University of Michigan Renewable Operating Permit Annual Monitoring/Recordkeeping Compliance Table January through December 31, 2022			
Permit Condition	**Compliance Status**		**Method Used to Determine Compliance**
	Continuous	**Intermittent**	
EUB0260-02 Boiler 2 at the Central Power Plant			
I.1: **SO2**: The sulfur dioxide emission rate from one boiler when firing No. 2 fuel oil shall not exceed 0.56 pounds per MMBTU heat input based upon a 24-hour period. This is equivalent to using No. 2 fuel oil with a 0.5% sulfur content and a heat value of 18,000 BTUs per pound.	✓		Fuel oil usage in Boiler No. 2 is monitored and reordered on a daily basis in a manner and with instrumentation acceptable to the AQD. The data is collected in the Delta V. The density and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the CPP. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit.
I.2: **NOx**: The nitrogen oxides emission rate from the one gas/oil fired boiler when firing No. 2 fuel oil shall not exceed 0.30 pounds per million BTUs heat input based on a 24-hour average.	✓		Fuel oil usage in Boiler No. 2 is monitored and reordered on a daily basis in a manner and with instrumentation acceptable to the AQD. The data is collected in the Delta V. The density and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the CPP. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit. Fuel usage is recorded daily.
I.3: **NOx**: The nitrogen oxides emission fromone gas/oil fired boiler when firing natural gas shall not exceed 0.20 pounds per million BTUs heat input, base on a 24-hour averaging period.	✓		Fuel oil usage in Boilers No. 1 and 2 is monitored and reordered on a daily basis in a manner and with instrumentation acceptable to the AQD. The data is collected in the Delta V. The density and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the CPP. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit. Fuel usage is recorded daily.
III.1: The permittee shall only fire natural gas and/or No. 2 fuel oil in EUB0260-02.	✓		Natural gas and No. 2 fuel oil are the only two fuels that can be fired at the CPP.

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V.1: **NOx**: The permittee shall submit a complete test protocol to the AQD for approval at least 60 days prior to the anticipated test date. The permittee shall submit a complete test report of the test results to the District Supervisor and the Technical Programs Unit within 60 days following the last date of the test.	✓		Required ROP testing was performed on January 25, 2023.
V.2: **NOx**: The permittee shall verify the NOx emission rate from the EUB0260-02, by testing, at a minimum, every five-years from the date of the last test.	✓		
V.3: **NOx**: The permittee shall notify the District Supervisor and the Technical Programs Unit no less than seven days prior to the anticipated test date.	✓		
VI.1: The permittee shall monitor and record the fuel oil usage in EUB0260-02 on a daily basis in a manner and with instrumentation acceptable to the AQD.	✓		The fuel oil usage is written on a daily log and the Delta V data acquisition handling system.
VI.2: The permittee shall maintain purchase records of the type and quantity of oil, the density, and the sulfur and BTU contents for each shipment of oil received.	✓		The density and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the CPP. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit. The U of M Utilities Department holds the purchase records.
VI.3: The permittee shall monitor the density, sulfur and BTU content of fuel oil by collecting a representative sample of the fuel oil fired at the Central Power Plant during each month that fuel oil is fired. The sample shall be submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method acceptable to AQD.	✓		The density and BTU content of fuel are monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density and BTU per gallon utilizing a method approved by AQD. A sample is taken during every truck delivery along with another sample when the fuel is dropped into each individual tank. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit.

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VI.4: In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in EUB0260-02, deomonstrating that the fuel sulfur content meets the requirement of SC I.1. These records may include purchase records for STM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analyical results from laboratory testing, or any records adequate to demonstrated compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.	✓		Records are maintained of fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit and shows ULSD.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.4 The permittee shall submit any performance test reports to AQD Technical Programs Unit and District Office in a format approved by the AQD.	✓		A copy of the performance tests were sent both to Technical Programs and District Office.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		The gases discharge vertically upward due to construction of the plant.
VIII.1.a: The maximum exhaust dimension shall be 168 inches.	✓		The maximum exhaust dimension is due to construction of the stack.
VIII.1.b: The minimum height for the north stack shall be 250 feet above a stack base elevation of 859 ft.	✓		The stack is at minimum height above elevation due to construction of the plant.
IX.1: The permittee shall comply with all provisions of 40 CFR Part 63, Subparts A and DDDDD, as they apply to EUB0260-02.	✓		UM performs annual maintenance to EUB0260-02 to meet subpart DDDDD.

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Emission Unit: EUB0260-06 Boiler 6 at Central Power Plant			
1: The permittee shall not operate EUB0260-06 unless the associated low NOx burner system and flue gas recirculation system is installed and operating properly.	✓		The NOx burner system and flue gas system were installed in 1999 while the boiler was installed. Annual combustion tuning including the gas recirculation system is performed.
I.1: **Opacity**: When burning fuel oil in Boiler No. 6, Permittee shall not discharge to the atmosphere any gases that exhibit greater than 20% opacity (6-minute average), except for one 6-minute period per hour of no more than 27% opacity. This opacity standard applies at all times, except during periods of startup, shutdown, or malfunction.	✓		Opacity: A continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere has been installed, and is calibrated, maintained, and operated by the permittee. The output of the system is recorded when burning fuel oil, according to the requirements of 40 CFR 60.48b, and records of such monitoring are collected and maintained in accordance with 40 CFR 60.49b. COMS is calibrated annually. Results kept on site.
I.2: **NOx**: The nitrogen oxides (NOx) emission rate from Boiler No. 6 shall not exceed 0.10 pounds per million BTUs heat input, nor 36.0 pounds per hour, based on a 24-hour rolling time period.	✓		NOx: A continuous monitoring system for measuring NOx emissions discharged to the atmosphere has been installed, and is calibrated, maintained, and operated by the permittee. The output of the system is recorded, according to the requirements of 40 CFR 60.48b, and records of such monitoring are collected and maintained in accordance with 40 CFR 60.49b; except that data is collected and reported on the basis of a 24-hour rolling average emission rate as specified by 40 CFR 52.21(j). Alarms are set in the CEMS at 0.090 lbs./MMBtu; 32.0 lbs./hr.; and total 86.0 tons.
I.3: **NOx**: The total combined NOx emission rate from Boiler No. 6 shall not exceed 88.3 tons per 12-month rolling time period. Applicant shall calculate the tons of NOx emissions for the previous 12-month time period by the tenth day of each calendar month.	✓		
I.4: **SO2**: The sulfur dioxide (SO2) emission rate from the boiler shall not exceed 0.30 pounds per million BTUs heat input, and 108.0 pounds per hour, both based upon a 24-hour rolling time period. This is equivalent to using fuel oil with a 0.30% sulfur content and a heat value of 141,200 BTUs per gallon.	✓		Fuel oil usage in Boiler No. 6 is monitored and recorded on a daily basis in a manner and with instrumentation acceptable to the AQD. The fuel oil usage is collected in the CEMS. Alarms set in CEMS at 0.275 lbs/MMBtu; 100 lbs/hr; and total 38.0 tons.
I.5: **SO2**: The total combined SO2 emission rate from the boiler shall not exceed 38.6 tons per 12-month time period. Applicant shall calculate the tons of SO2 emissions for the previous 12-month time period by the tenth day of each calendar month.	✓		

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I.6: **VOC**: The volatile organic compounds (VOC) emission rate from the boiler shall not exceed 0.025 pounds per million BTUs heat input and 9.4 pounds per hour, based on a 24-hour rolling time period.	✓		Fuel oil usage in Boiler No. 6 is monitored and recorded on a daily basis in a manner and with instrumentation acceptable to the AQD. The VOC emission rate, heat input, and total tons are monitored through CEMS. Alarms are set in the CEMS at .020 lbs/MMBtu; 9.0 lbs/hr; and total 41.0 tons. VOC shall be tested using EPA Method 25A every 5 years from date of last test. Required ROP testing was performed on December 15 and 16, 2022.
I.7: **VOC**: The total combined VOC emission rate from the boiler shall not exceed 41.2 tons per 12-month rolling time period. Applicant shall calculate the tons of VOC emissions for the previous 12-month time period by the tenth day of each calendar month.	✓		
I.8: **CO**: The carbon monoxide (CO) emission rate from the boiler while firing fuel oil shall not exceed 0.15 pounds per millions BTUs heat input and 54.0 pounds per hour, nor 0.10 pounds per million BTUs heat input while firing natural gas and 37.6 pounds per hour, both based on a 24-hour rolling time period.	✓		Fuel oil usage in Boiler No. 6 is monitored and recorded on a daily basis in a manner and with instrumentation acceptable to the AQD. The CO emission rate, heat input, and total tons for both fuel oil and natural gas are monitored through the CEMS. Alarms are set in the CEMS for natural gas at 0.080 lbs/MMBtu and 35.0 lbs/hr and for fuel oil at 0.125 lbs/MMBtu and 50.0 lbs/hr. The total tons is set to alarm at 170.0 tons. The data is backed through the UM ITS system. CO shall be tested using EPA Method 10 every 5 years from date of last test. Required ROP testing was performed on December 15 and 16, 2022.
I.9: **CO**: The total combined CO emission rate from the boiler shall not exceed 170.3 tons per 12-month rolling time period. Applicant shall calculate the tons of CO emissions for the previous 12-month time period by the tenth day of each calendar month.	✓		
III.1: The permittee shall only fire natural gas and/or No. 2 fuel oil in EUB0260-06.	✓		Natural gas and No. 2 fuel are the only two fuels that can be fired at the CPP.
III.2: The permittee shall not exceed a maximum No. 2 fuel oil firing rate of 1,774,286 gallons per 12-month rolling time period as determined by the tenth day of each calendar month in EUB0260-06.	✓		The fuel oil usage is monitored by the CEMS. The CEMS is set to alarm at 1,600,000 gallons.
V: Records shall be maintained on file for a period of five years.	✓		Documentation filed at EHS and CPP for 5 years.

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V.1: **VOC**: The permittee shall submit a complete test protocol to the AQD for approval at least 60 days prior to the anticipated test date.	✓		Required ROP testing was performed on December 15 and 16, 2022.
V.2: **VOC**: The permittee shall verify the VOC emission rate from EUB0260-06, by testing, once within the five-year term of the permit.	✓		
V.3: **VOC**: The permittee shall notify the District Supervisor and the Technical Programs Unit no less than seven days prior to the anticipated test date.	✓		
V.4: **VOC**: The permittee shall submit a complete test report of the test results to the District Supervisor and the Technical Programs Unit within 60 days following the last date of the test.	✓		
V.5: **CO**: The permittee shall submit a complete test protocol to the AQD for approval at least 60 days prior to the anticipated test date.	✓		Required ROP testing was performed on December 15 and 16, 2022.
V.6: **CO**: The permittee shall verify the CO emission rate from EUB0260-06, by testing, once within the 5-year term of the permit.	✓		
V.7: **CO**: The permittee shall notify the District Supervisor and the Technical Programs Unit no less than seven days prior to the anticipated test date.	✓		
V.8: **CO**: The permittee shall submit a complete test report of the test results to the District Supervisor and the Technical Programs Unit within 60 days following the last date of the test.	✓		
VI.1: **Opacity**: The permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system when burning fuel oil, according to the requirements of 40 CFR 60.49b.	✓		The opacity monitor was installed in 1999 while the boiler was being installed. The CEMS collects continuous data while burning fuel oil.

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VI.2: **NOx**: The permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the NOx emissions discharged to the atmosphere and record the output of the system, according to the requirements of 40 CFR 60.48b, and shall collect and maintain records of such monitoring in accordance with 40 CFR 60.49b; except that data shall be collected and reported on the basis of a 24-hour rolling average emission rate as specified by 40 CFR 52.21 (j).	✓		The CEMS was installed in 1999 while the boiler was being installed.
VI.3: The permittee shall monitor and record the fuel oil usage in EUB0260-06 on a daily basis in a manner and with instrumentation acceptable to the AQD.	✓		The fuel oil usage is written on a daily log, collected in the CEMS, the Delta V data acquisition handling system.
VI.4: The permittee shall maintain purchase records of the type and quantity of oil, the density, and the sulfur and BTU contents for each shipment of oil received.	✓		The density, sulfur, and BTU content of fuel are monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each delivery. The sample is submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method approved by AQD. A sample is taken during every truck delivery along with another sample when the fuel is dropped into each individual tank. Sulfur content is identified in lieu of sampling by receiving purchase records with sulfur content listed. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit. The U of M Utilities Department holds the purchase records.
VI.5: The permittee shall monitor the density, sulfur, and BTU content of fuel oil by collecting a representative sample of the fuel oil fired at the Central Power Plant during each month that fuel oil is fired. The sample shall be submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method acceptable to AQD.	✓		The density, sulfur, and BTU content of fuel are monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each delivery. The sample is submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method approved by AQD. A sample is taken during every truck delivery along with another sample when the fuel is dropped into each individual tank. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit.
VI.6: In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in EUB0260-06, deomonstrating that the fuel sulfur content meets the requirement of SC I.1. These records may include purchase records for STM specification fuel oil, specifications or analyses provided by the vendor at the time of delivery, analyical results from laboratory testing, or any records adequate to demonstrated compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.	✓		The density and BTU content of fuel are monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density and BTU per gallon utilizing a method approved by AQD. A sample is taken during every truck delivery along with another sample when the fuel is dropped into each individual tank. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit. Records kept at CPP.
VI.7: The permittee shall calculated and keep, in a satisfactory manner, records of monthly and 12-month rolling total Nox, SO2, VOC, and CO mass emissions for EUB0260-06, when firing on fuel oil and when firing on natural gas. The permittee shall keep all records on file and make them available.	✓		The CEMS calculates the Nox, SO2, VOC, and CO mass emissions.

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VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		Deviations are reported within appropriate allotted time.
VII.2 & 3: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.4: The permittee shall submit any performance test reports including RATA reports to the AQD Technical Programs Unit and District Office.	✓		All reports are submitted within 60 days of test performed to both Technical Programs and District Office (Jackson).
VII.5: Semi-annual reporting of excess NOx emissions during either natural gas firing or fuel-oil firing modes, and/or excess opacity emissions during fuel-oil firing mode pursuant to 40 CFR Subpart Db 60.40b, 60.43b, 60.44b, 60.46b, 60.48b, and specifically 60.49b(h)(2)(ii) and (h)(3) and (h), where no excess emissions occurred during the calendar quarter.	✓		The U of M submits quarterly NOx emissions reports 30 days after the end of the quarter. A copy of the report is located at EHS and at the CPP.
VII.6: Quarterly reporting of excess NOx emissions during either natural gas firing or fuel-oil firing modes, and/or excess opacity emissions, during fuel-oil firing mode for any calendar quarter during which there are excess emissions from EU-B0260-06, as defined in 60.49b(h)(3) and (h)(4), except that instead of a 30-day rolling average NOx emission rate, a 24-hour rolling average NOx emission rate shall be calculated and reported as required by 40 CFR 52.21 (j).	✓		The U of M submits quarterly NOx emissions reports 30 days after the end of the quarter. A copy of the report is located at EHS and at the CPP. Opacity reports are included if fuel is run during the reporting period.
VII.5: 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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		The gases discharge vertically upward due to construction of the plant.
VIII.1.a: The maximum exhaust dimension for the south stack is to be 120 inches.	✓		The maximum exhaust dimension is due to construction of the stack.
VIII.1.b: The south stack shall be at a minimum height of 159 feet above a stack base elevation of 873 ft.	✓		The stack is at minimum height above elevation due to construction of the plant.

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IX.1: The permittee shall comply with all applicable requirements of the Standards of Performance for New Stationary Sources for Industrial Commercial Institutional Steam Generating Units as specified in 40 CFR Part 60, Subpart A and Db.	✓		Comply with the applicable requirements as state in the ROP.
IX.2: The permittee shall comply with all applicable requirements of the NESHAP for Major Sources Industrial, Commercial, and Institutional Boilers and Process Heaters, as specified in 40 CFR Part 63 Subparts A and DDDDD, as they apply to EUB0260-06.	✓		UM Boiler 6 considered a gas unit and requires tune ups. Tune ups performed every 5 years due to oxygen trim system. Annual PMs performed. Annual state boiler inspection performed.
IX.3: The permittee shall meet the monitoring, recordkeeping, and reporting requirements of the NOX SIP Call during the ozone season (May 1 through September 30).	✓		Quarterly EDR submitted to the EPA to cover all NOX sip call requirements.
Emission Unit: EUI0213-02 Crematory Incinerator at Med Sci II			
I.1: **PM**: The particulate emission from the crematorium incinerator shall not exceed 0.20 pounds per 1000 pounds of exhaust gases, corrected to 50% excess air.	✓		Visual inspection for abnormal/excessive smoke is performed at least once a day that the incinerator is operating. A record of all checks is kept, and abnormal conditions trigger initiation of abatement/repair actions. Opacity will be tested using Method 9 - visual determination of the opacity of emission from stationary sources - upon request of AQD, or if abnormal discharges persist following any above described abatement/repair actions.
II.1: **Waste**: The permittee shall not burn any waste in EUI0213-02 other than the following: **Pathological Wastes**- As defined in the federal Standards of Performance for New Stationary Sources, 40 CFR 60.51c, pathological waste means waste materials consisting of only human or animal remains, anatomical parts, and/or tissue; the bags/containers used to collect and transport the waste material; and animal bedding. This permit applies to Human pathological waste and associated materials.	✓		Only documented pathological wastes burned.
II.2: **Fuel**: The permittee shall not burn any fuel in EUI0213-02 other than natural gas.	✓		Only natural gas burned due to construction of unit.
III.1: The permittee shall not charge more than 750 pounds per charge in EUI0213-02.	✓		Amount of matereial weighed before each burn and documented. Records kept on site in log book and database.
III.2: The permittee shall not combust waste in EUI0213-02 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the secondary combustion chamber are maintained.	✓		The temperature is continuously monitored and due to construction of unit, waste combusted at a minimum temperature of 1600 Fahrenheit.
III.3: The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EUI0213-02. A list of recommended operating and maintenance procedures is specified in Section A.	✓		Annual maintenance is performed by unit. Operating and maintenance procedures reviewed periodically. Last PM by Matthews was September 2022.

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IV.1: The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature in the secondary combustion chamber of EUI0213-02 on a continuous basis.	✓		The temperature is continuously measured and due to construction of unit.
IV.2: The permittee shall maintain a scale at the facility, for the purpose of verifying the charge weight as required by SC II.2.	✓		All materials weighed on cart prior to burning. Documented in log located on site.
IV.3: The permittee shall not operate EUI0213-02 unless the secondary combustion chamber with afterburner is installed, maintained, and operated in a satisfactory manner.	✓		The unit was installed with afterburner.
V.1: Upon request of the AQD District Supervisor or if abnormal/excessive smoke persist following any abatement/repair actions required by SC VI.5, the permittee shall perform a certified visible emissions reading, as a surrogate for PM, according to EPA Method 9. The permittee shall keep all records on file and make them available to the Department upon request.	✓		No abnormal/ excessive smoke during this reporting period.
VI.1: The permittee shall monitor and record the temperature in the secondary combustion chamber of EUI0213-02 on a continuous basis.	✓		The unit records the temperature continuously.
VI.2: The permittee shall keep, in a satisfactory manner, daily records of the time (duration of burn), description and weight of waste combusted in EU-I0213-02, as required by SC II.1 and SC II.2. The permittee shall keep all records on file and make them available to the Department upon request.	✓		All records are kept on site with unit.
VI.3: The permittee shall calculate the weight percent of pathological waste burned in EUI213-02, as required by SC II. 1, on a calendar quarter basis. All records shall be kept on file and made available to the Department upon request.	✓		The weight percent is calculated within the 15 days of the following month of the quarter.
VI.4: The permittee shall keep, in a satisfactory manner, secondary combustion chamber temperature records for EUI0213-02, as required by SC IV 1. The permittee shall keep all records on file and make them available to the Department upon request.	✓		All records are kept on site with unit.

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VI.5: The permittee shall keep, in a satisfactory manner, a record of all service, maintenance and equipment inspections for EUI0213-02. The record shall include the description, reason, date and time of the service, maintenance or inspection. The permittee shall keep all records on file and make them available to the Department upon request.	✓		Maintenance log kept on site with unit. Last PM performed by Matthews September 2022.
VI.6: The permittee shall perform an uncertified visible emissions reading at least once per operating day, to determine the presence of abnormal/excessive smoke. Abnormal conditions shall trigger initiation of abatement/repair actions. A record shall be made of all readings. The permittee shall keep all records on file and make them available to the Department upon request.	✓		Visible emission reading performed once per day when burning. Log kept on site with unit.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII. Exhaust gases shall be discharged, unobstructed, vertically upwards unless otherwise noted.	✓		The gases discharge vertically upward due to construction of the incinerator.
VIII.1.a: The maximum exhaust dimension shall be 20 inches.	✓		The maximum exhaust dimension is due to construction of the stack.
VIII.1.b: The minimum height of the stack shall be 100 feet above ground.	✓		The stack is at minimum height due to construction of crematory.

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IX.1: Designate a trained operator for the unit and make that person responsible for compliance with the air pollution control requirements.	✓		Incinerator Operator reviews guidelines on a regular basis and follows manufacturer's recommendations. All maintenance on unit kept in log book on site.
IX.2: Clean grates/hearth before each day's operation (more often if necessary) and dispose of the ashes properly.	✓		
IX.3: Do not combust waste until the secondary combustion chamber (afterburner) is at or above the minimum required temperature. This temperature must be maintained for the duration of the burn cycle.	✓		
IX.4: Do not overload the incinerator. Stay within the given loading rates and follow the manufacturer's instructions.	✓		
IX.5: Schedule charges to minimize opening the charging door as infrequently as possible. Opening the charging door lets cold air in and quenches the fire, causing smoke.	✓		
IX.6: Burn only the type of wastes that the incinerator has been approved to burn. Follow the manufacturer's instructions to maximize the efficiency of the unit and to properly burn the waste.	✓		
IX.7: Keep the combustion air adjusted according to the manufacturer's instructions.	✓		
IX.8: Observe the stack frequently and adjust the operation as necessary to eliminate smoke and fly ash.	✓		
IX.9: Post a copy of the manufacturer's manual and this Guideline near the incinerator.	✓		
IX.10: Make quarterly inspections to check and service all of the equipment. If a qualified person is not available for proper inspections, a service contract with a reputable manufacturer is advisable.	✓		
IX.11: Follow manufacturer's operation and maintenance guidelines.	✓		

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
Emission Unit: EUT0260-09 Gas Turbine 9 at Central Power Plant			
III.1: The permittee shall not operate EUT0260-09, when firing natural gas, unless the water injection system is installed and operating at a water-to-fuel ratio of at least 0.5 (by weight), or alternate water-to-fuel ratio as determined by testing. Any alternate water-to-fuel ratio must be approved by the District Supervisor prior to implementation. Performance criteria used to obtain representative data and the means by which an exceedance or excursion will be defined are described in SC VI.3, below.	✓		The gas turbines are equipped and maintained with instrumentation to continuously monitor and record the fuel consumption and the ratio of water to fuel being fired in each turbine. This system must be accurate to within plus or minus 5 percent. Flow rate data kept in Delta V. The DCS alarms if the water-to-fuel ratio goes below limit or there is loss of NOx water.
III.2: The permittee shall not operate EUT0260-09, when firing No. 2 fuel oil, unless EUT0260-09 is at full load conditions and unless the water injection system is installed and operating at a water-to-fuel ratio of at least 0.3 (by weight), or alternate water-to-fuel ratio as determined by testing. Any alternate water-to-fuel ratio must be approved by the District Supervisor prior to implementation. The permittee shall conduct the monitoring/recordkeeping in accordance with the requirements specified in 40 CFR 64.7 through 64.9.	✓		The gas turbines are equipped and maintained with instrumentation to continuously monitor and record the fuel consumption and the ratio of water to fuel being fired in each turbine. This system must be accurate to within plus or minus 5 percent. Operational procedures ensure full load. Flow rate data kept in Delta V and a strip chart recorder. The DCS alarms if the water-to-fuel ratio goes below limit or there is loss of NOx water.
VI.1: To avoid the requirement in 40 CFR 60.334 (h)(1) to monitor sulfur content on a daily basis for gaseous fuel, the permittee shall demonstrate that the gaseous fuel combusted in EUT0260-09 meets the definition of "natural gas" as defined in 40 CFR 60.331 (u) through use of one of the following sources of information to make the required demonstration: a. The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or b. Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of this chapter is required.	✓		DTE provided UM with a letter stating the natural gas sulfur content is less than 20.0 grains/100scf or less. Letter filed at EHS.
VI.2: The permittee shall equip and maintain EUT0260-09 with instrumentation to continuously monitor and record the fuel consumption and the ratio of water-to-fuel being fired in EU-T0260-09. The fuel consumption rate shall be monitored by a differential pressure orifice meter and the water injection rate shall be monitored using a turbine meter. The minimum water-to-fuel ratio values shall be 0.5 when firing natural gas and 0.3 when firing fuel oil. This system shall be accurate to within plus or minus 5 percent.	✓		The gas turbines are equipped and maintained with instrumentation to continuously monitor and record the fuel consumption and the ratio of water to fuel being fired in each turbine. This system must be accurate to within plus or minus 5 percent.
VI.3:The permittee shall notify the AQD of any excursions or exceedances using the procedures specified by R213 (c) and R912.	✓		All excursion or exceedances are reported as soon as found.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No prompt deviations reported during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII: Exhaust gas shall be discharged, unobstructed, vertically upwards to the ambient air unless otherwise noted.	✓		The gases discharge vertically upward due to construction of the plant.
VIII.1.a: The maximum exhaust dimensions shall be 120 inches.	✓		The maximum exhaust dimension is due to the construction of the stack.
VIII.1.b: The minimum stack height above ground shall be 159 feet above a stack base elevation of 873 feet.	✓		The stack is at minimum height above elevation due to construction of the plant.
IX.1: The permittee shall comply with all applicable requirements for the Standards of Performance for Stationary Gas Turbines, as specified in 40 CFR Part 60, Subparts A and GG, as they apply to EUT0260-09.	✓		Comply with the applicable requirements as state in the ROP for Gas Turbines.
IX.2: The permittee shall comply with all applicable requirements of the NESHAP for Stationary Combustion Turbines, as specified in 40 CFR Part 63, Subparts A and YYYY, as they apply to EUT0260-09.	✓		Comply with the applicable requirements as state in the ROP for Gas Turbines.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
Emission Unit: EUT0260-10 Gas Turbine 10 at Central Power Plant			
I.1: **CO**: The CO emission rate from EUT0260-10 shall not exceed 7.54 pounds per hour, when firing natural gas in the turbines, nor 37.87 pounds per hour, when firing No. 2 fuel oil in the turbines.	✓		III.B.4-6: **CO**: Shall be tested using EPA Method 10 every 5 years from date of last test. Required last tested March was December 13, 2022..
III.1: The permittee shall equip and maintain EUT0260-10 with instrumentation to continuously monitor and record the fuel consumption and the ratio water-to-fuel being fired in EUT0260-10. The minimum water-to-fuel ratio value shall be 0.5 when firing natural gas and 0.3 when firing fuel oil. This system shall be accurate to within plus or minus 5 percent.	✓		The gas turbines are equipped and maintained with instrumentation to continuously monitor and record the fuel consumption and the ratio of water to fuel being fired in each turbine.
V.1: **CO**: The permittee shall submit a complete test protocol to the AQD for approval at least 60 days prior to the anticipated test date. The permittee shall submit a complete test report of the test results to the District Supervisor and the Technical Programs Unit within 60 days following the last date of the test.	✓		Required ROP testing was performed on December 13, 2022.
V.2: **CO**: The permittee shall verify the CO emission rate from the EUT0260-10, every 5 years from date of last test.	✓		
V.3: **CO**: The permittee shall notify the District Supervisor and the Technical Programs Unit no less than seven days prior to the anticipated test date.	✓		
VI.1: To avoid the requirement in 40 CFR 60.334 (h)(1) to monitor sulfur content on a daily basis for gaseous fuel, the permittee shall demonstrate that the gaseous fuel combusted in EUT0260-10 meets the definition of "natural gas" as defined in 40 CFR 60.331 (u) through use of one of the following sources of information to make the required demonstration: a. The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or b. Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of this chapter is required.	✓		DTE provided UM with a letter stating the natural gas sulfur content is less than 20.0 grains/100scf or less. Letter filed at EHS.
VI.2: The permittee shall equip and maintain EUT0260-10 with instrumentation to continuously monitor and record the fuel consumption and the ratio of water-to-fuel being fired in EUT0260-10 to demonstrate ongoing compliance with the NOx emissions limits. The minimum water-to-fuel ratio in lbs. of water injected to lbs of fuel fired shall be 0.5 when firing natural gas and 0.3 when firing fuel oil. This system shall be accurate to within plus or minus 5 percent.	✓		The gas turbines are equipped and maintained with instrumentation to continuously monitor and record the fuel consumption and the ratio of water to fuel being fired in each turbine. This system must be accurate to within plus or minus 5 percent.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.3: The permittee shall notify AQD of any excursions or exceedences using the procedures specified by R213(c)(3) and R912.	✓		All excursions/ exceedences are reported either immediately when found.
VI.4: The permittee shall maintain and calibrate the fuel and water flow meters consistent with each manufacturer's specifications.	✓		All meters are calibrated as per the manufacturer specifications.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No prompt deviations reported during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards unless otherwise noted.	✓		The gases discharge vertically upward due to construction of the plant.
VIII.1.a: The maximum exhaust dimension shall be 120 inches.	✓		The maximum exhaust dimension is due to construction of the stack.
VIII.1.b: The minimum height of the south stack shall be 159 feet above a stack base elevation of 873 feet.	✓		The stack is at minimum height above elevation due to construction of the plant.
Emission Unit: EUCPP-CHPHRSG Combined Heat and Power at CPP			
I.1: **NOx**: The nitrogen oxides (NOx) emission rate from CHPHRSG shall not exceed 25 ppm at 15% O2 or 150 ng/J of useful output when firing natural gas at full load, based on 30-day rolling average as determined each operating day.	✓		
I.2: **NOx**: The nitrogen oxides (NOx) emission rate from CHPHRSG shall not exceed 74 ppm at 15% O2 or 460 ng/J of useful output when firing ULSD at full load, based on 30-day rolling average as determined each operating day.	✓		
I.3: **NOx**: The nitrogen oxides (NOx) emission rate from CHPHRSG shall not exceed 7.69 lb/hr when firing natural gas at full load, based on 24-hour rolling average determined each operating hour.	✓		NOx: A continuous monitoring system for measuring NOx emissions discharged to the atmosphere has been installed, and is calibrated, maintained, and operated by the permittee.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
I.4: **NOx**: The nitrogen oxides (NOx) emission rate from CHPHRSG shall not exceed 15.16 lb/hr when firing ULSD at full load, based on 24-hour rolling average determined each operating hour.	✓		
I.5: **NOx:**The nitrogen oxides (NOx) emission rate from CHPHRSG shall not exceed 9 lb/ event duration of a start up or shutdown.	✓		
I.6: **NOx**: The nitrogen oxides (NOx) shall not exceed 35.7 tpy based on 12-month rolling time period as determined at the end of each calendar month.	✓		
I.7: **CO:** The CO emission rate from CHPHRSG shall not exceed 19.33 lb/ hr. when firing natural gas at full load based hourly.	✓		Fuel usage is monitored and recorded on a daily basis in a manner and with instrumentation acceptable to the AQD. CO was tested August 2022 and will be tested every 5 years from date of last test.
I.8: **CO:** The CO emission rate from CHPHRSG shall not exceed 10.10 lb/ hr. when firing ULSD at full load based hourly.	✓		
I.9: **CO:** The CO shall not exceed 94.2 tpy based on 12-month rolling time period as determined at the end of each calendar month.	✓		
I.10: **PM10:**The PM10 emission rate from CHPHRSG shall not exceed 3.60 lb/ hr. when firing natural gas at full load based hourly.	✓		Fuel usage is monitored and recorded on a daily basis in a manner and with instrumentation acceptable to the AQD. PM10 and PM2.5 was tested August 2022 and will be tested every 5 years from date of last test.
I.11: **PM10:**The PM10 emission rate from CHPHRSG shall not exceed 3.50 lb/ hr. when firing ULSD at full load based hourly.	✓		
I.12: **PM2.5:**The PM2.5 emission rate from CHPHRSG shall not exceed 3.60 lb/ hr. when firing natural gas at full load based hourly.	✓		
I.13: **PM2.5:**The PM2.5 emission rate from CHPHRSG shall not exceed 3.50 lb/ hr. when firing ULSD at full load based hourly.	✓		
I.14: **SO2:** The SO2 emission rate from the CHPHRSG shall not exceed 0.06 lb/ MMBtu at full load conditions hourly.	✓		Fuel oil usage in CHPHRSG is monitored and recorded on a daily basis. Fuel purchase records showing ULSD is kept on site.
I.15: **VOC**: The VOC emission rate from the CPPHRSG shall not exceed 4.08 lb/ hr when firing natural gas hourly.	✓		Fuel usage is monitored and recorded on a daily basis in a manner and with instrumentation acceptable to the AQD. VOC was tested August 2022 and will be tested every 5 years from date of last test.
I.16: **VOC**: The VOC emission rate from the CPPHRSG shall not exceed 5.8 lb/ hr when firing ULSD hourly.	✓		
I.17: **GHG as CO2e:** The GHG as CO2e shall not exceed 155,597 tpy based on 12-month rolling time period as determined at the end of each calendar month.	✓		Fuel usage is monitored and recorded on a daily basis. Data entered into 12-month rolling spreadsheet to ensure compliance.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
I.18: **GHG as CO2e:** The GHG as CO2e rate shall not exceed 1,000 lb/ MWh of gross energy output at full load conditions based on 12-month rolling time period as determined at the end of each calendar month.	✓		Fuel usage is monitored and recorded on a daily basis. Data entered into 12-month rolling spreadsheet to ensure compliance.
II. 1:: The permittee shall only burn pipeline quality natural gas or ultra-low sulfur diesel (ULSD) in EUCPP-CHPHRSG.	✓		Natural gas and ULSD is permitted to be fired at the CPP.
II. 2: The pipeline quality natural gas burned in EUCPP-CHPHRSG shall not have a total sulfur content in excess of 0.5 grains of sulfur per 100 standard cubic feet. This restriction subsumes the sulfur content fuel requirement of 20 grains of sulfur per 100 standard cubic feet of gas in 40 CFR Part 60, Subpart KKKK.	✓		DTE provided a letter August 30, 2021 stating the pipeline natural gas shall not have a total sulfur content in excess of 0.5 grains of sulfur per 100 standard cubic feet.
II.3: The ULSD burned in EUCPP-CHPHRSG shall not have a total sulfur content in excess of 15 ppmw. This restriction subsumes the 0.05 weight percent (500 ppmw) sulfur content fuel requirement in 40 CFR Part 60, Subpart KKKK	✓		Only ULSD is burned at the CPP. Purchase records of fuel kept on site. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit.
III.1: The permittee shall not operate EUCPP-CHPHRSG burning ULSD for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month	✓		Fuel oil is monitored and recorded daily.
III.2: 2. Within 180 days of operation, the permittee shall submit, implement, and maintain a malfunction abatement plan (MAP) as described in Rule 911(2) for EUCPP-CHPHRSG. The MAP shall, at a minimum, specify the following: a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement. b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures. c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits. d. Operating variables and ranges under various load conditions shall be monitored and recorded. The normal operating range of these variables and a description of the method of monitoring shall be maintained.	✓		MAP was submitted to MI EGLE September 1, 2022.
III: If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits	✓		The MAP has not be amended since initially submitted.
III.3.: Within 180 days of operation, the permittee shall submit, implement, and maintain a plan that describes how emissions will be minimized during startup and shutdown. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporate standard industry practices, and shall describe the demonstrated percent of design capacity, or demonstrated steady state level. Unless notified by the District Supervisor within 30 business days after plan submittal, the plan shall be deemed approved	✓		The startup and shutdown plan was submited to MI EGLE September 1, 2022.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.4.: The total number of startup and shutdown events for EUCPP-CHPHRSG shall not exceed 60 events per 12 month rolling time period as determined at the end of each calendar month	✓		The number of startup and shutdown events are recorded on the 12-month rolling spreadsheet.
III.5.: The permittee shall operate and maintain EUCPP-CHPHRSG, including associated equipment and monitors, in a manner consistent with safety and good air pollution control practice	✓		The CHPHRSG is monitored by the CPP as well as Solar remotely. The CPP has a maintenace contract with Solar. Solar performs thorough semi and annual maintenance on the unit.
III.6: The permittee shall implement and maintain an audio/visual/olfactory (AVO) plan for the natural gas piping and associated components to EUCPP-CHPHRSG	✓		The Audio/ visual/ olfactory plan was submitted to MI EGLE April 2022.
III.7: Upon the loss of natural gas, the permittee shall take immediate action to exhaust EUCPP-CHPHRSG through the north stack and to shut down the duct burning until natural gas is restored.	✓		No loss of natural gas during this reporting period.
III.8: The permittee shall not operate EUTURBINE, EUCPP-CHPHRSG and FGBT0260-CO for more than 1,000 hours in aggregate between the gas turbines per 12-month rolling time period when firing No. 2 fuel oil.	✓		The run time is recorded daily when running on fuel oil.
IV. 1: The maximum design heat input capacity for the turbine in EUCPP-CHPHRSG shall not exceed, on a fuel heat input basis, 190.1 MMBTU per hour (HHV) on natural gas and 173.4 MMBTU/hr (HHV) on ULSD and the design heat input capacity the duct burner in EUCPP-CHPHRSG shall not exceed, on a fuel heat input basis, 112 MMBTU per hour (HHV)	✓		The unit will operate as designed.
IV.2: The permittee shall not operate EUCPP-CHPHRSG unless the dry low NOx technology and selective catalytic reduction are installed, maintained, and operated in a satisfactory manner, for EUCPP-CHPHRSG. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP for EUCPP-CHPHRSG as required in SC III.2	✓		SoloNox was installed and regularly monitored both by the CPP and Solar remotely. SCR was installed and continuously monitored by the CPP.
IV.3: The permittee shall install, calibrate, maintain and operate, in a satisfactory manner, devices to monitor and record the NOx emissions and oxygen (O2) content of the exhaust gas from EUCPP-CHPHRSG on a continuous basis. The permittee shall install and operate the Continuous Emission Monitoring System (CEMS) to meet the timelines, requirements and reporting detailed in Appendix 3		✓	CEMS was installed, certified, and operating continously. *See deviation report.*
IV. 4: The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the natural gas usage rate for EUCPP-CHPHRSG on a continuous basis. The device shall be operated in accordance with 40 CFR 60.4345(c).	✓		A natural gas monitor was installed, maintained, and calibrated per the manufacturer. The gas usage is continously monitored and data collected in the Delta V.
IV.5: The permittee shall install, calibrate, maintain and operate in a satisfactory manner a sufficient number of watt meters to continuously measure and record the hourly gross electric output from EUCPP-CHPHRSG	✓		Watt meter installed and maintained per the manufacturer.
IV.6: The permittee shall install, calibrate, maintain and operate in a satisfactory manner a sufficient number of watt meters to continuously measure and record the total useful thermal output from EUCPP-CHPHRSG	✓		Will discuss with Distrcit Office. Typo error and will modify permit.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
V. 1: Within 180 days after commencement of initial startup, the permittee shall verify CO, PM10, PM2.5, and VOC emission rates from EUCPP-CHPHRSG at maximum routine operating conditions, by testing at owner's expense, in accordance with Department requirements. The permittee must complete the required testing once every five years of operation, thereafter. Testing shall be based on an average of three 1-hour or longer test runs performed using an approved EPA Method listed in	✓		Peformance testing was completed August 23-26, 2022.
V.2: Within 180 days after commencement of initial startup, and annually thereafter, the permittee shall verify SO2 emissions by verifying the sulfur content of the fuels burned in EUCPP-CHPHRSG. This can be performed by obtaining fuel characterization documentation as specified in 40 CFR 60.4365 or by performing an analysis of fuel samples following ASTM D5287 for natural gas and ASTM D4177 for oil. Alternatively, for oil, the permittee may follow the procedures for manual pipeline sampling in section 14 of ASTM D4057. The fuel analyses may be performed either by the permittee, a service contractor retained by the permittee, the fuel vendor, or any other qualified agency. The samples for the total sulfur content of the fuel shall be analyzed using:2 (40 CFR 60.4415(a)(1)) a. For liquid fuels, ASTM D129, or alternatively D1266, D1552, D2622, D4294, or D5453 (all of which are incorporated by reference, see 40 CFR 60.17); or b. For gaseous fuels, ASTM D1072, or alternatively D3246, D4084, D4468, D4810, D6228, D6667, or Gas Processors Association Standard 2377 (all of which are incorporated by reference,	✓		DTE provided a letter August 30, 2021 stating the pipeline natural gas shall not have a total sulfur content in excess of 0.5 grains of sulfur per 100 standard cubic feet. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit.
V.3: The permittee shall verify CO, PM10, PM2.5, and VOC emission rates from EUCPP-CHPHRSG, at a minimum, every five years from the date of the last test.	✓		Emissions rates were verified August 23-26, 2022. The emissions rates will be verified every 5 years from the date of last test.
V.4:. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted.	✓		The AQD TPU Supervisor and District Supervisor were notified of test not less than 7 days prior.
VI. 1: The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition	✓		Report completed and submitted.
VI.2: The permittee shall continuously monitor and record, in a satisfactory manner, the NOx emissions and the O2, emissions from EUCPP-CHPHRSG. The permittee shall operate each CEMS to meet the timelines, requirements and reporting detailed in Appendix A and shall use the CEMS data for determining compliance with SC I.1, SC I.2, SC I.3, SC I.4, and SC I.5	✓		CEMS was installed, certified, and operating continously.
VI.3: The permittee shall monitor and record, in a satisfactory manner, the natural gas usage for EUCPP-CHPHRSG on an hourly and monthly basis. The permittee shall keep all records on file and make them available to the Department upon request	✓		The natural gas usage is recorded continuosly and logged daily. Records kept on site at CPP.
VI.4: The permittee shall maintain a record of the number of hours ULSD is fired in EUCPP-CHPHRSG on a monthly and 12-month rolling time period basis as determined at the end of each calendar month	✓		The ULSD usage is recorded continuously and logged daily. Records kept on stie at CPP.
VI.5: The permittee shall maintain a record of the number startup and shutdown events EUCPP-CHPHRSG is operating under startup on a monthly and 12-month rolling time period basis as determined at the end of each calendar month	✓		The number of startup and shutdown events are calculated on the monthly spreadsheet.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.6: The permittee shall keep, in a satisfactory manner, a record of the following: a. Hourly and 24-hour rolling average NOx emission rate for each fuel type. b. Daily and 30-day rolling average NOx concentration for each fuel type. c. Mass of NOx emissions for each startup or shutdown event. Startup and shutdown events were defined in footnote C of the emission limit table in Section I. d. Total monthly and 12-month rolling NOx, and CO emission rates.	✓		The records are calculated on the monthly spreadsheet. Continuously calculated in the DAHS.
VI. 7: The permittee shall keep, in a satisfactory manner, all test reports for EUCPP-CHPHRSG, on file at the facility and make them available to the Department upon request	✓		All tests reports were submitted to EGLE and copies of report are kept on site.
VI.8: The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total CO2e mass emissions and mass per MWh for EUCPP-CHPHRSG, as required by SC I.17 and SC I.18. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using the method included in Appendix 7 unless a new method is approved by the District Supervisor	✓		The records are calculated on the monthly spreadsheet.
VI.9: The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit for EUCPP-CHPHRSG. This information shall include, but shall not be limited to the following: a. Compliance tests and any testing required under the special conditions of this permit; b. Monitoring data; c. Total sulfur content and potential sulfur emissions, as applicable, of the natural gas and ULSD as required by 40 CFR 60.4365(a); d. Verification of heat input capacity; e. Identification, type, and amount of fuel combusted on a calendar month basis; f. Gross energy output on a calendar month basis; g. All records required by 40 CFR 60.7; h. Records of the duration of all dates and times of startup and shutdown events; i. All calculations necessary to show compliance with the limits contained in this permit; j. All records related to, or as required by, the MAP, AVO and the startup and shutdown plan.	✓		The records are calculated on the monthly spreadsheet.
VI.10: The permittee shall maintain a record of all natural gas loss events including the dates and times of the natural gas loss and when natural gas supply was restored. This record shall indicate that the exhaust was through the north stack and the duct burner was off before the natural gas loss event or else indicate the times that the duct burner was turned off and/or the exhaust was routed to the north stack.	✓		No loss gas incdents during this reporting period.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A	✓		No prompt reporting during this reporting period.
VII.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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.4: The permittee shall submit any performance test reports including RATA reports to the AQD Technical Programs Unit and District Office.	✓		All performance tests reports and RATA reports are submitted to the TPU and District Office.
VII.5: 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 EUCPP-CHPHRSG	✓		UM providing completion of CHPHRSG in letter to the AQD District Supervior dated March 14, 2022.
VII.6: The permittee shall provide written notification of the date construction commences and the actual date of initial startup of EUCPP-CHPHRSG, in accordance with 40 CFR 60.7. The permittee shall submit the notification(s) to the AQD District Supervisor within the time frames specified in 40 CFR 60.7 and 40 CFR 60.19, where applicable	✓		The PTI was considered notification.
VII.7: The permittee shall submit reports of excess emissions and monitor downtime, in accordance with 40 CFR 60.7(c) and with 40 CFR 60.4375 and 40 CFR 4380. The reports shall be postmarked by the 30th day following the end of each 6-month period.	✓		The U of M submits semi-annual NOx emissions reports 30 days after the end of the 6/30 and 12/31. A copy of the report is located at EHS and at the CPP.
VIII.1..1: The maximum exhaust dimension for the north stack is to be 168 inches.	✓		The maximum exhaust dimension is due to construction of the stack.
VIII.1. 2: The maximum exhaust dimension for the south stack is to be 120 inches.	✓		The maximum exhaust dimension is due to construction of the stack.
IX.1: The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and KKKK, as they apply to EUCPP-CHPHRSG.	✓		Comply with the applicable requirements as state in the ROP for EUCPP-CHPHRSG.
Emission Unit: EUB0805-02 Boiler No. 2 at the Hoover Heating Plant			
I.1: **NOx**: The nitrogen oxides emission rate from Boiler No. 2 when firing natural gas shall not exceed 0.018 pounds per MMBtu.	✓		The fuel usage is recorded on a daily basis.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
I.2: **NOx**: The nitrogen oxides emission rate from Boiler No. 2 when firing natural gas shall not exceed 0.37 pounds per hour.	✓		The fuel usage is recorded on a daily basis.
I.3: **NOx**: The nitrogen oxides emission rate from Boiler No. 2 when firing fuel oil shall not exceed 0.113 pounds per MMBtu.	✓		The fuel usage is recorded on a daily basis.
I.4: **NOx**: The nitrogen oxides emission rate from Boiler No. 2 when firing fuel oil shall not exceed 2.3 pounds per hour.	✓		The fuel usage is recorded on a daily basis.
I.5: **Opacity**: Permittee shall not discharge to the atmosphere from Boiler No. 2 any gases that exhibit greater that 20% opacity (6-minute average).	✓		The stack is observed periodically.
II.1: **Fuel Oil**: Sulfur content of fuel oil shall not exceed 0.25% by weight.	✓		The density and BTU content of fuel are monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density and BTU per gallon utilizing a method approved by AQD. A sample is taken during every truck delivery along with another sample when the fuel is dropped into each individual tank. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit. Records kept at HHP.
IIII.1: The permittee shall only combust natural gas and/or fuel oil in EUB0805-02.	✓		Natural gas and No. 2 fuel oil are the only two fuels that can be fired at the HHP.
III.2: The permittee shall install, maintain, and operate EUB0805-02 according to the manufacturer's written instructions, or procedures developed by the owner/operator and approved by the boiler manufacturer, over the entire life of each boiler.	✓		UM operates the boiler in accordance to the manufacturer.
IV.1: The maximum design heat input rate of each boiler in EUB0805-02 shall not exceed 31.4 million British thermal units per hour (MMBtu/hr) on a fuel heat input basis.	✓		The maximum design is due to construction of the unit.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
V.1. Upon the request of the District Supervisor, the permittee shall verify NOx emission rates from EUB0805-02 by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.	✓		No requests at this time. Fuel usage is documented daily and records kept on site.
V.2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted	✓		
VI.1: The permittee shall monitor and record the fuel oil usage in EUB0805-02 on a daily basis in a manner and with instrumentation acceptable to the AQD.	✓		Fuel oil usage for Boiler 2 is recorded daily.
VI.2. The permittee shall keep, in a satisfactory manner, fuel oil supplier certification for each delivery of fuel oil. The certification shall include the name of the fuel oil supplier and a statement from the fuel oil supplier that the fuel oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c.	✓		The UM Utilities department maintains purchase records.
VI.3. The permittee shall monitor and record the fuel oil usage in EUB0805-02 on a daily basis in a manner and with instrumentation acceptable to the AQD.	✓		The fuel oil usage is documented daily when burned.
VI.4. The permittee shall maintain purchase records of the type and quantity of oil, the density, and the sulfur and BTU contents for each shipment of oil received.	✓		The UM Utilities department maintains purchase records. Fuel oil paperwork kept on site at HHP.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.5 & VI.6. The permittee shall monitor the density, sulfur and BTU content of fuel oil by collecting a representative sample of the fuel oil fired at the Hoover Heating Plant during each month that fuel oil is fired. The sample shall be submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method acceptable to AQD. (R 336.1213(3)) In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the EUB0805-02 demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.	✓		Fuel oil paperwork kept on site at HHP.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.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.	✓		No request of tetsting during this reporting period.
VIII: Exhaust gases shall be discharged, unobstructed, vertically upwards to the ambient air unless otherwise noted.	✓		The gases discharge vertically upward due to construction of the plant.
VIII.1.a: The maximum exhaust dimension shall be 20 inches.	✓		The maximum exhaust dimension is due to construction of stack.
VIII.1.b: The minimum height of the stack above ground shall be 50 feet.	✓		The maximum height of stack is due to construction.
IX.1. The permittee shall comply with all applicable requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units as specified in 40 CFR Part 60, Subparts A and Dc, as they apply to EUB0805-02.	✓		EUB0805-02 is considered a gas unit and requires tune ups. Tune ups performed annually. Annual PMs performed. Annual state boiler inspection performed.
IX.2. 2. The permittee shall comply with all applicable requirements of the NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, as specified in 40 CFR Part 63, Subparts A and DDDDD, as they apply to EUB0805-02.	✓		EUB805-02 performs annual maintenance to meet subpart DDDDD.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
Emission Unit: EUB0805-03 Boiler No. 3 at Hoover Heating Plant			
I.1: **Opacity**: Permittee shall not discharge to the atmosphere from Boiler No. 3 any gases that exhibit greater that 20% opacity (6-minute average).	✓		Initial performance test performed in 2008. Daily fuel usage documented.
II.1: **Fuel Oil**: Sulfur content of fuel oil shall not exceed 0.25% by weight.	✓		The permittee shall monitor the density, sulfur, and BTU content of fuel oil by collecting a representative sample of the fuel oil fired at the Hoover Heating Plant during each month that fuel oil is fired. The sample shall be submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method acceptable to AQD.2 (R 336.1225, R 336.1702(a), 40 CFR 60.48c(g)) In lieu of taking a representative sample, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the Hoover Heating Plant demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil. Records kept at HHP. .
III.1: The permittee shall only fire natural gas and/or No. 2 fuel oil in EUB0805-03	✓		Natural gas and No. 2 fuel oil are the only two fuels that can be fired at the HHP.
VI.1: The permittee shall monitor, in a satisfactory manner, the natural gas and fuel oil usage from EUB0805-03 on a monthly basis.	✓		The natural gas and fuel oil usage are documented daily.
VI.2: The permittee shall keep, in a satisfactory manner, fuel oil supplier certification for each delivery of fuel oil. The certification shall include the name of the fuel oil supplier and a statement from the fuel oil supplier that the fuel oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c.	✓		The purchase records and supplier certifications are reviewed and copies are kept on site with unit. Purchase records also filed with the UM Utilities Department.
VI.3.The permittee shall monitor, in a satisfactory manner, the natural gas and fuel oil usage from EUB0805-03 on a monthly basis.	✓		The natural gas and fuel oil usage are documented daily.
VI.4. The permittee shall maintain purchase records of the type and quantity of oil, the density, and the sulfur and BTU contents for each shipment of oil received.	✓		The purchase records and supplier certifications are reviewed and copies are kept on site with unit. Purchase records also filed with the UM Utilities Department.
VI.5. & VI.6. The permittee shall monitor the density, sulfur, and BTU content of fuel oil by collecting a representative sample of the fuel oil fired at the Hoover Heating Plant during each month that fuel oil is fired. The sample shall be submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method acceptable to AQD.2 (R 336.1225, R 336.1702(a), 40 CFR 60.48c(g)) In lieu of taking a representative sample, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the Hoover Heating Plant demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.	✓		The purchase records and supplier certifications are reviewed and copies are kept on site with unit. Purchase records also filed with the UM Utilities Department.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII: Exhaust gases shall be discharged, unobstructed, vertically upwards to the ambient air unless otherwise noted.	✓		The gases discharge vertically upward due to construction of the plant.
VIII.1.a: The maximum exhaust dimension shall be 26 inches.	✓		The maximum exhaust dimension is due to construction of the stack.
VIII.1.b: The minimum height of the stack above ground shall be 30 feet.	✓		The maximum height of stack is due to construction.
IX.1: The permittee shall comply with all applicable requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units as specified in 40 CFR Part 60, Subpart A and Subpart Dc, as they apply to EUB0805-03.	✓		EU0805-03 considered a gas unit and requires tune ups. Tune ups performed annually. Annual PMs performed. Annual state boiler inspection performed.
IX.2: The permittee shall comply with all applicable requirements of the NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, as specified in 40 CFR Part 63, Subparts A and DDDDD, as they apply to EUB0805-03.	✓		EU0805-03 performs annual maintenance to meet subpart DDDDD.
Emission Unit: EUB550-GEN Emergency Generator at NCRC Building 550			
I.1: **NOx**: Nitrogen Oxide emissions shall not exceed 15 tons per 12-month rolling time period as determined at the end of each calendar month.	✓		Monthly calculation of Nox in tons per year.
III.1: The permittee shall not operate EUB550-GEN for more than 500 hours per 12-month rolling time period as determined at the end of each calendar month.	✓		Records of operating hours by monthly preventative maintenance task readings.
VI.1: The permittee shall keep monthly and previous 12-month NOx calculation records for EUB550-GEN. All records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.	✓		All monthly records kept on for a period of 5 years.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.2: The permittee shall monitor and record the hours of operation for EUB550-GEN each month in a manner and with instrumentation acceptable to the District Supervisor, Air Quality Division.	✓		Records of operating hours by monthly preventative maintenance task readings.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
IX.1: The permittee shall comply with all applicable provisions of 40 CFR, Part 63, Subparts A and ZZZZ as they apply to EUB550-GEN.	✓		The only applicable requirement, initial notification, was submitted under ownership of Pfizer.
Emission Unit: EU-TURBINE Turbine located at NCRC Powerhouse			
I.1: **NOx**: Nitrogen Oxide emissions shall not exceed 36.1 pounds per hour, which is equivalent to 167 parts per million by volume on a dry gas basis, corrected to 15% oxygen and at ISO conditions.	✓		Monthly calculation of NOx in lbs/hr.
II.1: No. 2 fuel oil shall not exceed 0.10% sulfur content by weight based on a 30-day rolling time period.	✓		A sample is taken during every truck delivery to ensure sulfur is less than 0.1%. In lieu of taking a representative sample, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the Hoover Heating Plant demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil. The fuel analyses and supplier certifications are kept on site at NCRC Power Plant.
III.1: The permittee shall not operate EUTURBINE and FGBT0260-CO for more than 1,000 hours in aggregate between the gas turbines per 12-month rolling time period when firing No. 2 fuel oil.	✓		The run times for all units are recorded daily.
V.1: **NOx**: The permittee shall verify NOX emission rates from EUTURBINE by testing at the owner's expense. Testing shall be performed using an approve USEPA method listed in 40 CFR Part 60 Appendix A. No less than 30 days priro to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The permittee must submit a complete report of the test results to the AQD technical Programs Unit and District Office within 60 days.	✓		
V.2: **NOx**: The permittee shall verify the NOx emission rate from the EUTURBINE, by testing, every five years from the date of last test.	✓		Required testing will be performed every 5 years from date of last test. The required testing was completed on December 20, 2022.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
V.3: The permittee shall notify the Department not less than 7 days prior to anticpated test date.	✓		
VI.1: The permittee shall maintain purchase records of the type and quantity of oil, the density, and the sulfur and BTU contents for each shipment of oil received.	✓		Fuel supplier certifications are kept on site at NCRC Power Plant showing sulfur conent.
VI.2: The permittee shall monitor the density, sulfur, and BTU content of fuel oil by collecting a representative sample of the fuel oil fired at the NCRC during each month that fuel oil is fired. The sample shall be submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method acceptable to AQD.	✓		Fuel supplier certifications are kept on site at NCRC Power Plant showing sulfur conent.
VI.3. In lieu of taking a representative sample, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the Hoover Heating Plant demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.	✓		Fuel supplier certifications are kept on site at NCRC Power Plant showing sulfur conent.
VI.4: The permittee shall keep monthly and previous 12-month NOx calculation records for EUTURBINE. The permittee will show compliance with the SC I.1, NOx emission limit by maintaining records of total monthly fuel usage, operating hours, and by calculating the pounds per hour on a 12-month rolling time period using this data after the end of each calendar month. Emission calculations are based upon fuel usage and SC I.1, emission factors.	✓		Readings are taken daily and calculated after the end of each month.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.5: To avoid the requirement in 40 CFR 60.334 (h)(1) to monitor sulfur content on a daily basis for gaseous fuel, the permittee shall demonstrate that the gaseous fuel combusted in EU-T0260-09 meets the definition of "natural gas" as defined in 40 CFR 60.331(u) through use of one of the following sources of information to make the required demonstration: a. The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or b. Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of Appendix D to Part 75 of this chapter is required.	✓		DTE provided UM with a letter stating the natural gas sulfur content is less than 20.0 grains/100scf or less. Letter filed at EHS.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.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.	✓		No testing performed during this reporting period.
VIII: Exhaust gases shall be discharged, unobstructed, vertically upwards to the ambient air unless otherwise noted.	✓		The gases discharge vertically upward due to construction of the plant.
VIII.1: SV-COGEN shall be at a minimum height of 87 feet above the ground.	✓		The minimum height of stack is due to construction of plant.
VIII.2: SV-BYPASS shall be at a minimum height of 87 feet above the ground.	✓		The minimum height of stack is due to construction of plant.
IX.1: The permittee shall comply with all applicable provisions of 40 CFR Part 60, Subparts A and GG, as they apply to EUTURBINE.	✓		All conditions of for EU-TURBINE are reviewed to ensure compliance with 40 CFR Part 60 subpart A and GG.
IX.2: The permittee shall comply with all applicable provisions of 40 CRF Part 63, Subparts A and YYYY, as they apply to EUTURBINE.	✓		All conditions of EUTURBINE are reviewed to ensure compliance with 40 CFR Part 63 subparts A and YYYY.
Emission Unit: EUDUCTBURNER Duct Burner at NCRC Powerhouse			

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
I.1: **NOx**: Nitrogen oxide emissions shall not exceed 0.14 pounds per million BTUs of heat input per 30-day rolling time period.	✓		Monthly calculation of Nox in tons.
I.2: **NOx**: Nitrogen oxide emissions shall not exceed 1.63 tons per 30-day rolling time period.	✓		
VI.1: The permittee shall keep monthly and previous 12-month NOx calculation records for EUDUCTBURNER. The permittee will show compliance with the SC I.2, NOx emission limits by maintaining records of total monthly fuel usage, operating hours, and by calculating the tons per month NOx emissions on a 12-month rolling time period using this data after the end of each calendar month. Emission calculations are based upon fuel usage and SC I.1 - I.2, NOx emission factors. The permittee tracks fuel use and operating hours on a daily basis.	✓		Fuel usage and operating hours are recorded daily.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		The gases discharge vertically upward due to construction of the plant.
VIII.1: SV-COGEN shall be at a minimum height of 87 feet above the ground.	✓		The minimum height of stack is due to construction of plant.
IX.1: The permittee shall comply with all applicable provisions of 40 CFR Part 60, Subparts A and Dc, as they apply to EUDUCTBURNER.	✓		All conditions of for EU-DUCTBURNER t are reviewed to ensure compliance with 40 CFR Part 60 subpart A and GG.
Emission Unit: EUB800-GEN1 Emergency Generator			
I.1: **NOx**: Nitrogen Oxides emissions shall not exceed 6.9 tons per year based on a 12-month rolling time period as determined at the end of each month.	✓		Monthly calculation of Nox in tons.
II.1: Only Diesel No. 2 fuel oil shall be used for emergency generator EUB800-GEN1.	✓		Unit can only burn No. 2 fuel oil.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.1: The permittee shall operate EUB800-GEN1 in accordance with manufacturer's recommendations for safe and proper operation to minimize emissions during periods of startup, shutdown, and malfunction.	✓		The unit is maintained and PM is performed per the manufacturer's recommendations.
III.2: The permittee shall not operate EUB800-GEN1 more than 250 hours per 12-month rolling time period as determined at the end of each calendar month.	✓		Operating hours are documented monthly.
VI.1: The permittee shall monitor the hours of operation of EUB800-GEN1 on a monthly basis in a manner that is acceptable to the District Supervisor, Air Quality Division.	✓		Operating hours are documented monthly.
VI.2: The permittee shall keep, in a satisfactory manner, records of the date, duration, and description of malfunctions and corrective maintenance performed that may impact the air emissions of EUB800-GEN1. Also, results from any air emissions testing of EUB800-GEN1 must be maintained. All records shall be kept on file for a period of at least five years and made available to the Department upon request.	✓		All maintenance is documented and filed on site. Monthly operating times are documented. All records kept on file for 5 years.
VI.3: The permittee shall keep, in a satisfactory manner, hours of operation records for EUB800-GEN1, as required by SC VI.1. All records shall be kept on file for a period of at least five years and made available to the Department upon request.	✓		Operating hours are documented monthly.
VI.4: The permittee shall calculate monthly and 12-month rolling time period NOx emissions from EUB800-GEN1, and shall keep these calculations on file for a period of five years and make them available to the Department upon request. For the purpose of showing compliance with the NOx emission limit in SC I.1, the applicant shall multiply the NOx emission factor by the number of operating hours and the output capacity (3,251 brake horsepower) of the generator. If EUB800-GEN1 is in service, it will be assumed to be operating at 100% load (in standby mode) for every hour of operation. Any alternate method of calculating NOx emissions based upon testing must be approved by the District Supervisor, Air Quality Division.	✓		Monthly calculation of Nox in tons and operating hours.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
IX.1: The permittee shall comply with all provisions of 40 CFR Part 60, Subparts A and IIII, as they apply to EUB800-GEN1.	✓		All conditions of EUB800-GEN 1 are reviewed to ensure compliance with
IX.2: EUB800-GEN1 complies with 40 CFR Part 63, Subparts A and ZZZZ by complying with 40 CFR Part 60, Subpart IIII.	✓		The only applicable requirement, initial notification, was submitted under ownership of Pfizer.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
Emission Unit: EUB85-FIREPUMP2 Diesel Fire Pump No. 2			
I.1: **NOx**: NOx emissions shall not exceed 1.41 tons per year based on a 12 month rolling time period as determined at the end of each calendar month.	✓		Monthly calculation of Nox via operating hours and daily fuel usage.
II.1: **Diesel Fuel**: Diesel fuel is the only fuel allowed for EUB85-FIREPUMP2.	✓		EUB85-FIREPUMP2 can only burn diesel fuel.
III.1: The permittee shall not operate EUB85-FIREPUMP2. for more than 500 hours each per 12-month rolling time period as determined at the end of each calendar month.	✓		Monthly calculations of operating hours and fuel usage. EHS maintains the spreadsheet.
VI.1: The permittee shall equip and maintain each of the fire protection pumps in EUB85-FIREPUMP2.with a device to monitor the hours of operation.	✓		EUB85-FIREPUMP2. is equipped with non resettable meters.
VI.2: The permittee shall monitor the hours of operation for EUB85-FIREPUMP2. on a monthly basis in a manner and with instrumentation acceptable to the District Supervisor, Air Quality Division.	✓		Monthly calculations of operating hours and fuel usage. EHS maintains the spreadsheet.
VI.3: The permittee shall keep records of the hours of operation of EUB85-FIREPUMP2. on a monthly basis and 12-month rolling time period basis as determined at the end of each calendar month. All records shall be kept on file for a period of at least five years and made available to the Department upon request.	✓		EHS maintains the 12-month rolling hours of operationg spreadsheet.
VI.4: The permittee shall calculate monthly and 12-month rolling time period NOx emissions from EUB85-FIREPUMP2. and shall keep these calculations on file for a period of at least five years and make them available to the Department upon request.	✓		EHS maintains the 12-month rolling Nox emissions spreadsheet.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
IX.1: The permittee shall comply with all applicable provisions of 40 CFR Part 63, Subparts A and ZZZZ as they apply to EUB85-FIREPUMP2..	✓		EUB85-FIREPUMP2 meet supbart ZZZZ and the initial notification was submitted via Pfizer.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
Flexible Group: FGB0260-03-04 Boilers 3 and 4 at the Central Power Plant (EUB0260-03, EUB0260-04)			
I.1: **SO2**: The sulfur dioxide emission rate from Boiler No.3 and Boiler No. 4, individually, when firing No. 2 fuel oil shall not exceed 0.56 lbs. per million BTUs heat input, based upon a 24-hour period. This is equivalent to using No. 2 fuel oil with 0.5% sulfur content and a heat value of 18,000 BTUs per lb.	✓		Fuel oil usage in Boilers No. 3 and 4 is monitored and recorded on a daily basis in a manner and with instrumentation acceptable to the AQD. The data is collected in the CEMS. Alarms are set in the CEMS at 0.50 lbs/MMBtu. The density, sulfur and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the CPP. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit.
I.2: **NOx**: The nitrogen oxides emission rate from Boiler No. 3 and Boiler No. 4 when firing natural gas and exhausting out south stack shall not exceed 0.55 pounds per million BTUs heat input, based on a 24-hour average.	✓		Nitrogen oxides shall be tested every 5-years from date of last test. In lieu of statck testing once within the permit term, permittee may provide one week of Nox data when boilers 3 and 4 are running higher than normal operations to the District Supervisor explaining that NOx data will be substituted for the NOx stack testing. If this option is selected, quarterly linearity tests as describedin 40 CFRPart 75 will provided along with NOx data. The data is collected in the CEMS. Alarms are set in the CEMS at 0.50 lbs/MMBtu.
III.1: The permittee shall not fire any fuel in FGB0260-03-04 other than natural gas, while the boilers are exhausting through the south stack.	✓		Boilers only fire natural gas while exhausting to the south stack through operational procedures.
III.2: The permittee shall only fire natural gas and/or No. 2 fuel oil in FGB0260-03-04 when exhausting through the north stack.	✓		Boilers only fire natural gas/ No. 2 fuel oil while exhausting to the north stack through operational procedures.
V.1: **NOx**: The permittee shall submit a complete test protocol to the AQD for approval at least 60 days prior to the anticipated test date.	✓		Testing required every 5-years from the last test date. CEMS data submitted in place of test. Alternate data approved by the EGLE. Alternate ROP testing data submitted February 1, 2019. In lieu of statck testing once within the permit term, permittee may provide one week of Nox data when boilers 3 and 4 are running higher than normal operations to the District Supervisor explaining that NOx data will be substituted for the NOx stack testing. If this option is selected, quarterly linearity tests as describedin 40 CFRPart 75 will provided along with NOx data.
V.2: **NOx**: The permittee shall verify the NOx emission rate from FGB0260-03-04, every 5 years from date of last test.	✓		
V.3: **NOx**: The permittee shall notify the District Supervisor and the Technical Programs Unit no less than seven days prior to the anticipated test date.	✓		
V.4: **NOx**: In lieu of statck testing once within the permit term, permittee may provide one week of Nox data when boilers 3 and 4 are running higher than normal operations to the District Supervisor explaining that NOx data will be substituted for the NOx stack testing. If this option is selected, quarterly linearity tests as describedin 40 CFRPart 75 will provided along with NOx data.	✓		

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.1: The permittee shall monitor and record the fuel oil usage in FGB0260-03-04 on a daily basis in a manner and with instrumentation acceptable to the AQD.	✓		The fuel oil usage is written on a daily log, collected in the CEMS, the Delta V data acquisition handling system.
VI.2: The permittee shall maintain purchase records of the type and quantity of oil, the density, and the sulfur and BTU contents for each shipment of oil received.	✓		The UM Utilities Department holds the purchase records.
VI.3: The permittee shall monitor the density, sulfur, and BTU content of fuel oil by collecting a representative sample of the fuel oil fired at the Central Power Plant during each month that fuel oil is fired. The sample shall be submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method acceptable to AQD.	✓		The density, sulfur and BTU content of fuel are monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method approved by AQD. A sample is taken during every truck delivery along with another sample when the fuel is dropped into each individual tank. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit.
VI.4: In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the EUB0805-02 demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.	✓		In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII.1.a: The maximum exhaust dimension of the north stack (SV-B0260-01) shall be 168 inches.	✓		The maximum exhaust dimension is due to construction of the stack.
VIII.1.b: The minimum height of the north stack shall be 250 feet above a stack base elevation of 859 feet.	✓		The stack is at minimum height above elevatoin due to construction of stack.
VIII.2.a: The maximum exhaust dimension of the south stack (SV-B0260-02) shall be 120 inches.	✓		The maximum exhaust dimension is due to construction of the stack.
VIII.2.b: The minimum height of the south stack shall be 159 feet above a stack base elevation of 873 feet.	✓		That stack is at minimum height above elevation due to construction of stack.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
IX.1: The permittee shall comply with all applicable requirements of the NESHAP for Major Sources: Industrial Commercial, and Institutional Boilers and Process Heaters, as specified in 40 CFR Part 63, Subparts A an DDDDD, as they apply to FGB0260-03-04	✓		Tune ups and annual compliance report completed when required.
IX.2: The permittee shall meet the monitoring, recordkeeping, and reporting requirements of the Nox SIP Call during ozone season (May1 through September 30)	✓		The CEMS collects all required data for the Nox budget trading program.
Flexible Group: FGBT0260-CO Boilers 7 and 8 & Gas Turbines 9 and 10 at Central Power Plant (EU0260-07, EU0260-08, EU0260-09, EU0260-10)			
I.1: **NOx**: The NOx gas emissions from the gas turbines, when firing natural gas at full load conditions, shall not exceed 53.3 parts per million by volume (ppmv), corrected to 15% oxygen, on a dry basis.	✓		Nitrogen oxides testing will be performed every 5 years from last test date. Required ROP testing was performed on December 15 and 16, 2022.
I.2 **NOx**: The NOx emissions from the gas turbines, when firing No. 2 fuel oil at full load conditions, shall not exceed 114.8 ppmv, corrected to 15% oxygen, on a dry basis.	✓		
I.3: **NOx**: The NOx emission rate from the heat recovery steam generators (HRSG) shall not exceed 0.10 lbs/MMBTUs heat input, based on a 24-hr average.	✓		
I.4: **NOx**: The NOx emissions from the gas turbines and the HRSGs, hereinafter "cogeneration facility" shall not exceed 30.4 lbs/hr when firing natural gas in the turbines, nor 47.3 lbs/hr when firing No. 2 fuel oil in the turbines.	✓		
I.5: **CO**: The CO emission rate from the cogeneration facility shall not exceed 29.0 lbs/hr when firing natural gas in the turbines, nor 72.0 lbs/hr when firing No.2 fuel oil in the turbines.	✓		CO testing will be performed every 5 years from last test date. Required ROP testing was performed on December 15 and 16, 2022.
I.6: **SO2**: The SO2 emission rate from the gas turbines, when firing No. 2 fuel oil, shall not exceed 0.155 lbs/MMBtus heat input, based on a 24 hour period. This is equivalent to using oil with a 0.15% sulfur content and heat value of 138,000 Btus/gal.	✓		The density, sulfur and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the CPP. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.1: The permittee shall not operate FGBT0260-CO, when firing natural gas, unless the water injection system is installed and operating at a water-to-fuel ratio of at least 0.5, or alternate water-to-fuel ratio as determined by testing. Any alternate water-to-fuel ratio must be approved by the District Supervisor prior to implementation. Performance criteria used to obtain representative data and the means by which an exceedance or excursion will defined are described by SC. VI.3. below.	✓		The water-to-fuel ratio is continuously monitored and reviewed monthly.
III.2: The permittee shall not operate FGBT0260-CO when firing no. 2 fuel oil, unless the turbines are full load conditions and unless the water injection system is installed and operating at a water-to-fuel ratio of at least 0.3 or alternate water-to-fuel ratio is determined by testing. Any alternate water-to-fuel ratio must be approved by the District Supervisor prior to implementation.	✓		The water-to-fuel ratio is continuously monitored and reviewed monthly.
III.3: The permittee shall not operate FGBT0260-CO and EU-TURBINE, and EUCPP-CHPHRSG for more than 1,000 hours in aggregate between the gas turbines per 12-month rolling time period when firing No. 2 fuel oil.	✓		The run times for all units are recorded daily.
III.4: The permittee shall equip and maintain FGBT0260-CO with instrumentation to continuously monitor and record the fuel consumption and the ratio of water-to-fuel being fired in FGBT0260-CO. The minimum water-to-fuel ratio in lbs of water injected to lbs of fuel fired shall be 0.5 when firing natural gas and 0.3 when firing fuel oil. This shall be accurate to within plus or minus 5 percent.	✓		The gas turbines are equipped and maintained with instrumentation to continuously monitor and record the fuel consumption and the ratio of water to fuel being fired in each turbine. This system must be accurate to within plus or minus 5 percent. Flow rate data kept in Delta V. The DCS alarms if the water-to-fuel ratio goes below limit or there is loss of NOx water.
V.1: **NOx:**The permittee shall verify the NOX emissions rate from the FGBT0260-CO, by testing once within the five year term of the permit.	✓		
V.2: **NOx:**The permittee shall submit a complete Nox test protocol to the AQD for approval at least 60 days prior to the anticipated test date.	✓		Nitrogen oxides testing will be performed once within the 5-year term of the ROP. The required test was not performed during this reporting period.
V.3:**NOx:**: The permittee shall notify the District Supervisor and the Technical Programs Unit no less than seven days prior to the anticipated test date.	✓		Required ROP testing was performed on December 15 and 16, 2022.
V.4: **NOx**: The permittee shall submit a complete test report of the test results to the District Supervisor and the Technical Programs Unit within 60 days following the last date of the test.	✓		
V.5: **CO**: The permittee shall verify the CO emission rate from the FGBT0260-CO, by testing, once within the five-year term of the permit.	✓		

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
V.6: **CO**: The permittee shall submit a complete test protocol to the AQD for approval at least 60 days prior to the anticipated test date.	✓		CO testing will be performed once within the 5-year term of the ROP. The required test was not performed during this reporting period. Scheduled for March 2018. Required ROP testing was performed on December 15 and 16, 2022.
V.7: **CO**: The permittee shall notify the District Supervisor and the Technical Programs Unit no less than seven days prior to the anticipated test date.	✓		
V.8: CO: The permittee shall submit a complete test report of the test results to the District Supervisor and the Technical Programs Unit within 60 days following the last date of the test.	✓		
V.9: CO: The permittee shall verify NOX and CO emission rates from the FGBT0260-CO by testing at owners expense.	✓		
VI.1: To avoid the requirement in 40 CFR 60.334 (h)(1) to monitor sulfur content on a daily basis for gaseous fuel, the permittee shall demonstrate that the gaseous fuel combusted in FGBT0260-CO meets the definition of "natural gas" as defined in 40 CFR 60.331 (u) through use of one of the following sources of information to make the required demonstration: a. The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or b. Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of this chapter is required.	✓		DTE provided UM with a letter stating the natural gas sulfur content is less than 20.0 grains/100scf or less. Letter filed at EHS.
VI.2: The permittee shall maintain purchase records of the type and quantity of oil, the density, and the sulfur and BTU contents for each shipment of oil received.	✓		The density, sulfur and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the CPP. The UM Utilities Department holds the purchase records.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.3 The permittee shall monitor the density, sulfur and BTU content of fuel oil by collecting a representative sample of the fuel oil fired at the Central Power Plant during each month that fuel oil is fired. The sample shall be submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method acceptable to AQD.	✓		The density, sulfur and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the Central Power Plant is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the CPP. In lieu of taking a representative sample, maintain a complete record of the fuel oil spec. This includes purchase records that demonstrate compliance with the percent sulfur limit. Fuel paperwork located at the CPP.
VI.4: 4. In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the Central Power Plant demonstrating that the fuel sulfur content meets the requirement of SC I. 6. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.	✓		Fuel shipping papers and paperwork located at the CPP.
VI.5: The permittee shall equip and maintain FGBT0260-CO with instrumentation to continuously monitor and record the fuel consumption and the ratio of water-to-fuel being fired in FGBT0260-CO to demonstrate ongoing compliance with the NOx emission limits. The minimum water-to-fuel ratio values shall be 0.5 when firing natural gas and 0.3 when firing fuel oil. This system shall be accurate to within plus or minus 5 percent.	✓		The gas turbines are equipped and maintained with instrumentation to continuously monitor and record the fuel consumption and the ratio of water to fuel being fired in each turbine. This system must be accurate to within plus or minus 5 percent.
VI.6: The water-to-fuel ratio shall be recorded by the CPP data acquisition system with, at a minimum, four data points equally spaced over each hour. Compliance with the water-to-fuel ratio values shall be determined by comparing the average of all data points for each operating hour with the minimum values described in. An excursion from the indicator range will be defined as two consecutive hours in which the average water-to-fuel ratio is less than the minimum values of 0.5 when firing natural gas and 0.3 when firing fuel oil. Any alternate water-to-fuel ratio must be approved by the District Supervisor prior to implementation.	✓		The gas turbines are equipped and maintained with instrumentation to continuously monitor and record the fuel consumption and the ratio of water to fuel being fired in each turbine. This system must be accurate to within plus or minus 5 percent.
VI.7: The permittee shall notify AQD of any excursions or exceedances using the procedures specified by R 336.1213(c)(3) and R 336.1912.	✓		No excursions or exceedences occurred during this reporting period.
VI.8: The permittee shall notify AQD of any excursions or exceedances using the procedures specified by R 336.1213(c)(3) and R 336.1912.	✓		No excursions or exceedences occurred during this reporting period.
VI.8:Pursuant to 40 CFR Part 64, the permittee shall conduct all monitoring specified in SC VI.5 – VI.6 and shall satisfy all requirements specified by 40 CFR 64.7 through 40 CFR 64.9.	✓		The gas turbines are equipped and maintained with instrumentation to continuously monitor and record the fuel consumption and the ratio of water to fuel being fired in each turbine. This system must be accurate to within plus or minus 5 percent. Water to fuel ratio reviewed monthly.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.9: Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). In the event that an exceedance or an excursion occurs, FGBT0260-CO shall be shut down or restored to the specified water-to-fuel ratio as quickly as possible.	✓		No excursions or exceedences occurred during this reporting period.
VI.10: Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.	✓		No excursions, exceedences, or malfunctions occurred during this reporting period.
VI.11: The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment.	✓		The CPP has inventory parts for the Gas Turbine.
VI.12: The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions.	✓		The CPP has an approved CAM Plan. Monitoring data is collected in the DCS, performance records are kept on site and corrective actions are taken when needed. All data, informationg kept on site at the CPP.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No prompt deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VII.4: **NOx**: Semi-annual reporting of excess emissions required under 40 CFR 60.7 (c) are defined as any one-hour period during which the average water-to-fuel ratio drops below the limits specified in FG-BT0260-CO, SC I.1-1.4, pursuant to and in a manner specified in 40 CFR 60.334(c)(1) and 40 CFR 60.7(c).	✓		No excess emissions occurred during this reporting period.
VII.5: **SO2**: Semi-annual reporting of excess emissions required under 40 CFR 60.7(c) are defined as any daily period during which the sulfur content of the fuel being fired exceeds the limit specified in FG-BT0260-CO, SC I.3, pursuant to 40 CFR 60.334 (c)92), and in a manner specified in 40 CFR 60.7(c).	✓		No excess emissions occurred during this reporting period.
VII.6: Notification, as well as monitoring and recording of emissions and operating information is required to comply with the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and GG. All notifications shall be submitted, in writing, to the District Supervisor. All source emissions data and operating data shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.	✓		No notifications during this reporting period. No excurions/ exceedeances during this reporting period
VII.7: Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances	✓		No deviations during this reporting period. No monitor downtime.
VII.8:Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime.	✓		No deviations during this reporting period.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		The gases discharge vertically upward due to construction of the plant. The stack is visually checked hourly.
VIII.1.a: The maximum exhaust dimension shall be 120 inches.	✓		The stack maximum exhaust dimension is due to construction of the stack.
VIII.1.b: The minimum height of the south stack shall be 159 feet above a stack base elevation of 873 feet.	✓		The minimum height of stack is due to construction of plant.
IX.1: The permittee shall comply with all applicable provisions of 40 CFR Part 64, as they apply to FGBT0260-CO	✓		The compliance assurance plan was approved by the EGLE as per 40 CFR Part 64.
IX.2: If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.	✓		No modifications to the monitoring plan.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
IX.3:The permittee shall comply with all applicable requirements for the Standards of Performance for Stationary Gas Turbines, as specified in 40 CFR Part 60, Subparts A and GG, as they apply to FGBT0260-CO.	✓		The compliance assurance plan was approved by the EGLE as per 40 CFR Part 64.
IX.4: The permittee shall comply with all applicable requirements of the NESHAP for Stationary Combustion Turbines, as specified in 40 CFR Part 63, Subparts A and YYYY, as they apply to FGBT0260-CO.	✓		All conditions of FGBT0260-CO are reviewed to ensure compliance with 40 CFR Part 63 subparts A and YYYY.
Flexible Group: FG-6ETO Two 3M 5XL EtO sterilizers and four 3M 8XL EtO sterilizers (EU-ETO-1E, EU-ETO-2E, EU-ETO-3E, EU-ETO-4E, EU-ETO-5E, EU-ETO-6E) Removed June 2022.			
1. Each sterilizer is equipped with a 3M Model 50 EtO "Abator" catalytic oxidizer control.	✓		All units are equipped with catalytic oxidizers.
I.1: **EtO**: EtO emissions shall not exceed 0.00194 pph for all sterilizers exhausting at one time.	✓		The amount of EtO used in each sterilizer per cycle/load. The number of cycles/loads processed in each sterilizer per calendar day and per calendar month. EtO mass emission calculations determining the monthly emission rate, in pounds per calendar month, from each sterilizer, and for both sterilizers combined. EtO mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month, from each sterilizer, and for both sterilizers combined.
I.2: **EtO**: EtO emissions shall not exceed 1.42 lbs per year based on a 12-month rolling time period as determined at the end of each calendar month (for all sterilizers combined).	✓		
II.1: **EtO**: No more than 170 grams of EtO per cycle/load shall be used in EU-ETO-E3, EU-ETO-E4, EU-ETO-E5, EU-ETO-E6 sterilizers within FG-6ETO.	✓		
II.2: **EtO**: Usage of no more than 100 grams of EtO per cycle/load shall be used in EU-ETO-E1, and EU-ETO-E2 sterilizers within FG-ETO.	✓		
III.1: The permittee shall not operate all sterilizers associated with FG-6ETO unless the catalytic oxidation systems are maintained, and operated in a satisfactory manner. Satisfactory operation of the catalytic oxidation system includes an EtO destruction efficiency of 99.9 percent by weight.	✓		Each sterilizer was installed with a catalytic oxidizer. Sterilizers do not operate unless the catalytice oxidizer is operating properly.
III.2: The permittee shall not operate any sterilizer associated with FG6ETO unless a malfunction abatement plan (MAP) as described in Rule 911 (2), has been submitted within 60 days of permit issuance, and is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.	✓		A malfunction abatement plan was submitted within 60 days of issuance of permit and approved by the MI EGLE.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
IV.1: The permittee shall not operate any sterilizer associated with FG6ETO unless each respective closed loop recirculating-fluid vacuum pump, air ejector system, or other method of drawing a vacuum and evacuating each sterilizer chamber and which prevents the discharge of any EtO to a wastewater stream is installed, maintained, and operated in a satisfactory manner or each sterilizer associated with FG6ETO.	✓		Each sterilizer is equipped with a closed loop recirculating fluid vacuum pump.
V.1: The permittee shall verify Ethylene Oxide (EtO) emission rates and destruction efficiency of the abator catalytic oxidizer controls from three sterilizers in FG6ETO by testing at the owner's expense, in accordance with the Department requirements no later than July 30, 2022. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modfications to the method in the test protocol that are proposed after the initial submittal. The permittee must a submit a complete report of the test resultsto the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.	✓		Test not yet scheduled.
V.2: The permittee shall verify Ethylene Oxide (EtO) emission rates and destruction efficiency of the abator catalytic oxidizer controls connected to the vents of the remaining three sterilizers in FG6ETO not tested in SC V.1. by testing at the owner’s expense, in accordance with the Department requirements no later than July 30, 2024. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test	✓		Test not yet scheduled.
V.3: The permittee shall verify the EtO emission rates from FG6ETO at a minimum, every five years from the date of the last test. This testing requirement may be waived if the most recent approved stack test results remain valid and representative and, an acceptable demonstration is made to and approved by the AQD District Supervisor.	✓		Test not yet scheduled.
V.4: The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted.	✓		Test not yet scheduled.
VI.1: The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.	✓		All calculations are completed by the 15th day of the following calendar month.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.2: The permittee shall keep a separate monthly record of the following information: a. The amount of EtO used in each sterilizer per cycle/load. b. The number of cycles/loads processed in each sterilizer per calendar day and per calendar month. c. EtO mass emission calculations determining the monthly emission rate, in pounds per calendar month, from each sterilizer, and for both sterilizers combined. d. EtO mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month, from each sterilizer, and for both sterilizers combined. The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.	✓		All required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition
VI.3: The permittee shall monitor a parameter/parameters, based on either the manufacturer's specifications or a performance test, which assures at least 99.9 percent reduction of EtO emissions. A copy of the manufacturer's specifications for the control device shall be maintained on file.	✓		The catalytic oxidizers are reviewed daily and a copy of the manufactutures specs and operating manuals are filed on site with units.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.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.	✓		No testing performed during this reporting period.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		Exhaust gases discharge vertically due to the contruction of the stack.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VIII.1.a: Maximum exhaust dimensions for stack SV-EF-310 shall be 20 inches.	✓		The maximum exhaust dimensions and minimum heights of the stacks are due to construction of the stacks.
VIII.1.b: The minimum height of SV-EF-310 shall be 77.25 feet above the ground.	✓		
VIII.2.a: Maximum exhaust dimensions for stack SV-EF-311 shall be 20 inches.	✓		
VIII.2.b: The minimum height of SV-EF-311 shall be 77.25 feet above ground.	✓		
VIII.3.a: Maximum exhaust dimensions for stack SV-EF-312 shall be 28 inches.	✓		
VIII.3.b: The minimum height of SV-EF-312 shall be 85.25 feet above ground.	✓		
VIII.4.a: Maximum exhaust dimensions for stack SV-EF-313 shall be 28 inches.	✓		
VIII.4.b: The minimum height of SV-EF-313 shall be 85.25 feet above ground.	✓		
Flexible Group: FGB5102-01-02 Two natural gas fired boilers located at the Brehm Tower (EUB5102-01, EUB5102-02)			
I.1: **NOx**: NOx emissions shall not exceed 0.89 pounds per hour when firing natural gas.	✓		Fuel usage and operating hours are recorded monthly.
I.2: **NOx**: NOx emissions shall not exceed 4.4 pounds per hour when firing No. 2 fuel oil.	✓		
I.3: **NOx**: NOx emissions shall not exceed 9.6 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.	✓		
I.4: **CO**: CO emissions shall not exceed 0.99 pounds per hour when firing Natural gas.	✓		
I.5: **CO**: CO emissions shall not exceed 0.94 pounds per hour when firing No. 2 fuel oil.	✓		
I.6: **CO**: CO emissions shall not exceed 7.8 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.	✓		

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
II.1: **Sulfur content of Fuel Oil**: The sulfur content of fuel oil shall be 0.05% by weight.	✓		The supplier certification of fuel oil is received to confirm sulfur content. A copy is filed on site with unit.
II.2: **Natural gas**: Natural gas usage shall not exceed 350,000,000 cubic feet per 12-month rolling-time period. This limit is based upon a higher heating value of 140,120 Btu/Gal of fuel oil and the default emission factors listed in the Emission Limit Table.	✓		Fuel usage and operating hours are recorded monthly.
II.3: **Fuel Oil**: Fuel oil usage shall not exceed 240,000 gallons per 12-month rolling time period. This limit is based upon a higher heating value of 140,120 Btu/gal. of fuel oil and the default emission factors listed in the Emission Limit Table.	✓		Fuel usage and operating hours are recorded monthly.
III.1: The permittee shall only fire natural gas and/or No. 2 fuel oil in FGB5102-01-02.	✓		Natural gas and fuel oil are the only two fuels that are permitted in FGB5102-01-02.
VI.1: The permittee shall continuously monitor in a satisfactory manner, the natural gas and fuel oil usage rates for each boiler in FGB5102-01-02 using respective fuel flow meters on a monthly basis.	✓		Fuel flow meters installed and fuel usage is recorded monthly.
VI.2: The permittee shall monitor emissions, operating information and keep records for each boiler within FGB5102-01-02 in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Dc.	✓		FGB5102-01-02 permitted in accordance to 40 CFR Part 60 Subparts A and Dc.
VI.3: The permittee shall keep records of the sulfur content, in percent by weight, of the fuel oil burned in FGB5102-01-02. The permittee shall keep a separate record of the sulfur content for each shipment of fuel oil received.	✓		Fuel oil supplier certifications kept on site with unit.
VI.4: The permittee shall keep in a satisfactory manner, monthly fuel use records for each boiler within FGB5102-01-02 as required by SC VI.1.	✓		All monthly fuel usage records are kept on file at EHS.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		Exhaust gases discharge vertically due to the contruction of the stack.
VIII.1.a: Maximum exhaust dimensions for stack SV-BOILER-01 shall be 26 inches.	✓		Maximum exhaust dimension is due to the construction of the stack.
VIII.1.b: The minimum height above ground for stack SV-BOILER-01 shall be 180.67 feet.	✓		The minimum height of stack is due to construction of stack.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VIII.2.a: Maximum exhaust dimensions for stack SV-BOILER-02 shall be 26 inches.	✓		The maximum exhaust dimensions of the stack are due to construction of the stack.
VIII.2.b: The minimum height above ground for stack SV-BOILER-02 shall be 180.67 feet.	✓		The minimum height of stack is due to construction of stack.
IX.1: The permittee shall comply with all applicable provisions of 40 CFR Part 60, Subparts A and Dc, as they apply to FGB5102-01-02.	✓		FGB5102-01-02 permitted in accordance to 40 CFR Part 60 Subparts A and Dc.
IX.2: The permittee shall comply with all provisions of 40 CFR Part 63, Subparts A and DDDDD, as they apply to FGB5102-01-02.	✓		UM performs annual maintenance and required boiler tune up to FGB5102-01-02 to meet subpart DDDDD.
Flexible Group: FGB5102-03-04 Two Natural Gas-Fired Boilers at Brehm Tower (EUB5102-03, EUB5102-04)			
I.1: **NOx**: NOx emissions shall not exceed 0.98 pounds per hour.	✓		Fuel usage and operating hours are recorded monthly.
I.2: **NOx**: NOx emissions shall not exceed 7.5 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.	✓		
I.3: **CO**: CO emissions shall not exceed 0.82 pounds per hour.	✓		
I.4: **CO**: CO emissions shall not exceed 6.3 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.	✓		
II.1: **Natural gas**: Natural gas usage shall not exceed 150,000,000 cubic feet per 12-month rolling time period. This is based upon a natural gas higher heating value of 1,020 Btu per cubic feet, and the default emission factors listed in the Emission Limit Table.	✓		Natural gas usage is recorded monthly.
III.1: The permittee shall only fire natural gas in the FGB5102-03-04.	✓		Boiler 3 and 4 can only burn natural gas.
VI.1: The permittee shall monitor, in a satisfactory manner, the natural gas usage rates for each boiler within FGB5102-03-04 to record and maintain records of the amount of each fuel combusted during each calendar month.	✓		Fuel usage is recorded monthly.
VI.2: The permittee shall monitor emissions operating information and record keeping for each boiler within FGB5102-03-04 in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Dc.	✓		Fuel usage is recorded monthly.
VI.3: The permittee shall keep in a satisfactory manner, monthly fuel use records for each boiler within FGB5102-03-04 as required by SC VI.1.	✓		Fuel usage is recorded and calculated monthly.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		Exhaust gases discharge vertically due to the contruction of the stack.
VIII.1.a: Maximum exhaust dimensions for stack SV-BOILER-03 shall be 20 inches.	✓		Maximum exhaust dimension is due to the construction of the stack.
VIII.1.b: The minimum height above ground for stack SV-BOILER-03 shall be 180 feet.	✓		Minimum height above ground is due to the construction of the stack.
VIII.2.a: Maximum exhaust dimensions for stack SV-BOILER-04 shall be 20 inches.	✓		Maximum exhaust dimension is due to the construction of the stack.
VIII.2.b: The minimum height above ground for stack SV-BOILER-04 shall be 180 feet.	✓		Minimum height above ground is due to the construction of the stack.
IX.1: The permittee shall comply with all applicable provisions of 40 CFR Part 60, Subparts A and Dc, as they apply to FGB5102-03-04.	✓		FGB5102-03-04 permitted in accordance to 40 CFR Part 60 Subparts A and Dc.
IX.2: The permittee shall comply with all provisions of 40 CFR Part 63, Subparts A and DDDDD, as they apply to FGB5102-03-04.	✓		UM performs annual maintenance to FGB5102-03-04 to meet subpart DDDDD.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
Flexible Group: FG3GENS-5102 Three Diesel Emergency Generators at Brehm Tower			
I.1: **NMHC + NOx**: NMHC and NOx emission limits shall not exceed 6.4 g/kw-hr^2.	✓		Continuously monitor the fuel oil usage for each emergency generator using respective flow meters on a monthly basis. The data is collected monthly.
I.2: **CO**: CO emission limits shall not exceed 0.80 g/kw-hr^2.	✓		
I.3: **PM**: PM emission limits shall not exceed 0.1 g/kw-hr^2.	✓		
II.1: **Diesel fuel**: The permittee shall meet the specifications and requirements of 40 CFR 80.510 (b) for all of the current diesel fuels.	✓		Sulfur content certifications is supplied by the vendor prior to delivery and also from each shipment. Copies of the fuel oil certifications are kep with Hospital Maintenance.
II.2: **Sulfur content of diesel fuel**: The permittee shall only burn diesel fuel with a maximum sulfur content of 15 ppm.	✓		Sulfur content certifications is supplied by the vendor prior to delivery and also from each shipment. Copies of the fuel oil certifications are kep with Hospital Maintenance.
III.1: The permittee shall operate FG3GENS-5102 in accordance with its manufacturer's written instructions of by operating procedures developed by the permittee that are approved by the manufacturer.	✓		Hospital Maintenance operates the emergency generators per the manufacturer's recommendations.
III.2: The permittee shall not change or revise the operating instructions, procedures or settings for FG3GENS-5102 unless permitted by the manufacturer in writing.	✓		No changes in operating instructions. Hospital Maintenance operates the emergency generators per the manufacturer's recommendations.
III.3: The permittee shall not operate any single emission unit of FG3GENS-5102 for more than 100 hours per engine per 12-month rolling time period as determined at the end of each calendar month during maintenance checks and readiness testing and not more than a total of 500 hours of operation per engine per rolling 12-month rolling time period as determined at the end of each calendar month, total.	✓		The hours of operation are documented monthly and input in the rolling spreadsheet.
IV.1: The permittee shall equip FG3GENS-5102 with a non-resettable hour meter to track the number of operating hours.	✓		A non-resettable meters are installed on each emergency generator.
IV.2: If any emission unit of FG3GENS-5102 contains a diesel particulate filter to comply with SC I.3, the filter must be installed with a backpressure monitor that notifies the owner/operator when the high backpressure limit of the engine is approached.	✓		NA
VI.1: The permittee shall monitor the hours of operation of FG3GENS-5102 on a monthly basis, in a manner that is acceptable to the District Supervisor, Air Quality Division.	✓		Hours of operation are documented during each use/ month. The hours are given to EHS monthly to document in the rolling spreadsheet.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.2: The permittee shall monitor in a satisfactory manner, the fuel oil usage for each diesel generator within FG3GENS-5102 on a monthly basis. The total diesel oil usage for all equipment combined using delivery records and monthly tank level(s) and measure engine fuel use as the difference between total diesel fuel usage and that used by Boiler 1 and 2.	✓		The fuel oil usage is documented monthly from each individual fuel oil meters located on each engine. The fuel oil usage is given to EHS monthly to document in the rolling spreadsheet.
VI.3: The permittee shall keep in a satisfactory manner, the following records on file and make them available to the Department upon request: a. Engine certification according to 40 CFR Part 89 or Part 94, as applicable, for the same engine model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications. b. Records of performance test results for each pollutant for a test conducted on FG3GENS-5102. The test must have been conducted correctly and used the same methods specified in 40 CFR Part 60, Subpart IIII. c. Records of engine manufacturer data indicating compliance with these standards. d. Records of control device vendor data indicating compliance with these standards, as applicable.	✓		Records of compliance with the emission standards are kept at EHS and Brehm.
VI.4: The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period fuel use records for FG3GENS-5102. The records must indicate the total amount of fuel used in FG3GENS-5102.	✓		The fuel oil usage is documented monthly from each individual fuel oil meters located on each engine. The fuel oil usage is given to EHS monthly to document in the 12-month rolling spreadsheet.
VI.5: The permittee shall keep records of the sulfur content, in percent by weight, of the fuel oil. The permittee shall keep a separate record of the sulfur content for each shipment of fuel oil received.	✓		Sulfur content certifications is supplied by the vendor prior to delivery and also from each shipment. Copies of the fuel oil certifications are kep with Hospital Maintenance.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		
VIII.1.a: Maximum exhaust dimensions for SV-DGEN-01 shall be 10 inches.	✓		
VIII.1.b: The minimum height above ground for stack SV-DGEN-01 shall be 193 feet.	✓		
VIII.2.a: Maximum exhaust dimensions for SV-DGEN-02 shall be 10 inches.	✓		The gases discharge vertically upward due to construction of unit and stacks. The maximum exhaust dimension of the stacks are due to construction of the stacks. The minimum height of above ground is due to the construction of the building and units.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VIII.2.b: The minimum height above ground for stack SV-DGEN-02 shall be 193 feet.	✓		
VIII.3.a: Maximum exhaust dimensions for SV-DGEN-03 shall be 10 inches.	✓		
VIII.3.b: The minimum height above ground for stack SV-DGEN-03 shall be 193 feet.	✓		
IX.1: The permittee shall comply with all provisions of 40 CFR Part 60, Subparts A and IIII, as they apply to FG3GENS-5102.	✓		FG3GENS-5102 permitted in accordance to 40 CFR Part 60 Subparts IIII.
IX.2: FG3GENS-5102 complies with 40 CFR Part 63, Subpart ZZZZ by complying with 40 CFR Part 60, Subpart IIII.	✓		FG3GENS-5102 permitted to be in compliance with Subpart ZZZZ.
Flexible Group: FG4GENS-5173 Four diesel fuel-fired generators at C.S. Mott Children's and Women's Hospitals.			
I.1: **NMHC + NOx**: NMHC and NOx emissions shall not exceed 6.4 grams per kilo-watt hour.	✓		Continuously monitor the fuel oil usage for each emergency generator using respective flow meters on a monthly basis. The data is collected monthly.
I.2: **CO**: CO emissions shall not exceed 3.5 grams per kilowatt-hour.	✓		
I.3: **PM**: PM emissions shall not exceed 0.20 grams per kilowatt-hour.	✓		
I.4: **NOx**: NOx emissions shall not exceed 35.9 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.	✓		
II.1: **Diesel Fuel**: The permittee shall meet the specifications and requirements of 40 CFR 80.510 (b) for all of the current diesel fuels.	✓		Sulfur content certifications is supplied by the vendor prior to delivery and also from each shipment. Copies of the fuel oil certifications are kep with Hospital Maintenance.
II.2: **Diesel Fuel**: The permittee shall only burn diesel fuel with a maximum sulfur content of 15 ppm.	✓		Sulfur content certifications is supplied by the vendor prior to delivery and also from each shipment. Copies of the fuel oil certifications are kep with Hospital Maintenance.
III.1: The permittee shall operate each engine in FG4GENS-5173 in accordance with its manufacturer's written instructions or by operating procedures developed by the permittee that are approved by the manufacturer.	✓		Hospital Maintenance operates the emergency generators per the manufacturer's recommendations.
III.2: The permittee shall not change or revise the operating instructions, procedures or settings for any engine in FG4GENS-5173 unless permitted by the manufacturer in writing.	✓		No changes in operating instructions. Hospital Maintenance operates the emergency generators per the manufacturer's recommendations.
III.3: The permittee shall not operate any engine in FG4GENS-5173 for maintenance checks and readiness testing for more than 100 hours per 12-month rolling time period as determined at the end of each calendar month, except as allowed by 40 CFR 60.4211(e).	✓		The hours of operation are documented monthly and input in the rolling spreadsheet.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.4: The permittee shall not operate any engine in FG4GENS-5173 for any purpose for more than 500 hours per 12-month rolling time period as determined at the end of each calendar month.	✓		The hours of operation are documented monthly and input in the 12-month rolling spreadsheet.
IV.1: The permittee shall equip and maintain each engine in FG4GENS-5173 with a non-resettable hour meter before startup of the engine.	✓		A non-resettable meters are installed on each emergency generator.
VI.1: The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.	✓		All required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition
VI.2: The permittee shall monitor in a satisfactory manner the hours of operation for each engine in FG4GENS-5173 on a monthly basis.	✓		Hours of operation are documented during each use/ month. The hours are given to EHS monthly to document in the rolling spreadsheet.
VI.3: The permittee shall keep, in a satisfactory manner, monthly and previous 12-month NOx emission calculation records for FG4GENS-5173, as required by SC I.4. The permittee shall keep all records on file and make them available to the Department upon request.	✓		Hours of operation are documented during each use/ month. The hours are given to EHS monthly to document in the rolling spreadsheet.
VI.4: The permittee shall keep, in a satisfactory manner, a written log of the monthly hours of operation of each engine in FG4GENS-5173. Each log entry shall state whether operation was for maintenance checks and readiness testing or for some other purpose. The permittee shall keep all records on file and make them available to the Department upon request.	✓		Written log with run times, reasons, and maintenance maintained on site with unit.
VI.5: The permittee shall keep records of the sulfur content, in percent by weight, of the diesel fuel used in FG4GENS-5173. The permittee shall keep a separate record of the sulfur content for each shipment of diesel fuel received. The permittee shall keep all records on file and make them available to the Department upon request.	✓		Sulfur content certifications is supplied by the vendor prior to delivery and also from each shipment. Copies of the fuel oil certifications are kep with Hospital Maintenance.
VII.1: Prompt reporting or deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		
VIII.1.a: Maximum exhaust dimensions for SV-DGEN5173-01 shall be 20 inches.	✓		

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VIII.1.b: The minimum height from the ground for SV-DGEN5173-01 shall be 164.2 feet.	✓		The gases discharge vertically upward due to construction of unit and stacks. The maximum exhaust dimension of the stacks are due to construction of the stacks. The minimum height of above ground is due to the construction of the building and units.
VIII.2.a: Maximum exhaust dimensions for SV-DGEN5173-02 shall be 20 inches.	✓		
VIII.2.b: The minimum height from the ground for SV-DGEN5173-02 shall be 164.2 feet.	✓		
VIII.3.a: Maximum exhaust dimensions for SV-DGEN5173-03 shall be 20 inches.	✓		
VIII.3.b: The minimum height from the ground for SV-DGEN5173-03 shall be 164.2 feet.	✓		
VIII.4.a: Maximum exhaust dimensions for stack SV-DGEN5173-04 shall be 20 inches.	✓		
VIII.4.b: The minimum height of SV-DGEN5173-04 shall be 164.2 feet.	✓		
IX.1: The permittee shall comply with all provisions of 40 CFR Part 60, Subparts A and IIII, as they apply to FG4GENS-5173.	✓		FG4GENS-5173 permitted in accordance to 40 CFR Part 60 Subparts IIII.
IX.2: FG4GENS-5173 complies with 40 CFR Part 63, Subpart ZZZZ by complying with 40 CFR Part 60, Subpart IIII.	✓		FG4GENS-5173 permitted to be in compliance with Subpart ZZZZ.
Flexible Group: FG10DGENS-2MW Ten generators at Medical Information Technology Center, Cardiovascular Center, Biological Sciences Research Building, University of Michigan Hospital, Medical Center Information Technology Building.			
I.1: **NOx**: NOx emissions shall not exceed 6.9 gram/hp-hr for each engine in FG10DGENS-2MW.	✓		Continuously monitor the fuel oil usage for each emergency generator using respective flow meters on a monthly basis.
I.2: **CO**: CO emissions shall not exceed 8.5 gram/hp-hr for each engine in FG10DGENS-2MW.	✓		
I.3: **PM**: PM emissions shall not exceed 0.4 gram/hp-hr for each engine in FG10DGENS-2MW.	✓		
I.4: **VOC**: VOC emissions shall not exceed 1.0 gram/hp-hr for each engine in FG10DGENS-2MW.	✓		

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
I.5: **NOx**: NOx emissions shall not exceed 30.6 tons per year based on a 12-month rolling time period as determined at the end of each calendar month for units EUMITC-GEN1, EUMITC-GEN2, and EUMITC-GEN3.	✓		The data is collected monthly.
I.6: **NOx**: NOx emissions shall not exceed 20.4 tons per year based on a 12-month rolling time period as determined at the end of each calendar month for units EUCVC-GEN1 and EUCVC-GEN2.	✓		
I.7: **NOx**: NOx emissions shall not exceed 22.0 tons per year based on a 12-month rolling time period as determined at the end of each calendar month for units EUBSRB-GEN1 and EUBSRB-GEN2.	✓		
I.8: **NOx**: NOx emissions shall not exceed 22.4 tons per year based on a 12-month rolling time period as determined at the end of each calendar month for units EUMCIT-GEN1 and EUMCIT-GEN2.	✓		
II.1: **Diesel Fuel**: The permittee shall meet the specifications and requirements of 40 CFR 80.510 (b) for all of the current diesel fuels for FG10DGENS-2MW.	✓		Sulfur content certifications is supplied by the vendor prior to delivery and also from each shipment. Copies of the fuel oil certifications are kept with facility unit.
II.2: **Diesel Fuel**: The permittee shall only burn diesel fuel with a maximum sulfur content of 15 ppm for FG10DGENS-2MW.	✓		Sulfur content certifications is supplied by the vendor prior to delivery and also from each shipment. Copies of the fuel oil certifications are kept with facility unit.
III.1: The permittee shall operate each engine in FG10DGENS-2MW in accordance with its manufacturer's written instructions or by operating procedures developed by the permittee that are approved by the manufacturer.	✓		Units operate the emergency generators per the manufacturer's recommendations.
III.2: The permittee shall not change or revise the operating instructions, procedures or settings for any engine in FG10DGENS-2MW unless permitted by the manufacturer in writing.	✓		No changes in operating instructions. Units operate the emergency generators per the manufacturer's recommendations.
III.3: The permittee shall not operate any engine in FG10DGENS-2MW for maintenance checks and readiness testing for more than 100 hours per 12-month rolling time period as determined at the end of each calendar month, except as allowed by 40 CFR 60.4211(e).	✓		The hours of operations are documented monthly and input in the rolling spreadsheet maintained by EHS.
III.4: The permittee shall not operate any engine in FG10DGENS-2MW for any purpose for more than 500 hours per 12-month rolling time period as determined at the end of each calendar month.	✓		The hours of operations are documented monthly and input in the rolling spreadsheet maintained by EHS.
IV.1: The permittee shall equip and maintain each engine in FG10DGENS-2MW with a non-resettable hour meter before startup of the engine.	✓		All units are have non-resettable meters installed.
VI.1: The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.	✓		All required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.2: The permittee shall monitor in a satisfactory manner the hours of operation for each engine in FG10DGENS-2MW on a monthly basis.	✓		Hours of operation are documented during each use/ month. The hours are given to EHS monthly to document in the rolling spreadsheet.
VI.3: The permittee shall keep, in a satisfactory manner, monthly and previous 12-month NOx emission calculation records for FG10DGENS-2MW, as required by SC I.5, I.6, I.7 and I.8. The permittee shall keep all records on file and make them available to the Department upon request.	✓		Hours of operation are documented during each use/ month. The hours are given to EHS monthly to document in the rolling spreadsheet.
VI.4: The permittee shall keep, in a satisfactory manner, a written log of the monthly hours of operation of each engine in FG10DGENS-2MW. Each log entry shall state whether operation was for maintenance checks and readiness testing or some other purpose. The permittee shall keep all records on file and make them available to the Department upon request.	✓		Written log with run times, reasons, and maintenance maintained on site with unit or through the UM PM system.
VI.5: The permittee shall keep records of the sulfur content, in percent by weight, of the diesel fuel used in FG10DGENS-2MW. The permittee shall keep a separate record of the sulfur content for each shipment of diesel fuel received. The permittee shall keep all records on file and make them available to the Department upon request.	✓		Sulfur content certifications is supplied by the vendor prior to delivery for each shipment. Copies of the fuel oil certifications are kep with unit.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		
VIII.1.a: Maximum exhaust dimension for SV-MITC-GEN1 shall be 24 inches.	✓		
VIII.1.b: The minimum height above ground for SV-MITC-GEN1 shall be 17 feet.	✓		
VIII.2.a: Maximum exhaust dimension for SV-MITC-GEN2 shall be 24 inches.	✓		
VIII.2.b: The minimum height above ground for SV-MITC-GEN2 shall be 17 feet.	✓		
VIII.3.a: Maximum exhaust dimension for SV-MITC-GEN3 shall be 24 inches.	✓		

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VIII.3.b: The minimum height above ground for SV-MITC-GEN3 shall be 17 feet.	✓		The gases discharge vertically upward due to construction of unit and stacks. The maximum exhaust dimension of the stacks are due to construction of the stacks. The minimum height of above ground is due to the construction of the building and units.
VIII.4.a: Maximum exhaust dimension for SV-CVC-GEN1 shall be 24 inches.	✓		
VIII.4.b: The minimum height above ground for SV-CVC-GEN1 shall be 133 feet.	✓		
VIII.5.a: Maximum exhaust dimension for SV-CVC-GEN2 shall be 24 inches.	✓		
VIII.5.b: The minimum height above ground for SV-CVC-GEN2 shall be 133 feet.	✓		
VIII.6.a: Maximum exhaust dimension for SV-BSRB-GEN1 shall be 24 inches.	✓		
VIII.6.b: The minimum height above ground for SV-BSRB-GEN1 shall be 126 feet.	✓		
VIII.7.a: Maximum exhaust dimension for SV-BSRB-GEN2 shall be 24 inches.	✓		
VIII.7.b: The minimum height above ground for SV-BSRB-GEN2 shall be 126 feet.	✓		
VIII.8.a: Maximum exhaust dimension for SV-UMH-GEN4 shall be 35.8 inches.	✓		
VIII.8.b: The minimum height above ground for SV-UMH-GEN4 shall be 50 feet.	✓		
VIII.9.a: Maximum exhaust dimension for SV-MCIT-GEN1 shall be 24 inches.	✓		
VIII.9.b: The minimum height above ground for SV-MCIT-GEN1 shall be 15.3 feet.	✓		
VIII.10.a: Maximum exhaust dimension for SV-MCIT-GEN2 shall be 24 inches.	✓		
VIII.10.b: The minimum height above ground for SV-MCIT-GEN2 shall be 15.3 feet.	✓		
IX.1: The permittee shall comply with all provisions of 40 CFR Part 60, Subparts A and IIII, as they apply to FG10DGENS-2MW.	✓		FG10DGENS-2MW permitted in accordance to 40 CFR Part 60 Subparts IIII.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
IX.2: FG10DGENS-2MW complies with 40 CFR Part 63, Subpart ZZZZ by complying with 40 CFR Part 60, Subpart IIII.	✓		FG10DGENS-2MW permitted to be in compliance with Subpart ZZZZ.
Flexible Group: FGBOILERS1A&1B Boiler 1A and Boiler 1B at NCRC Powerhouse (EUBOILER1A, EUBOILER1B)			
I.1: **NOx**: NOx emissions shall not exceed 0.14 pound per million BTUs heat input for FGBOILERS1A&1B.	✓		Monthly calculation of Nox via operating hours and daily fuel usage.
I.2: **NOx**: NOx emissions shall not exceed 1.02 tons per month for FGBOILERS1A&1B.	✓		Monthly calculation of Nox via operating hours and daily fuel usage.
II.1: **No. 2 Fuel Oil**: No. 2 Fuel Oil shall not exceed 0.05% sulfur content by weight per 30-day rolling time period for FGBOILER1A&1B.	✓		Suppliers certification received for each delivery along with grabbing a sample and sending out to 3rd party. In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the NCRC demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.
VI.1: The permittee shall maintain purchase records of the type and quantity of oil, the density, and the sulfur and BTU contents for each shipment of oil received.	✓		The density, sulfur and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the NCRC Powerhouse is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the NCRC. In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the NCRC demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil. Purchase records kept on site at NCRC and with UM Utilities department.
VI.2: The permittee shall monitor the density, sulfur, and BTU content of fuel oil by collecting a representative sample of the fuel oil fired at the NCRC during each month that fuel oil is fired. The sample shall be submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method acceptable to AQD.	✓		In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the NCRC demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil. Purchase records kept on site at NCRC and with UM Utilities department.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.3: In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the NCRC demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.	✓		Purchase records kept on site at NCRC and with UM Utilities department.
VI.4: The permittee shall keep monthly and previous 12-month NOx calculation records for FG-BOILERS1A&1B. The permittee will show compliance with the SC I.1, NOx emission limit by maintaining records of total monthly fuel usage, operating hours, and by calculating the pounds per hour on a 12-month rolling time period using this data after the end of each calendar month. Emission calculations are based upon fuel usage and SC I.1, emission factors.	✓		Monthly calculation of Nox via operating hours and daily fuel usage. Calculation spreadsheet maintained by EHS.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.4: Semi-annual reports of certifications: The permittee will submit semi-annual reports of sulfur content certifications required to be reported pursuant to 40 CFR 60.48c by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30.	✓		No fuel delivered during this reporting period.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		Exhaust gases discharge vertically due to the contruction of the stack.
VIII.1.a: The minimum height above ground for SV-BOILERS1A&1B shall be 87 feet.	✓		The minimum height above ground is due to construction of stack.
IX.1: The permittee shall comply with all applicable provisions of 40 CFR Part 60, Subparts A and Dc, as they apply to FGBOILERS1A&1B.	✓		FGBOILERS1A&1B are permitted to comply with 40 CFR Part 60 per the EGLE.
IX.2: The permittee shall comply with all provisions of 40 CFR Part 63, Subparts A and DDDDD, as they apply to FG-BOILER1A&1B.	✓		UM performs annual maintenance to Boilers 1A and 1B to meet subpart DDDDD.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
Flexible Group: FGBOILER2&3 Boiler No. 2 and Boiler No. 3 at NCRC Powerhouse (EU-BOILER2, EU-BOILER3)			
I.1: **NOx**: NOx emissions shall not exceed 0.14 pounds per millions Btus heat input per 30-day rolling time period.	✓		Monthly calculation of Nox via operating hours and daily fuel usage.
I.2: **NOx**: NOx emissions shall not exceed 3.23 tons per month.	✓		Monthly calculation of Nox via operating hours and daily fuel usage.
II.1: **No. 2 Fuel Oil**: No. 2 fuel oil shall not exceed 0.10% sulfur content by weight per 30-day rolling time period.	✓		In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the NCRC demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.
V.1: Upon the request of the District Supervisor, the permittee shall verify NOx emission rates from FGBOILERS2&3 by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.	✓		No testing was requested during this reporting period.
V.2: The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted.	✓		No testing was requested during this reporting period.
VI.1: The permittee shall maintain purchase records of the type and quantity of oil, the density, and the sulfur and BTU contents for each shipment of oil received.	✓		The density, sulfur and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the NCRC Powerhouse is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the NCRC. In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the NCRC demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil. Purchase records kept on site at NCRC and with UM Utilities department.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.2: The permittee shall monitor the density, sulfur, and BTU content of fuel oil by collecting a representative sample of the fuel oil fired at the NCRC during each month that fuel oil is fired. The sample shall be submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method acceptable to AQD.	✓		The density, sulfur and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the NCRC Powerhouse is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the NCRC. In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the NCRC demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.
VI.3: In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the NCRC demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.	✓		Purchase records kept on site at NCRC and with UM Utilities department.
VI.4: The permittee shall keep monthly and previous 12-month NOx calculation records for FG-BOILERS2&3. The permittee will show compliance with the SC I.1, NOx emission limit by maintaining records of total monthly fuel usage, operating hours, and by calculating the pounds per hour on a 12-month rolling time period using this data after the end of each calendar month. Emission calculations are based upon fuel usage and SC I.1, emission factors.	✓		Monthly calculation of Nox via operating hours and daily fuel usage. Calculation spreadsheet maintained by EHS.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.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.	✓		No plans submitted during this reporting period.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		Exhaust gases discharge vertically due to the contruction of the stack.
VIII.1: The minimum height above ground for SV-BLR2 shall be 80 feet.	✓		The minimum height above ground is due to construction of stack.
VIII.2: The minimum height above ground for SV-BLR3 shall be 80 feet.	✓		

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
IX.1: 1. The permittee shall comply with all applicable requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units as specified in 40 CFR Part 60, Subparts A and Dc, as they apply to FGBOILERS5&6.	✓		The units were permitted per Subparts A and Dc.
IX.2: The permittee shall comply with all provisions of 40 CFR Part 63, Subparts A and DDDDD, as they apply to FGBOILERS2&3.		✓	UM performs annual maintenance to Boilers 2 and 3 to meet subpart DDDDD. *See deviation report.*
Flexible Group: FGBOILERS5&6 Boiler No. 5 and Boiler No. 6			
I.1: **NOx**: NOx emissions shall not exceed 0.14 pounds per million BTUs heat input for FG-BOILERS5&6 per 30-day rolling time period.	✓		Monthly calculation of Nox via operating hours and daily fuel usage.
I.2: **NOx**: NOx emissions shall not exceed 3.58 tons per month for EU-BOILER5 and EU-BOILER6 per 30-day rolling time period.	✓		Monthly calculation of Nox via operating hours and daily fuel usage.
I.3: **Opacity:** Permittee shall not discharge to the atmosphere from Boiler No. 5 or Boiler No. 6 any gases that exhibit greater that 20% opacity (6-minute average) as specified in 40 CFR 60.43(c).	✓		The stack is observed periodically.
II.1: **Fuel Oil No. 2**: Fuel oil No. 2 cannot exceed 0.10% sulfur content by weight for FGBOILERS5&6 per 30-day rolling time period.	✓		Supplier certifcation is received prior to delivery. The density, sulfur and BTU content of fuel is monitored. A representative sample of the fuel oil fired at the NCRC Powerhouse is taken during each month that fuel oil is fired. The sample is submitted for an independent analysis of the density, sulfur content in percent by weight and BTU per gallon utilizing a method approved by AQD. The sample analyses are kept at the NCRC. In lieu of taking a representative sample of the fuel oil fired, the permittee shall maintain a complete record of the fuel oil specifications and/or fuel analysis for each delivery, or storage tank of fuel oil used in the NCRC demonstrating that the fuel sulfur content meets the requirement of SC II. 1. 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 records adequate to demonstrate compliance with the percent sulfur limit in fuel oil. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.
III.1: The permittee will operate FGBOILERS5&6 in such a manner that the opacity limits as provided in 40 CFR 60.43c(c) will not be exceeded. The opacity standard applies at all times except during startup, shutdown, or malfunction.	✓		Fuel oil supplier certifications received prior to ensure fuel oil is less than .10% to comply with opacity standard.
V.1: Upon the request of the District Supervisor, the permittee shall verify NOx and Opacity emission rates from FGBOILERS5&6 by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.	✓		No testing performed during this reporting period.
V.2: The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted.			

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.1: The permittee shall obtain fuel oil certification from the supplier for sulfur content of fuel oil used in FGBOILERS5&6. The permittee will provide sulfur content certification for fuel oil and record daily fuel combustion amounts as required to comply with all applicable requirements in 40 CFR Part 60, Subparts A and Dc.	✓		Supplier certifcation is received prior to delivery.
VI.2: The permittee shall keep monthly and previous 12-month NO2 calculation records for FGBOILERS5&6. The permittee will show compliance with the SC I.1, NO2 emission limit by maintaining records of total monthly fuel usage, operating hours, and by calculating the pounds per hour on a 12-month rolling time period using this data after the end of each calendar month. Emission calculations are based upon fuel usage and SC I.1, emission factors.	✓		Monthly calculation of Nox via operating hours and daily fuel usage. Calculation spreadsheet maintained by EHS.
VI.3: Monitoring and recording of emissions and operating information for EUBOILER5 and EU-BOILER6 is required to comply with all of the applicable requirements in the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Dc. All source emissions data and operating data required to be reports by 40 CFR Part 60.48c (Subpart Dc) shall be submitted in an acceptable format and 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.	✓		All monitoring and recording of emissions and operating information for Boiler 5 & 6 are kept on site. Daily fuel use maintained on site.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year. No fuel oil delivered during this reporting period.
VII.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.	✓		No testing performed during this reporting period.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		Minimum height above ground is due to the construction of the stack. Exhaust gases discharge unobstructed vertically due to construction of stack.
VIII.1: The minimum height above ground for SVBOILER5 shall be 87 feet.	✓		
VIII.2: The minimum height above ground for SVBOILER6 shall be 87 feet.	✓		
IX.1: The permittee shall comply with all applicable provisions of 40 CFR Part 60, Subparts A and Dc, as they apply to FGBOILERS5&6.	✓		FGBOILERS5&6 are permitted to comply with 40 CFR Part 60 per the AQD.
IX.2: The permittee shall comply with all provisions of 40 CFR Part 63, Subparts A and DDDDD, as they apply to FGBOILERS5&6.	✓		UM performs annual maintenance to Boilers 5 and 6 to meet subpart DDDDD.
Flexible Group: FG85EMERGENS Two RICE generators at NCRC Powerhouse. (EU85EMERGEN1, EU85EMERGEN2)			

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
I.1: **NOx**: NOx emissions shall not exceed 15.4 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.	✓		Monthly calculation of Nox via operating hours and daily fuel usage.
II.1: **Diesel Fuel**: Diesel fuel is the only fuel allowed for FG85EMERGENS.	✓		85EMERGENS can only burn diesel fuel.
III.1: The permittee shall not operate EU85EMERGEN1 of EU85EMERGEN2 for more than 500 hours each per 12-month rolling time period as determined at the end of each calendar month.	✓		Monthly calculations of operating hours and fuel usage.
VI.1: The permittee shall equip and maintain each of the emergency generators in FG85EMERGENS with a device to monitor the hours of operation.	✓		Each 85EMERGENS maintain non resettable meters.
VI.2: The permittee shall monitor the hours of operation for FG85EMERGENS on a monthly basis in a manner and with instrumentation acceptable to the District Supervisor, Air Quality Division.	✓		Monthly cacluation of operating hours arne fuel usage.
VI.3: The permittee shall keep records of the hours of operation of FG85EMERGENS on a monthly basis and 12-month rolling time period basis as determined at the end of each calendar month. All records shall be kept on file for a period of at least five years and made available to the Department upon request.	✓		EHS maintains the 12-month rolling hours of operation spreadsheet.
VI.4: The permittee shall calculate monthly and 12-month rolling time period NOx emissions from FG85EMERGENS and shall keep these calculations on file for a period of at least five years and make them available to the Department upon request.	✓		EHS maintains the 12-month rolling Nox emissions spreadsheet.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
IX.1: The permittee shall comply with all applicable provisions of 40 CFR Part 63, Subparts A and ZZZZ, as they apply to FG-85EMERGENS.	✓		85EMERGENS meet supbart ZZZZ and the initial notification was submitted via Pfizer.
Flexible Group: FGPATHDGENS (EUPATH-DGEN1, EUPATH-DGEN2)			
I.1: **NOx**: NOx emissions shall not exceed 9.2 g/kW-hr for each engine.	✓		
I.2: **HC:** HC emissions shall not exceed 1.3 g/kW-hr for each engine.	✓		
I.3: **NMHC+NOx:** NMHC+NOx emissions shall not exceed 6.4 g/kW-hr for each engine.	✓		

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
I.4: **CO:** CO emissions shall not exceed 3.5 g/kW-hr for each engine.	✓		Continuously monitor the fuel oil usage for each emergency generator using respective flow meters on a monthly basis. The data is collected monthly.
I.5: **PM**: PM emissions shall not exceed .20 g/kW-hr for each engine.	✓		
II.1: The permittee shall burn only diesel fuel, in FGPATHDGENS with the maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent.	✓		Fuel oil paperwork kept on site with Facilities.
III.1:The permittee shall not operate either engine in FGPATHDGENS 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.2	✓		The run times are documented every month.
III.2: The permittee may operate each engine in FGPATHDGENS for no more than 100 hours per calendar year for the purpose of necessary 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 permittee may petition the Department for approval of the additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing od emergency internal combustion engines beyond 100 hours per calendar year.	✓		The run times are documented every month.
III.3: Each engine in FGPATHDGENS may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing as provided in 40 CFR 60.4211(f)(2). Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calender year for non-emergecny situation cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity.			Engines only run during emergency purposes.
III.4: If the permittee purchased a certified engine, according to procedures specified in 40 CFR Part 60 subpart IIII, for the same model year, the permittee shall meet the following requirements for each engine in FGPATHDGENS: a. Operate and maintain the certified engine and control device 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 as specified in 40 CFR 89.94 and/or 1068, as it applies to you.	✓		Certified engines and Certificate of Conformity filed at EHS
III.5: If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan for each engine in FGPATHDGENS and shall, to the the extent practicable, maintain and operate each engine in a manner consistent with good air pollution control practice for minimizing emissions.	✓		Certified engines and Certificate of Conformity filed at EHS

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
IV. 1: The permittee shall equip and maintain each engine in FGPATHDGENS with non-resettable hours meters to track the operating hours.	✓		Non resettable meters installed and runtimes are documented monthly.
IV.2: The permittee shall install, maintain, and operate each engine in FGPATHDGENS certified to the emission standards in 40 CFR 60.4205(b), as described in SC I.1, I.2, I.3, I.4, and I.5, for the same model year and NFPA nameplated engine power for each engine in FGPATHDGENS. The engine must be installed and configured according to the manufacturer's emission-related specifications.	✓		Engines were installed as per the manufacturer.
V.1: By February 2, 2019, the permittee shall conduct an initial performance test for each engine in FGPATHDGENS. to demonstrate compliance with the emission limits in 40 CFR 60.4205 unless the engines have 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	✓		The FGPATHDGENS are certified engines. No testing during this reporting period.
V.2: The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted.			
VI.1: The permittee shall keep all required records and calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.	✓		Calculations kept at EHS.
VI.2: For each engine in FGPATHDGENS, 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 FGPATHDGENS meets the applicable requirements contained in the federal Standards of Performance for New Stationary Sources 40 CFR Part 60, Subpart IIII. If any engine in FGPATHDGENS becomes uncertified then the permittee must also keep records of a maintenance plan and maintenance activities. The permittee shall keep all records on file and make them available to the Department upon request.	✓		No testing during this reporting period.
VI.3: The permittee shall monitor and record the total hours of operation and the hours of operation during non-emergencies for each engine in FGPATHDGENS, on a monthly and 12-month rolling time period basis, in a manner acceptable to the District Supervisor, Air Quality Division. The permittee shall document how many hours are spent for emergency operation of each engine in FGPATHDGENS, including what classified the operation as emergency and how many hours are spent for non-emergency operation.	✓		Runtime are documented monthly.
VI.4: The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in FGPATHDGENS, demonstrating that the fuel meets the requirement of 40 CFR 80.510(b). The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil.	✓		Records kept on site with engines.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.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.	✓		No testing during this reporting period.
VIII: Exhaust gases shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted.	✓		Exhaust gases discharge vertically due to the contruction of the stack.
VIII.1.a: The minimum height above ground for SVENGINE1 & SVENGINE2 shall be 34.5 feet.	✓		The minimum height above ground is due to construction of stack.
VIII.2.b: The maximum exhaust diameter for SVENGINE1 & SVENGINE2 shall be14 inches.	✓		The maximum diameter of the exhaust stack is due to construction of stack.
IX.1:The permittee shall submit a notification specifying whether each engine in FGPATHDGENS will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation.	✓		FGPATHDGENS are certified and been maintained per manufacturer.
IX.2:The permittee shall comply with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, as specified in in 40 CFR Part 60, Subparts A and IIII, as they apply to FGPATHDGENS.	✓		FGPATHDGENS were permitted per 40 CFR Part 60.
IX.3: The permittee shall comply with the applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines, as specified in 40 CFR Part 63, Subparts A and ZZZZ, as they apply to FGPATHDGENS.	✓		FGPATHDGENS were permitted per 40 CFR Part 63.
Flexible Group: FGCITENGINES (EUCIT01, EUCIT02, EUCIT03) - ENGINES NOT INSTALLED			
Flexible Group: FGEMERG-IIII			
I.1: **NOx**: See Table 1 and/or Table 2 Subpart IIII	✓		Units affected by Subpart IIII meet the EPA emissions limits per the manufacturer certification/ specifications.
I.2: **HC**: See Table 1 and/or Table 2 Subpart IIII	✓		
I.3: **NMHC + NOx**: See Table 1 and/or Table 2 Subpart IIII	✓		
I.4: **CO**: See Table 1 and/or Table 2 Subpart IIII	✓		
I.5: **PM**: See Table 1 and/or Table 2 Subpart IIII	✓		
II.1: **NR Diesel Fuel**: NR diesel fuel shall not exceed 15 ppm sulfur content.	✓		Units affected by Subpart IIII located on UM campus can only burn diesel fuel.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.1: There is no time limit on the use of emergency stationary RICE in emergency situations.	✓		All affected Subpart IIII units are only for emergency purposes. Runtimes are maintained on site with unit and provided to EHS for the 12-month rolling spreadsheet. Also campus units monthly maintenance sheets scanned into the UM Mbox account showing operating time. EHS uses to maintain the 12-month rolling spreadsheet(s)/ database.
III.2: The permittee may operate each engine in FGEMERG-IIII for no more than 100 hours per calendar year for the purpose of necessary 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 permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year.	✓		Runtimes are maintained on site with unit and provided to EHS for the 12-month rolling spreadsheet.
III.3: Each engine in FGEMERG-IIII may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing as provided in 40 CFR 60.4211(f)(2). Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity.	✓		Engines are only for emergency use only.
III.4:The owner or operator must purchase an engine certified according to 40 CFR Part 89 or 40 CFR Part 94 as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer’s specifications.	✓		UM maintains certified engines as per the manufacturer's recommendations.
III.5:The owner or operator must operate and maintain the stationary CI ICE and control device according to the manufacturer’s emission-related written instructions; change only those emission-related settings that are permitted by the manufacturer; and meet the requirements of 40 CFR Parts 89, 94 and/or 1068, as they apply to you.	✓		UM maintains certified engines as per the manufacturer's recommendations.
III.6:Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4204 and 40 CFR 60.4205 over the entire life of the engine.	✓		UM maintains certified engines as per the manufacturer's recommendations.
IV.1: The owner or operator shall equip and maintain each engine in FG-EMERG-IIII with non-resettable hour meters to track the operating hours.	✓		All engines affected by Subpart IIII have non resettable meters installed.
V.1:1. The owner or operator is not required to conduct testing of CI ICE if certified by the equipment manufacturer as required by 40 CFR 60.4210.	✓		No testing during this reporting period.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.1: The permittee shall keep records of the following for FG-EMERG-IIII: a. All notifications. b. All maintenance performed on the engine. c. If using a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards of 40 CFR Part 60, Subpart IIII. d. If not using a certified engine, documentation that the engine meets the emission standards, which shall be demonstrated with an initial performance test within one year of engine installation. e. The permittee shall keep a complete copy of the diesel fuel analysis including the sulfur content in percent, as supplied by the vendor for each shipment of diesel fuel received.	✓		a. All notifications are filed at EHS: b. All maintenance performed is documented on site with unit or within the UM Preventative Maintenance system; c. All engines affected by Supbart III are certified per the Manufacturer's specifications; d. Supplier certifications kept on site with unit or with facility.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.3: Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
IX.1: The permittee shall comply with all provisions of 40 CFR Part 60, Subparts A and IIII, as they apply to FGEMERG-IIII.	✓		The units impacted by Subpart IIII are permitted to comply per the EGLE.
IX.2: FGEMERG-IIII complies with 40 CFR Part 63, Subpart ZZZZ by complying with 40 CFR Part 60, Subpart IIII.	✓		All initial notifications were submitted.
Flexible Group: FGEMERG-JJJJ			
I.1: **NOx for engines 25<HP<130**: NOx emissions for engines with HP between 25 and 130 shall not exceed 10 grams per HP-hr.	✓		Units affected by Subpart JJJJ meet the EPA emissions limits per the manufacturer certification/ specifications or tested by a third party emissions stack testing group.
I.2: **NOx for engines HP>=130**: NOx emissions for engines with HP larger than or equal to 130 shall not exceed 2.0 grams per HP-hr or 160 ppmvd at 15% O2.	✓		
I.3: **CO for engines 25<HP<130**: CO emissions for engines with HP between 25 and 130 shall not exceed 387 grams per HP-hr.	✓		
I.4: **CO for engines HP>=130**: CO emissions for engines with HP greater than or equal to 130 shall not exceed 4.0 grams per HP-hr or 540 ppmvd at 15% O2.	✓		
I.6: **VOC for engines HP>=130**: VOC emissions for engines with HP greater than 130 shall not exceed 1.0 grams per HP-hr or 86 ppmvd at 15% O2.	✓		
III.1: There is no time limit on the use of emergency stationary RICE in emergency situations.	✓		Units are emergency purposes only.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.2: The permittee may operate each engine in FGEMERG-JJJJ for no more than 100 hours per calendar year for the purpose of necessary 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 permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year.	✓		All affected Subpart JJJJ units are only for emergency purposes. Run times are maintained on site in log books.
III.3: Each engine in FGEMERG-JJJJ may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing as provided in 40 CFR 60.4243(d)(2). Except as provided in 40 CFR 60.4243(d)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity.	✓		Units are emergency purposes only.
III.4: Owners and operators of stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of 40 CFR 60.4233.	✓		No units run on propane.
III.5: If you are an owner or operator of a stationary SI ICE that is less than or equal to 500 HP and you purchase a non-certified engine or you do not operate and maintain your certified stationary SI ICE and control device according to the manufacturer's written emission-related instructions, you are required to perform initial performance testing as indicated in this section, but you are not required to conduct subsequent performance testing unless the stationary engine is rebuilt or undergoes major repair or maintenance. A rebuilt stationary SI ICE means an engine that has been rebuilt as that term is defined in 40 CFR 94.11(a).	✓		Engines after 2009 are certified engines.
III.6: It is expected that air-to-fuel ratio controllers will be used with the operation of three-way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.	✓		The units are maintained as per the manufacturer.
III.7. If you are an owner/operator of a stationary SI ICE with maximum engine power greater than or equal to 500 HP that is manufactured after July 1, 2007 and before July 1, 2008, and must comply with the emission standards specified in 40 CFR 60.4233(b) or (c), you must comply by one of the methods specified in paragraphs (h)(1) through (h)(4) of this section.	✓		Engines are emergency purposes only and maintained per the manufacturer.
IV.1: Starting on July 1, 2010, if the emergency stationary SI ICE that is greater than or equal to 500 HP that was built on or after July 1, 2010, does not meet the standards applicable to non-emergency engines, the owner or operator must install a non-resettable hour meter.	✓		NA
IV.2: Starting on January 1, 2011, if the emergency stationary SI ICE that is greater than or equal to 130 HP and less than 500 HP that was built on or after January 1, 2011, does not meet the standards applicable to non-emergency engines, the owner or operator must install a non-resettable hour meter.	✓		All UM engines are for emergency purposes only.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
IV.3: If you are an owner or operator of an emergency stationary SI ICE that is less than 130 HP, was built on or after July 1, 2008, and does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter upon startup of your emergency engine.	✓		
V.1: If you are an owner or operator of a stationary SI ICE that is manufactured after July 1, 2008, and must comply with the emission standards specified in 60.4233(a) through (c), you must comply by purchasing an engine certified to the emission standards in 60.4231(a) through (c), as applicable, for the same engine class and maximum engine power. You must also meet the requirements as specified in 40 CFR Part 1068, Subparts A through D, as they apply to you. If you adjust engine settings according to and consistent with the manufacturer's instructions, your stationary SI ICE will not be considered out of compliance. In addition, you must meet one of the requirements specified in (a)(1) and (2) of this section.	✓		Engines are maintained per the manufacturer's recommendations.
V.2: If you are an owner or operator of a stationary SI ICE and must comply with the emission standards specified in 60.4233(d) or (e), you must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) and (2) or this section. a. Purchasing an engine certified according to procedures specified in this subpart, for the same model year and demonstrating compliance according to one of the methods specified in paragraph 40 CFR 60.4243(a). b. Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in 60.4233(d) or (e) and according to the requirements specified in 60.4244, as applicable, and according to paragraphs 40 CFR 60.4243(b)(2)(i) and (ii). i. If you are an owner or operator of a stationary SI ICE greater than 25 HP and less than or equal to 500 HP, you must conduct an initial performance test to demonstrate compliance. ii. If you are an owner or operator of a stationary SI ICE greater than 500 HP, you must conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.	✓		Units affected by Subpart JJJJ meet the EPA emissions limits per the manufacturer certification/ specifications or tested by a third party emissions stack testing group.
VI.1: For each emergency stationary SI ICE you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.	✓		Runtimes are maintained on site with unit and scanned into the UM AIMS PM system showing operating time. EHS uses to maintain the 12-month rolling spreadsheet(s)/ database. Maintenance is noted on scanned sheets and documented in UM EHS emergency generator database.
VI.2: The permittee shall keep records of the following for FG-EMERG-JJJJ: a. All notifications. b. All maintenance performed on the engine. c. If using a certified engine, documentation from the manufacturer that the engine is certified to meet the emissions standards of 40 CFR Part 60, Subpart JJJJ, as applicable. d. If not using a certified engine, documentation that the engine meets the emissions standards, which shall be demonstrated with an initial performance test within one year of engine installation.	✓		a. All notifications are filed at EHS: b. All maintenance performed is documented on site with unit or within the UM Preventative Maintenance system; c.&d. All engines affected by Supbart JJJJ are certified per the Manufacturer's specifications or third party certified;
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.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	✓		No test performed during this reporting period.
IX.1: The permittee shall comply with all provisions of 40 CFR Part 60, Subparts A and JJJJ, as they apply to FGEMERG-JJJJ.	✓		Units impacted by Subpart JJJJ comply with provisions of 40 CFR Part 60, Subpart A and JJJJ..
IX.2: FGEMERG-JJJJ complies with 40 CFR Part 63, Subpart ZZZZ by complying with 40 CFR Part 60, Subpart JJJJ.	✓		Units in complance with Subpart JJJJ are in compliance with Subpart ZZZZ.
Flexible Group: FGZZZZ-CI<500			
II.1: The permittee shall burn only diesel fuel in each engine with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent.	✓		All fuel deilvered is ULSD.
III.1 The permittee must comply with the requirements in Item 1 of Table 2c of 40 CFR Part 63, Subpart ZZZZ which apply to each engine in FGZZZZ-CI<500 as specified in the following: a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2; b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the management practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable.	✓		UM has a monthly preventative maintenance program for emergency generators and maintained in the Plant Operations Preventative Maintenance FMS. EHS also maintains run times and maintenance performed in the emergency generator database.
III.2: The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC lll.1. The oil analysis must be performed at the same frequency specified for changing the oil in SC lll.1.	✓		All engines are for emergency purposes only.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.3. The permittee shall operate and maintain each engine in FGZZZZ-CI<500 and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.	✓		Where applicable, maintained per the manufacturer.
III.4. For each engine in FGZZZZ-CI<500, 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, after which time the emission standards applicable to all times other than startup apply.	✓		All engines are for emergency purposes only and run per manufucturer.
III.5: The permittee may operate each engine in FGZZZZ-CI<500 for no more than 100 hours per calendar year for the purpose of necessary 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 permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year	✓		All engines are for emergency purposes only and run hours are kept in log book at engine or on the PM sheets in the UM FMS AIM system.
III.6: Each engine in FGZZZZ-CI<500 may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in SC lll.5. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.	✓		All engines are for emergency purposes only and run hours are kept in log book at engine or on the PM sheets in the UM FMS AIM system.
IV.1: The permittee shall equip and maintain each engine in FGZZZZ-CI<500 with non-resettable hours meters to track the operating hours.	✓		Engines are equipped with non resettable meters.
V.1: If using the oil analysis program, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.	✓		Engines go through a monthly PM and annual PM by an engine manufacturer. The oil is checked and reviewed whether needs to be changed and is noted on the PM sheet.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.1: For each engine in FGZZZZ-CI<500, the permittee shall keep in a satisfactory manner the following: a. A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, b. Records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment, c. Records of performance tests and performance evaluations, d. Records of all required maintenance performed on the air pollution control and monitoring equipment, e. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.	✓		Records and WO's are kept in the AIM system by asset identification.
VI.2: For each engine in FGZZZZ-CI<500, the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with the operation and maintenance of the engine according to the manufacturer's emission-related operation and maintenance instructions; or of a maintenance plan that provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The permittee shall keep all records on file and make them available to the department upon request.	✓		Monthly PMs are performed and documented.
VI.3: For each engine in FGZZZZ-CI<500 the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request.	✓		Monthly PMs are performed and documented.
VI.4: The permittee shall monitor and record, the total hours of operation for each engine in FGZZZZ-CI<500 on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in FGZZZZ-CI<500 on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. The permittee shall keep all records on file and make them available to the department upon request.	✓		Monthly runtimes are documented in the log book on site with engine and documented on engine PM sheet.
VI.5: The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in FGZZZZ-CI<500, demonstrating that the fuel meets the requirement of SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request.	✓		All paperwork kept on site with engine. All sites use ULSD.
VI.6: The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).	✓		No request during this reporting period. Available upon request.
VI.7: As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.	✓		All records kept in the AIM system.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
IX.1: The permittee shall comply with all applicable provisions of 40 CFR Part 63, Subparts A and ZZZZ as they apply to FG-EMERG-ZZZZ.	✓		Engines comply with Subpart ZZZZ.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
Flexible Group: FGZZZZ-SI<500			
III.1 The permittee must comply with the requirements in Item 6 of Table 2c of 40 CFR Part 63, Subpart ZZZZ which apply to each engine in FGZZZZ-SI<500 as specified in the following: a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2; b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the management practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable.	✓		UM has a monthly preventative maintenance program for emergency generators and maintained in the Plant Operations Preventative Maintenance FMS. EHS also maintains run times and maintenance performed in the emergency generator database.
III.2: The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC lll.1. The oil analysis must be performed at the same frequency specified for changing the oil in SC lll.1.	✓		Monthly PMs are performed and documented. Annaul PMs performed by a engine manufacturer.
III.3. The permittee shall operate and maintain each engine in FGZZZZ-SI<500 and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.	✓		Monthly PMs are performed and documented. Annaul PMs performed by a engine manufacturer.
III.4. For each engine in FGZZZZ-SI<500, 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, after which time the emission standards applicable to all times other than startup apply.	✓		Engine for emergency purposes only and run per manufactuer.
III.5: The permittee may operate each engine in FGZZZZ-SI<500 for no more than 100 hours per calendar year for the purpose of necessary 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 permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year	✓		Engines for emergency purposes only.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.6: Each engine in FGZZZZ-SI<500 may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in SC lll.5. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.	✓		All engines are for emergency purposes only. Runtimes are documented on site at the unit or in the FMS.
IV.1: The permittee shall equip and maintain each engine in FGZZZZ-SI<500 with non-resettable hours meters to track the operating hours.	✓		Engines are equipped with non resettable meters.
V.1: If using the oil analysis program, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.	✓		Engines go through a monthly PM and annual PM by an engine manufacturer. The oil is checked and reviewed whether needs to be changed and is noted on the PM sheet.
VI.1: For each engine in FGZZZZ-SI<500, the permittee shall keep in a satisfactory manner the following: a. A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, b. Records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment, c. Records of performance tests and performance evaluations, d. Records of all required maintenance performed on the air pollution control and monitoring equipment, e. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.	✓		No recorded malfunctions during this reporting period.
VI.2: For each engine in FGZZZZ-SI<500, the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with the operation and maintenance of the engine according to the manufacturer's emission-related operation and maintenance instructions; or of a maintenance plan that provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The permittee shall keep all records on file and make them available to the department upon request.	✓		Monthly records kept in AIM system.
VI.3: For each engine in FGZZZZ-SI<500 the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request.	✓		Monthly records kept in AIM system.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.4: The permittee shall monitor and record, the total hours of operation for each engine in FGZZZZ-SI<500 on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in FGZZZZ-SI<500 on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. The permittee shall keep all records on file and make them available to the department upon request.	✓		Runtimes kept on site in log book and on PM sheets.
VI.5: The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).	✓		No request during this reporting period.
VI.6: As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.	✓		All records kept in the AIM system.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
IX.1: The permittee shall comply with all applicable provisions of 40 CFR Part 63, Subparts A and ZZZZ as they apply to FG-EMERG-ZZZZ.	✓		Engines comply with Subpart ZZZZ.
Flexible Group: FGZZZZ-SI>500			
III.1: The permittee shall operate and maintain each engine in FGZZZZ-SI>500 and after-treatment control device (if any) in a manner consistent with good air pollution control practice for minimizing emissions.	✓		After-treatment control is maintained per the manufacturer, where applicable.
III.2: For each engine in FGZZZZ-SI>500, 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, after which time the emission standards applicable to all times other than startup apply.	✓		Engines are run per the manufacturer recommendations.
III.3. The permittee may operate each engine in FGZZZZ-SI>500 for no more than 100 hours per calendar year for the purpose of necessary 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 permittee may petition the Department 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 internal combustion engines beyond 100 hours per calendar year.	✓		Engines are for emergency use only.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.4. Each engine in FGZZZZ-SI>500 may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted towards the 100 hours per calendar year provided for maintenance and testing as provided in SC lll.3. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.	✓		Engines are for emergency use only.
IV.1: The permittee shall equip and maintain each engine in FGZZZZ-SI>500 with non-resettable hours meters to track the operating hours.	✓		Engines are equipped with non-resettable meters.
VI.1:For each engine in FGZZZZ-SI>500, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request.	✓		Records are kept on site with engines and/or in the AIMS maintenance system.
VI.2: The permittee shall monitor and record, the total hours of operation for each engine in FGZZZZ-SI>500 on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in FGZZZZ-SI>500 on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. The permittee shall keep all records on file and make them available to the department upon request.	✓		Records are kept on site with engines and/or in the AIMS maintenance system.
VI. 3: The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).	✓		Records are kept on site with engines and/or in the AIMS maintenance system.
VI.4:. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.	✓		Records are kept on site with engines and/or in the AIMS maintenance system.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
IX.1: The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ for Stationary Reciprocating Internal Combustion Engines.	✓		Engines comply with Subpart ZZZZ.
Flexible Group: FGZZZZ-CI>500			
II.1: The permittee shall burn only diesel fuel in each engine with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent.	✓		Only ultra low sulfur burned in engines. Paperwork on site with unit.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.1: The permittee shall operate and maintain each engine in FGZZZZ-CI>500 and after-treatment control device (if any) in a manner consistent with good air pollution control practices for minimizing emissions.	✓		After-treatment control is maintained per the manufacturer, where applicable.
III.2: For each engine in FGZZZZ-CI>500, 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, after which time the emission standards applicable to all times other than startup apply.	✓		Engines are for emergency use only. Only run during monthly test or emergency purposes only.
III.3. The permittee may operate each engine in FGZZZZ-CI>500 NEW for no more than 100 hours per calendar year for the purpose of necessary 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 permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year.	✓		Engines are for emergency use only.
III.4: Each engine in FGZZZZ-CI>500 may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in SC lll.3. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.	✓		Engines are for emergency use only.
IV.1: The permittee shall equip and maintain each engine in FGZZZZCI>500 with non-resettable hours meters to track the operating hours.	✓		Engines are equipped with non-resettable meters.
VI.1: . For each engine in FGZZZZ-CI>500, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request.	✓		After treatment maintained as per the manufacturer where applicable.
VI.2: The permittee shall monitor and record, the total hours of operation for each engine in FGZZZZ-CI>500 on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in FGZZZZ-CI>500 on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. The permittee shall keep all records on file and make them available to the department upon request.	✓		Records are kept on site with engines and/or in the AIMS maintenance system.
VI. 3: The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in FGZZZZ-CI>500, demonstrating that the fuel meets the requirement of SC ll.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request.	✓		Records of fuel kept on site with unit. Only ULSD burned in engines.
VI.4:. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).	✓		Records are kept on site with engines and/or in the AIMS maintenance system.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.5: As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.	✓		Records avaiable upon request. No request during this reporting period.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
IX.1: The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ for Stationary Reciprocating Internal Combustion Engines.	✓		Engines comply with Subpart ZZZZ.
Flexible Group: FGZZZZ-SI>500 NEW			
III.1: The permittee shall operate and maintain each engine in FGZZZZ-SI>500 NEW and after-treatment control device (if any) in a manner consistent with good air pollution control practice for minimizing emissions.	✓		After-treatment control is maintained per the manufacturer, where applicable.
III.2: For each engine in FGZZZZ-SI>500 NEW, 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, after which time the emission standards applicable to all times other than startup apply.	✓		Engines are run per the manufacturer recommendations.
III.3. The permittee may operate each engine in FGZZZZ-SI>500 NEW for no more than 100 hours per calendar year for the purpose of necessary 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 permittee may petition the Department 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 internal combustion engines beyond 100 hours per calendar year.	✓		Engines are for emergency use only.
III.4. Each engine in FGZZZZ-SI>500 NEW may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted towards the 100 hours per calendar year provided for maintenance and testing as provided in SC III.3. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.	✓		Engines are for emergency use only.
IV.1: The permittee shall equip and maintain each engine in FGZZZZ-SI>500 NEW with non-resettable hours meters to track the operating hours.	✓		Engines are equipped with non-resettable meters.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.1:For each engine in FGZZZZ-SI>500 NEW, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request.	✓		Records are kept on site with engines and/or in the AIMS maintenance system.
VI.2: The permittee shall monitor and record, the total hours of operation for each engine in FGZZZZ-SI>500 NEW on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in FGZZZZ-SI>500 NEW on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. The permittee shall keep all records on file and make them available to the department upon request.	✓		Records are kept on site with engines and/or in the AIMS maintenance system.
VI. 3: The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).	✓		Records are kept on site with engines and/or in the AIMS maintenance system. No request during this reporting period.
VI.4:. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.	✓		Records are kept on site with engines and/or in the AIMS maintenance system.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.4: The permittee shall submit an Initial Notification that includes the information in 40 CFR 63.9(b)(2)(i) through (v), and a statement that FGZZZZ-SI>500 NEW has no additional requirements and the basis of the exclusion.	✓		No initial notificaitons during this reporting period.
IX.1: The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ for Stationary Reciprocating Internal Combustion Engines.	✓		Engines comply with Subpart ZZZZ.
Flexible Group: FGZZZZ-CI>500 NEW			
II.1: The permittee shall burn only diesel fuel in each engine with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent.	✓		Only ultra low sulfur burned in engines. Paperwork on site with unit.
III.1: The permittee shall operate and maintain each engine in FGZZZZ-CI>500 NEW and after-treatment control device (if any) in a manner consistent with good air pollution control practices for minimizing emissions.	✓		After-treatment control is maintained per the manufacturer, where applicable.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.2: For each engine in FGZZZZ-CI>500 NEW, 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, after which time the emission standards applicable to all times other than startup apply.	✓		Engines are for emergency use only. Only run during monthly test or emergency purposes only.
III.3. The permittee may operate each engine in FGZZZZ-CI>500 NEW for no more than 100 hours per calendar year for the purpose of necessary 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 permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. 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 internal combustion engines beyond 100 hours per calendar year.	✓		Engines are for emergency use only.
III.4: Each engine in FGZZZZ-CI>500 NEW may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in SC lll.3. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.	✓		Engines are for emergency use only.
IV.1: The permittee shall equip and maintain each engine in FGZZZZ-CI>500 NEW with non-resettable hours meters to track the operating hours.	✓		Engines are equipped with non-resettable meters.
VI.1: For each engine in FGZZZZ-CI>500 NEW, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request.	✓		After treatment maintained as per the manufacturer where applicable.
VI.2: The permittee shall monitor and record, the total hours of operation for each engine in FGZZZZ-CI>500 NEW on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in FGZZZZ-CI>500 NEW on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. The permittee shall keep all records on file and make them available to the department upon request.	✓		Records are kept on site with engines and/or in the AIMS maintenance system.
VI. 3: The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in FGZZZZ-CI>500 NEW, demonstrating that the fuel meets the requirement of SC ll.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request.	✓		Records of fuel kept on site with unit.
VI.4:. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).	✓		Records are kept on site with engines and/or in the AIMS maintenance system.
VI.5: As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.	✓		Reocrds avaiable upon request.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.4: The permittee shall submit an Initial Notification that includes the information in 40 CFR 63.9(b)(2)(i) through (v), and a statement that FGZZZZ-CI>500 NEW has no additional requirements and the basis of the exclusion.	✓		No notifications during this reporting period.
IX.1: The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ for Stationary Reciprocating Internal Combustion Engines.	✓		Engines comply with Subpart ZZZZ.
Flexible Group: FGBLRMACT-LG			
III.1:The permittee shall conduct an annual tune up of each boiler or process heater as specified below. The annual tune-up shall be no more than 13 months after the previous tune-up.			
III.1.a: As applicable, inspect the burner, and clean or replace any components of the burner as necessary. The permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown. Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment.			
III.1.b: Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.			
III.1.c: Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.	✓		Tune up are performed accordingly unless the boiler is down for maintenance, not running, or low load.
III.1.d: Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOX requirement to which the unit is subject.			
III.1.e: Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.			

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.2: If the unit is not operated on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup.			
III.3: The permittee shall conduct a tune-up of each emission unit that has an oxygen trim system installed in FGBLRMACT-LG of the burner(s) and combustion controls, as applicable, every 5 years as specified in 40 CFR 63.7540(a)(10)(i) through (vi). (40 CFR 63.7500(d), 40 CFR 63.7540(a)(12), Table 3 of 40 CFR Part 63, Subpart DDDDD) a. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. (40 CFR 63.7515(d)) b. The permittee may delay the burner inspection until the next scheduled or unscheduled unit shutdown, but each burner must be inspected at least once every 72 months. (40 CFR 63.7540(a)(12)) c. If the unit is not operating on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup.	✓		Tune up are performed accordingly unless the boiler is down for maintenance, not running, or low load.
III.4: At all times, the permittee must operate and maintain each existing gas 1 boiler or process heater, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.	✓		UM boilers are on an annual PM along with a boiler tune up pending on frequecy.
VI.1:The permittee must keep a copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted.	✓		All records kept on file.
VI.2: If the permittee uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under 40 CFR Part 63, Other Gas 1 fuel, or gaseous fuel subject to another subpart of 40 CFR Part 60 or Part 61, or Part 65, the permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies.	✓		Only natural gas and/ or fuel is burned in the affected boilers.
VI.3: The permittee shall maintain on-site and submit, if requested by the AQD, an annual tune-up report containing the information listed below. a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. (40 CFR 63.7540(a)(10)(vi)(A)) b. A description of any corrective actions taken as a part of the tune-up. (40 CFR 63.7540(a)(10)(vi)(B)) c. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.		✓	All UM boilers are catergorized as gas 1. *See deviation report.*

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VI.4:The permittee's records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1).	✓		Records available upon request.
VI.5: As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.	✓		Records kept for 5-years and available upon request.
VI.6: The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2-years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3-years.	✓		Records kept for 5-years and available upon request.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.4: For the initial compliance demonstration for each boiler or process heater, the permittee must submit the Notification of Compliance Status before the close of business on the 60th day following the completion of all compliance demonstrations. The Notification of Compliance Status report must contain all of the information specified below. a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD. (40 CFR 63.7545(e)(1)) b. In addition to the information required in 40 CFR 63.9(h)(2), the notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official. i. "This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR Part 63, Subpart DDDDD at this site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi)." (40 CFR 63.7545(e)(8)(i)) ii. "The facility has had an energy assessment performed according to 40 CFR 63.7530(e)."	✓		First compliance report submitted January 2018 via CEDRI.
VII.5: The permittee must submit an Initial Notification not later than 15-days after the actual date of startup of the affected source.	✓		No initial notificaitons during this reporting period.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VII.6: If the permittee intends to use a fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart of 40 CFR Part 63, Part 60, Part 61, or Part 65, or Other Gas 1 fuel to fire the affected unit during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575, the permittee must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575. The notification must include the information as listed below. a. Company name and address. (40 CFR 63.7545(f)(1)) b. Identification of the affected unit. (40 CFR 63.7545(f)(2)) c. Reason the permittee is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared, or the natural gas supply interruption began. (40 CFR 63.7545(f)(3)) d. Type of alternative fuel that the permittee intends to use. (40 CFR 63.7545(f)(4)) e. Dates when the alternative fuel use is expected to begin and end.	✓		Only natural gas and/ or fuel is burned in the affected boilers.
VII.7: If the permittee has switched fuels or made a physical change to the boiler or process heater and the fuel switch or physical change resulted in the applicability of a different subcategory, the permittee must provide notice of the date upon which the permittee switched fuels or made the physical change within 30 days of the switch/change. The notification must identify. a. The name of the owner or operator of the affected source, the location of the source, the boiler(s) and process heater(s) that have switched fuels, were physically changed, and the date of the notice. (40 CFR 63.7545(h)(1)) b. The currently applicable subcategory under 40 CFR Part 63, Subpart DDDDD. (40 CFR 63.7545(h)(2)) c. The date upon which the fuel switch or physical change occurred.	✓		Only natural gas and/ or fuel is burned in the affected boilers.
VII.8: The permittee must submit boiler and process heater tune-up compliance reports to the appropriate AQD District Office. The reports must be postmarked or submitted by March 15th and must cover the period of January 1 through December 31 of the reporting year. For new units, the first report should cover the period of startup to December 31 of the reporting year. Compliance reports must also be submitted to EPA using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx).	✓		Compliance report submitted to District Office and Via CEDRI by March 15 of reporting year.
VII.9:The permittee must submit a compliance report containing the following information. a. Company and Facility name and address. (40 CFR 63.7550(c)(5)(i)) b. Process unit information, emissions limitations, and operating parameter limitations. (40 CFR 63.7550(c)(5)(ii)) c. Date of report and beginning and ending dates of the reporting period. (40 CFR 63.7550(c)(5)(iii)) d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv)) e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.	✓		Compliance report submitted to District Office and Via CEDRI by March 15 of reporting year.
VII.10: The permittee must submit all reports required by Table 9 of this subpart electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, submit the report to the EPA Region V at the appropriate address listed in 40 CFR 63.13 and to the appropriate AQD District Office.	✓		Compliance report submitted to District Office and Via CEDRI by March 15 of reporting year.
IX.1:. The permittee shall comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters as specified in 40 CFR Part 63, Subparts A and DDDDD.	✓		One-time energy assessment was completed in January 2018. Copy at EHS.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
Flexible Group: FGBLRMACT-SM			
III.1:The permittee shall conduct an annual tune up of each boiler or process heater as specified below. The annual tune-up shall be no more than 13 months after the previous tune-up.			
III.2: The permittee must, for boilers or process heaters with a heat input capacity of greater than 5 MMBTU/hr and less than 10 MMBTU/hr, conduct a biennial tune-up of the boiler or process heater according to 40 CFR 63.7540(a)(11) no more than 25 months after the previous tune-up.			
III.3:The permittee must, for boilers or process heaters that has a continuous oxygen trim system installed, conduct a tune-up of the burner(s) and combustion controls, as applicable, every 5 years as specified in 40 CFR 63.7540(a)(10)(i) through (vi). (40 CFR 63.7540(a)(12), 40 CFR Part 63, Subpart DDDDD, Table 3.1) a. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. (40 CFR 63.7515(d)) b. The permittee may delay the burner inspection until the next scheduled or unscheduled unit shutdown, but each burner must be inspected at least once every 72 months. (40 CFR 63.7540(a)(12)) c. The permittee shall set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. (40 CFR 63.7540(a)(12)) d. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.			
III.4: The permittee must conduct a tune-up of each boiler or process heater as specified in the following: (40 CFR 63.7540(a)(11) or (12)) a. As applicable, inspect the burner and clean or replace any components of the burner as necessary. The permittee may perform the burner inspection any time prior to the tune-up or may delay the burner inspection until the next scheduled unit shutdown. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. (40 CFR 63.7540(a)(10)(i)) b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (40 CFR 63.7540(a)(10)(ii)) c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The permittee may delay the inspection until the next scheduled unit shutdown. (40 CFR 63.7540(a)(10)(iii)) d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOX requirement to which the unit is subject. (40 CFR 63.7540(a)(10)(iv)) e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.	✓		Tune up are performed accordingly unless the boiler is down for maintenance, not running, or low load.
III. 5: If the unit is not operated on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup			

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
III.6:At all times, the permittee must operate and maintain each existing small boiler or process heater, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.	✓		Boiler tune up are performed in addition to annual PM and annual state boiler inspection.
VI. 1: The permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or 2 or 5 year compliance report or one-time energy assessment, as applicable, that the permittee submitted	✓		Copy of notifications kept on file and available upon request.
VI. 2: The permittee must keep the records in a form suitable and readily available for expeditious review.	✓		Records available upon request.
VI.3:The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record	✓		Records kept for 5-years and available upon request.
VI.4:. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3 years.	✓		Records kept for 5-years and available upon request.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
VII.4:The permittee must submit boiler or process heater tune-up compliance reports to the appropriate AQD District Office and must be postmarked or submitted by March 15th of the year following the applicable 2 or 5-year period starting from January 1 of the year following the previous tune-up to December 31 (of the latest tune-up year). Compliance reports must also be submitted to EPA using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to EPA Region 5.	✓		Compliance report submitted to District Office and Via CEDRI by March 15 of reporting year.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
VII.5: The permittee must include the following information in the compliance report. (40 CFR 63.7550(c)(1)) a. Company and Facility name and address. (40 CFR 63.7550(c)(5)(i)) b. Process unit information, emissions limitations, and operating parameter limitations. (40 CFR 63.7550(c)(5)(ii)) c. Date of report and beginning and ending dates of the reporting period. (40 CFR 63.7550(c)(5)(iii)) d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done biennially or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv)) e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.	✓		Compliance report submitted to District Office and Via CEDRI by March 15 of reporting year.
IX.1: The permittee shall comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters as specified in 40 CFR Part 63, Subparts A and DDDDD.	✓		One-time energy assessment was completed in January 2018. Copy at EHS.
Flexible Group: FG-COLDCLEANER			
II.1: The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compound: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof.	✓		No units on campus use cleaners containing more than 5 percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof.
III.1: Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases.	✓		All parts are drained for no less than 15 seconds within case.
III.2: The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer.	✓		Cold Cleaners on campus have contracts to maintain units. EHS HazMat assists with units if needed.
IV.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. b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment.	✓		No units are greater than 10 square feet and is only for cleaning metal parts.
IV.2: The cold cleaner shall be equipped with a device for draining cleaned parts.	✓		All units are available to drain clean parts.
IV.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.	✓		All units on campus have covers. They are kept covered whenever parts are not being handled. Periodic inspections are conducted by UM EHS.
IV.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.	✓		The cover is mechanically assisted for the units that have a Reid vapor pressure greater than 0.3 psia.

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
IV.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. b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD.	✓		No units installed.
VI.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.	✓		No units installed.
VI.2. The permittee shall maintain the following information on file for a period of five years for each cold cleaner: 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).	✓		Information for each cold cleaner maintained on site with unit and at EHS.
VI.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.	✓		All units have procedures posted.
VI.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.	✓		All units have closed (contained) units to prevent evaporation.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.
Flexible Group: FG-RULE287(c)			

Permit Condition	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
II.1: **Coatings**: Coatings shall not exceed 200 gallons per month, as applied, minus water, per emission unit.	✓		Coating usage rate: monthly records in gallons/month of coating used, as applied, minus water, per emission unit. Records are kept on site with units.
IV.1:Any exhaust system installed on or after December 20, 2016, that serves only coating spray equipment shall be equipped with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the permittee develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions. All emission units installed before December 20, 2016, with an exhaust system that serves only coating spray equipment must have a properly installed and operated particulate control system	✓		All exhaust systems are supplied with a properly installed and operating particulate control system. No new systems have been installed since 2016.
VI.1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 287(c), Permit to Install Exemption Record form or an alternative format that is approved by the AQD District Supervisor. a. Volume of coating used, as applied, minus water, in gallons. b. Documentation of any filter replacements for exhaust systems serving coating spray equipment.	✓		All records are kept on site with at unit. All maintenance documented in FMS and on site with unt.
VII.1: Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.	✓		No deviations during this reporing period.
VII.2: Semi-annual 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.	✓		The semi-annual was submitted by September 15 for the reporting period of January 1 through June 30.
VII.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.	✓		The annual certification is submitted by March 15 for the reporting period for the previous calendar year.

Notes:
CPP - Central Power Plant
DCS - CPP Distributive Control System; Stores data up to 24 hours
Delta V - Data acquisition system (has its own back up)
EHS - Occupational Safety and Environmental Health
U of M - University of Michigan
EtO - Ethylene Oxide Sterilizers
MSDS - Material Safety Data Sheet