

B2811
munda FCE

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : DTE Electric Company - Trenton Channel Power Plant	SRN : B2811
Location : 4695 W JEFFERSON AVE	District : Detroit
	County : WAYNE
City : TRENTON State: MI Zip Code : 48183	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Jonathan Lamb
FCE Begin Date : 9/14/2017	FCE Completion Date : 9/14/2018
Comments : FCE, FY 2018	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/11/2018	CEM RATA	Compliance	Mercury Sorbent Tube Monitoring System (STMS) RATA report. Testing was performed June 28, 2018, by Clean Air Engineering. Relative accuracy of 2.08% demonstrates compliance with the <20% required per 40 CFR 63, Subpart UUUUU (MATS). Results were reviewed by Regina Hines, AQD-TPU.
09/06/2018	Scheduled Inspection	Non Compliance	Scheduled inspection, FY 2018
08/27/2018	ROP Annual Cert	Compliance	Section 2 Annual certification for time period January 1 through December 31, 2017. No deviations reported.
08/27/2018	ROP SEMI 2 CERT	Compliance	Section 2 Semi-Annual ROP certification for time period July 1 through December 31, 2017. No deviations reported.
08/27/2018	ROP SEMI 2 CERT	Compliance	One deviation reported for exceeding opacity limits, which had previously been reported in the Quarterly Excess Emission reports. Reports will be evaluated as part of the next full compliance evaluation.
08/27/2018	ROP Annual Cert	Compliance	One deviation reported for exceeding opacity limits, which had previously been reported in the Quarterly Excess Emission reports. Reports will be evaluated as part of the next full compliance evaluation.

Activity Date	Activity Type	Compliance Status	Comments
08/27/2018	MACT (Part 63)	Unknown	Semi-Annual compliance report for Unit 9 for the time period July 1 through December 31, 2017, as required by the Mercury and Air Toxics Standards (MATS; 40 CFR Part 63, Subpart UUUUU). Facility reported no exceedances of Hg or PM MATS limits, but did report 168 consecutive hours of CMS downtime between November 5 through November 12, 2017, due to "failed AQ/QC pair agreement". DEQ does not currently have delegated enforcement authority for MATS, so compliance status is considered to be indeterminate at this time.
08/27/2018	Stack Test	Compliance	Testing of the HCl emission rate for Unit 9 for 1st Quarter, 2018, as required per the Mercury and Air Toxics Standard (MATS), 40 CFR Part 63, Subpart UUUUU. Testing was performed on March 21, 2018. Results show an HCl emission rate of 0.0005 lbs/MMBtu at a boiler load of 235 MW, which is in compliance with the MATS limit of 0.002 lbs/MMBtu.

Activity Date	Activity Type	Compliance Status	Comments
08/06/2018	Excess Emissions (CEM)	Compliance	<p>Excess Opacity Emissions, SO2 Emission Rate, and Sulfur in Coal reports, 2nd Quarter 2018. Boiler 9 was not in operation between April 1 and June 8, 2018. The reported average monthly sulfur content of coal for the months of April (0.00 lbs sulfur/MMBtu), May (0.00 lbs sulfur/MMBtu), and June (0.48 lbs sulfur/MMBtu), 2018, was below the permit limit of 0.83 lbs sulfur/mmBtu.</p> <p>Stack 7 COMS data showed 0.0 % excess emissions (6 minutes for 1 event) and 0.0% downtime. Stack 7 SO2 CEMS data showed 0.0% excess emissions and 0.0% monitor downtime.</p> <p>Stack 6 is associated with equipment no longer in use and therefore reported 0.0% excess emissions/0.0% downtime for COMS and CEMS.</p> <p>The highest daily SO2 emissions reported during the quarter was 29.51 tons on June 10, 2018, which is below the permit limit of 90.78 tons SO2 per day allowed in PTI No. 125-11C.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/25/2018	Excess Emissions (CEM)	Compliance	<p>Excess Opacity Emissions, SO2 Emission Rate, and Sulfur in Coal reports, 1st Quarter 2018. Received via email on 5/15/18; hard copy received 5/17/18. The reported average monthly sulfur content of coal for the months of January (0.20 lbs sulfur/MMBtu), February (0.23 lbs sulfur/MMBtu), and March (0.22 lbs sulfur/MMBtu), 2018, was below the permit limit of 0.83 lbs sulfur/mmBtu.</p> <p>Stack 7 COMS data showed 0.4 % excess emissions (24 minutes over 4 separate events) and 0.0% downtime. Stack 7 SO2 CEMS data showed 0.0% excess emissions and 0.46% (8 hours downtime/1,733 hours operating time) monitor downtime.</p> <p>Stack 6 is associated with equipment no longer in use and therefore reported 0.0% excess emissions/0.0% downtime for COMS and CEMS.</p> <p>The highest daily SO2 emissions reported was 39.87 tons on February 5, 2018, which is below the permit limit of 90.78 tons SO2 per day allowed in PTI No. 125-11C.</p>
05/24/2018	MAERS	Compliance	Reviewed 5/24/2018
05/21/2018	ROP Other	Compliance	2017 MAERS Report/ROP Certification Form Received
05/21/2018	Other	Compliance	2017 MAERS review

Activity Date	Activity Type	Compliance Status	Comments
05/16/2018	MACT (Part 63)	Non Compliance	<p>On April 27, 2018, AQD received notification from DTE Energy that the Trenton Channel Power Plant Unit 9 exceeded the Mercury and Air Toxics Standards (MATS; 40 CFR Part 63, Subpart UUUUU) 30-day rolling mercury emission limit of 1.2 lbs/Tbtu from the time period beginning March 3 through March 12, 2018; reported mercury emissions during this time was 1.3 lbs/Tbtu. The exceedance was caused by a malfunction of the activated carbon injection (ACI) system. DEQ does not currently have delegated enforcement authority for MATS, so compliance status is considered to be indeterminate at this time. A copy of this notification was forwarded to EPA on May 16, 2018. As a result, EPA issued a Finding of Violation (FOV) to the facility on September 12, 2018.</p>
03/02/2018	NSR Emissions Report	Unknown	<p>2017 NSR Emissions report. Data shows 2017 emissions for Unit 9A and the High Pressure Boilers are below established baselines for CO2, PM, NOx, and SO2. The High Pressure Boilers were permanently shut down on April 16, 2016, and reported no emissions in 2017. The compliance status is indeterminate at this time.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/08/2018	Excess Emissions (CEM)	Compliance	<p>Excess Opacity Emissions, SO2 Emission Rate, and Sulfur in Coal reports, 4th Quarter 2017. The reported average monthly sulfur content of coal for the months of October (0.23 lbs sulfur/MMBtu), November (0.23 lbs sulfur/MMBtu), and December (0.29 lbs sulfur/MMBtu), 2017, was below the permit limit of 0.83 lbs sulfur/mmBtu.</p> <p>Stack 7 COMS data showed 0.0 % excess emissions/0.1% (66 minutes) downtime; all 66 minutes of downtime was due to maintenance. Stack 7 SO2 CEMS data showed 0.0% excess emissions and 0.6% (9 hours) monitor downtime.</p> <p>Stack 6 is associated with equipment no longer in use and therefore reported 0.0% excess emissions/0.0% downtime for COMS and CEMS.</p> <p>The highest daily SO2 emissions reported was 57.41 tons on December 15, 2017, which is below the permit limit of 90.78 tons SO2 per day allowed in PTI No. 125-11C.</p>
01/22/2018	Stack Test	Compliance	<p>Testing of the HCl emission rate for Unit 9 for 4th Quarter, 2017, as required per the Mercury and Air Toxics Standard (MATS), 40 CFR Part 63, Subpart UUUUU. Testing was performed on November 7, 2017. Results show an HCl emission rate of <0.0005 lbs/MMBtu, which is in compliance with the MATS limit of 0.002 lbs.MMBtu.</p>
01/22/2018	Stack Test	Compliance	<p>Testing of the HCl emission rate for Unit 9 for 3rd Quarter, 2017, as required per the Mercury and Air Toxics Standard (MATS), 40 CFR Part 63, Subpart UUUUU. Testing was performed on August 29, 2017. Results show an HCl emission rate of 0.0009 lbs/MMBtu, which is in compliance with the MATS limit of 0.002 lbs.MMBtu.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/21/2017	Other	Compliance	7-day notification of testing for maximum heat release capacity for Auxiliary Boiler Nos. 21 and 22.
11/14/2017	Other	Compliance	7-day notification of testing for maximum heat release capacity for Auxiliary Boiler No. 23.
11/07/2017	Excess Emissions (CEM)	Compliance	Excess Opacity Emissions, SO2 Emission Rate, and Sulfur in Coal reports, 3rd Quarter 2017. The reported average monthly sulfur content of coal for the months of July (0.29 lbs sulfur/MMBtu), August (0.43 lbs sulfur/MMBtu), and September (0.33 lbs sulfur/MMBtu), 2017, was below the permit limit of 0.83 lbs sulfur/mmBtu. Facility reported 0.1 % excess emissions/0.0% CEM downtime for Stack 7. 54 of the 90 minutes of excess emissions reported for Stack 7 were attributed to control equipment issues (precipitator failure) of short duration. Stack 6 is associated with equipment no longer in use and therefore reported 0.0% excess emissions/0.0% CEM downtime. The highest daily SO2 emissions reported was 71.15 tons on September 13, 2017, below the permit limit of 90.78 tons SO2 per day allowed in PTI No. 125-11C.
10/24/2017	MACT (Part 63)	Unknown	Semi-Annual compliance report for Unit 9 for the time period Jan. 1 through June 30, 2017, as required by the Mercury and Air Toxics Standards (MATS; 40 CFR Part 63, Subpart UUUUU). Facility reported no exceedances of Hg or PM MATS limits, but did report 242 consecutive hours of CMS downtime between March 27 through April 6 due to "failed RRA". DEQ does not currently have delegated enforcement authority for MATS, so compliance status is considered to be indeterminate at this time.
10/24/2017	ROP Semi 1 Cert	Compliance	Facility reports no deviations for the certification period of Jan. 1-June 30, 2017 for Section 2 of the ROP.

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10/24/2017	ROP Semi 1 Cert	Compliance	One deviation reported for exceeding opacity limits, which had previously been reported in the Quarterly Excess Emission reports. Reports will be evaluated as part of the next full compliance evaluation.

Name: 

Date: 9-24-18

Supervisor: JK