. 2 in FG-REF-BRFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2802(4)(e)
2. PM	0.072 pph ²	Test protocol will specify averaging time.	REFA silo dust collector in FG-REF-BRFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2802(4)(e)
3. PM	0.392 pph ²	Test protocol will specify averaging time	Each individual dust collector No. 1 and dust collector No. 2 in FG-REF-BRFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2802(4)(e)
4. PM10	0.072 pph ²	Test protocol will specify averaging time	REFA silo dust collector in FG-REF-BRFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2803 R 336.2804 R 336.2802(4)(e) 40CFR52.21 (c)&(d)
5. PM10	0.392 pph ²	Test protocol will specify averaging time	Each individual dust collector No. 1 and dust collector No. 2 in FG-REF-BRFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2803 R 336.2804 R 336.2802(4)(e) 40CFR52.21 (c)&(d)
6. PM2.5	0.072 pph ²	Test protocol will specify averaging time	REFA silo dust collector in FG-REF-BRFC	SC V.1 and VI.4	R 336.1205 R 336.2902(2)(e) 40 CFR 51 (App S)

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7. PM2.5	0.392 pph ²	Test protocol will specify averaging time	Each individual dust collector No. 1 and dust collector No. 2 in FG-REF-BRFC	SC V.1 and VI.4	R 336.1205 R 336.2902(2)(e) 40 CFR 51 (App S)
8. Opacity	10 percent ²	Test protocol will specify averaging time	Each individual REFA silo dust collector; solid REFA day bin dust collectors No. 1 & No. 2, and Dust Collectors #1 & #2, in FG-REF-BRFC	SC 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. S-Sorb	1824 tons/day ²	Calendar Day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3) R 336.1225
2. S-Sorb	250,000 tpy ²	12-month rolling time period as determined at the end of each calendar day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3) R 336.1225
3. Mer Sorb	54 tons/day ²	Calendar Day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3) R 336.1225
4. Mer Sorb	7500 tpy ²	12-month rolling time period as determined at the end of each calendar day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3) R 336.1225
5. PRE REF Coal	36,000 tons/day ²	Calendar Day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3) R 336.1225
6. PRE REF Coal	5,000,000 tpy ²	12-month rolling time period as determined at the end of each calendar day	FG-REF-BRFC	SC VI.3	R 336.1205 (1)(a) & (3)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall maintain and implement a revised Fugitive Dust Control Plan to manage fugitive sources, such as haul roads, etc., from FG-REF-BRFC. If at any time the Fugitive Dust Control Plan fails to address or inadequately addresses an event that meets the characteristics of fugitive dust, the permittee shall amend the Fugitive Dust Control Plan within 45 days after such an event occurs. The permittee shall also amend the Fugitive Dust Control Plan within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the Fugitive Dust Control Plan and any amendments to the Fugitive Dust Control Plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the Fugitive Dust Control Plan or amended Fugitive Dust Control Plan shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(Act 451 Section 324.5524, R 336.1372, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**
2. The permittee shall maintain and implement a malfunction abatement plan (MAP) as described in Rule 911(2), for FG-REF-BRFC. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor.

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Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1225, R 336.1331, R 336.1910, R 336.1911)

3. The fugitive emission sources of FG-REF-BR shall be operated in a manner which will minimize the fugitive particulate emissions.² (Act 451 Section 324.5524, R 336.1372, R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate FG-REF-BRFC unless the enclosed conveyors, silo dust collector, bin vent filters and dust collectors are installed, maintained and operated in a satisfactory manner, and/or in accordance with a malfunction abatement plan (MAP), approvable by the AQD District Supervisor.² (R 336.1901, R 336.1910, R 336.1911)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. Verification of PM, PM10, and PM2.5 mass emissions from dust collectors No. 1 and No. 2 or representative unit in FG-REF-BRFC by testing at owner's expense, in accordance with Department requirements, may be required. If testing is required, the permittee must complete test once every five years, for the next 10 years of operation after FG-REF-BRFC modification, until December 28, 2019. 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 336.2001, R 336.2003, R 336.2004, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall perform and document non-certified visible emissions observations on a daily basis when FG-REF-BRFC is operating, as required in SC 1.8. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c), R 336.1303, 40 CFR 60.42a(b))
2. The permittee shall inspect all total enclosure conveyors to determine and record conditions, once per calendar month. (R 336.1213(3))
3. The permittee shall keep, in a satisfactory manner records on a daily, monthly and 12-month rolling time period as determined at the end of each calendar month of the PREREF Coal, S-Sorb, and MerSorb processed in FG-REF-BRFC.² (R 336.1205(1)(a), R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))
4. The permittee shall calculate and keep records of PM, PM10 and PM2.5 emissions from FG-REF-BRFC, in tons per calendar year. The annual calendar year recordkeeping period shall begin on the first day of the month during which FG-REF-BRFC commenced operation. Calculations and records shall be kept in the format described in Appendix 4.1-BRFC, or an alternative format acceptable to AQD Permit Section Supervisor. Requirement to conduct calculations for records shall end 10 calendar years after FG-REF-BRFC commences operation, 12-31-2019.² (R 336.1205, R 336.1901, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)

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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 annual records of the PM, PM10, and PM2.5 emissions from FG-REF-BRFC, in tons per calendar year as specified in SC VI.4 to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of the first calendar year. In addition, the records shall identify the following:
 - a. Exceedances of the yearly actual emission of the PM, PM10, and PM2.5 above the baseline actual emissions (BAE) by a significant amount, and
 - b. Identify if the year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test used for FG-REF-BRFC.

The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to SC VI.5, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² **(R 336.1205, R 336.1901, R 336.2802(4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))**

See Appendix 8-BRFC

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. SV-REFASILO	10-inch diameter, non-vertical ²	64 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SV-DUSTCOLL-1	10 X 16 horizontal ²	40 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
3. SV-DUSTCOLL-2	10 X 16 horizontal ²	40 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. 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 Y, as they apply to FG-REF-BRFC.² **(40 CFR Part 60 Subparts A & Y, 60.252(c))**

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQs	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

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Appendix 2-BRFC 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-BRFC. Monitoring Requirements

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

Appendix 4-BRFC. Recordkeeping

4.1

Recordkeeping Provisions for PSD Source Using Hybrid Applicability Test

All information in this Appendix shall be maintained pursuant to R 336.2818 and 40 CFR 52.21 (r)(6)(i) for 10 years after the REF Technology becomes operational, and shall be provided to both the AQD Permit Section Supervisor and the AQD District Supervisor for the first year and thereafter made available to the Department upon request.

A. Project Description:

The project is to install new sorbent technology which uses REF sorbent solution as a fuel additive to reduce mercury, nitrogen oxides and sulfur dioxide emissions. These changes include installation of liquid storage tanks, solid storage silo, day bins, screw feeders and pug mills, existing and new conveyors and other material handling equipment so that coal can be treated with this sorbent material processed in FG-REF-BRFC and before being burned in FG-BOILERS-BR at Belle River Power Plant.

B. Applicability Test Description: Minor modifications are not subject to PSD. Actual to projected actual hybrid applicability test as described in the table below will be used to demonstrate that PSD does not apply to these modifications.

C. Emission Limitations

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions	Excluded Emissions	
FG-REF-BRFC and FG-BOILERS-BR	PM	210	230.63	12.3	FG-REF-BRFC and FG-BOILERS-BR were capable of accommodating emissions up to 12.3 TPY. The projected emission increase of 8.33 tpy is less than significant level of 22.5 tpy (90% of the significant level of 25 tpy).

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Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions	Excluded Emissions	
FG-REF-BRFC and FG-BOILERS-BR	PM10	141	155.38	8	FG-REF-BRFC and FG-BOILERS-BR were capable of accommodating emissions up to 8 TPY. The projected emission increase of 6.38 tpy is less than significant level of 13.5 tpy (90% of the significant level of 15 tpy).
FG-REF-BRFC and FG-BOILERS-BR	PM2.5	61	69.86	3.5	FG-REF-BRFC and FG-BOILERS-BR were capable of accommodating emissions up to 3.5 TPY. The projected emission increase of 5.36 tpy is less than significant level of 9 tpy (90% of the significant level of 10 tpy).

D. Netting Calculations and Discussion: NA

Appendix 5-BRFC. 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-BRFC. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B2796-2009a is being reissued as Source-Wide PTI No. MI-PTI-B2796-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
164-08C	201500008*	Refined emissions fuel project	FG-REF-BRFC

Appendix 7-BRFC. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 8-BRFC. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, Part B of this appendix is not applicable.

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SECTION 7 – ST. CLAIR FUELS COMPANY, LLC

LOCATED AT

4505 King Road
China, Michigan 48054

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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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. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following: **(R 336.1301(1))**
 - 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.

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

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(5))**

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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.

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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))**

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- 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))**

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Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaiming, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

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

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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, EGLE.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 of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

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

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

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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.

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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 C-7

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

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU- PREREFEEED- SCFC	Coal handling activity consisting of existing coal handling equipment, including Cogar feeder transferring coal to plant feed conveyor then to a chute with two flop gates where emissions are controlled by partial enclosures. Coal is then directed from the chute to pug mill Nos. 1, 2 & 3.	12/29/2009	FG-REF-SCFC
EU-REF-SCFC	The REF production process consists of a 750-ton solid REF Additive (REFA) silo No. 1 controlled by silo dust collector; coal, liquid MerSorb and solid REFA mixing process. The solid REFA mixing process consists of three solid REFA day bins Nos. 1, 2 & 3, each with a bin vent filter discharged into the building; three screw feeders & pug mills Nos. 1, 2 & 3 each controlled by a common dust collector, dust collector No. 1. The liquid MerSorb consisting of three liquid storage tanks, where MerSorb is directed to pug mill Nos. 1, 2 & 3	12/29/2009	FG-REF-SCFC
EU-REFCOAL-SCFC	All treated coal transferring from pug mill Nos. 1, 2 & 3 to existing conveyors CV-113 where emissions are controlled by partial enclosures and dust collector No.1	12/29/2009	FG-REF-SCFC

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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 D-7

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-REF-SCFC	Emission Units within the St. Clair Fuels Company producing the "Reduced Emissions Fuel" refined coal.	EU- PREREFEEED-SCFC EU-REF-SCFC, EU-REFCOAL-SCFC

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**FG-REF-SCFC
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

This flexible group represents the REF refined coal production system including: coal handling activity consisting of existing coal Cogar feeder, existing coal plant feed conveyor and one coal chute where emissions are controlled by partial enclosures; a 750 ton solid REFA silo No. 1 controlled by silo dust collector; coal, MerSorb process consisting of three liquid MerSorb storage tanks Nos. 1, 2 & 3; and solid REFA mixing process consisting of three solid REFA day bins Nos. 1, 2 & 3 each with a bin vent filter; three screw feeders Nos. 1, 2 & 3; pug mills Nos. 1, 2 & 3 each controlled by a common dust collector, dust collector No. 1; and all the treated coal transferring from three pug mills Nos. 1, 2 & 3 to existing coal conveyors CV-113.

Emission Units: EU-PREREFEEED-SCFC, EU-REF-SCFC, EU-REFCOAL-SCFC

Flexible Group ID: FG-REF-SCFC

POLLUTION CONTROL EQUIPMENT

Enclosures and dust collectors

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.008 grains per dscf ²	Test protocol will specify averaging time.	Solid REFA silo No. 1 controlled by a dust collector; in FG-REF-SCFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2802(4)(e)
2. PM	0.078 pph ²	Test protocol will specify averaging time.	Solid REFA silo No. 1 controlled by a dust collector in FG-REF-SCFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2802(4)(e)
3. PM	0.008 grains per dscf ²	Test protocol will specify averaging time.	Pug mills Nos. 1, 2 & 3 controlled by a common dust collector, dust collector No. 1 in FG-REF-SCFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2802(4)(e)
4. PM	0.294 pph ²	Test protocol will specify averaging time.	Pug mills Nos. 1, 2 & 3 controlled by a common dust collector, dust collector No. 1 in FG-REF-SCFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2802(4)(e)
5. PM10	0.078 pph ²	Test protocol will specify averaging time.	Solid REFA silo No. 1 controlled by a dust collector in FG-REF-SCFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2803 R 336.2804 R 336.2802(4)(e) 40 CFR 52.21 (c) and (d)

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Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
6. PM10	0.294 pph ²	Test protocol will specify averaging time.	Pug mills Nos. 1, 2 & 3 controlled by a common dust collector, dust collector No. 1 in FG-REF-SCFC	SC V.1 and VI.4	R 336.1205 R 336.1331(1)(c) R 336.2803 R 336.2804 R 336.2802(4)(e) 40 CFR 52.21 (c) and (d)
7. PM2.5	0.078 pph ²	Test protocol will specify averaging time.	Solid REFA silo No. 1 controlled by a dust collector in FG-REF-SCFC	SC V.1 and VI.4	R 336.1205 R 336.2902(2)(e) 40 CFR 51 (Appendix S)
8. PM2.5	0.294 pph ²	Test protocol will specify averaging time.	Pug mills Nos. 1, 2 & 3 controlled by a common dust collector, dust collector No. 1 in FG-REF-SCFC	SC V.1 and VI.4	R 336.1205 R 336.2902(2)(e) 40 CFR 51 (Appendix S)
9. Opacity	10 percent ²	Test protocol will specify averaging time.	Solid REFA silo No. 1 controlled by a dust collector; and pug mills Nos. 1, 2 & 3 controlled by a common dust collector, dust collector No. 1 in FG-REF-SCFC	SC VI.1	R 336.1301(1)(c)

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. S-Sorb	3240 tons/day ²	Calendar Day	FG-REF-SCFC	SC VI.3	R 336.1205(1)(a) & (3), R 336.1225
2. S-Sorb	135,000 tpy ²	12-month rolling time period as determined at the end of each calendar month	FG-REF-SCFC	SC VI.3	R 336.1205(1)(a) & (3), R 336.1225
3. Mer Sorb	162 tons/day ²	Calendar Day	FG-REF-SCFC	SC VI.3	R 336.1205(1)(a) & (3), R 336.1225
4. Mer Sorb	6750 tons/year ²	12-month rolling time period as determined at the end of each calendar month	FG-REF-SCFC	SC VI.3	R 336.1205(1)(a) & (3), R 336.1225
5. PRE REF Coal	108,000 tons/day ²	Calendar Day	FG-REF-SCFC	SC VI.3	R 336.1205(1)(a) & (3), R 336.1225
6. PRE REF Coal	4,500,000 tpy ²	12-month rolling time period as determined at the end of each calendar month	FG-REF-SCFC	SC VI.3	R 336.1205(1)(a) & (3)

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III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall maintain and implement a revised Fugitive Dust Control Plan to manage fugitive sources, such as haul roads, etc., from FG-REF-SCFC. If at any time the Fugitive Dust Control Plan fails to address or inadequately addresses an event that meets the characteristics of fugitive dust, the permittee shall amend the Fugitive Dust Control Plan within 45 days after such an event occurs. The permittee shall also amend the Fugitive Dust Control Plan within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the Fugitive Dust Control Plan and any amendments to the Fugitive Dust Control Plan to AQD District Supervisor for review and approval. If AQD does not notify the permittee within 90 days of submittal, amended Fugitive Dust Control Plan shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(Act 451 Section 324.5524, R 336.1372, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**
2. The permittee shall maintain and implement a malfunction abatement plan (MAP) as described in Rule 911(2), for FG-REF-SCFC. If at any time, the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to AQD District Supervisor for review and approval. If AQD does not notify the permittee within 90 days of submittal, the amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(R 336.1225, R 336.1331, R 336.1910, R 336.1911)**
3. The fugitive emission sources of FG-REF-SCFC shall be operated in a manner which will minimize the fugitive particulate emissions.² **(Act 451 Section 324.5524, R 336.1372, R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate FG-REF-SCFC unless the partial enclosure conveyors, silo dust collector, bin vent filters and dust collectors are installed, maintained and operated in a satisfactory manner, and/or in accordance with a malfunction abatement plan (MAP), approved by the AQD District Supervisor.² **(R 336.1901, R 336.1910, R 336.1911)**
2. The permittee shall not discharge any emissions from the solid REFA day bin Nos. 1, 2 and 3 each controlled by a dust collector to the atmosphere.² **(R 336.1205)**

V. TESTING/SAMPLING

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

1. Verification of PM, PM10, and PM2.5 mass emissions from Pugmill No. 1, Pugmill No. 2, and Pugmill No. 3, controlled by a common dust collector (Dust Collector No. 1. in FG-REF-SCFC), by testing at owner's expense, in accordance with Department requirements, may be required. If testing is required, the permittee must complete test once every five years, for the next 10 years of operation after the FG-REF-SCFC modification, 12-28-2019. 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 AQD within 60 days following the last date of the test.² **(R 336.2001, R 336.2003, R 336.2004, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall perform and document non-certified visible emissions observations as required in SC I.9 on a daily basis when FG-REF-SCFC is operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any

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visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD.² (R 336.1301(1)(c), R 336.1303, 40 CFR 60.42a(b))

2. The permittee shall inspect all total enclosure conveyors to determine and record conditions, once per calendar month.² (R 336.1213(3))
3. The permittee shall keep, in a satisfactory manner records on a daily, monthly and 12-month rolling time period as determined at the end of each calendar month of the PREREF Coal, S-Sorb, and MerSorb processed in FG-REF-SCFC. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² (R 336.1205(1)(a), R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))
4. The permittee shall calculate and keep records of PM, PM10 and PM2.5 emissions from FG-REFSC-FC, in tons per calendar year. The annual calendar year recordkeeping period shall begin on the first day of the month during which FG-REF-SCFC commences operation. The calculations and records shall be kept in the format described in Appendix 4.1-SCFC, or an alternative format acceptable to the AQD Permit Section Supervisor. Requirement to conduct calculations for records shall end 10 calendar years after FG-REF-SCFC commences operation, December 31, 2019. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205, R 336.1901, R 336.2802(4)(e), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21)

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 annual records of the PM, PM10, and PM2.5 emissions from FG-REF-SCFC, in tons per calendar year as specified in SC VI.4 to both the AQD Permit Section Supervisor and the AQD District Supervisor within 60 days following the end of the first calendar year. In addition, the records shall identify the following:
 - a. Exceedances of the yearly actual emission of the PM, PM10, and PM2.5 above the baseline actual emissions (BAE) by a significant amount, and
 - b. Identify if the year's actual emissions differ from the pre-construction projection. The pre-construction projection is the sum of the projected actual emissions from each existing emission unit and the potential emissions from each new emission unit included in the Hybrid Applicability Test used for FG-REF-BRFC.

The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to SC VI.5, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projection).² (R 336.1205, R 336.1901, R 336.2802 (4)(c), R 336.2902(2)(e), 40 CFR 51 (Appendix S), R 336.2818, 40 CFR 52.21(r)(6)(c)(iii))

See Appendix 8-SCFC

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VIII. STACK/VENT RESTRICTIONS

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. SV-REFASILO1	10-inch diameter, non-vertical ²	64 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SV-PUGMILL1-3 controlled by dust collector No. 1	11.38 x 16.81 horizontal ²	20 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

1. 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 Y, as they apply to FG-REF-SCFC.² **(40 CFR Part 60 Subparts A & Y, 60.252(c))**

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).

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APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

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Appendix 2-SCFC 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-SCFC. Monitoring Requirements

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

Appendix 4-SCFC. Recordkeeping

4.1

Recordkeeping Provisions for PSD Source Using Hybrid Applicability Test

All information in this Appendix shall be maintained pursuant to R 336.2818 and 40 CFR 52.21 (r)(6)(i) for 10 years after the REF system becomes operational and shall be provided for the first year and all the years made available to the Department upon request.

A. Project Description:

The project is to install new sorbent technology which uses REF sorbent solution as a fuel additive to reduce mercury, nitrogen oxides and sulfur dioxide emissions. These changes include installation of liquid storage tanks, solid storage silo, partially enclosed chutes, day bins, screw feeders and pug mills, existing partially enclosed and new conveyors and other material handling equipment so that coal can be treated with this sorbent material processed in FG-REFSC-FC and before being burned in EU-BOILER-6-SC, EU-BOILER-7-SC, and FG-BLRS-1-4-SC at Saint Clair Power Plant. In addition, these changes include installation of liquid storage tanks, solid storage silo, day bins, screw feeders and pug mills, existing and new conveyors and other material handling equipment so that coal can be treated with this sorbent material processed in FG-REF-BRFC and before being burned in FG-BOILERS-BR at Belle River Power Plant.

B. Applicability Test Description: Minor modifications are not subject to PSD. Actual to projected actual hybrid applicability test as described in the table below will be used to demonstrate that PSD does not apply to these modifications.

C. Emission Limitations: Saint Clair Power Plant

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions*	Excluded Emissions	
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC	PM	470	537.03	60	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 60 TPY. The projected emission increase of 7.03 tpy is less than significant level of 22.5 tpy (90% of the significant level of 25 tpy).

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Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions	Projected Actual Emissions*	Excluded Emissions	
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC	PM10	314.9	358.94	40.18	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 40.18 TPY. The projected emission increase of 3.94 tpy is less than significant level of 13.5 tpy (90% of the significant level of 15 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC	PM2.5	136.3	156.26	17.4	FG-REF-SCFC and FG-BOILERS-SC were capable of accommodating emissions up to 17.4 TPY. The projected emission increase of 2.56 tpy is less than significant level of 9 tpy (90% of the significant level of 10 tpy).

* Projected actual emissions = projected actual emissions from the boilers + Chem Mod material handling, storage and conveyance operations

Combined Saint Clair and Belle River Power Plants

Emission Unit/Flexible Group ID	Pollutant	Emissions (tpy)			Reason for Exclusion
		Baseline Actual Emissions (tpy)	Projected Actual Emissions (tpy)*	Excluded Emissions (tpy)	
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM	680	767.66	72.3	It was capable of accommodating emissions up to 72.3 TPY. The projected emission increase of 15.36 tpy < significant level of 22.5 tpy (90% of the significant level of 25 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM-10	455.9	513.1	48.1	It was capable of accommodating emissions up to 48.1 TPY. The projected emission increase of 10.32 tpy < significant level of 13.5 tpy (90% of the significant level of 15 tpy).
FG-REF-SCFC, EU-BOILER-6-SC, EU-BOILER-7-SC, & FG-BLRS-1-4-SC and FG-REF-BRFC & FG-BOILERS-BR	PM2.5	197.3	226.12	20.9	It was capable of accommodating emissions up to 20.9 TPY. The projected emission increase of 7.92 tpy < significant level of 9 tpy (90% of the significant level of 10 tpy).

* Projected actual emissions = projected actual emissions from the boilers + Chem Mod material handling, storage and conveyance operations

D. Netting Calculations and Discussion: NA

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Appendix 5-SCFC. 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-SCFC. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2796-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B2796-2009a is being reissued as Source-Wide PTI No. MI-PTI-B2796-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
176-09A	201500008*	Refined emissions fuel project	FG-REF-SCFC

Appendix 7-SCFC. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 8-SCFC. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, Part B of this appendix is not applicable.