



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

February 11, 2021

Mr. Michael Twomley  
Plant Manager  
DTE Electric Company – Monroe Power Plant  
3500 East Front Street  
Monroe, Michigan 48161

SRN: B2816, Monroe County

Dear Mr. Twomley:

**VIOLATION NOTICE**

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), reviewed the fourth quarter 2020 Continuous Emission Monitoring (CEMS) Downtime and Excess Emission Report submitted electronically on January 28, 2021, by DTE Electric Company – Monroe Power Plant, located at 3500 E. Front Street, in Monroe. The Renewable Operating Permit number MI-ROP-B2816-2019, requires the facility to maintain and operate a wet flue gas desulfurization (FGD) control system in a satisfactory manner. This unit is also subject to Title 40 of the Code of Federal Regulations (CFR) Part 63 Subpart UUUUU National Emissions Standards for Hazardous Air Pollutants: Coal and Oil-Fired Electric Utility Steam Generating Units.

During review of the fourth quarter 2020 CEMS report, the AQD evaluated compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B2816-2019, and MI-PTI-B2816-2019.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-UNIT4, Coal-fired cell burner boiler	R 336.1910/EU-UNIT4 SC IV.2; FGMATS SC IV.1, SC VI.5	Malfunctioning mist eliminator trays and wash nozzles caused by pluggage in the flue gas desulfurization control device caused the unit's SO <sub>2</sub> , NO <sub>x</sub> , CO, and CO <sub>2</sub> CEMS to malfunction for 190 consecutive hours.
	EU-UNIT4 SC III.1	Failed to update malfunction abatement plan (MAP) 45 days after determining cause of FGD malfunction.

The fourth quarter 2020, excess emissions report indicated that there was an extended period of monitor downtime. Specifically, SO<sub>2</sub>, NOx, CO, and CO<sub>2</sub> monitor downtime was reported for a time period of November 25, 2020 – December 3, 2020, which was caused by a plugged dilution sample probe filter due to excess particulate matter settling in the stack due to increased liquid in the stack caused by malfunctioning mist eliminator trays and wash nozzles.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 4, 2021, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; estimated emissions using data substitution per 40 CFR Part 75, (as applicable); a timeframe for the submittal of a revised MAP; and what steps are being taken to prevent a recurrence.

Please submit the written response to EGLE, AQD, Jackson District, at 301 East Louis Glick Highway, Jackson, Michigan 49201-1535, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If DTE Electric Company believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Brian Carley  
Environmental Quality Specialist  
Air Quality Division  
517-416-4631

cc: Ms. Alexis Thomas, DTE Electric Company  
Ms. Mary Ann Dolehan, EGLE  
Dr. Eduardo Olague, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Scott Miller, EGLE