

May 11, 2022

DTE Electric Company  
Belle River Power Plant  
4505 King Road  
China Twp., MI 48054

Mr. Mark Dziadosz  
Senior Environmental Quality Analyst  
Air Quality Division  
Department of Environment, Great Lakes, and Energy  
227700 Donald Court  
Warren, MI 48092

Re: Belle River Power Plant Violation Notice Dated April 20, 2022

Dear Mr. Dziadosz:

The following is in response to the Violation Notice dated April 20, 2022 concerning the 7-Day Visible Emission records for the coal handling system at Belle River Power Plant.

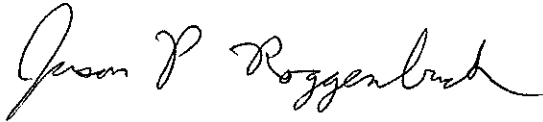
Belle River personnel discovered the lack of weekly Visible Emissions observations on 3/12/2021. Thereafter, this was self-reported to EGLE and immediate corrective actions began internally. Per the requested information in the Violation Notice, the visible emission records that were not maintained in 2021 were for the weeks of 1/10/21, 1/24/21, 2/14/21, 2/21/21, 2/28/21, 3/21/21, 5/2/21, 5/9/21, 7/4/21, 7/11/21, 7/18/21, 7/25/21, 10/24/21, 10/31/21, and 12/26/21. In a typical 7-day period there is the potential for 1,176 operating hours across the 7 dust collectors in FG-COALHAND-BR. During those weeks in which records were not maintained, there were only 2, 26, 42, 112, 100, 41, 12, 3, 82, 78, 59, 106, 176, and 82 total hours of operation respectively. It should be noted that the records we have do not indicate that there were malfunctions with the dust collectors or that there were visible emissions during the operation of these dust collectors.

The root cause of the missing Visible Emission observations was a shift in responsible personnel. The group responsible for completing these observations had been Plant Operations. This then shifted to Fuel Supply Operations. Training between the two groups consisted of an on-the-job training, however this was variable based on the employees involved. Many of the Fuel Supply Operators did not know where to file these observation forms once completed. Additionally, many of the dust collectors were out of service for large parts of the year, in part due to dust collector replacement projects.

This violation is not on going. Corrective actions were implemented upon discovery on 3/12/22. These corrective actions include uniform reinforced expectations from management to all Fuel Supply Operators and Shift Supervisors, specifications in the weekly work orders about the environmental criticality of completing these work orders, a designated huddle board where all records are stored and reviewed, and assigning a Shift Supervisor to confirm the observations are completed every week. Since implementing these changes, all Visible Emission observations have been completed and records maintained on the dust collectors in FG-COALHAND-BR.

Should you have any further questions, please feel free to contact me at (810) 278-0282 or [jason.roggenbuck@dteenergy.com](mailto:jason.roggenbuck@dteenergy.com).

Sincerely,

A handwritten signature in cursive script that reads "Jason P. Roggenbuck". The signature is written in black ink and is positioned above the typed name and title.

Jason P Roggenbuck  
Principal Environmental Engineer  
Belle River Power Plant  
810-278-0282

Cc: Ms. Jenine Camilleri, EGLE