



Dearborn Industrial Generation



December 11, 2023

Ms. Caryn Owens
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Grand Rapids District Office
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503

**RE: Renewable Operating Permit (ROP) Amendment Involving “Enhanced” PTI
Dearborn Industrial Generation, LLC (SRN: N6631)**

Dear Ms. Owens:

Dearborn Industrial Generation, LLC (DIG) is submitting this notification and enclosed Administrative Amendment involving an “Enhanced” Permit to Install (PTI) to incorporate the terms and conditions of PTI No. 109-23 into our Renewable Operating Permit (ROP). The PTI was issued to incorporate federally enforceable permit conditions in accordance with U.S. EPA’s Detroit Sulfur Dioxide (SO₂) Federal Implementation Plan (FIP), published in the Federal Register on October 12, 2022 (87 FR 61514).

Overview of PTI No. 109-23 for Detroit SO₂ FIP

DIG received approval of PTI No. 109-23 on September 26, 2023 for the incorporation of federally enforceable permit conditions that apply to DIG’s three boilers and two BFG flares operating under the combined group flexible group “FGBFG” and located at 240 Miller Road in Dearborn, Wayne County, MI. The permit conditions of FGBFG include a daily average SO₂ emission limit of 840 pounds per hour (pph) and associated monitoring requirements for attaining the 2010 SO₂ primary National Ambient Air Quality Standard (NAAQS) for the Detroit SO₂ nonattainment area.

This application for an Administrative Amendment involving an “Enhanced” PTI of ROP No. MI-ROP-N6631-2012a is being submitted pursuant to Michigan Air Pollution Control Rule 216(1)(a)(v) to incorporate the terms and conditions of PTI No. 109-23 into the ROP. PTI No. 109-23 contains the necessary monitoring, recordkeeping, and reporting requirements, and has gone through a public comment period; therefore, the PTI may be incorporated into the ROP as an administrative amendment, pursuant to Rule 216(1)(a)(v).



Dearborn Industrial Generation

App #202400007

The ROP Amendment application includes the M-001 and C-001 forms, a copy of ROP No. MI-ROP N6631-2012a incorporating PTI No. 109-23, and a copy of PTI No. 109-23. If you have questions regarding this submittal, please contact Mr. Ken Mroczkowski of DIG at (734) 691-0795 or Mr. Chris Occhipinti of NTH Consultants, Ltd. at (616) 951-4774.

Sincerely,

Adam Brentlinger
Director of Gas Operations

cc: Mr. Jon Lamb, EGLE – AQD
Ms. Rebecca Loftus, EGLE – AQD
Mr. Ken Mroczkowski, Dearborn Industrial Generation LLC, - NorthStar
Ms. Kathryn Cunningham, P.E., Consumers Energy
Mr. Chris Occhipinti, NTH Consultants, Ltd.
EGLE-ROP@michigan.gov (electronic only)



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

**RENEWABLE OPERATING PERMIT APPLICATION
C-001: CERTIFICATION**

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

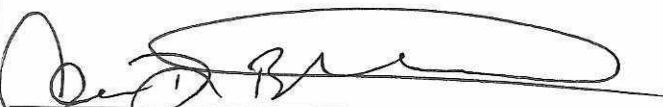
This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN N6631
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Stationary Source Name Dearborn Industrial Generation, LLC	
City Dearborn	County Wayne

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

CONTACT INFORMATION	
Contact Name Ken Mroczkowski	Title Sr. Environmental and Compliance Coordinator
Phone number 734-691-0795	E-mail address Kenneth.Mroczkowski@cmsenergy.com

This form must be signed and dated by a Responsible Official.				
Responsible Official Name Adam Brentlinger			Title Director of Gas Operations	
Mailing address 2400 Miller Road				
City Dearborn	State MI	ZIP Code 48120	County Wayne	Country USA
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.				
 Signature of Responsible Official			12/11/2023 Date	

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

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

1. SRN N6631	2. ROP Number MI-ROP-N6631-2012a	3. County Wayne
4. Stationary Source Name Dearborn Industrial Generation, LLC		
5. Location Address 2400 Miller Road		6. City Dearborn
<p>7. Submittal Type - <i>The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.</i></p> <p><input type="checkbox"/> Rule 215(1) Notification of change. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 215(2) Notification of change. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 215(3) Notification of change. Complete Items 8 – 11 and 14</p> <p><input type="checkbox"/> Rule 215(5) Notification of change. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. Complete Items 8 – 10 and 14</p> <p><input checked="" type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions.</p> <p><input type="checkbox"/> Rule 216(2) Minor Modification. Complete Items 8 – 12 and 14</p> <p><input type="checkbox"/> Rule 216(3) Significant Modification. Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions.</p> <p><input type="checkbox"/> Rule 216(4) State-Only Modification. Complete Items 8 – 12 and 14</p>		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> <u>09/26/2023</u>		9. Change in emissions? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>10. Description of Change - <i>Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).</i></p> <p>Dearborn Industrial Generation, LLC (DIG) is submitting this amendment to incorporate the SO2 emission limit required by U.S. EPA's Detroit SO2 Federal Implementation Plan, as specified in PTI No. 109-23 for the Detroit SO2 nonattainment area. The emission limit pertains to the flexible group for DIG's boilers and flares ("FGBFG").</p>		
<p>11. New Source Review Permit(s) to Install (PTI) associated with this application? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, enter the PTI Number(s) <u>109-23</u> - - - - -</p>		
<p>12. Compliance Status - <i>A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.</i></p> <p>a. Is the change identified above in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>c. If the change includes a future applicable requirement(s), will timely compliance be achieved? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		
13. Operator's Additional Information ID - <i>Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.</i>		AI 109-23
14. Contact Name	Telephone No.	E-mail Address
Ken Mroczkowski	734-691-0795	Kenneth.Mroczkowski@cmsenergy.com
<p>15. This submittal also updates the ROP renewal application submitted on <u>08/31/2016</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A <i>(If yes, a mark-up of the affected pages of the ROP must be attached.)</i></p>		

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

For Assistance
Contact: 800-662-9278

www.michigan.gov/egle

EQP 5775 (Rev.04-2019)



RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

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

SRN: N6631	Section Number (if applicable):
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1. Additional Information ID AI-109-23

Additional Information

2. Is This Information Confidential? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Please find attached Permit 109-23 issued by EGLE on 09/26/2023 as well as a mark-up of the ROP conditions for FGBFG.

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

September 26, 2023

**PERMIT TO INSTALL
109-23**

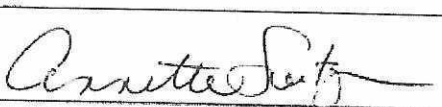
ISSUED TO
Dearborn Industrial Generation, LLC

LOCATED AT
2400 Miller Road
Dearborn, Michigan 48121

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
N6331

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

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: January 30, 2023	
DATE PERMIT TO INSTALL APPROVED: September 26, 2023	SIGNATURE: 
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

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

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

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

GENERAL CONDITIONS

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

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUBOILER1*	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBFG
EUBOILER2*	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBOILERS
EUBOILER3*	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBOILERS
EUBFGFLARE1*	One blast furnace gas flare equipped with a natural gas pilot flame. This flare is fired exclusively with blast furnace gas and is designed to operate when the blast furnace gas/natural gas boilers are not operating. The flare is rated at an approximate heat input of 480 MM Btu/hour.	3/1/1999	FGBFGFLARE S
EUBFGFLARE2*	One blast furnace gas flare equipped with a natural gas pilot flame. This flare is fired exclusively with blast furnace gas and is designed to operate when the blast furnace gas/natural gas boilers are not operating. The flare is rated at an approximate heat input of 1292 MM Btu/hour.	5/1/1999	FGBFGFLARE S
*Other applicable permit requirements for the emission units in this table can be found in the Title V permit, ROP-MI-N6631-2012a.			

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

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGBFG	This emission group consists of any emission unit which combusts, or has the capability of combusting, blast furnace gas.	EUBOILER1, EUBOILER2, EUBOILER3, EUBFGFLARE1, EUBFGFLARE2

**FGBFG
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

This emission group consists of any emission unit which combusts, or has the capability of combusting, blast furnace gas.

Emission Unit: EUBOILER1, EUBOILER2, EUBOILER3, EUBFGFLARE1, EUBFGFLARE2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. SO ₂	840 pph**	Daily average	FGBFG	SC VI.1	FIP, Docket Id No. EPA-R05-OAR-2021-0536, 40 CFR 52.1189(e)(1), Act 451 324.5503(b)

** This limit includes all periods of operation (includes during startups, shutdowns and malfunctions).

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the SO₂ emissions from EUBOILER1, EUBOILER2 and EUBOILER3 on a continuous basis. Installation and operation of each continuous emission monitoring system (CEMS) shall meet the timelines, requirements and reporting detailed in 40 CFR Part 60 Appendix F. If the permittee chooses to use a Predictive Emissions Monitoring System (PEMS) in lieu of a Continuous Emissions Monitoring System (CEMS) to monitor SO₂ emissions, the permittee shall follow the protocol delineated in Performance Specification 16 in Appendix B of 40 CFR Part 60. (FIP, Docket Id No. EPA-R05-OAR-2021-0536, 40 CFR 52.1189(e)(2)(i), Act 451 324.5503(b))
2. The owner or operator shall verify compliance with the emission limits for Boilers 1, 2 and 3 and Flares 1 and 2 (combined) by following the procedures and methodologies contained in the document entitled

"Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP
MI-ROP-N6631-2004" dated May 31, 2011, or subsequent revisions to this document approved by EPA.
(FIP, Docket Id No. EPA-R05-OAR-2021-0536, 40 CFR 52.1189(e)(2)(ii), Act 451 324.5503(b))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Dearborn Industrial Generation, L.L.C.
 N6631N6631N6631-2012a

ROP No.: MI-ROP-

Expiration Date: March 28, 2017
 PTI No: MI-PTI-N6631-2012a

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/Modification Date	Flexible Group ID
EUBOILER1	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBOILERS, FGBFG
EUBOILER2	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBOILERS, FGBFG
EUBOILER3	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBOILERS, FGBFG
EUBFGFLARE1	One blast furnace gas flare equipped with a natural gas pilot flame. This flare is fired exclusively with blast furnace gas and is designed to operate when the blast furnace gas/natural gas boilers are not operating. The flare is rated at an approximate heat input of 480 MM Btu/hour.	3/1/1999	FGBFGFLARES, FGBFG
EUBFGFLARE2	One blast furnace gas flare equipped with a natural gas pilot flame. This flare is fired exclusively with blast furnace gas and is designed to operate when the blast furnace gas/natural gas boilers are not operating. The flare is rated at an approximate heat input of 1292 MM Btu/hour.	5/1/1999	FGBFGFLARES, FGBFG
EU3516GEN1	Caterpillar model 3516 reciprocating engine – 1.7 megawatts and 14.4 MMBtu/hour heat input.	10/1/2003	FGEMERGENCYGENS
EU3516GEN2	Caterpillar model 3516 reciprocating engine – 1.7 megawatts and 14.4 MMBtu/hour heat input.	10/1/2003	FGEMERGENCYGENS

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**FGBFG
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

This emission group consists of any emission unit which combusts, or has the capability of combusting, blast furnace gas.

Emission Units: EUBFGFLARE1, EUBFGFLARE2, EUBOILER1, EUBOILER2, and EUBOILER3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	1087.1 tpy ²	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	R 336.1205(1)(a)
2. CO	1798 tpy ²	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	R 336.1205(1)(a)
3. PM	237.1 tpy ²	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	R 336.1205(1)(a)
4. SO2	673 pph ^{2*}	Daily average	FGBFG	SC VI.1, SC VI.2	R 336.1205(1)(a), 40 CFR 52.21 (c) and (d)
5. SO2	2947.7 tpy ²	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	R 336.1205(1)(a)
6. SO2	840 pph ^{**}	Daily average	FGBFG	PTI (SC VI.4, SC VI.5)	FIP, Docket Id No. EPA-R05-OAR-2021-0536, 40 CFR 52.1189(e)(1), Act 451 324.5503(b)

NOTE:
 * Does not apply during periods of startup, shutdown and malfunction(s).
 ** This limit includes all periods of operation (includes during startups, shutdowns and malfunctions).

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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)

NA

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 verify compliance with the emission limitations for FGBFG by following the procedures and methodologies contained in the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-ROP-N6631-2004" dated May 31, 2011, or subsequent revisions to this document as provided under special condition VI.3.2 (R 336.1205(1)(a))
2. The permittee shall maintain the following records²
 - Calculated PM emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
 - Calculated CO emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
 - Calculated NO_x emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
 - Calculated SO₂ emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
 - Calculated SO₂ emission rate, lbs/hour, based upon a daily averaging period.
(R 336.1205(1)(a))
3. If it becomes necessary to revise, modify or update the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-ROP-N6631-2004" dated May 31, 2011, the permittee shall re-submit the document to the District Supervisor for review and written approval before implementing such revisions modifications, or updates.² (R 336.1205(1)(a))
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the SO₂ emissions from EUBOILER1, EUBOILER2 and EUBOILER3 on a continuous basis. Installation and operation of each continuous emission monitoring system (CEMS) shall meet the timelines, requirements and reporting detailed in 40 CFR Part 60 Appendix F. If the permittee chooses to use a Predictive Emissions Monitoring System (PEMS) in lieu of a Continuous Emissions Monitoring System (CEMS) to monitor SO₂ emissions, the permittee shall follow the protocol delineated in Performance Specification 16 in Appendix B of 40 CFR Part 60. (FIP, Docket Id No. EPA-R05-OAR-2021-0536, 40 CFR 52.1189(e)(2)(i), Act 451 324.5503(b))
5. The owner or operator shall verify compliance with the emission limits for Boilers 1, 2 and 3 and Flares 1 and 2 (combined) by following the procedures and methodologies contained in the document entitled Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-ROP-N6631-2004" dated May 31, 2011, or subsequent revisions to this document approved by EPA. (FIP, Docket Id No. EPA-R05-OAR-2021-0536, 40 CFR 52.1189(e)(2)(ii), Act 451 324.5503(b))

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See Appendices 3 and 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by 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. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. (R 336.1213(4)(c))

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBOILER1	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBOILERS, <u>FGBFG</u>
EUBOILER2	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBOILERS, <u>FGBFG</u>
EUBOILER3	One boiler capable of firing either natural gas or a combination of natural gas and blast furnace gas (BFG). When exclusively firing natural gas, the boiler is rated at a design heat input of 763 MM Btu per hour, and while firing natural gas and BFG, the boiler is rated at a design heat input of 746 MM Btu per hour. While operating on either fuel, the boiler has a design output capacity of 500,000 pounds of steam per hour.	8/7/2001	FGBOILERS, <u>FGBFG</u>
EUBFGFLARE1	One blast furnace gas flare equipped with a natural gas pilot flame. This flare is fired exclusively with blast furnace gas and is designed to operate when the blast furnace gas/natural gas boilers are not operating. The flare is rated at an approximate heat input of 480 MM Btu/hour.	3/1/1999	FGBFGFLARES, <u>FGBFG</u>
EUBFGFLARE2	One blast furnace gas flare equipped with a natural gas pilot flame. This flare is fired exclusively with blast furnace gas and is designed to operate when the blast furnace gas/natural gas boilers are not operating. The flare is rated at an approximate heat input of 1292 MM Btu/hour.	5/1/1999	FGBFGFLARES, <u>FGBFG</u>
EU3516GEN1	Caterpillar model 3516 reciprocating engine – 1.7 megawatts and 14.4 MMBtu/hour heat input.	10/1/2003	FGEMERGENCYGENS
EU3516GEN2	Caterpillar model 3516 reciprocating engine – 1.7 megawatts and 14.4 MMBtu/hour heat input.	10/1/2003	FGEMERGENCYGENS

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**FGBFG
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

This emission group consists of any emission unit which combusts, or has the capability of combusting, blast furnace gas.

Emission Units: EUBFGFLARE1, EUBFGFLARE2, EUBOILER1, EUBOILER2, and EUBOILER3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	1087.1 tpy ²	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	R 336.1205(1)(a)
2. CO	1798 tpy ²	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	R 336.1205(1)(a)
3. PM	237.1 tpy ²	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	R 336.1205(1)(a)
4. SO2	673 pph ^{2*}	Daily average	FGBFG	SC VI.1, SC VI.2	R 336.1205(1)(a), 40 CFR 52.21 (c) and (d)
5. SO2	2947.7 tpy ²	12-month rolling time period	FGBFG	SC VI.1, SC VI.2	R 336.1205(1)(a)
6. SO2	840 pph ^{**}	Daily average	FGBFG	PTI (SC VI.4, SC VI.5)	FIP, Docket Id No. EPA-R05-OAR-2021-0536, 40 CFR 52.1189(e)(1), Act 451 324.5503(b)

NOTE:
 * Does not apply during periods of startup, shutdown and malfunction(s).
 ** This limit includes all periods of operation (includes during startups, shutdowns and malfunctions).

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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)

NA

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)(iii))

1. The permittee shall verify compliance with the emission limitations for FGBFG by following the procedures and methodologies contained in the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-ROP-N6631-2004" dated May 31, 2011, or subsequent revisions to this document as provided under special condition VI.3.² (R 336.1205(1)(a))
2. The permittee shall maintain the following records²
 - Calculated PM emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
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 - Calculated NO_x emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
 - Calculated SO₂ emission rate, tons/year, based upon a 12-month rolling time period, as determined at the end of each month.
 - Calculated SO₂ emission rate, lbs/hour, based upon a daily averaging period.
(R 336.1205(1)(a))
3. If it becomes necessary to revise, modify or update the document entitled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-ROP-N6631-2004" dated May 31, 2011, the permittee shall re-submit the document to the District Supervisor for review and written approval before implementing such revisions modifications, or updates.² (R 336.1205(1)(a))
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the SO₂ emissions from EUBOILER1, EUBOILER2 and EUBOILER3 on a continuous basis. Installation and operation of each continuous emission monitoring system (CEMS) shall meet the timelines, requirements and reporting detailed in 40 CFR Part 60 Appendix F. If the permittee chooses to use a Predictive Emissions Monitoring System (PEMS) in lieu of a Continuous Emissions Monitoring System (CEMS) to monitor SO₂ emissions, the permittee shall follow the protocol delineated in Performance Specification 16 in Appendix B of 40 CFR Part 60. (FIP, Docket Id No. EPA-R05-OAR-2021-0536, 40 CFR 52.1189(e)(2)(i), Act 451 324.5503(b))
5. The owner or operator shall verify compliance with the emission limits for Boilers 1, 2 and 3 and Flares 1 and 2 (combined) by following the procedures and methodologies contained in the document entitled Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP MI-ROP-N6631-2004" dated May 31, 2011, or subsequent revisions to this document approved by EPA. (FIP, Docket Id No. EPA-R05-OAR-2021-0536, 40 CFR 52.1189(e)(2)(ii), Act 451 324.5503(b))

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See Appendices 3 and 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(iii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by 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. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. (R 336.1213(4)(c))