

Appendix 90

Emission Limits – Excerpts from ROP for Smurfit- Stone
Container Company



Michigan Department of Environmental Quality
Air Quality Division

EFFECTIVE DATE: January 1, 2007
REVISION DATES: June 13, 2007; November 13, 2007;
June 29, 2009

ISSUED TO:

**Smurfit-Stone Container Enterprises, Inc.
d/b/a Smurfit-Stone Container Corporation**

State Registration Number (SRN): A5754

LOCATED AT:

One Superior Way, Ontonagon, Michigan 49953

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-A5754-2007c

Expiration Date: December 31, 2011

Administratively Complete ROP Renewal Application Due Between July 1, 2010 and July 1, 2011

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-A5754-2007c

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.

Smurfit-Stone Container

ROP No: MI-ROP-A5754-2007c
Expiration Date: December 31, 2011
PTI No: MI-PTI-A5754-2007c

William A. Presson, Acting Permit Section Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state only enforceable Source-wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in federally enforceable Source-wide PTI No. MI-PTI-A5754-2007c pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; "a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP." The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
 - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.
¹(R 336.1901(a))
 - b. Unreasonable interference with the comfortable enjoyment of life and property. **¹(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than five years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A responsible official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.
22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:

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

Permit Shield

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

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

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
- 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))**
 - If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
 - 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))**
 - If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

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, N/A (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, N/A (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))	Control Device	Installation Date/ Modification Date	Flexible Group ID
EUCOPE	The Copeland Reactor is a chemical recovery furnace rated at 131 million BTU/hour; the Emission Unit includes a Chemical Recovery Storage Tank and a dissolving tank.	Cyclone, Venturi Scrubber, Packed Column Scrubber, Dissolving Tank Baghouse, Regenerative Thermal Oxidizer.	12/01/1989 01/01/1990 6/2009	N/A
EURB1	The No. 1 Riley Boiler is rated for 375 million BTU/hour and is capable of firing coal, wood, natural gas, No. 2 thru No. 6 fuel oil and noncondensable gases (NCGs) in compliance with 40 CFR 63 Subpart S.	Electro Static Precipitator, Cyclone.	01/01/1965 01/01/1983	N/A
EUFA1	An Ash Silo used to collect ash from the burning of coal or wood in the No. 1 Riley boiler.	Baghouse.	01/01/1965 01/01/1983	N/A
EUPB2A	The No. 2A package boiler is rated for 136 million BTUs/hour and is fired by natural gas with backup by No. 2 thru No. 6 fuel oil. It is also capable of incinerating NCGs in compliance with 40 CFR 63 Subpart S.		06/30/1986	N/A
EUPB3	The No. 3 package boiler is rated at 136 million BTU/hour and is fired by natural gas with backup by No. 2 thru No. 6 fuel oil. It is also capable of incinerating NCGs in compliance with 40 CFR 63 Subpart S.		06/01/1978	N/A
EUPB4	The No. 4 package boiler, rated for 65 million BTU/hour, is fired by natural gas. It is also capable of incinerating NCGs in compliance with 40 CFR 63 Subpart S.		06/01/1989	N/A

EUCOPE
EMISSION UNIT CONDITIONS

DESCRIPTION: The Copeland Reactor is a chemical recovery furnace rated at 131 million BTUs per hour heat input. Emission controls are by a cyclone, venturi scrubber, packed tower scrubber and a Regenerative Thermal Oxidizer (RTO).

POLLUTION CONTROL EQUIPMENT: Cyclone, venturi scrubber, packed tower scrubber and a regenerative thermal oxidizer.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate matter (PM)	16 lbs/hour ²	Per hour limit based on 3 hour average.	EUCOPE	V.1	R 336.1331, 40 CFR 52.21
2. Sulfur Dioxide (SO ₂)	a. 2.62 lbs/hour ²		EUCOPE	V.1	R 336.1402(2), 40 CFR 52.21
	b. Less than 0.02 lbs per MM BTUs heat input ²	24 hour average.	EUCOPE	V.1	R 336.1201(3), 40 CFR 52.21
3. Nitrogen Oxides (NO _x)	a. Less than 2.62 lbs per hour when controlled by the cyclone, venturi scrubber and packed tower scrubber ²	Per hour.	EUCOPE	V.1	R366.1201(3), 40 CFR 52.21
	b. Less than 0.02 lbs per million BTUs heat input when controlled by the cyclone, venturi scrubber and packed tower scrubber ²	24 hour average	EUCOPE	V.1	R 336.1201(3), 40 CFR 52.21
	c. Less than 63.0 lbs per hour when controlled by the cyclone, venturi scrubber, packed tower scrubber followed by the RTO ²	24 hour average	EUCOPE	V.1	R 336.1201(3), 40 CFR 52.21
4. Carbon Monoxide (CO)	Less than 157.0 lbs per hour when controlled by the cyclone, venturi scrubber, packed tower scrubber followed by the RTO ²	24 hour average	EUCOPE	V.1	R 336.1201(3), 40 CFR 52.21

II. MATERIAL LIMIT(S) N/A

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Permittee shall operate the Copeland reactor in accordance with a malfunction abatement plan to prevent, detect, and correct malfunctions or equipment failures resulting in emissions exceeding any applicable emission limitations. **(R 336.1911)¹**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Permittee shall equip and maintain each scrubber with a liquid flow indicator. **(R 336.1201(3), R 336.1910)¹**
2. Permittee shall not operate the Copeland reactor unless the cyclone, venture scrubber, and packed tower scrubber, are installed and operating properly. **(R 336.1201(3), R 336.1910, 40 CFR 52.21, 40 CFR 63 Subpart MM)²**

V. TESTING/SAMPLING

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

1. The permittee shall conduct stack testing of the Copeland/RTO, at the owner's expense, to verify compliance with the CO, PM, NO_x, SO₂, RTO (VOC/HAP) destruction efficiency, and Gaseous organic HAPs. Testing shall be within the five year life of this permit and in accordance with Department requirements. A complete and acceptable test plan must be submitted 30 days prior to the test and approved prior to testing. See IX 5. **(R 336.1201(3))**
2. Acceptable performance testing shall be conducted by the permittee in accordance with R 336.2003. **(R 336.2003, R 336.2004)**

VI. MONITORING/RECORDKEEPING

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

1. Permittee shall maintain records of the emission rates of PM, SO₂, and NO_x from the Copeland reactor to demonstrate compliance with the pounds per hour and tons per year emission rates. **(R 336.1201(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.SVCR-9S	60	144	R 336.1201(3) ¹
2.SVPSG-10S	76	144	R 336.1201(3) ¹

IX. OTHER REQUIREMENT(S)

1. Permittee shall ensure that the HAP emissions from the RTO as measured by total hydrocarbons reported as carbon, are reduced by at least 90 percent prior to discharge. **(R 336.1201(3), 40 CFR 63.862(c)(2)(ii))**
2. Permittee shall established an RTO operating temperature range as specified in 40 CFR 63.864(j) and operate the RTO within that range per 40 CFR 63.864(k). Permittee shall monitor and record the RTO operating temperature in a continuous basis and with instrumentation acceptable to the AQD. **(R 336.1201(3), R 336.1910, 40 CFR 63.864(j) & (k))**
3. The permittee shall comply with the general monitoring requirements under 40 CFR Section 63.864(a); and the on-going compliance provisions of 40 CFR Section 63.864 (k)(1)(iii). **(R 336.1910, 40 CFR 63.864(a))**
4. The permittee shall comply with the applicable recordkeeping requirements specified in 40 CFR Section 63.866(a)-(c)(1) and (c)(3)-(5) and the reporting requirements under 40 CFR Section 63.867(a), (b)(3)(i), (b)(3)(iii) and (c). **(R 336.1201(3), 40 CFR 63.866(a)-(c)(1), (c)(3)-(5), 40 CFR 63.867(a)(b)(3)(i) & (iii) and (c))**
5. The RTO efficiency test methods and procedures shall use Method 25A in appendix A of 40 CFR Part 60 as well as paragraphs (b)(5)(i)-(iv) of 40 CFR Part 63 Subpart MM Section 63.865. **(R 336.1201(3), 40 CFR 60 Appendix A, 40 CFR 63.865)**
6. The permittee shall not use any fuel other than natural gas or charcoal for start up of the Copeland reactor. **(R 336.1201(3), 40 CFR 52.21)**
7. The permittee shall not use any fuel other than natural gas and ultra low sulfur diesel oil as an auxiliary fuel in the Copeland reactor. **(R 336.1201(3), 40 CFR 52.21)**

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).

**EURB1
 EMISSION UNIT CONDITIONS**

DESCRIPTION: The number 1 Riley Boiler, rated at 375 million BTU per hour, is capable of firing coal, wood, natural gas, and No. 2 through No. 6 fuel oil. The boiler is also capable of incinerating noncondensable gases (NCGs) in compliance with 40 CFR 63 Subpart S.

POLLUTION CONTROL EQUIPMENT: Particulate matter is controlled by a cyclone and an electrostatic precipitator.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. SO ₂	a. The SO ₂ emission rate while firing coal in the Riley Boiler shall not exceed 2.50 pounds per million BTUs heat input. ²	24 hours	Riley Boiler	V.1	R 336.1402
	b. The SO ₂ emission rate while firing coal in the Riley Boiler may be measured as usage of coal with a sulfur content not exceeding 1.5 % at a heat value of 12,000 BTUs per pound of coal ²	N/A	Riley Boiler	V.1	R 336.1402
	c. The maximum sulfur content of fuel oil fired in the Riley Boiler shall not exceed 1.5% based on a heat value of 18,000 BTUs per pound of oil. ²	N/A	Riley Boiler	V.1	R 336.1201(3)
2. NO _x	Nitrogen oxides emissions shall not exceed 0.95 pounds per million BTU heat input averaged over the ozone control period. Total NO _x emissions shall not exceed 350 pounds per hour. ¹	Ozone control period average (May 1 through September 30)	Riley Boiler	V.2	R 336.1801(8)
3. PM	The particulate emission from the Riley Boiler shall not exceed 0.25 pounds per 1,000 pounds of exhaust gases, corrected to 50% excess air. ²	N/A	Riley Boiler	V.1	R 336.1330, R 336.1331

II. MATERIAL LIMIT(S) N/A

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Upon initiation of collector bypass, the input feed (excluding natural gas) to the Riley boiler shall cease immediately, consistent with safe operating procedures. Coal, oil, and or wood feed to the Riley boiler shall not restart until the collector is back on line and functioning properly. **(R 336.1301, R 336.1331)²**
2. The blow tank and evaporator systems shall be enclosed and vented into a closed vent system and routed to the No. 1 Riley boiler, or other onsite boiler capable of incinerating NCGs, and the permittee shall comply with the compliance date under 40 CFR 63.440(d) and the applicable requirements under 40 CFR 63.443 (d) and (e)(1). The enclosures and closed vent system shall meet the applicable requirements specified in 40 CFR 63.450. **(40 CFR 63, Subpart S)²**

IV. DESIGN/EQUIPMENT PARAMETER(S) N/A**V. TESTING/SAMPLING**

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

1. Permittee shall conduct a performance stack testing of the boiler to verify PM emission rates from the Riley boiler during the five year life of this ROP. Test method as specified in 40 CFR 63, Subpart S. **(R 336.1201(3), R 336.2001; 40 CFR 63, Subpart S; 40 CFR 60 Appendix A)²**
2. Permittee shall measure nitrogen oxides emissions from Riley Boiler by any of the following. **(R 336.1801(8))**
 - a. Performance tests described in Rule 801(9).
 - b. Through the use of continuous emission monitoring in accordance with the provisions of Rule 801(11).
 - c. According to a schedule and method acceptable to the department.
3. The permittee shall obtain and keep records of the sulfur, ash, and BTU content of the coal burned in No. 1 Riley Boiler, as detailed in Appendix 4. **(R 336.1201(3))²**

See Appendix 4

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 operate the continuous opacity monitoring system on the duct serving No. 1 Riley Boiler. The permittee shall keep records of the opacity on a continuous basis and with instrumentation acceptable to the Air Quality Division. **(R 336.1201(3))**
2. The continuous opacity monitoring system shall comply with 40 CFR Part 60 Appendix B, Performance Specification 1. **(R 336.2150)**
3. The continuous opacity monitoring system shall comply with the cycling time requirements specified in Rule 1152. **(R 336.2152)**
4. The continuous opacity monitoring system shall comply with the zero and drift requirements specified in Rule 1153. **(R 336.2153)**
5. The continuous opacity monitoring system shall comply with the instrument span requirements specified in Rule 1154. **(R 336.2154)**
6. The continuous opacity monitoring system shall comply with the monitor location requirements specified in Rule 1155. **(R 336.2155)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Within 60 days after the end of the ozone control period, the permittee shall submit a summary report in an acceptable format to the Air Quality Division to include all of the information specified in rule 801(12).¹ **(R 336.1801(12))**
3. 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))**
4. 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.SVPSG-7S	120	195	R 336.1201(3) ¹

IX. OTHER REQUIREMENT(S) N/A

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).

**EUFA1
 EMISSION UNIT CONDITIONS**

DESCRIPTION: Ash silo, used to collect ash from the burning of coal and/or wood in the No. 1 Riley boiler.

POLLUTION CONTROL EQUIPMENT

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	Emission from the fly ash silo shall not exceed 0.10 pounds per 1,000 lbs. of exhaust gases, calculated on a dry gas basis ²	Test Protocol	Ash Silo	N/A	R 336.1331

II. MATERIAL LIMIT(S) N/A

III. PROCESS/OPERATIONAL RESTRICTION(S): N/A

IV. DESIGN/EQUIPMENT PARAMETER(S) N/A

V. TESTING/SAMPLING N/A

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

VI. MONITORING/RECORDKEEPING

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

1. Permittee shall keep records of Fugitive Dust Control Program specified in IX below. (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.SVPSG-8S	N/A	N/A	N/A

IX. OTHER REQUIREMENT(S)

1. The permittee shall establish and implement a Fugitive Dust Control Program, which will include keeping a log for recording inspections, problems identified, repairs and/or corrective actions taken, and scheduled and completed maintenance to enclosures or other dust control or suppression mechanisms. The log shall also include observations of the Ash Handling and Storage activities and other actions taken to control fugitive dust. **(R 336.1213(3), R 336.1370)**

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).

**EUPB2A
 EMISSION UNIT CONDITIONS**

DESCRIPTION: The No. 2A package boiler is rated at 136 million BTUs per hour and is fired by natural gas with No. 2 through No. 6 fuel oils as back up. The boiler is capable of incinerating noncondensable gases in compliance with 40 CFR 63, Subpart S.

Flexible Group ID: N/A

POLLUTION CONTROL EQUIPMENT N/A

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. SO ₂	a. SO ₂ emissions shall not exceed 1.67 lbs. per billion BTUs heat input ²	Per 24 hour period.	# 2A Package Boiler	Test Protocol	R 336.1401, Table 42
	b. SO ₂ emissions shall not exceed 117 tons ²	Per year	# 2A Package Boiler	Test Protocol	R 336.1201(3)
	c. The maximum sulfur content of oil fired in the No. 2A boiler shall not exceed 1.5 percent ²	Percent sulfur based on heat value of 18,000 BTUs per lb. of oil.	# 2A Package Boiler	Test Protocol	R 336.1201(3)
2. NO _x	a. NO _x emissions shall not exceed 74.8 lbs	per hour	# 2A Package Boiler	Test Protocol	R 336.1201(3) AP-42
	b. NO _x emissions shall not exceed 150 tons	per year	# 2A Package Boiler	Test Protocol	R 336.1201(3) AP-42
3. PM	Visible emissions from the boiler shall not exceed a 6 minute average of 20% opacity while burning No. 2 through No. 6 fuel oil, except as specified in Rule 336.1301(1)(a) ²		# 2A Package Boiler		R 336.1301(1)(a), R 336.1303

II. MATERIAL LIMIT(S)

Material	Limit	Equipment	Underlying Applicable Requirements
1. Fuel Oil	Permittee shall not burn more than 990,000 gallons of No. 6 fuel oil per year.	# 2A Package Boiler	R 336.1201(3), 40 CFR 52.21

Material	Limit	Equipment	Underlying Applicable Requirements
2. Natural Gas	Permittee shall not burn more than 545.4 million cubic feet of natural gas per year, except when No. 6 fuel oil is used in the 2A package boiler, the maximum allowed natural gas usage shall be reduced by applying the following equation: (545.4 – 0.122G) million cubic feet of natural gas per year, where G is No. 6 fuel oil usage in thousands of gallons.	# 2A Package Boiler	R 336.1201(3), 40 CFR 52.21

III. PROCESS/OPERATIONAL RESTRICTION(S) N/A

IV. DESIGN/EQUIPMENT PARAMETER(S) N/A

V. TESTING/SAMPLING

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

1. Permittee shall conduct performance stack testing of one package boiler (Package Boiler # 2A, #3, or #4) to determine compliance with the NOx emission limitations within five years of issuance of this ROP. The package boiler tested and the test method shall be approved by the Department. **(R 336.1213(3), R 336.2001)**
2. Visible observation of the boiler emissions shall be conducted as specified in the Inspection and Maintenance Program. **(R 336.1301, R 336.1303)**

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. Records shall be kept in accordance with the Inspection and Maintenance Program, specified in IX. The records shall include but not be limited to, records of inspections, problems identified, repairs and or corrective action taken, scheduled and completed maintenance, and records of visual observations to assure compliance with Rule 336.1301 and Rule 336.1901. **(R 336.1213(3), R 336.1301(1)(a), R 336.1303)**

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. The Permittee shall submit quarterly reports of fuel usage pursuant to Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by June 15 for the January 1 to March 31 reporting period, and by September 15 for the April 1 to June 30 reporting period, December 15 for the July 1 to September 30 reporting period, and March 15 for the October 1 to December 31 reporting period. **(R 336.1213(3)(c)(i))**

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

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.SVPSG-91011S	55	195	R 336.1201(3) ¹

IX. OTHER REQUIREMENT(S)

- The permittee shall carry out an Inspection and Maintenance Program for the No. 2A Package boiler, including keeping a log, to assure that the process equipment is maintained and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control Rules and existing law. **(R 336.1301, R 336.1331)**

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).

**EUPB3
 EMISSION UNIT CONDITIONS**

DESCRIPTION: The number 3 package boiler, rated at 136 million BTUs per hour, is fired by natural gas with No. 2 through No. 6 fuel oil back up. The boiler is also capable of incinerating noncondensable gases (NCGs) in compliance with 40 CFR 63 Subpart S.

POLLUTION CONTROL EQUIPMENT

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. SO ₂	SO ₂ emissions shall not exceed 1.67 pounds per million BTUs heat input ²	Per 24 hour period	No. 3 boiler	Test Protocol	R 336.1401

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. No. 2 through No. 6 fuel oil	The maximum sulfur content of oil fired in the No. 3 boiler shall not exceed 1.5 %, based on a heating value of 18,000 BTUs per pound of oil ²	N/A	No. 3 boiler	Test protocol	R 336.1201(3)

III. PROCESS/OPERATIONAL RESTRICTION(S) N/A

IV. DESIGN/EQUIPMENT PARAMETER(S) N/A

V. TESTING/SAMPLING

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

1. Permittee shall conduct performance stack testing of one package boiler (Package Boiler # 2A, #3, or #4) to determine compliance with the NO_x emission limitations within five years of issuance of this ROP. The package boiler tested and the test method shall be approved by the Department. (R 336.1213(3), R 336.2001)
2. Visible observations of the boiler emissions shall be conducted as specified in the Inspection and Maintenance Program. (R 336.1301, R 336.1303)

VI. MONITORING/RECORDKEEPING

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

1. On a monthly basis permittee shall record fuel usage rates and total SO₂ emissions. The SO₂ emissions may be calculated from the fuel usage. **(R 336.1201(3))**
2. Records shall be kept in accordance with the Inspection and Maintenance Program, specified in IX. The records shall include but not be limited to, records of inspections, problems identified, repairs and or corrective action taken, scheduled and completed maintenance, and records of visual observations to assure compliance with Rule 336.1301 and R 336.1901. **(R 336.1213(3), R 336.1301(1)(a), R 336.1303)**

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. The Permittee shall submit quarterly reports of fuel usage pursuant to Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by June 15 for the January 1 to March 31 reporting period, and by September 15 for the April 1 to June 30 reporting period, December 15 for the July 1 to September 30 reporting period, and March 15 for the October 1 to December 31 reporting period. **(R 336.1213(3)(c)(i))**
4. 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.SVPSG-91011S	55	195	R 336.1201(3)¹

IX. OTHER REQUIREMENT(S)

1. The permittee shall carry out an Inspection and Maintenance Program for the No. 3 Package boiler, including keeping a log, to assure that the process equipment is maintained and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control Rules and existing law. **(R 336.1301, R 336.1331)**

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).

**EUPB4
 EMISSION UNIT CONDITIONS**

DESCRIPTION: The number 4 package boiler, rated at 65 million BTUs per hour and 50,000 pounds of steam (at 250 psi.) per hour, is fired by natural gas. This boiler is also capable of incinerating noncondensable gases (NCGs) in compliance with 40 CFR 63 Subpart S.

POLLUTION CONTROL EQUIPMENT N/A

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	a. NOx emissions when firing natural gas shall not exceed 0.14 lbs per million BTUs heat input	Per 24 hour average	No. 4 boiler	Approved method per R 336.2004, may be calculated based on fuel use	R 336.1201(3)
	b. Emissions shall not exceed 9.09 pounds	Per hour	No. 4 boiler	Approved method per R 336.2004, may be calculated based on fuel use	R 336.1201(3)

II. MATERIAL LIMIT(S) N/A

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Permittee shall not fire any fuel in the boiler other than sweet natural gas. **R 336.1201(1)**

IV. DESIGN/EQUIPMENT PARAMETER(S) N/A

V. TESTING/SAMPLING

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

1. Permittee shall conduct performance stack testing of one package boiler (Package Boiler # 2A, #3, or #4) to determine compliance with the NOx emission limitations within five years of issuance of this ROP. The package boiler tested and the test method shall be approved by the Department. **(R 336.1213(3), R 336.2001)**
2. Visible observation of the boiler emissions shall be conducted as specified in the Inspection and Maintenance Program. **(R 336.1301, R 336.1303)**

VI. MONITORING/RECORDKEEPING

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

N/A

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 quarterly reports of fuel usage pursuant to Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by June 15 for the January 1 to March 31 reporting period, and by September 15 for the April 1 to June 30 reporting period, December 15 for the July 1 to September 30 reporting period, and March 15 for the October 1 to December 31 reporting period. **(R 336.1213(3)(c)(i))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.SVPSG-91011S	55	195	R 336.1201(3)¹

IX. OTHER REQUIREMENT(S)

1. The permittee shall carry out an Inspection and Maintenance Program for the No.4 Package boiler, including keeping a log, to assure that the process equipment is maintained and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control Rules and existing law. **(R 336.1301, R 336.1331)**

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).

D. FLEXIBLE GROUP CONDITIONS

Part D outlines 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, N/A (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1: Abbreviations and Acronyms

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

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	N/A	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
gr	Grains	psig	Pounds per square inch gauge
HAP	Hazardous Air Pollutant	PeTE	Permanent Total Enclosure
Hg	Mercury	PTI	Permit to Install
hr	Hour	RACT	Reasonable Available Control Technology
HP	Horsepower	ROP	Renewable Operating Permit
H ₂ S	Hydrogen Sulfide	SC	Special Condition
HVLP	High Volume Low Pressure *	scf	Standard cubic feet
ID	Identification (Number)	sec	Seconds
IRSL	Initial Risk Screening Level	SCR	Selective Catalytic Reduction
ITSL	Initial Threshold Screening Level	SO ₂	Sulfur Dioxide
LAER	Lowest Achievable Emission Rate	SRN	State Registration Number
lb	Pound	TAC	Toxic Air Contaminant
m	Meter	Temp	Temperature
MACT	Maximum Achievable Control Technology	THC	Total Hydrocarbons
MAERS	Michigan Air Emissions Reporting System	tpy	Tons per year
MAP	Malfunction Abatement Plan	µg	Microgram
MDEQ	Michigan Department of Environmental Quality	VE	Visible Emissions
mg	Milligram	VOC	Volatile Organic Compounds
mm	Millimeter	yr	Year

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

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

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in EURB1Number 1 Riley Boiler. Alternative formats must be approved by the AQD District Supervisor.

1. Coal Analysis

- a) For each coal shipment received, the permittee shall obtain from the coal supplier a laboratory analysis of the ash content, sulfur content, and the BTU content. The determination of sulfur content shall be carried out in accordance with one of the following procedures: ASTM Method 3177-75 or ASTM Method 4239-85 or an alternative method approved by the AQD District Supervisor. For each coal shipment received, the permittee shall record the date received, source of coal and shipper, and tons received. These records shall be retained by the permittee for a minimum of five years, and made available to the Air Quality Division upon request.
- b) At least once per calendar year, the permittee shall have an analysis performed of the coal ash content, sulfur content, and BTU content for one sample each of eastern coal and western coal. These analyses shall be independent of the analyses received from the coal supplier with each shipment. The determination of coal sulfur content shall be carried out in accordance with one of the following procedures: ASTM Method 3177-75 or ASTM Method 4239-85 or an alternative method approved by the AQD District Supervisor. These records shall be retained by the permittee for a minimum of five years, and made available to the Air Quality Division upon request.

Specific recordkeeping requirements, formats and procedures for the remaining emission units are detailed in Part A or the appropriate source-wide emission unit and/or flexible group special conditions.

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No 199600350.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
N/A		

Appendix 7. Emission Calculations

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

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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