



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

November 21, 2017

Mr. Michael F. Dunlap II, Plant Manager  
DTE Electric Company - Trenton Channel Power Plant  
4695 West Jefferson Ave.  
Trenton, MI 48183

SRN: B2811, Wayne County

Dear Mr. Dunlap:

### VIOLATION NOTICE

On November 14, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received email notification from DTE Electric Company - Trenton Channel Power Plant (DTE - Trenton Channel) located at 4695 West Jefferson Ave., Trenton, Michigan, that the facility had scheduled testing to determine the maximum heat release capacity for Auxiliary Boiler No. 23 (EU-TCHAUX3-S1) on November 21, 2017, in accordance with Permit to Install (PTI) number 227-15A, Special Condition V.1. The notification also stated that Auxiliary Boilers No. 21 (EU-TCHAUX1-S1) and No. 22 (EU-TCHAUX2-S1) would be tested at a later date.

PTI No. 227-15A, Special Condition V.1 states, in part:

“The permittee shall test each boiler in FG-AUXBOILERS-S1 to assure that the maximum heat release capacity of the boiler does not exceed 99.9 MMBtu per hour at the maximum steam production rate of each boiler. This testing shall be performed no later than 180 days after initial operation of each boiler, and shall follow all appropriate American Society of Mechanical Engineers (ASME) Performance Test Codes, or an alternate method approved by the AQD...”

FG-AUXBOILERS-S1 includes Auxiliary Boilers EU-TCHAUX1-S1, EU-TCHAUX2-S1, and EU-TCHAUX3-S1; Auxiliary Boilers EU-TCHAUX4-S1 and EU-TCHAUX5-S1 have not been installed.

On December 16, 2016, DTE – Trenton Channel provided notification that Auxiliary Boiler No. 22 (EUTCHAUX2-S1) had an initial startup date of December 7, 2016. Per PTI No. 227-15A, S.C. V.I, testing to determine the maximum steam production rate of this boiler would have been required to be completed by June 5, 2017.

On January 11, 2017, DTE – Trenton Channel provided notification that Auxiliary Boiler Nos. 21 and 23 (EUTCHAUX1-S1 and EU-TCHAUX3-S1) both had an initial startup date of December 29, 2016. Per PTI No. 227-15A, S.C. V.I, testing to determine the

maximum steam production rate of each boiler would have been required to be completed by June 27, 2017.

As a result, AQD has cited the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EU-TCHAUX1-S1, EU-TCHAUX2-S1, and EU-TCHAUX3-S1 of FG-AUXBOILERS-S1	PTI No. 227-15A; S.C. V.1	Facility did not perform testing to determine the maximum heat release capacity of each boiler within 180 days of start up of that boiler.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 12, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are 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; and what steps are being taken to prevent a reoccurrence.

If DTE Electric Company - Trenton Channel Power Plant 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 violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jonathan Lamb  
Senior Environmental Quality Analyst  
Air Quality Division  
313-456-4683

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ