DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B281643801

FACILITY: DTE Electric Company - Monroe Power Plant		**SRN / ID:** B2816
LOCATION: 3500 E FRONT ST, MONROE		**DISTRICT:** Jackson
CITY: MONROE		**COUNTY:** MONROE
CONTACT: Lisa Lockwood , Senior Environmental Engineer		**ACTIVITY DATE:** 03/20/2018
STAFF: Brian Carley	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

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I arrived at the facility and met with Lisa Lockwood and Kailyn Gerzich of DTE Electric Company - Monroe Power Plant (DTE Monroe). As I was driving up to the facility I saw that Units 1, 2, and 4 were operating and that Unit 3 wasn't. I was informed that Unit 3 was not operating because of catalyst replacement in the SCR.

Prior to this inspection, on March 6, 2018, I contacted DTE concerning a condition in each of the four units in their current permit to install (PTI). On March 14, 2018 during a conference call with Lisa Lockwood and Andrew Fadanelli of DTE, it was determined that DTE Monroe had not been conducting the annual PM2.5 stack test as specified in PTI 27-13B. In Tables EU-UNIT1-S1, EU-UNIT2-S1, EU-UNIT3-S1, and EU-UNIT4-S1, Special Condition V.3 requires verification of PM2.5 emission rates annually for 10 years after the completion of the modification on each unit. This condition is a carryover from previous PTIs numbered 93-09, 93-09A, 93-09B, 63-11, 27-13, and 27-13A. The units each completed the modifications in the following timeframes: EU-UNIT1-S1 - April 2014; EU-UNIT2-S1 - November 2014; EU-UNIT3-S1 - November 2009; and EU-UNIT4-S1 - June 2009. The last PM2.5 stack test for each unit was completed in 2014 for EU-UNIT1-S1 and in 2015 for EU-UNIT2-S1, EU-UNIT3-S1, and EU-UNIT4-S1. A violation notice (VN) was sent to Michael Twomley, Responsible Official for DTE Monroe, on March 29, 2018 and an electronic response was received on April 19, 2018 with a hard copy coming the mail.

This facility is currently operating under ROP #MI-ROP-B2816-2009, PTI #27-13B, and PTI #178-08. The following compliance determinations of the emission units permitted under PTI #27-13B unless otherwise noted.

EU-UNIT1-S1
Unit 1 was operating at the time of the inspection. They are currently combusting bituminous and sub-bituminous coal with the REF sorbents in this unit to generate electricity (S.C. II.2). The only other fuel that is used in this unit is #2 ultralow sulfur diesel fuel for startup (S.C. II.1). They have submitted a malfunction abatement plan (MAP) that also includes a plan that describes how emissions will be minimized during startup/shutdown for Unit 1 that was approved on December 4, 2013 (S.C. III.1 & 3). Per the EPA Clean Air Market Division (CAMD) database, Unit 1 operated at 42,595,453.88 mmBtu for 7,898 hours, which equals 5,393 mmBtu/hr for 2017 and is less than their limit of 7,624 mmBtu/hr (S.C. IV.1). All air pollution control devices were operating at the time of the inspection (S.C. IV.2). They completed all the required initial compliance stack tests during the week of January 3, 2011 (Section V, see files for stack test results). I requested the fuel and pet coke usage for the months of March, July, September, and December of 2017 (see attachment #1a and 1b). They have a COM installed in the duct work before the FGD, which they use as a process monitor by the control room (S.C. VI.2). I also reviewed records of the monitoring that is required per S.C. VI.1, 7, 8, 9, 10, 11, and 12 from submitted quarterly excess emission reports, data reported to the CAMD database, and from information provided to me during my inspection. They have installed a PM monitor and had it certified by AQD. On February 26, 2018, they have sent in the results of the Relative Response Audit (RRA) that was conducted January 8-9, 2018, which is the annual test to recertify the PM CEMS and the results showed that the monitor passed the RRA. They have certified SO2, NOx, CO, CO2 CEMS installed on this stack (S.C. VI.4). They are also monitoring flow with a certified meter and are monitoring mercury with sorbent tubes, which also has been certified (S.C. VI.5 & 6). They have been submitting quarterly excess emission reports as required by S.C. VII.1 (see MACES report received). They are currently in compliance with Acid Rain and CSAPR requirements (S.C. IX.1 & 2). Due to the compliance deadline for MATS was April 16, 2016, all requirements for MATS have been consolidated into a proposed table in their draft ROP renewal (S.C. IX.3, see below for FGMATS). However, because of the violation mentioned previously, I have

determined that they're not in compliance with the conditions set forth in this table.

EU-UNIT2-S1
Unit 2 was operating at the time of the inspection. They are currently combusting bituminous and sub-bituminous coal with the REF sorbents in this unit to generate electricity (S.C. II.2). The only other fuel that is used in this unit is #2 ultralow sulfur diesel fuel for startup (S.C. II.1). They have submitted a malfunction abatement plan (MAP) that also includes a plan that describes how emissions will be minimized during startup/shutdown for Unit 2 that was approved on December 4, 2013 (S.C. III.1 & 3). Per the EPA-CAMD database, Unit 2 operated at 31,339,343 mmBtu for 5,603 hours, which equals 5,593 mmBtu/hr for 2017 and is less than their limit of 7,624 mmBtu/hr (S.C. IV.1). All air pollution control devices were operating at the time of the inspection (S.C. IV.2). They completed all the required initial compliance stack tests during the week of January 3, 2011 (Section V, see files for stack test results). I requested the fuel and pet coke usage for the months of March, July, September, and December of 2017 (see attachment #1a and 1b). They have a COM installed in the duct work before the FGD, which they use as a process monitor by the control room (S.C. VI.2). I also reviewed records of the monitoring that is required per S.C. VI.1, 7, 8, 9, 10, 11, and 12 from submitted quarterly excess emission reports, data reported to the CAMD database, and from information provided to me during my inspection. They have installed a PM CEMS and had it certified by AQD. They conducted their annual RRA on December 14-15, 2017 on the PM CEMS. The results of the RRA, received on January 31, 2018, showed that the monitor passed the RRA. They have certified SO2, NOx, CO, CO2 CEMS installed on this stack (S.C. VI.4). They are also monitoring flow with a certified meter and are monitoring mercury with sorbent tubes, which also has been certified (S.C. VI.5 & 6). They have been submitting quarterly excess emission reports as required by S.C. VII.1 (see MACES report received). They are currently in compliance with Acid Rain and CSAPR requirements (S.C. IX.1 & 2). Due to the compliance deadline for MATS was April 16, 2016, all requirements for MATS have been consolidated into a proposed table in their draft ROP renewal (S.C. IX.3, see below for FGMATS). However, because of the stack test violation mentioned previously, I have determined that they're not in compliance with the conditions set forth in this table.

EU-UNIT3-S1
Unit 3 was not operating at the time of the inspection. When operating, they are combusting bituminous and sub-bituminous coal with the REF sorbents and pet coke in this unit to generate electricity (S.C. II.2). The only other fuel that is used in this unit is #2 ultralow sulfur diesel fuel for startup (S.C. II.1). They have submitted a malfunction abatement plan (MAP) that also includes a plan that describes how emissions will be minimized during startup/shutdown for Unit 3 that was approved on December 4, 2013 (S.C. III.1 & 3). Per the EPA-CAMD database, Unit 3 operated at 43,157,133 mmBtu for 7,773 hours which equals 5,552 mmBtu/hr for 2017, which is less than their limit of 7,624 mmBtu/hr (S.C. IV.1). All air pollution control devices were installed at the time of the inspection (S.C. IV.2). They completed all the required initial compliance stack tests during the week of January 3, 2011 (Section V, see files for stack test results). I requested the fuel and pet coke usage for the months of March, July, September, and December of 2017 (see attachment #1a and 1b). They have a COM installed in the duct work before the FGD, which they use as a process monitor by the control room (S.C. VI.2). I also reviewed records of the monitoring that is required per S.C. VI.1, 7, 8, 9, 10, 11, and 12 from submitted quarterly excess emission reports, data reported to the CAMD database, and from information provided to me during my inspection. They have installed a PM CEMS and had it certified by AQD. On February 26, 2018, they have sent in the results of the Relative Response Audit (RRA) that was conducted January 31 and February 1, 2018, which is the annual test to recertify the PM CEMS and the results showed that the monitor passed the RRA. They have certified SO2, NOx, CO, CO2 CEMS installed on this stack (S.C. VI.4). They are also monitoring flow with a certified meter and are monitoring mercury with sorbent tubes, which also has been certified (S.C. VI.5 & 6). They have been submitting quarterly excess emission reports as required by S.C. VII.1 (see MACES report received). They are currently in compliance with Acid Rain and CSAPR requirements (S.C. IX.1 & 2). Due to the compliance deadline for MATS was April 16, 2016, all requirements for MATS have been consolidated into a proposed table in their draft ROP renewal (S.C. IX.3, see below for FGMATS). However, because of the violation mentioned previously, I have determined that they're not in compliance with the conditions set forth in this table.

EU-UNIT4-S1
Unit 4 was operating at the time of the inspection. They are currently combusting bituminous and sub-bituminous coal with the REF sorbents and pet coke in this unit to generate electricity (S.C. II.2). The only other fuel that is used in this unit is #2 ultralow sulfur diesel fuel for startup (S.C. II.1). They have submitted a malfunction abatement plan (MAP) that also includes a plan that describes how emissions will be minimized during startup/shutdown for Unit 4 that was approved on December 4, 2013 (S.C. III.1 & 3). Per the EPA-CAMD database, Unit 4 operated at 44,591,073 mmBtu for 7,842 hours which equals

5,686 mmBtu/hr for 2017, which is less than their limit of 7,624 mmBtu/hr (S.C. IV.1). All air pollution control devices were operating at the time of the inspection (S.C. IV.2). They completed all the required initial compliance stack tests during the week of January 3, 2011 (Section V, see files for stack test results). I requested the fuel and pet coke usage for the months of March, July, September, and December of 2017 (see attachment #1a and 1b). They have a COM installed in the duct work before the FGD, which they use as a process monitor by the control room (S.C. VI.2). I also reviewed records of the monitoring that is required per S.C. VI.1, 7, 8, 9, 10, 11, and 12 from submitted quarterly excess emission reports, data reported to the CAMD database, and from information provided to me during my inspection. They have installed a PM CEMS and had it certified by AQD. They have conducted the RRA on the PM CEMS on March 7-8, 2018 and I am awaiting the results of the RRA. They have certified SO2, NOx, CO, CO2 CEMS installed on this stack (S.C. VI.4). They are also monitoring flow with a certified meter and are monitoring mercury with sorbent tubes, which also has been certified (S.C. VI.5 & 6). They have been submitting quarterly excess emission reports as required by S.C. VII.1 (see MACES report received). They are currently in compliance with Acid Rain and CSAPR requirements (S.C. IX.1 & 2). Due to the compliance deadline for MATS was April 16, 2016, all requirements for MATS have been consolidated into a proposed table in their draft ROP renewal (S.C. IX.3, see below for FGMATS). However, because of the violation mentioned previously, I have determined that they're not in compliance with the conditions set forth in this table.

EU-WFGD-QP1, EU-WFGD-QP2, EU-WFGD-QP3, and EU-WFGD-QP4
These units are used as emergency FGD quench pumps. All four quench pumps were not operating at the time of the inspection. These pumps only burn diesel fuel with a sulfur content of 15 ppm per S.C. II.1, which I verified after reviewing the fuel analysis that they provided me during this inspection. They are operating the pumps according to the manufacturer's instructions (S.C. III.1 & 3). Each pump has a non-resettable hour meter that they use to track the amount of time in minutes and hours each one runs (S.C. IV.1). They record the amount of time it ran, the time that it ran, and the reason for operating in their facility database per S.C. VI.2 (see attachments #2, 3, and 4). They are considered emergency stationary ICE and they are being operated for less than 100 hours for the last year. I consider them in compliance with 40 CFR Part 60, Subpart IIII, which means they are also in compliance with 40 CFR Part 63, Subpart ZZZZ (S.C. IX.1 & 3). They have submitted notification of construction and operation for the units that are servicing Units 1, 2, 3, and 4, which are EU-WFGD-QP3, EU-WFGD-QP4, EU-WFGD-QP1, and EU-WFGD-QP2 respectively (S.C. IX.2). I have determined that they're in compliance with the requirements of this table.

EU-CASCADES-S1
We did not go onto the roof to see the exhaust vents for the Cascades room, which is a coal handling system that is covered under EU-CASCADES-S1 to see if there was any opacity coming from the vents. They currently have an approved fugitive dust plan and a malfunction abatement plan (MAP) for this unit per SC III.1 and 2, respectively. All the associated enclosures, water sprays, and dust collectors are being operated in a satisfactory manner (SC IV.1 and 2). Instead of installing a bag leak detection system, they conduct and document daily non-certified visible emissions observations per SC VI.3, which I reviewed on their plant database. They have upgraded the dust collectors for Cascades #1 and 6 and they are planning on upgrading Cascades #2 and 3 this year and #4 and 5 next year. They have tested Cascades #6 (SC V.1). Based on the information and my inspection, I determined that they're in compliance with this table.

EU-TRANSFERHS-S1
This table covers coal handling in the transfer houses (nos. 1, 2, 3, 9, and 11) and this emission unit was partially operating at the time of the inspection. Transfer Houses 1 and 2 were not operating at the time of the inspection. The dust collectors in Transfer Houses 1, 2, 3 are no longer in use and they are using a fog spray from a portable hose for these areas to control the dust. In Transfer House 9, they are currently using a surfactant and water spray to control the dust. This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II1 & 2). The Fuel Systems personnel use non-certified VE readings with the requirement that if any VE is detected that corrective actions must be taken with the incident documented (S.C. IV.1 and VI.2 & 3). They enter their observations into the fuel systems shift report on a daily basis, which I was able to review on their plant database. They are required to do a stack test to verify the PM2.5 emissions after they modify the emission unit. They did conduct a PM 2.5 stack test on 12/9/12 on the Transfer House 11 dust collector and had a result of 0.03 lb/hr, which is lower than the PM2.5 limit of 2.74 lb/hr for this unit. However, in 2017 they dismantled the dust collector and now use a fog spray from a portable hose to control the dust. They are currently planning on installing/upgrading the controls in these transfer houses potentially starting in 2020 and finishing in 2025 (see attachment #5). I have determined that they're in compliance with the requirements of this

table.

EU-DUMPERHS-S1
This emission unit only operates when they are unloading coal trains and it was not in operation at the time of the inspection. This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II1 & 2). They are maintaining and operating the dust collector as described in their MAP. The Fuel Systems personnel use non-certified VE readings with the requirement that if any VE is detected, corrective actions must be taken with the incident documented to show that they are operating and maintaining the dust collector satisfactorily (S.C. IV.1 and VI.2 & 3). They enter their observations into the fuel systems shift report daily, which I reviewed on their plant database. They did a PM 2.5 stack test on the Dumper House on December 4-7, 2017 with the results of 0.087 lb/hour, which is below their limit of 6.44 lb/hr (S.C. V.1). I have determined that they're in compliance with the requirements of this table.

EU-COALUNLOAD-S1
This unit only operates when there is a coal shipment that comes in on Great Lakes ship and there was not one on site on the day of the inspection. This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II1 & 2). The Fuel Systems personnel use non-certified VE readings with the requirement that if any VE is detected that corrective actions must be taken with the incident documented (S.C. IV.1 and VI.2 & 3). They enter their observations into the fuel systems shift report on a daily basis, which I reviewed on their plant database. All the external conveyors are hooded they are being maintained (S.C. IV.2). I have determined that they're in compliance with the requirements of this table.

EU-CRUSHERHS-S1
This unit covers the coal handling operations in the crusher house. This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II1 & 2). The Fuel Systems personnel use non-certified VE readings with the requirement that if any VE is detected that corrective actions must be taken with the incident documented (S.C. IV.1 and VI.2 & 3). All external conveyors are hooded and are being maintained (S.C. IV.2). They enter their observations into the fuel systems shift report on a daily basis, which I reviewed on their plant database. They are required to do a stack test to verify the PM2.5 emissions after they modify the emission unit. They have not modified this emission as of the time of this this inspection. I have determined that they're in compliance with the requirements of this table.

EU-REFHS&BL-S1
This emission unit represents coal and sorbent handling activity in the REF Transfer House and Refined Coal Plant Building, which is operated by the Monroe Fuel Company, and it was operating at the time of the inspection. This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II1 & 2). I met with Vincent Verschueren, Plant Manager for the Monroe Fuels Company and he provided me with their records of their daily observations (see attachment #6). The Fuel Systems personnel use non-certified VE readings with the requirement that if any VE is detected that corrective actions must be taken with the incident documented (S.C. IV.1 and VI.2 & 3). They enter their observations into the fuel systems shift report daily. All the external conveyors are hooded and are being maintained (S.C. IV.2). This emission unit is subject to 40 CFR Part 60, Subpart Y and they did their initial Method 9 compliance test on 5/13/13 on the REF dust collectors and bin vent filter system resulted in 6-minute averages below the 5% opacity standard. All monitoring and recordkeeping required in 40 CFR 60.255 (f)(1)(i) and (ii) are being completed and I reviewed the documentation stored on site. Per 60.255 (f)(1)(iii), the most recent Method 9 test occurred on April 19, 2018 for the REF control equipment. I have determined that they're in compliance with the requirements of this table.

EU-PETCOKE-S1
This unit covers the pet coke handling activity, including roadway traffic and pile maintenance, and it was operating on the day of the inspection. At the time of the inspection, Units 3 and 4 were getting most of the pet coke that is used as part of the fuel blend for those boilers. Units 1 and 2 do not burn as much pet coke due to the specifications required for the fly ash from Headwaters, who they sell the ash to from these units See attachment #1b). This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II1 & 2). They keep logs of the trucks that are delivering the pet coke to the Monroe Power Plant and they are being operated for less than 16 hours per day as required by S.C. III.3 and VI.3 (see attachment #7 and 8). The Fuel Systems personnel use non-certified VE readings with the requirement that if any VE is detected that corrective actions must be taken with the incident documented (S.C. IV.1 and VI.2 & 3). They enter their observations into the fuel systems shift report daily (see attached #7 and 8). I did not see any fugitive emissions from the pile or any part of the process. They have installed the permanent equipment (S.C. IV.2 and VII.1). I have determined that they're in

compliance with the requirements of this table.

EU-LIMESTONE-S1
This emission unit covers the limestone handling activities, which includes the ship unloading process, storage and pile maintenance, and reclaims activities – including any trucking activities, and the Prep building. There was not a ship delivering limestone at the time of the inspection so that portion of the emission unit was not in operation at the time of the inspection. This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II1 & 2). They are maintaining and operating the dust collector as described in their MAP. The FGD Operations personnel use non-certified VE readings with the requirement that if any VE is detected that corrective actions must be taken with the incident documented to show that they are operating and maintaining the dust collector satisfactorily. All observations are recorded in the Plant View database and are in a format like the fuel systems report (S.C. IV.1 and VI.2 & 3). All external conveyors are hooded and are being maintained (S.C. IV.2). They enter their observations into the fuel systems shift report daily, which I reviewed on their plant database. They did a Method 9 stack test as required by 40 CFR Part 60, Subpart OOO on the exhaust ports on the Reagent Building where they crush the limestone on 9/9/13 with the results of no visible emissions were observed, which is below their limit of 5% opacity (S.C. IX.1). They have three limestone silos, each with its own dust collector and exhaust bin vents that exhaust out of the side of the Reagent Building and down at least 115 feet above the ground. I have determined that they're in compliance with the requirements of this table.

EU-GYPSUMHAND-S1
This emission unit covers the gypsum handling activity in the gypsum dewatering building and the gypsum storage and loading building. This emission unit was in operation at the time of the inspection. This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II1 & 2). They are maintaining and operating the dust collector as described in their MAP. The FGD Operations personnel use non-certified VE readings with the requirement that if any VE is detected that corrective actions must be taken, and the incident documented to show that they are operating and maintaining the dust collector satisfactorily. All observations are recorded in the Plant View database and are in a format like the fuel systems report (S.C. IV.1 and VI.2 & 3). They keep logs, like the ones they are using for the pet coke delivery, of the trucks that are hauling the gypsum from the Monroe Power Plant. They are being operated for well under than 16 hours per day as required by S.C. III.3 and VI.3 (see attachment #9 and 10). All external conveyors are hooded and are being maintained (S.C. IV.2). I have determined that they're in compliance with the requirements of this table.

EU-HYDRATEDLIME-S1
This emission unit covers the storage and handling of hydrated lime. This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II1 & 2). They are maintaining and operating the dust collector as described in their MAP. The FGD Operations personnel use non-certified VE readings with the requirement that if any VE is detected corrective actions must be taken with the incident documented to show that they are operating and maintaining the dust collector satisfactorily. All observations are recorded in the Plant View database and are in a format like the fuel systems report (S.C. IV.1 and VI.2 & 3). The associated enclosures have been installed and are being maintained (S.C. IV.2). They have two hydrated lime silos with its own dust collector and exhaust bin vents that exhaust out of the side of the dust collector and are at least 89 feet above the ground. I have determined that they're in compliance with the requirements of this table.

FG-ProjectPC1-4
This flexible group is to verify that the increase of the use of sub-bituminous coal and adding pet coke to provide additional fuels for Units 1, 2, 3, and 4; the installation of four (4) wet FGD quench pumps; modifications to the fuel handling systems; the installation of new material handling systems for limestone and gypsum; and the installation of a new fuel handling system for petroleum coke is a minor nonattainment source modification by use of the actual-to-projected-actual applicability test. They submitted the 2017 Annual Emission Analysis Report on March 2, 2018 to AQD which showed that the actual emissions were lower than the projected annual emissions as well as the baseline annual emissions. I have determined that they're in compliance with this table.

FGAUXBOILERS
This flexible group contains two auxiliary boilers that are subject to 40 CFR 63 Subpart DDDDD (Boiler MACT) as existing limited use boilers. At the time of the inspection, auxiliary boilers #1 and #2 were not operating. These two boilers are used when necessary and can be sent to any header that it is needed at. These two boilers only burn diesel fuel with a sulfur content of 15 ppm per S.C. II.1, which I reviewed

on their plant database as required by S.C. VI.3. They are also keeping track of the monthly fuel usage and hours of operation per S.C. VI.2 and 4 (see attachment #11). They have submitted their Notification of Compliance Status Report on March 10, 2016 and they have certified that they have complied with the tune up requirements of the Boiler MACT. I have determined that they're in compliance with this table.

FG-MESBLDG (proposed table in draft renewal MI-ROP-B2816-20XX)
This flexible group contains two 6.3 mmBtu/hr boilers, which are subject to the Boiler MACT. These two boilers are in the units designed to burn light oil sub-category and have a heat input rating less than 10 mmBtu/hr. As a result, they do not have any emission limits or compliance demonstrations. The initial compliance requirements for these boilers are limited to the work practice standards of tune ups and a one-time energy assessment, which they have done. On March 10, 2016, DTE Monroe submitted a certification of compliance stating that they have completed the required initial tune ups and have performed an energy assessment on these boilers by the required date of January 31, 2016 (see files for notification). I have determined that they would be in compliance with this proposed table.

FG-EMERGENS (proposed table in draft renewal MI-ROP-B2816-20XX)
This is an emergency fire pump in the Unit 1-2 Screenhouse that is exempt from Rule 201 but is subject to 40 CFR 63 Subpart ZZZZ. This unit only burns diesel fuel with a sulfur content of 15 ppm per S.C. II.1. They are limited to 100 hours of operation per year for maintenance checks and testing with up to 50 hours of those 100 hours able to operate in non-emergency situations (SC III.1). They have non-resettable hour meters on these boilers (SC IV.1). I have determined that they would be in compliance with this proposed table.

FGMATS (proposed table in draft renewal MI-ROP-B2816-20XX)
This table covers all the requirements of the National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units (also known as the Mercury and Air Toxics Standards (MATS)). EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4 are subject to this standard. On September 29, 2016 and December 22, 2016, DTE Monroe was sent a LOV for exceeding the mercury emission limit specified by MATS. Since Michigan currently is not delegated to enforce this regulation, it was referred to EPA Region V for them to take the lead on any enforcement action.

FGLANDFILLGEN (proposed table in draft renewal MI-ROP-B2816-20XX)
This table covers two portable 92.5 hp diesel gensets to provide electrical power to blowers that will be used to apply dust suppressant to remote areas of the Vertical Extension landfill on an intermittent basis when conditions dictate their use. These two gensets are exempt from needing to obtain a permit to install per Rule 285(2)(g) (see exemption determination in files). However, these gensets are subject to 40 CFR 63 Subpart ZZZZ for Major Sources of HAPs and 40 CFR 60 Subpart IIII. If they meet the all requirements of Subpart IIII, then they are considered to meet all the requirements of Subpart ZZZZ. These gensets have been EPA certified by the manufacturer as a "Tier 4 Final", "New Off-Road Compression Ignition Engine" for model year 2016 under EPA Engine Family GSZXL03.0RXB. They have not deviated from the manufacturer's written instructions for operation and maintenance. Because of this, I have determined that they're in compliance with Subpart IIII and therefore in compliance with Subpart ZZZZ.

FGPEAKERS-S2
This flexible group covers five diesel fuel-fired generator peaking units that are limited use stationary reciprocating internal combustion engines, which were not operating at the time of the inspection. These five peaking units only burn diesel fuel with a sulfur content of 15 ppm per S.C. II.1. Each peaking unit has a non-resettable hour meter that they use to track the amount of time in minutes and hours each one runs (S.C. IV.1). They are also keeping track of the monthly fuel usage and hours of operation per S.C. VI.2 and 4 (see attachment #12 and 13). These peaking units are also subject to 40 CFR Part 63, Subpart ZZZZ. Since these peaking units are classified as limited use, they do not have to meet the requirements of Subpart ZZZZ and of subpart A of this part except for the initial notification requirements of § 63.6645 (f). AQD received the initial notification for these peaking units on August 30, 2010. I have determined that they're in compliance with this table.

EU-FlyAshStorage (PTI #178-08)
This emission unit covers a fly ash storage facility that is operated by Headwaters, Inc. Headwaters, Inc. receives fly ash from Units 1 and 2 and will sell it as a raw material for the heavy construction market. I did not see any visible emissions from any of the exhaust stacks at the time of the inspection (S.C. 1.2). This facility, which located at 3333 E. Front St. is due west of the plant and is contiguous to the Monroe Plant. As such, the Monroe Plant includes the Headwaters facility in their fugitive dust plan. When

treatment is needed to control the dust, Headwaters contacts DTE to have them do the treatment (S.C. 1.3). They do not keep any outside fly ash storage piles nor is there any sign of any storage piles, which meets the requirement of S.C. 1.4. The four silos, two at the Monroe Plant and two at the Headwaters facility, are controlled with bin vent filters. The two silos at the Monroe Plant are also equipped with two filter receivers each (S.C. 1.5, 1.6, 1.7, 1.8, 1.9, & 1.10). I have determined that they're in compliance with this permit.

FGCOLDCLNRS-S1 (MI-ROP-B2816-2009)
This flexible group covers all the cold cleaners that are at the Monroe Plant. There are currently four cold cleaners on site: One at the CHCC Machine Shop; One at the Motor Pool Building; and the remaining two are in the building where they work on the heavy machinery. These parts cleaners are the same ones that I have inspected in previous scheduled inspections. At the time of the inspection, none of the cold cleaners were in use and all of them had written operating instructions posted in an accessible, conspicuous location on or near each cold cleaner (S.C. VI.3). They are keeping all the required records with the information required by S.C. VI.2 (see attachment #14). I have determined that they're in compliance with this table.

They also showed me where they are planning to eventually install a new fire pump in the Unit 3-4 Screenhouse. They said that this fire pump would be are exempt from needing to obtain a permit to install per Rule 285(2)(g). However, like the landfill gensets, this fire pump would be subject to 40 CFR 63 Subpart ZZZZ for Major Sources of HAPs and 40 CFR 60 Subpart IIII. The proposed fire pump would be 350 hp diesel engine with a displacement of 9 liters and would be EPA certified. Once it has been installed, DTE should follow procedures to incorporate it into the ROP.

They have submitted all the reports required by MI-ROP-B2816-2009, PTIs #27-13B and #178-08, and MAERS within the timeframes mentioned in those permits and programs. All the reports have been determined as acceptable as submitted (see MACES report received). However, because of the previously mentioned failure to conduct the annual PM2.5 stack test on Units 1, 2, 3, and 4, I have determined that they are not in compliance.

NAME Brian Carley DATE 4/23/18 SUPERVISOR