

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

EFFECTIVE DATE: December 3, 2019

ISSUED TO

**Zellar MPI Equipment, Inc.  
UP Paper, LLC**

State Registration Number (SRN): A6475

LOCATED AT

402 West Elk Street, Manistique, Schoolcraft County, Michigan 49854

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-A6475-2019

Expiration Date: December 3, 2024

Administratively Complete ROP Renewal Application Due Between  
June 3, 2023 to June 3, 2024

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 Rule 210(1) of the administrative rules promulgated under Act 451, this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

**SOURCE-WIDE PERMIT TO INSTALL**

Permit Number: MI-PTI-A6475-2019

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, 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

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Ed Lancaster, Marquette 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.

## 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))**

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).<sup>2</sup> **(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:"<sup>2</sup> **(R 336.1301(1))**
  - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% 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.<sup>1</sup> **(R 336.1901(a))**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **(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).<sup>2</sup> **(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))**

## 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 state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
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 60604-3507. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
  - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
  - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
  - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.
22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
  - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

- b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; “based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete.” The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.<sup>2</sup> **(R 336.1912)**

## Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
- a. The applicable requirements are included and are specifically identified in the ROP.
  - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.
- Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
- a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
  - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
  - d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:

- a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
  - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
  - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
  - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
  - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

## Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(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))**

## 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(9))**

## 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 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))**

### 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.<sup>2</sup> **(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.<sup>2</sup> **(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.<sup>2</sup> **(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.<sup>2</sup> **(R 336.1201(4))**

#### **Footnotes:**

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

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

## **B. SOURCE-WIDE CONDITIONS**

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

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

### C. EMISSION UNIT SPECIAL CONDITIONS

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

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

#### EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBLR003	99 MMBtu/hr boiler fired on natural gas or #2 fuel oil. Boiler No. 3	05/01/1994 10/11/2012	NA
EUDYE001	Paper dyeing process #1	01/01/1920 11/22/1994	NA
EUPROCESS	Process chemical usage	01/01/1965	NA
EUBLR004	A natural gas-fired boiler rated at 186.8 MMBtu/hr for steam production used on the paper machine. The boiler is equipped with low NOx burners and flue gas recirculation.	02/19/2014	NA

**EUBLR003  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Boiler rated 99 MMBtu/hr, fired on natural gas and No.2 fuel oil.

**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
1. NOx	14.35 pph <sup>2</sup>	Hourly	EUBLR003	SC V.1	R 336.1205(1)(a) R 336.2803 R 336.2804 40 CFR 52.21(c) & (d)
2. NOx	26.4 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUBLR003	SC VI.5	R 336.1205(3)
3. SO <sub>2</sub>	50.94 pph <sup>2</sup>	Hourly	EUBLR003	SC V.1	R 336.1205(1)(a) R 336.2803 R 336.2804 40 CFR 52.21(c) & (d)
4. SO <sub>2</sub>	27.8 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUBLR003	SC VI.5	R 336.1205(3)
5. PM	0.10 lbs/1000 lbs exhaust gas <sup>2</sup>	Instantaneous	EUBLR003	SC V.1	R 336.1331(1)(a)

\*Test protocol shall determine averaging time

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. No. 2 fuel oil	775,000 gallons per year <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUBLR003	SC IV.2 SC VI.2	R 336.1205(3)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
2. No. 2 fuel oil	The sulfur content shall not exceed 0.5 percent by weight <sup>2</sup>	Instantaneous	EUBLR003	SC VI.4	<b>R 336.1225</b> <b>R 336.1402(1)</b> <b>40 CFR 52.21 (c) &amp; (d)</b> <b>40 CFR Part 60.42c(d)</b>

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

1. The permittee shall not exceed 867,240 MMBtu per year of heat input into EUBLR003, based on a 12-month rolling time period as determined at the end of each calendar month<sup>2</sup>. **(R 336.1205(3), 40 CFR Part 60.40c(a))**
2. The permittee shall burn only pipeline quality natural gas and diesel fuel in EUBLR003.<sup>2</sup> **(R 336.1225, R 336.1702, 40 CFR Part 60.41c)**
3. The permittee shall operate EUBLR003 in accordance with manufacturer’s recommendations for safe and proper operation to minimize emissions during periods of startup, shutdown and malfunction.<sup>2</sup> **(R 336.1912)**

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

1. The heat input capacity of EUBLR003 shall not exceed a maximum of 99 million BTU per hour.<sup>2</sup> **(R 336.1205(3), R 336.1225, 40 CFR Part 60.40c(a))**
2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the use of each fuel used in EUBLR003 on a monthly basis.<sup>2</sup> **(R 336.1205(3), R 336.1225)**

**V. TESTING/SAMPLING**

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

1. Upon request from the district supervisor, the permittee shall verify NOx, SO2, and PM emission rates from EUBLR003 by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A
SO2	40 CFR Part 60, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit 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.<sup>2</sup> **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted.<sup>2</sup> **(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 complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1205(3), R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**
2. The permittee shall keep, in a satisfactory manner, monthly fuel use records for EUBLR003. The records must indicate the type and total amount of each fuel used in EUBLR003. All records shall be kept on file and made available to the Department upon request.<sup>2</sup> **(R 336.1205(3), R 336.1225, 40 CFR 60.48c(g))**
3. The permittee shall keep, in a satisfactory manner, records of calculations of the heat input to EUBLR003 on a monthly and a 12-month rolling time period basis as determined at the end of each calendar month.<sup>2</sup> **(R 336.1205(3), 40 CFR Part 60.40c(a))**
4. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EUBLR003, demonstrating that the fuel sulfur content meets the requirement of SC II.2. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.<sup>2</sup> **(R 336.1205(3), R 336.1402(1), 40 CFR Part 60.48c(f)(1))**
5. The permittee shall keep, in a satisfactory manner, NO<sub>x</sub> and SO<sub>2</sub> emission calculations for EUBLR003 on a monthly and 12-month rolling time period basis as determined at the end of each calendar month. All records shall be kept on file and made available to the Department upon request.<sup>2</sup> **(R 336.1205(3), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

See Appendix 4

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBLR003	48 <sup>2</sup>	33 <sup>2</sup>	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 Dc, as they apply to EUBLR003. **(40 CFR Part 60, Subparts A & Dc)**

2. The permittee shall comply with all provisions of the federal National Emissions Standards for Hazardous Air Pollutants in 40 CFR Part 63, Subparts A and DDDDD, as they apply to EUBLR003. **(40 CFR Part 63, Subparts A & DDDDD)**

**Footnotes:**

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

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

**EUDYE001  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Paper Dyeing

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

Tank Covers

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	9.1 pph <sup>2</sup>	Hourly	EUDYE001	SC VI.1 SC VI. 2	R 336.1201(3)
2. VOC	26.7 tpy <sup>2</sup>	12-month rolling time period	EUDYE001	SC VI.2	R 336.1201(3)

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall not operate EUDYE001 unless the tank covers are in place.<sup>2</sup> (R 336.1201(3), (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))

NA

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall maintain a record of the Volatile Organic Compound content of each material used in EUDYE001.<sup>2</sup> (R 336.1201(3), (R 336.1213(3)))
2. The permittee shall maintain a monthly record of the usage rate of each VOC containing material used in EUDYE001.<sup>2</sup> (R 336.1201(3), (R 336.1213(3)))
3. The permittee shall keep a written record to document the status of compliance with material limitations, emission limits, and other requirements specified in this table.<sup>2</sup> (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**

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

NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

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

**EUPROCESS  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Paper manufacturing process chemical use

**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
1. VOC	82.3 tpy <sup>2</sup>	12-month rolling time period	EUPROCESS (Total VOCs including cleaning solvents)	SC VI.3	R 336.1201(3) R 336.1702(3)
2. Kerosene (CAS No. 8008-20-6)	349 lbs <sup>2</sup>	8-hour shift	EUPROCESS	SC VI.1	R 336.1201(3) R 336.1702 R 336.1901
3. Petroleum Distillate (CAS No. 64742-47-8)	18.72 tpy <sup>2</sup>	12-month rolling time period	EUPROCESS	SC VI.2	R 336.1201(3) R 336.1702 R 336.1901

**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))

- The permittee shall record the usage rates and calculate the No. 1 fuel oil or kerosene (CAS #8008-20-6) emission rates from EUPROCESS for each 8-hour shift to determine compliance with the limitation specified under Emission Limits above.<sup>2</sup> (R 336.1201(3), R 336.1213(3))

2. The permittee shall record the usage rates and calculate the petroleum distillates (CAS #64742-47-8) emission rates from EUPROCESS for each month and year based on a 12-month rolling time period as determined at the end of each calendar month to determine compliance with the limitation specified under Emission Limits above.<sup>2</sup> **(R 336.1201(3), R 336.1213(3))**
3. The permittee shall record the usage rates and calculate the total VOC emission rates from EUPROCESS including the cleaning solvents and excluding the dye, for each month and year based on a 12-month rolling time period as determined at the end of each calendar month to determine compliance with the limitation specified under Emission Limits above.<sup>2</sup> **(R 336.1201(3), R 336.1213(3))**
4. The permittee shall keep records of the VOC content, water content and density of each VOC containing material used or mixed.<sup>2</sup> **(R 336.1201(3), (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

**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-Beater #2	8 <sup>2</sup>	30.7 <sup>2</sup>	<b>(R 336.1201(3), R 336.1901)</b>
#2-Machine-1	60 <sup>2</sup>	44 <sup>2</sup>	<b>(R 336.1201(3), R 336.1901)</b>
#3-Machine-2	48 x 48 <sup>2</sup>	44 <sup>2</sup>	<b>(R 336.1201(3), R 336.1901)</b>
#4-Machine-3	36 <sup>2</sup>	47 <sup>2</sup>	<b>(R 336.1201(3), R 336.1901)</b>
#5-Machine-4	36 <sup>2</sup>	47 <sup>2</sup>	<b>(R 336.1201(3), R 336.1901)</b>
#6-Machine-5	48 <sup>2</sup>	45 <sup>2</sup>	<b>(R 336.1201(3), R 336.1901)</b>
#7-Machine-6	67 x 62 <sup>2</sup>	43 <sup>2</sup>	<b>(R 336.1201(3), R 336.1901)</b>
#8-Machine-7	42 x 42 <sup>2</sup>	45 <sup>2</sup>	<b>(R 336.1201(3), R 336.1901)</b>
#9-Machine-8	48 <sup>2</sup>	45 <sup>2</sup>	<b>(R 336.1201(3), R 336.1901)</b>
#10-Machine-9	60 <sup>2</sup>	42 <sup>2</sup>	<b>(R 336.1201(3), R 336.1901)</b>

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

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

**EUBLR004  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A natural gas-fired boiler rated at 186.8 MMBtu/hr for steam production. The boiler is equipped with low NOx burners and flue gas recirculation.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Low NOx burners and flue gas recirculation

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	0.20 lb/MMBTU <sup>2</sup>	30-day average rolling time period	EUBLR004	SC VI.2 or SC VI.3	<b>40 CFR 60.44b(l)</b>
2. GHG as CO <sub>2e</sub>	74, 975 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUBLR004	SCVI.6	<b>R 336.1205(1)(a) &amp; (b)</b>

\*Test Protocol shall determine averaging time

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	1247 MMcf <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUBLR004	SC VI.5	<b>R 336.1205(1)(a) &amp; (b) R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21(c) &amp; (d)</b>

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

1. The permittee shall not operate EUBLR004 unless a malfunction abatement plan (MAP) as described in Rule 911(2), for EUBLR004 operation, has been submitted within 180 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

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 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. **(R 336.1225, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))**

2. The permittee shall burn only pipeline quality natural gas in EUBLR004.<sup>2</sup> **(R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d), 40 CFR Part 60, Subpart Db)**

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

1. The maximum design heat input capacity for EUBLR004 shall not exceed 186.8 MMBtu per hour on a fuel heat input basis.<sup>2</sup> **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR Part 60, Subpart Db)**
2. The permittee shall not operate EUBLR004 unless the low NO<sub>x</sub> burners and flue gas recirculation system are installed, maintained, and operated in a satisfactory manner.<sup>2</sup> **(R 336.1205(1)(a) & (b), R 336.1910, 40 CFR 52.21(c) & (d))**
3. The permittee shall install, calibrate, maintain and operate, in a satisfactory manner, a device to monitor and record the daily natural gas usage rate for EUBLR004 on a continuous basis.<sup>2</sup> **(R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d), 40 CFR 60.49b(d))**
4. If the permittee chooses the compliance method specified in SC VI.2, the permittee shall install, calibrate, maintain and operate in a satisfactory manner, devices to monitor and record the NO<sub>x</sub> emissions, and oxygen (O<sub>2</sub>), or carbon dioxide (CO<sub>2</sub>), content of the exhaust gas from EUBLR004 on a continuous basis.<sup>2</sup> **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR 60.48b, 40 CFR Part 75)**

#### **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 complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR Part 60, Subpart Db)**
2. Except as specified in SC VI.3, the permittee shall continuously monitor and record, in a satisfactory manner, the NO<sub>x</sub> emissions and the O<sub>2</sub>, or CO<sub>2</sub>, emissions from EUBLR004. The permittee shall operate each Continuous Emission Monitoring System (CEMS) to meet the timelines, requirements and reporting detailed in Appendix A and shall use the CEMS data for determining compliance with SC I.1.<sup>2</sup> **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR Part 60, Subpart Db)**
3. As an alternative to the compliance method specified in SC VI.2, the permittee may demonstrate compliance by monitoring EUBLR004 operating conditions and predicting NO emission rates in a satisfactory manner. The permittee shall submit a plan that identifies the operating conditions to be monitored and the records to be maintained. The permittee shall operate each Predictive Emission Monitoring System (PEMS) to meet the timelines, requirements and reporting detailed in Appendix A and shall use the PEMS data for determining compliance with SC I.1.<sup>2</sup> **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR Part 60, Subpart Db)**

4. The permittee shall keep monthly natural gas usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of natural gas used, in cubic feet, on an average calendar day basis, a calendar month basis, and a 12-month rolling time period basis. The permittee shall keep all records on file at the facility and make them available to the Department upon request.<sup>2</sup> **(R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d), 40 CFR 60.49b(d))**
5. The permittee shall calculate and keep, in a satisfactory manner, records of the monthly and 12-month rolling annual capacity factor for natural gas for EUBLR004. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> **(40 CFR 60.49b(d))**
6. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total CO<sub>2</sub>e emissions for EUBLR004, as required by SC I.2. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> **(R 336.1205(1)(a) & (b))**
7. The permittee shall keep, in a satisfactory manner, records of the fuel receipts from the fuel supplier that certify that the natural gas meets the definition of natural gas defined in 40 CFR 60.41b for EUBLR004 on file at the facility and make them available to the Department upon request.<sup>2</sup> **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) and (d), 40 CFR Part 60, Subpart Db, 40 CFR 60.49b(r)(1))**
8. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:
  - a) Compliance tests and any testing required under the special conditions of this permit.
  - b) Monitoring data.
  - c) Verification of heat input capacity required to show compliance with SC IV.1.
  - d) Identification, type and the amounts of fuel combusted in EUBLR004 on an average calendar day basis.
  - e) All records required by 40 CFR 60.7 and 60.49b.
  - f) All calculations necessary to show compliance with the limits contained in this permit.

All of the above information shall be stored in a format acceptable to the AQD and shall be consistent with the requirements of 40 CFR 60.7(f).<sup>2</sup> **(R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.1912, 40 CFR 52.21(c) & (d), 40 CFR 60.7(f), 40 CFR Part 60, Subpart Db)**

**See Appendix 3**

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7.<sup>2</sup> **(40 CFR 60.7)**
5. The permittee shall provide written notification of the actual date of initial startup to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.49b(a). The notification shall include:
  - a. The design heat input capacity of EUBLR004 and identification of the fuels to be combusted in EUBLR004.
  - b. The annual capacity factor at which the owner or operator anticipates operating the facility based on all fuels fired and based on each individual fuel fired.

The permittee shall submit this notification to the AQD District Supervisor within 15 days after initial startup occurs.<sup>2</sup> **(40 CFR 60.49b(a))**

- 6. The permittee shall submit all reports required by the federal Standards of Performance for New Stationary Sources, 40 CFR 60.49b, as applicable. The permittee shall submit these reports to the AQD District Supervisor within the time frames specified in 40 CFR 60.49b and/or 40 CFR 60.7.<sup>2</sup> **(40 CFR 60.7, 40 CFR 60.49b(h) & (i))**

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. SVBOILER4	72 <sup>2</sup>	40 <sup>2</sup>	R 336.1225, 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 Db, as they apply to EUBLR004. **(40 CFR Part 60, Subparts A & Db)**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **D. FLEXIBLE GROUP SPECIAL CONDITIONS**

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

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

**E. NON-APPLICABLE REQUIREMENTS**

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

<b>Emission Unit/Flexible Group ID</b>	<b>Non-Applicable Requirement</b>	<b>Justification</b>
EUPROCESS	40 CFR Part 60, Subpart BB	Facility is not a Kraft Paper Mill
EUPROCESS	40 CFR Part 63, Subpart S	Facility process and materials not subject to Subpart S

## 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 <sub>2</sub> 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 <sub>2</sub> 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 <sub>x</sub>	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 <sub>2</sub>	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.

**Appendix 2. Schedule of Compliance**

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

**Appendix 3. Monitoring Requirements**

**NO<sub>x</sub> Monitoring  
Continuous Emission Monitoring System (CEMS) and  
Predictive Emission Monitoring System (PEMS) Requirements**

- 1. Within 30 calendar days after commencement of trial operation, the permittee shall submit two copies of a Monitoring Plan to the AQD, for review and approval. The Monitoring Plan shall include drawings or specifications showing proposed locations and descriptions of the required CEMS/PEMS.
- 2. Within 150 calendar days after commencement of trial operation, the permittee shall submit two copies of a complete test plan for the CEMS/PEMS to the AQD for approval.
- 3. Within 180 calendar days after commencement of trial operation, the permittee shall complete the installation and testing of the CEMS/PEMS.
- 4. Within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating the CEMS/PEMS complies with the requirements of the corresponding Performance Specifications (PS) in the following table.

Pollutant	Applicable PS
NO <sub>x</sub>	2
O <sub>2</sub> and CO <sub>2</sub>	3
PEMS	16

- 5. The span value shall be 2.0 times the lowest emission standard or as specified in the federal regulations.
- 6. The CEMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 2 and 3 of Appendix B to 40 CFR Part 60. If a PEMS is installed in lieu of a CEMS, the PEMS shall be installed, maintained, and operated in accordance with PS 16 of Appendix B to 40 CFR Part 60, as proposed or promulgated.
- 7. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CEMS set forth in Appendix F of 40 CFR Part 60. If a PEMS is installed in lieu of a CEMS, the permittee shall perform the Quality Assurance Procedures of the PEMS set forth in PS 16 of Appendix B to 40 CFR Part 60, as proposed or promulgated. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD in the format of the data assessment report (Figure 1, Appendix F).
- 8. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and summary report in an acceptable format to the AQD, within 30 days following the end of each calendar quarter. The 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 0.20 lb NO<sub>x</sub>/MMBtu. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period. A report of all periods of CEMS/PEMS

downtime and corrective action. A report of the total operating time of EUBLR004 during the reporting period. A report of any periods that the CEMS/PEMS exceeds the instrument range. If no exceedances or CEMS/PEMS 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.

**Appendix 4. Recordkeeping**

**Fuel Oil Analysis:**

For each fuel oil shipment received, the permittee shall obtain from the fuel oil supplier a laboratory analysis of the sulfur content. The determination of sulfur content (percent by weight) shall be carried out in accordance with any of the following procedures: ASTM Method D129-64 or ASTM Method 1552-83, or ASTM Method 2622-87 or ASTM Method 1266-87, or an alternative method approved by the AQD District Supervisor. For each fuel oil shipment received, the permittee shall also record the date received, source of fuel oil and supplier, and gallons received. These records shall be retained by the permittee for a minimum of 5 years and made available to the Air Quality Division upon request.

**Appendix 5. Testing Procedures**

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

**Appendix 6. Permits to Install**

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-A6475-2014a. 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-A6475-2014a is being reissued as Source-Wide PTI No. MI-PTI-A6475-2019.

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

**Appendix 7. 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. 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.