

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

8280668953

FACILITY: DTE Electric Company - Superior Peaking Facility	SRN / ID: 82806
LOCATION: 6000 FIRST STREET, SUPERIOR TWP	DISTRICT: Jackson
CITY: SUPERIOR TWP	COUNTY: WASHTENAW
CONTACT: Zachary Josefiak , Environmental Engineer	ACTIVITY DATE: 09/12/2023
STAFF: Brian Carley   COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled on-site inspection	
RESOLVED COMPLAINTS:	

Facility Contact: Zack Josefiak, Environmental Engineer  
Phone: 313-590-5703  
Email: [zachary.josefiak@dteenergy.com](mailto:zachary.josefiak@dteenergy.com)

**Purpose**

I conducted a virtual inspection of the facility with Zack Josefiak of DTE Energy to determine the compliance of the DTE Electric Company - Superior Peaking Station with ROP MI-ROP-B2806-2023.

**Background**

The Detroit Edison Superior Peaking Facility has four oil-fired combustion turbines that were installed in 1966 and are rated at approximately 19 MW each. Unit 1 has a 300 hp black start engine connected to it, which is used to start the unit and is subject to 40 CFR 63 Subpart ZZZZ (RICE MACT) as an area source. These units are only used when DTE Energy requires more power to the electrical grid or for maintenance purposes.

**Compliance Inspection**

*Timeframes for the records requested will be September 2022 through August 2023*

FGPEAKERS

This covers the four oil-fired combustion turbines at this facility. This facility was not operating at the time of the inspection. Zack provided me with the monthly totals of fuel usage and the hours of operation for the time period of September 2022 through August 2023. The totals for the requested timeframe were 14,772 gallons and 9.5 hours for all the units combined (see attachment 1). This is complying with SC VI.1 which requires that they record their monthly fuel usage. He also sent me a copy of the Fuel Oil Supply Agreement that contains fuel specifications of the fuel that they use (see attachment 2). They are using ultra-low sulfur diesel fuel that has a sulfur content of 15 ppm (0.0015%), which is well below their limit of 1.5% sulfur by weight per SC 111. I determined that they are complying with the requirements of this table.

EU-BLKSTART11-1

They have a 300 HP black start engine which is used to start Unit 1 and is subject to the RICE MACT as an area source. This unit was not operating at the time of the inspection. They had last changed the oil and filter on December 8, 2022, and inspected the hoses, belts, and air filter also on December 8, 2022, as required by SC 111.1 (see attachment 3). The hoses, belts, and air filters have not needed to be replaced since August 2019. They are operating and maintaining this unit by doing annual inspections, doing required maintenance, and recording that activity in the DTE database per SC 111.2 and recording the activity per SC VI.2 (see attachment 4). Zack stated that there has not been any additional maintenance done on this unit since the last inspection beyond what is required in SC 111.1. They are not doing the oil analysis in lieu of specified oil change requirement that is optional per SC 111.3. They also have an operation instruction manual for this emission unit that specifies how to operate and maintain the unit (see files for copy in the report for 8/13/2019 inspection). During the requested timeframe, this engine ran for 12 minutes in December 2022 and for 11 minutes in August 2023. They are minimizing the time spent at idle at startup and the time needed for appropriate and safe loading of the engine, which is not to exceed 30 minutes per SC 111.5 (see attachment 1). I determined that they are complying with the requirements of the RICE MACT and this table.

**Compliance Determination**

Based on the inspection, annual and semi-annual certifications, and MAERS submittals, I determined that they are in compliance with their ROP.

NAME B. Carley DATE 9/13/2023 SUPERVISOR [Signature]