



February 27, 2023

Ms. Joyce Zhu
EGLE – Air Quality Division
27700 Donald Court
Warren, MI 48092

RE: DTE Electric Company Response to the EGLE-AQD Violation Notice of February 7, 2023 Issued to Blue Water Energy Center

This letter is in response to the Violation Notice (VN) issued by EGLE-AQD to DTE Electric Company on February 7, 2023 to Blue Water Energy Center due to the failure to submit a Rule 912 notification of abnormal conditions. The VN cited the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCTGHRSG2	SC I.1; R 336.912 (5)	DTE submitted an Excess Emission Report indicating the NOx 2.0 ppm@15% O2 limit, based on a 24-hour rolling average, had been exceeded. A Rule 912 notification of abnormal conditions was not received within 10 days after the abnormal conditions or malfunction has been corrected or within 30 days of the discovery of the abnormal conditions or malfunction.

NOx emissions were in excess of the permit limit as outlined in the Excess Emission Report (EER) that was submitted. Due to the nature of operation at the time of the excess emissions, it was unclear whether the excess periods in question were indeed exceeded the limit as outlined in the permit. It was originally thought that the periods were periods of unit startup and that some of the emissions would be excluded from the 24-hour average emissions calculations. After investigating and during the QA/QC process associated with the EER submittal, it was determined that the excess emission periods that were identified in the EER were valid. This is what was ultimately reported in the EER. A Rule 912 notification of abnormal conditions was not submitted at the time of the incident. A notification was submitted to your office on February 14, 2023 after receiving the VN to ensure this was documented.

To ensure that all excess emission periods are identified properly at the time of occurrence or as soon as possible thereafter, the plant's data acquisition handling system (DAHS) has been programmed to include additional triggers for the end of startup operation. This ensures that plant operations has confidence that all excess emission periods identified by the DAHS through the alarm system are valid. Once an excess emission period is identified, it is escalated to plant environmental and plant management. This will ensure that the appropriate notifications are made in a timely manner to EGLE. Although there may be instances for which a future notification is required, the plant has also taken steps to improve the DAHS alarm system. This includes short-term alarms for elevated emissions to allow plant operations more time to troubleshoot any issues. This will reduce the risk of excess emission events going forward.

If you have any questions on the information in this letter or would like further information, please contact me at Barry.Marietta@dteenergy.com or (810) 343-6391.

Sincerely,

Barry Marietta

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