

From: [Johann Britting](#)
To: [EGLE-ROP](#)
Cc: [Benaway, Rachel \(EGLE\)](#); [William Turco](#)
Subject: [B2934] - ROP Renewal Application
Date: Tuesday, August 1, 2023 12:39:41 PM
Attachments: [image001.png](#)
[B2934_ROP_MARK-UP.docx](#)
[EUEVAPBOILER Engineering Change to 21 MMBtu per hour.pdf](#)
[Palisades signed ROP Renewal Application Form.pdf](#)

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Hello,

See attached ROP application form, ROP mark-up, and supplemental data.

A paper copy is also being mailed to the AQD district supervisor in Kalamazoo.

Thanks,

Johann Britting
Radiation Protection-Chemistry-Environmental
Holtec – Palisades
Office:269-764-2356
Cell:248-388-9479
j.britting@holtec.com



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

EFFECTIVE DATE: February 4, 2019

REVISION DATE: June 28, 2022

ISSUED TO
**Holtec Palisades, LLC
Palisades Nuclear Plant**

State Registration Number (SRN): B2934

LOCATED AT

27780 Blue Star Memorial Highway, Covert, Michigan 49043

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2934-2019a

Expiration Date: February 4, 2024

Administratively Complete ROP Renewal Application
Due Between August 4, 2022 and August 4, 2023

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B2934-2019a

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

Michigan Department of Environment, Great Lakes and Energy

Rex Lane, Kalamazoo 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).² **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"² **(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.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² **(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 states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(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.² **(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):
 - a. June 21, 1999,
 - b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - c. The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

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

Permit to Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUEVAPBOILER	Evaporation heating boiler – 21 MMBtu/hr, fuel oil fired.	01-01-1970	FGBOILERS
EUPLANTHEATBLR	Plant heating boiler - 23.2 MMBtu/hr, fuel oil fired.	01-01-1970	FGBOILERS
EUOFFICEBLR	Office heating boiler - 2.5 MMBtu/hr, fuel oil fired.	09-20-2018	NA
EUGEN1	Emergency generator #1 - 21.8 MMBtu/hr, compression ignition, diesel fired.	01-01-1970	FGGENS1&2 FGEMERG-EXRICE
EUGEN2	Emergency generator #2 - 21.8 MMBtu/hr, compression ignition, diesel fired.	01-01-1970	FGGENS1&2 FGEMERG-EXRICE
EUGEN3	Emergency generator #3 - 17.5 MMBtu/hr, 2.0 MW, compression ignition, diesel fired emergency generator set.	07-01-2006	NA
EUSECURITYGEN	Emergency generator for security operations - 5.9 MMBtu/hr, compression ignition diesel fired.	07-01-2011	NA
EUGENK-17	800 bhp emergency diesel engine, model year 2016, for auxiliary feedwater system.	10-26-2018	NA
EUGENK-5	Emergency fire pump - 175 bhp, compression ignition, diesel fired.	12-31-1971	FGEMERG-EXRICE
EUEGENK-10	Emergency fire pump - 175 bhp, compression ignition, diesel fired.	11-01-1974	FGEMERG-EXRICE
EUGENK-1A	Emergency air compressor - 10 bhp, spark ignition, gas fired.	12-31-1971	FGEMERG-EXRICE
EUGENK-1B	Emergency air compressor - 10 bhp, spark ignition, gas fired.	12-31-1971	FGEMERG-EXRICE
EUCOLDCLEANER	Various cold cleaners operating under Rule 281(h) or Rule 285(r)(iv).	01-01-1970	FGCOLDCLEANERS

EUOFFICEBLR EMISSION UNIT CONDITIONS

DESCRIPTION

Office heating boiler - 2.5 MMBtu/hr, fuel oil fired.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not burn fuel oil in EUOFFICEBLR which contains more than 0.40% sulfur by weight. **(R 336.1201)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a complete record of fuel oil specifications and/or a fuel oil analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The analysis method used to test the percent sulfur shall be an EPA, or equivalent, approved method. **(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)

1. The permittee shall comply with the applicable requirements of 40 CFR Part 63 Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. **(40 CFR Part 63, Subpart JJJJJJ)**

Footnotes:

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

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

**EUGEN3
EMISSION UNIT CONDITIONS**

DESCRIPTION

Emergency generator #3 - 17.5 MMBtu/hr, 2.0 MW, compression ignition, diesel fired emergency generator set.

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	428 lb/1000 gal of fuel used ²	Instantaneous	EUGEN3	SC V.1	R 336.1205(1)(a) and (3)

II. MATERIAL LIMIT(S)

- 1. The permittee shall only burn diesel fuel in EUGEN3.² (R 336.1205(1)(a) and (3), R 336.1224, R 336.1225, R 336.1401, R 336.1702(a), 40 CFR Part 52.21(c) and (d))
- 2. If any electricity produced by EUGEN3 is sold to a utility power distribution system, the sulfur content of the diesel fuel used in FGENGINES shall not exceed 0.05 percent by weight on an annual average. The annual average shall be calculated as specified in 40 CFR 72.7(d)(3).² (40 CFR Part 72.7)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EUGEN3 for more than 1,100 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month.² (R 336.1205(1)(a) and (3), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR Part 52.21(c) and (d))
- 2. The permittee shall operate EUGEN3 in accordance with manufacturer's recommendations for safe and proper operation to minimize emissions during periods of startup, shutdown and malfunction.² (R 336.1912)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The total capacity from EUGEN3 shall not exceed 5 MW.² (40 CFR Part 72.7)
- 2. The nameplate capacity of the generator of EUGEN3 shall not exceed 1,825 kW, and the nameplate capacity of the engine of EUGEN3 shall not exceed 2,628 hp, as certified by the equipment manufacturer.² (R 336.1205(1)(a) and (3), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR Part 52.21(c) and (d))
- 3. The permittee shall equip and maintain EUGEN3 with a non-resettable hours meter to track the operating hours.² (R 336.1205(1)(a) and (3), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR Part 52.21(c) and (d))

V. TESTING/SAMPLING

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

- 1. Verification of the NOx emission limit, as specified in SC I.1, from EUGEN3, by testing at owner's expense, in accordance with Department requirements may be required. No less than 60 days prior to testing, a complete

test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of the emission factor includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² **(R 336.1205(1)(a) and (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. **(R 336.1213(3))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall 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.² **(R 336.1205(1)(a) and (3), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR Part 52.21(c) and (d))**
2. If any electricity produced by EUGEN3 is sold to a utility power distribution system, the permittee shall keep records of the sulfur content calculated in percent by weight, on an annual average as required by Condition III.2. All records shall be kept on file for a period of at least five years and made available to the Department upon request.² **(40 CFR Part 72.7)**
3. The permittee shall monitor, record, and keep, in a satisfactory manner, the total hours of operation for EUGEN3, on a monthly and 12-month rolling time period basis, in a manner acceptable to the District Supervisor, Air Quality Division. All records shall be kept on file for a period of at least five years and made available to the Department upon request.² **(R 336.1205(1)(a) and (3), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR Part 52.21(c) and (d))**
4. The permittee shall keep, in a satisfactory manner, records of the date, duration, and description of any malfunction, any maintenance performed and any testing results for EUGEN3. All records shall be kept on file for a period of at least five years and made available to the Department upon request.² **(R 336.1912)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

1. The exhaust gases from EUGEN3 shall be discharged unobstructed vertically upwards to the ambient air.² **(R 336.1225, 40 CFR Part 52.21(c) and (d))**

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines.² **(40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:

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

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

**EUSECURITYGEN
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Emergency generator for security operations – 5.9 MMBtu/hr, compression ignition diesel fired.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

- 1. The permittee shall comply with the emission standards in CFR 40 CFR 94.8(a)(2), for all pollutants, for the same model year and maximum engine power as EUSECURITYGEN by purchasing an engine certified to the applicable emission standards. **(40 CFR 60.4205(b), 40 CFR 60.4202(e)(1), 40 CFR 60.4211(a) and (c))**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fuel oil sulfur content	15 ppm	Instantaneous, at all times	EUSECURITYGEN	SC VI.2	40 CFR 60.4207(b)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall maintain and operate EU-SECURTIYGEN in compliance with the appropriate emission standards for the life of the engine. **(40 CFR Part 60.4206)**
- 2. The permittee shall do all of the following except as permitted under 40 CFR 60.4211(g):
 - a. Operate and maintain EU-SECURITYGEN according to the manufacturer's emission-related written instructions;
 - b. Change only those emission-related settings that are permitted by the manufacturer; and
 - c. Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to EU-SECURITYGEN. **(40 CFR Part 60.4211(a))**
- 3. The permittee shall install and configure EU-SECURITYGEN according to the manufacturer's specifications. **(40 CFR Part 60.4211(c))**
- 4. In order for EU-SECURITYGEN to be considered an emergency engine under 40 CFR Part 60 Subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If you do not operate the engine accordingly, EU-SECURITYGEN will not be considered an emergency engine under Subpart IIII and must meet all requirements for non-emergency engines **(40 CFR Part 60.4211(f))**:
 - a. There is no time limit on the use of EU-SECURITYGEN in emergency situations.
 - b. EU-SECURITYGEN may be operated for any combination of the purposes specified in 40 CFR 60.4211(f)(2) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed in 3.c below counts as part of the 100 hours per calendar year.
 - c. EU-SECURITYGEN may be operated for up to 50 hours per calendar year in non-emergency situations. These hours are counted as part of the 100 hours per calendar year for maintenance, testing and emergency demand response provided in 3.b above. Except as provided for in 40 CFR 60.4211(f)(3)(i), the 50 hours for non-emergency situations cannot be used for peak shaving or non-emergency demand

response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. **(40 CFR Part 60.4211(f))**

5. If EU-SECURITYGEN is not installed, configured, operated and maintained according to the manufacturer's emission-related instructions, or the emission-related settings are changed in a way that is not permitted by the manufacturer, compliance shall be demonstrated by the applicable requirements in 40 CFR 60.4211(g). **(40 CFR Part 60.4211(g))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-SECURITYGEN unless a non-resettable hour meter has been installed. **(40 CFR Part 60.4209(a))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep a record of the following information on EU-SECURITYGEN:
 - a. Size of the unit in horsepower and KW, model year, cylinder displacement in liters;
 - b. The manufacturer's certification that EU-SECURITYGEN meets the applicable emission standards;
 - c. The manufacturer's information on the emissions-related instructions for installation, configuration, operation and maintenance. **(R 336.1213(3))**
2. The permittee shall keep a complete record of fuel oil specifications and/or a fuel oil analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The analysis method used to test the percent sulfur shall be an EPA, or equivalent, approved method. **(R 336.1213(3))**
3. The permittee shall keep a record of the following on the use of EU-SECURITYGEN:
 - a. The date and time of each start up,
 - b. The reason for each operation,
 - c. The hours of operation, and
 - d. The running total of the hours of operation for the calendar year adequate to demonstrate compliance with 40 CFR 60.4211(f). **(R 336.1213(3), (40 CFR Part 60.4214(b))**
4. The permittee shall keep a record of maintenance performed on EU-SECURITYGEN. **(R 336.1213(3))**

VII. REPORTING

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

4. If the permittee operates EU-SECURITYGEN under the purposes specified in § 60.4211(f)(2)(ii) and (iii) or § 60.4211(f)(3)(i) the annual report specified in § 60.4214(d) shall be submitted. **(40CFR Part 60.4214(d))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the federal New Source Performance Standards, as specified in 40 CFR Part 60, Subpart A and Subpart IIII for Stationary Compression Ignition Internal Combustion Engines. **(40 CFR Part 60, Subparts A and IIII)**
2. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines.² **(40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:

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

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

**EUGENK-17
 EMISSION UNIT CONDITIONS**

DESCRIPTION

800 bhp emergency diesel engine, model year 2016, for auxiliary feedwater system.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. The permittee shall comply with the emission standards in 40 CFR 60.4202, for all pollutants, for the same model year and maximum engine power as EUGENK-17 by purchasing an engine certified to the applicable emission standards.² **(40 CFR Part 60.4200(b), 40 CFR Part 60.4202(e), 40 CFR Part 60.4211(a) and (c))**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fuel oil sulfur content	15 ppm ²	Instantaneous, at all times	EUGENK-17	SC VI.1	40 CFR 60.4207(b)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate each engine in EUGENK-17 for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. The 500 hours includes the hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.5.² **(R 336.1205(1)(a) and (b), R 336.1225, R 336.1702(a), 40 CFR Part 52.21 (c) and (d))**
2. The permittee shall maintain and operate EUGENK-17 in compliance with the appropriate emission standards for the life of the engine.² **(40 CFR Part 60.4206)**
3. The permittee shall do all of the following except as permitted under 40 CFR 60.4211(g):
 - a. Operate and maintain EUGENK-17 according to the manufacturer’s emission-related written instructions;
 - b. Change only those emission-related settings that are permitted by the manufacturer; and
 - c. Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to EUGENK-17.² **(40 CFR Part 60.4211(a))**
4. The permittee shall install and configure EUGENK-17 according to the manufacturer’s specifications.² **(40 CFR Part 60.4211(c))**
5. In order for EUGENK-17 to be considered an emergency engine under 40 CFR Part 60 Subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If you do not operate the engine accordingly, EUGENK-17 will not be considered an emergency engine under Subpart IIII and must meet all requirements for non-emergency engines.² **(40 CFR Part 60.4211(f)):**
 - a. There is no time limit on the use of EUGENK-17 in emergency situations.

- b. EUGENK-17 may be operated for any combination of the purposes specified in 40 CFR 60.4211(f)(2) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed in 4.c below counts as part of the 100 hours per calendar year.
 - c. EUGENK-17 may be operated for up to 50 hours per calendar year in non-emergency situations. These hours are counted as part of the 100 hours per calendar year for maintenance, testing and emergency demand response provided in 4.b above. Except as provided for in 40 CFR 60.4211(f)(3)(i), the 50 hours for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.² **(40 CFR Part 60.4211(f))**
6. If EUGENK-17 is not installed, configured, operated and maintained according to the manufacturer's emission-related instructions, or the emission-related settings are changed in a way that is not permitted by the manufacturer, compliance shall be demonstrated by the applicable requirements in 40 CFR 60.4211(g).² **(40 CFR Part 60.4211(g))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUGENK-17 unless a non-resettable hour meter has been installed.² **(40 CFR Part 60.4209(a))**
2. The nameplate capacity of each engine in EUGENK-17 shall not exceed 800 BHP, as certified by the equipment manufacturer.² **(R 336.1205(1)(a) and (3), 40 CFR Part 60.4202, 40 CFR Part 89.112(a))**

V. TESTING/SAMPLING

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

1. The permittee shall conduct an initial performance test for each engine in EUGENK-17 within one year after startup of the engine to demonstrate compliance with the emission limits in 40 CFR 60.4205 unless the engine has been certified by the manufacturer and the permittee maintains the engine as required by 40 CFR Part 60 Subpart IIII. If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. Subsequent performance testing shall be conducted every 8,760 hours of engine operation or 3 years, whichever comes first.² **(40 CFR Part 60.4211, 40 CFR Part 60.4212, 40 CFR Part 60, Subpart IIII)**
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. **(R 336.1213(3))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep a complete record of fuel oil specifications and/or a fuel oil analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The analysis method used to test the percent sulfur shall be an EPA, or equivalent, approved method.² **(R 336.1205(1)(a) and (b), 40 CFR Part 80.510(b))**
2. The permittee shall keep a record of the following on the use of EUGENK-17:
 - a. The date and time of each start up,
 - b. The reason for each operation,
 - c. The hours of operation, and
 - d. The running total of the hours of operation for the calendar year adequate to demonstrate compliance with 40 CFR 60.4211(f).² **(40 CFR Part 60.4214)**

3. The permittee shall keep a record of maintenance performed on EUGENK-17.² **(40 CFR Part 60.4214(a)(2))**
4. The permittee shall keep, in a satisfactory manner, records of testing required in SC V.1 or manufacturer certification documentation indicating that each engine in EUGENK-17 meets the applicable requirements contained in the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subpart IIII. If an engine in FG-EG1 becomes uncertified, then the permittee must also keep records of a maintenance plan and maintenance activities for that engine. The permittee shall keep all records on file and make them available to the Department upon request.² **(40 CFR Part 60.4211(g))**
5. The permittee shall keep records of the operation of EUGENK-17 in emergency and non-emergency service that are recorded through the non-resettable hour meter, on a calendar year basis. The owner must record the time of operation of the engine and the reason the engine was in operation during each operational period. The record shall include calculations of the total number of hours used for each type of operation in the previous calendar year.² **(40 CFR Part 60.4211, 40 CFR Part 60.4214(b))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked 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. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUGENK-17.² **(R 336.1201(7)(a))**
5. If the EUGENK-17 is an emergency stationary internal combustion engine with a model year 2011 or newer, the permittee is not required to submit an initial notification.² **(40 CFR Part 60.4214(b))**
6. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the federal New Source Performance Standards, as specified in 40 CFR Part 60, Subpart A and Subpart IIII for Stationary Compression Ignition Internal Combustion Engines.² **(40 CFR Part 60, Subparts A and IIII)**

2. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines.² **(40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:

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

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

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGBOILERS	An evaporator heating boiler and a plant heating boiler that fire fuel oil and have heat input capacities of 21 MMBtu/hr and 23.2 MMBtu/hr respectively.	EUEVAPBOILER EUPLANTHEATBLR
FGGENS1&2	Two emergency generators that fire fuel oil and have heat input capacities of 21.8 MMBtu/hr each.	EUGEN1 EUGEN2
FGEMERG-EXRICE	Emergency generators subject to 40 CFR Part 63, Subpart ZZZZ, as existing units.	EUGEN1 EUGEN2 EUGENK-5 EUGENK-10 EUGENK-1A EUGENK-1B
FGCOLDCLEANERS	Any existing cold cleaner (placed into operation prior to July 1, 1979) or new cold cleaner (placed into operation after July 1, 1979) that is exempt from NSR permitting by R 336.1281(h) or R 336.1285(r)(iv).	EUCOLDCLEANER

**FGBOILERS
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

An evaporator heating boiler and a plant heating boiler that fire fuel oil and have heat capabilities of 23.2 MMBtu/hr.

Emission Units: EUEVAPBOILER, EUPLANTHEATBLR

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fuel Oil	The maximum sulfur content in fuel oil shall not exceed the equivalent of 1.5%.*	Instantaneous	FGBOILERS	SC VI.2, VI.4	R 336.1401(1), Table 41

* The maximum sulfur content in fuel is defined as the average sulfur content in all fuels burned at any one time in a power plant as calculated on the basis of 18,000 BTUs per pound of liquid fuels.

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall record the monthly fuel oil usage rates, in gallons, from FGBOILERS. (R 336.1213(3))
2. The permittee shall maintain a complete record of fuel oil specifications and/or a fuel oil analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The analysis method used to test the percent sulfur shall be an EPA, or equivalent, approved method. (R 336.1213(3))

3. To ensure proper operation, the permittee shall record the results of a weekly visible emission observation from SVPLNHTBLR and SVEVAPHTBLR. If visible emissions are observed, the permittee shall implement the Preventative Maintenance Plan at the facility. **(R 336.1213(3))**
4. The permittee shall sample and record the percent sulfur content, by weight, of fuel oil in the storage tank once every 12 months using an EPA or equivalent approved method. **(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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVEVAPHTBLR	27	100	R 336.1201(1)
2. SVPLNHTBLR	27	100	R 336.1201(1)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the applicable requirements of 40 CFR Part 63 Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. **(40 CFR Part 63, Subpart JJJJJJ)**

Footnotes:

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

**FGGENS1&2
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Two emergency generators that fire fuel oil and have heat input capacities of 21.8 MMBtu/hr each.

Emission Units: EUGEN1, EUGEN2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fuel Oil	The maximum sulfur content in fuel oil shall not exceed the equivalent of 1.5%.*	Instantaneous	FGGENS	SC VI.2, VI.3	R 336.1401(1), Table 41

* The maximum sulfur content in fuel is defined as the average sulfur content in all fuels burned at any one time in a power plant and is calculated on the basis of 18,000 BTUs per pound of liquid fuels.

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall record the monthly fuel oil usage rates, in gallons, from FGGENS. (R 336.1213(3))
2. The permittee shall maintain a complete record of fuel oil specifications and/or a fuel oil analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The analysis method used to test the percent sulfur shall be an EPA, or equivalent, approved method. (R 336.1213(3))

3. To ensure proper operation, the permittee shall record the results of a weekly visible emission observation from SVGEN1 and SVGEN2 when operating, and within one hour following start up conditions, if startup has occurred. If visible emissions are observed, the permittee shall implement the Preventative Maintenance Plan at the facility. **(R 336.1213(3))**
4. The permittee shall sample and record the percent sulfur content, by weight, of fuel oil in the storage tank once every 12 months using an EPA or equivalent approved method. **(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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVGEN1*	22	50	R 336.1201(1)
2. SVGEN2*	22	50	R 336.1201(1)

* Exhaust gases may be discharged horizontally.

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines.² **(40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:

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

FGEMERG-EXRICE FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Emergency generators subject to 40 CFR Part 63, Subpart ZZZZ, as existing units.

Emission Units: EUGEN1, EUGEN2, EUGENK-5, EUGENK-10, EUGENK-1A, EUGENK-1B

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine; not to exceed 30 minutes. **(40 CFR Part 63.6625(h))**
2. The permittee shall operate and maintain FGEMERG-EXRICE according to the manufacturer's emission-related operation and maintenance instructions or develop and follow a site-specific maintenance plan. The site-specific maintenance plan must provide, to the extent practicable, for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. **(40 CFR Part 63.6605(b), 40 CFR Part 63.6625(e), 40 CFR Part 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6.9)**
3. In order to be considered emergency generators the permittee must operate FGEMERG-EXRICE according to the requirements below. Any operation other than this is prohibited. If not operated accordingly, then the engine must meet all requirements in 40 CFR Part 63, Subpart ZZZZ for non-emergency engines:
 - a. There is no time limit on the use of the emergency engine in emergency situations.
 - b. The permittee may operate each FGEMERG-EXRICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by 3.c counts as part of the 100 hours per calendar year:
 - i. FGEMERG-EXRICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
 - ii. FGEMERG-EXRICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
 - iii. FGEMERG-EXRICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

- c. The permittee may operate each unit in FGEMERG-EXRICE up to 50 hours per year in non-emergency situations, but these 50 hours of operation are counted towards the 100 hours per year allowed in 3.b. Except as provided below, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity:
 - i. Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.
 - ii. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
 - A. The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - B. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - C. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - D. The power is provided only to the facility itself or to support the local transmission and distribution system.
 - E. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator. **(40 CFR Part 63.6640(f))**
4. The permittee shall maintain FGEMERG-EXRICE in a satisfactory manner, which includes the following:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first. The permittee has the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) or (j).
 - b. For diesel-fired units, inspect the air filter every 1,000 hours of operation or annually, whichever comes first.
 - c. For gas-fired units, inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first.
 - d. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. **(40 CFR Part 63.6603(a), 40 Part CFR 63.6625(i) and (j), 40 CFR Part 63, Subpart ZZZZ, Table 2d.4)**
 5. If the engine is operating during an emergency & it is not possible to shut down the engine in order to perform the work practice requirements in III.4, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. **(40 CFR Part 63, Subpart ZZZZ, Table 2d)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a non-resettable hour meter on each unit if one is not already installed. **(40 CFR Part 63.6625(f))**

V. TESTING/SAMPLING

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

1. If the permittee uses an oil analysis program for any engine as allowed in 40 CFR 63.6625(i) and (j) the permittee shall perform the tests specified. **(40 CFR Part 63.6625(i) and (j))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a log of all maintenance activities to demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ. **(R 336.1213(3)(b), 40 CFR Part 63.6625(i) and (j), 40 CFR Part 63.6655(d) and (e), 40 CFR Part 63.6660)**
2. The permittee shall maintain a log of the hours of operation of each engine in FGEMERG-EXRICE using the non-resettable hour meter. The log shall document the reason for the operation, including how many hours are spent for emergency operation and what classified the operation as an emergency and how many hours are for non-emergency operation. If the engines are used for demand response operation the permittee must keep records of the notification of the emergency situation and the time the engine was operated as part of the demand response. The records shall be sufficient to demonstrate compliance with the conditions in III.2 and 3, above. **(R 336.1213(3)(b), 40 CFR Part 63.6655(f), 40 CFR Part 63.6660)**
3. The permittee shall record the monthly fuel use for FGEMERG-EXRICE. **(R 336.1213(3))**
4. The permittee shall maintain a complete record of fuel oil specifications and/or a fuel oil analysis for each delivery, or storage tank, of fuel oil. These records may include purchase records for ASTM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analytical results from laboratory testing, or any other records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The analysis method used to test the percent sulfur shall be an EPA, or equivalent, approved method. **(R 336.1213(3))**
5. To ensure proper operation, the permittee shall record the results of a weekly visible emission observation from SVGEN1 and SVGEN2 when operating, and within one hour following start up conditions, if startup has occurred. If visible emissions are observed, the permittee shall implement the Preventative Maintenance Plan at the facility. **(R 336.1213(3))**

The permittee shall sample and record the percent sulfur content, by weight, of fuel oil in the storage tank once every 12 months using an EPA or equivalent approved method. **(R 336.1213(3))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee must report any failure to perform the work practices in condition III.5 above on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable. **(40 CFR Part 63, Subpart ZZZZ, Table 2d)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any existing cold cleaner (placed into operation prior to July 1, 1979) or new cold cleaner (placed into operation after July 1, 1979) that is exempt from NSR permitting by R 336.1281(h) or R 336.1285(r)(iv).

Emission Unit: EUCOLDCLEANER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

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

V. TESTING/SAMPLING

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

VII. REPORTING

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

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

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

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that 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.

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

APPENDICES

Appendix 1. Acronyms and Abbreviations

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

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

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

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

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

There have been no PTIs issued or ROP revision applications since the effective date of the previously issued ROP No MI-ROP-B2934-2019a.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
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Appendix 7. Emission Calculations

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

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the 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.

14,000 * 150 = 21,000,000 Btu/hr = 21 MMBtu/hr.

Commercial Change Package			
Document Number: 0000081493	Revision: 0	Applicable Facilities and Units: Palisades Unit(s) 1	Page 11 of 18

Design Input/Bounding Technical Requirement/Applicable Code/Standard	References
Replacement burner firing rates	P2E 10.003
Summary of Design Evaluation	
<p>Per section B.1 and B.4, the Cleaver-Brooks E series was selected as the replacement model, and a capacity of approximately 500 BoHP @ 80% efficiency was selected as the appropriate size.</p> <p>Model EL-210-2 lists approximately 500 BoHP @ 80% efficiency. The high fire rate is listed as 150 GPH, and assuming 8:1 turndown ratio per page 3, the low fire rate is approximately 18.75 GPH.</p> <p>Assuming 140,000 BTU/hr for #2 oil and 33,475 BTU/hr per BoHP, this corresponds to a firing rate of approximately 78.4 BoHP - 627.0 BoHP, or assuming 80% efficiency, a net boiler capacity of 62.7 BoHP - 501.6 BoHP, which is appropriately sized for the application.</p>	

Design Input/Bounding Technical Requirement/Applicable Code/Standard	References
Burner Component and Breaker Sizing	P2E 10.006, P2E 10.003, P2E 10.011
Summary of Design Evaluation	
<p>Per P2E 10.006 (which is an excerpt from VMAN M-50 Sh 12), the existing major components are as follows:</p> <p>For all components the incoming electrical power source is 460V/60Hz/3P. All amperage ratings are per P2E 10.011</p> <p><u>Blower Motor</u>- 30 HP (approx. 36A)</p> <p><u>Air compressor</u>- 5HP (approx. 6.0 A)</p> <p><u>Oil Pump</u>- 3/4 HP (approx. 1.2 A)</p> <p>Per CALC 4-5CR, the Full Load Amperage (FLA) of the burner system is 49.5A. The addition of the (3) major loads is approximately 43.2A, therefore an additional 6.3A is added to achieve the 49.5A.</p> <p>Per P2E 10.003, the replacement major components are as follows:</p> <p><u>Blower Motor</u>- 15 HP (approx. 19.0A)</p> <p><u>Air Compressor</u>- 5 HP (approx. 6.0A)</p>	



RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

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. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

SRN B2934	SIC Code 4911	NAICS Code 221113	Existing ROP Number MI-ROP-B2934-2019a	Section Number (if applicable) NA
Source Name Palisades Nuclear Plant				
Street Address 27780 Blue Star Memorial Hwy				
City Covert	State MI	ZIP Code 49043	County Van Buren	
Section/Town/Range (if address not available) NA				
Source Description Electric Power Production				
<input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.				

OWNER INFORMATION

Owner Name Holtec Palisades, LLC Palisades Nuclear Plant	Section Number (if applicable) NA			
Mailing address (<input checked="" type="checkbox"/> check if same as source address) 27780 Blue Star Memorial Hwy				
City Covert	State MI	ZIP Code 49043	County Van Buren	Country USA
<input type="checkbox"/> Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.				

SRN: B2934

Section Number (if applicable): NA

PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name Johann Britting		Title Chemistry Specialist		
Company Name & Mailing address (<input checked="" type="checkbox"/> check if same as source address) Holtec Decommissioning International, 27780 Blue Star Memorial Hwy				
City Covert	State MI	ZIP Code 49043	County Van Buren	Country USA
Phone number 269-764-2356		E-mail address j.britting@holtec.com		

Contact 2 Name (optional) Bill Turco		Title Chemistry Supervisor		
Company Name & Mailing address (<input checked="" type="checkbox"/> check if same as source address) Holtec Decommissioning International, 27780 Blue Star Memorial Hwy				
City Covert	State MI	ZIP Code 49043	County Van Buren	Country USA
Phone number 269-764-2537		E-mail address w.turco@holtec.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name Mike Mlynarek		Title Site Vice President		
Company Name & Mailing address (<input checked="" type="checkbox"/> check if same as source address) Holtec Decommissioning International, 27780 Blue Star Memorial Hwy				
City Covert	State MI	ZIP Code 49043	County Van Buren	Country USA
Phone number 269-764-2260		E-mail address m.mlynarek@holtec.com		

Responsible Official 2 Name (optional) Benjamin Reynolds		Title Director of Environmental Affairs		
Company Name & Mailing address (<input type="checkbox"/> check if same as source address) Holtec, 1 Holtec Blvd.				
City Camden	State NJ	ZIP Code 08104	County Camden	Country USA
Phone number 856-797-0900 x3564		E-mail address b.reynolds@holtec.com		

Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

Listing of ROP Application Contents. Check the box for the items included with your application.	
<input checked="" type="checkbox"/> Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	<input type="checkbox"/> Compliance Plan/Schedule of Compliance
<input checked="" type="checkbox"/> Mark-up copy of existing ROP using official version from the AQD website (required)	<input type="checkbox"/> Stack information
<input type="checkbox"/> Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	<input type="checkbox"/> Acid Rain Permit Initial/Renewal Application
<input type="checkbox"/> Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	<input type="checkbox"/> Cross-State Air Pollution Rule (CSAPR) Information
<input type="checkbox"/> MAERS Forms (to report emissions not previously submitted)	<input type="checkbox"/> Confidential Information
<input type="checkbox"/> Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	<input checked="" type="checkbox"/> Paper copy of all documentation provided (required)
<input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan	<input checked="" type="checkbox"/> Electronic documents provided (optional)
<input type="checkbox"/> Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	<input type="checkbox"/> Other, explain:

Compliance Statement	
This source is in compliance with <u>all</u> of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
This source will meet in a timely manner applicable requirements that become effective during the permit term.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.	
If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.	

Name and Title of the Responsible Official (Print or Type)	
Mike Mlynarek, Site Vice President	
<i>As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.</i>	
	26 Jul 2023
Signature of Responsible Official	Date

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

<p>C1. Actual emissions and associated data from <u>all</u> emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have <u>not</u> been reported in MAERS for the most recent emissions reporting year? If <u>Yes</u>, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>C2. Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>C3. Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If <u>Yes</u>, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>C4. Has this stationary source <u>added or modified</u> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO₂, VOC, lead) emissions? If <u>Yes</u>, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If <u>No</u>, criteria pollutant potential emission calculations do not need to be included.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Engineering Change 81493 for new burner and stack EUEVAPBOILER
<p>C5. Has this stationary source <u>added or modified</u> equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If <u>Yes</u>, include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions <u>must</u> be included in HAP emission calculations. If <u>No</u>, HAP potential emission calculations do not need to be included.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Engineering Change 81493 for new burner and stack EUEVAPBOILER
<p>C6. Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If <u>Yes</u>, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>C7. Are any emission units subject to the federal Acid Rain Program? If <u>Yes</u>, identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>C8. Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If <u>Yes</u>, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/>
<p>C9. Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If <u>Yes</u>, then a copy must be submitted as part of the ROP renewal application.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>C10. Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If <u>Yes</u>, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to all emission units and all applicable requirements in the existing ROP.

<p>E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If <u>Yes</u>, identify changes and additions on Part F, Part G and/or Part H.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E2. For each emission unit(s) identified in the existing ROP, <u>all</u> stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were <u>not</u> reported in the most recent MAERS reporting year? If <u>Yes</u>, identify the stack(s) that was/were not reported on applicable MAERS form(s).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If <u>Yes</u>, complete Part F with the appropriate information.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E4. Have any emission units identified in the existing ROP been dismantled? If <u>Yes</u>, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Comments:</p> <p>In regards to E3, Palisades Engineering Change 81493 included installation of a more efficient burner for EUEVAPBOILER. This is not a modification or reconstruction as defined in Rule 113(e) or 118(b). Engineering change 81493 is exempt from the requirement to obtain a PTI (R 336.1201(1)) per Rule 285(2)(b)(i)(G) which states, "Replacement of a fuel burner in a boiler with an equally or more thermally efficient burner."</p> <p>In regards to E4, although some emission units would likely never be used again if the site continues down the path of decommissioning, the ability to use all emission units is still maintained.</p>	
<p><input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: AI-</p>	

PART F: PERMIT TO INSTALL (PTI) INFORMATION

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to all emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. Yes No
 If No, go to Part G.

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (Include Process Equipment, Control Devices and Monitoring Devices)	Date Emission Unit was Installed/ Modified/ Reconstructed

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP. Yes No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP. Yes No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identify the stack(s) that were not reported on the applicable MAERS form(s). Yes No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form. Yes No

Comments:

Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: AI-

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.
 If Yes, identify the emission units in the table below. If No, go to Part H. Yes No
Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

Origin of Applicable Requirements	Emission Unit Description – Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices	Date Emission Unit was Installed/ Modified/ Reconstructed
<input type="checkbox"/> Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
<input type="checkbox"/> Rule 287(2)(c) surface coating line		
<input type="checkbox"/> Rule 290 process with limited emissions		

Comments:

Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: AI-

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If <u>Yes</u> , answer the questions below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If <u>Yes</u> , describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If <u>Yes</u> , identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H6. Does the source propose to add, change and/or delete source-wide requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H7. Are you proposing to streamline any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete emission limit requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H9. Does the source propose to add, change and/or delete material limit requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H10. Does the source propose to add, change and/or delete process/operational restriction requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H11. Does the source propose to add, change and/or delete design/equipment parameter requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H12. Does the source propose to add, change and/or delete testing/sampling requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H13. Does the source propose to add, change and/or delete monitoring/recordkeeping requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H14. Does the source propose to add, change and/or delete reporting requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H16. Does the source propose to add, change and/or delete any **other requirements**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: AI-



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: B2934	Section Number (if applicable): C4
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1. Additional Information ID
AI-C4

Additional Information

2. Is This Information Confidential? Yes No

Has this stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for **criteria pollutant** (CO, NOx, PM10, PM2.5, SO₂, VOC, lead) emissions?

Palisades updated boiler M-61 components under a commercial engineering change process (EC 81493) which included the burner associated with EUEVAPBOILER. The size of the EU was reduced from 23.2 MMBtu/hr to 21 MMBtu/hr. EUEVAPBOILER criteria pollutant emissions include CO, NOX, PM10, PM2.5, SO2, and lead.

Since the change to the emission unit was in the conservative (less emissions) direction, no updated PTE calculation is being performed with this AOP renewal.



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: B2934

Section Number (if applicable): C5

1. Additional Information ID
AI-C5

Additional Information

2. Is This Information Confidential? Yes No

Has this stationary source **added or modified** equipment since the last ROP renewal that changes the PTE for **hazardous air pollutants** (HAPs) regulated by Section 112 of the federal Clean Air Act?

As discussed on form AI-C4, Palisades EUEVAPBOILER was reduced from 23.2 MMBtu/hr to 21 MMBtu/hr. EUEVAPBOILER criteria pollutant emissions include lead.

Since the change to the emission unit was in the conservative (less emissions) direction, no updated PTE calculation is being performed with this AOP renewal.