

**From:** [Valenziano, Beth](#)  
**To:** [Carley, Brian \(EGLE\)](#); [Miller, Scott \(EGLE\)](#); [Ethridge, Christopher \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#)  
**Cc:** [Damico, Genevieve](#); [Blathras, Constantine](#)  
**Subject:** EPA comments re: 30 day comment period for the draft ROP and draft Acid Rain Permit for DTE Electric Company - Monroe Power Plant (SRN: B2816)  
**Date:** Tuesday, June 11, 2019 9:51:27 AM  
**Attachments:** [image001.png](#)

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Below are EPA's comments regarding the draft ROP renewal for DTE Electric Company - Monroe Power Plant (SRN: B2816). If you have any questions or would like to discuss further, please let me know.

Thank you!

Beth Valenziano

Air and Radiation Division

Air Permits Section

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The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit renewal for DTE Electric Company - Monroe Power Plant, Source Registration Number B2816, located in Monroe, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. Staff Report, Compliance Assurance Monitoring (CAM) applicability for EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4. The Staff Report describes several exemptions from CAM on the basis that the units are subject to the National Emission Standard for Hazardous Air Pollutants for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63 Subpart UUUUU) and the Title IV Acid Rain Program. In accordance with 40 CFR §64.2(b), please address the CAM nonapplicability analysis for the emission limits in EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4 (i.e., those limits not required by Subpart UUUUU and Title IV). For example, it appears that the relevant exemption may be 40 CFR §64.2(b)(1)(VI)- emission limitations for which the title V permit specifies a continuous compliance determination method.
2. FG-COALBLRCAM. The Staff Report indicates that EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4 are subject to CAM for PM-10, lead, and hydrogen flouride. However, FG-COALBLRCAM only includes excursion levels for PM-10 and hydrogen flouride. Please revise FG-COALBLRCAM as necessary to include the excursion level for lead, in accordance with 40 CFR §64.6(c)(2).
3. EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4, and FG-COALBLRCAM. Although the Staff Report indicates that the PM-10, lead, and hydrogen flouride limits in EU-UNIT1, EU-UNIT2, EU-

UNIT3, and EU-UNIT4 are subject to CAM, these respective Emission Unit and Flexible Group sections of the permit do not associate these emissions limits with the CAM requirements. Please revise the permit as necessary to identify which pollutant specific emission units (i.e., PM-10, lead, and hydrogen flouride limits for EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4) are subject to CAM, in accordance with 40 CFR §64.2(b). For example, the Monitoring/Testing Method column in the EU emissions tables could reference the applicable CAM requirements in FG-COALBLRCAM, and/or the applicable emission limits could be directly identified in FG-COALBLRCAM.

4. EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4. As drafted, many of the emission limitations in the table reference only performance testing provisions in the Monitoring/Testing Method column and do not identify monitoring requirements necessary to assure compliance on an ongoing basis, as required by 40 CFR 40 CFR §§70.6(a)(3) and (c)(1). Please review the Monitoring/Testing Method column in the emissions tables and update the permit as necessary to assure that the permit includes and identifies all associated monitoring requirements.
5. EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4, sections I.2. The particulate matter Monitoring/Testing Method in each of these sections incorrectly refers to SC VI.3. Please revise the citation to refer to SC VI.2., the particulate matter continuous emission monitoring provisions.
6. EU-CRUSHERHS. The unit description in the draft permit states: “The dust collectors (DC05) in this area have been decommissioned.” Additionally, this section of the permit includes some limits which apply after a dust collector has been recommissioned, and other limits which apply until a dust collector has been recommissioned. In the Staff Report, please clarify the status of the dust collectors, relative to the applicable emission limit requirements in the permit.

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**From:** Carley, Brian (EGLE) <CARLEYB@michigan.gov>

**Sent:** Thursday, May 9, 2019 5:43 AM

**To:** Valenziano, Beth <valenziano.beth@epa.gov>; Blathras, Constantine <blathras.constantine@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>

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**Subject:** Start of the 30 day comment period for the draft ROP and draft Acid Rain Permit for DTE Electric Company - Monroe Power Plant (SRN: B2816)

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B2816-20XX and for a draft renewal of Phase II Acid Rain Permit number MI-AR-1733-20XX, for DTE Electric Company - Monroe Power Plant (State Registration Number: B2816), located in Monroe, Monroe County, Michigan. The public comment period begins on May 13, 2019 and will end on June 12, 2019.

The Public Notice, Renewal ROP Application, Draft ROP, plans referenced in the ROP, and the Staff Report are available through the internet. The documents are located at the following address:

<http://www.michigan.gov/egle/0,4561,7-135-3310-389493--,00.html>

The Public Notice and the Draft Acid Rain Permit are available through the internet. The documents are located at the following address:

- [http://www.deq.state.mi.us/aps/downloads/acidrain/AR\\_Public\\_Notice.pdf](http://www.deq.state.mi.us/aps/downloads/acidrain/AR_Public_Notice.pdf)

Any comments that you could provide prior to the actual 45-day Environmental Protection Agency notice period would be appreciated. Comments can be e-mailed to Brian Carley ([carleyb@michigan.gov](mailto:carleyb@michigan.gov)), Environmental Quality Specialist, EGLE, Jackson District Office. Please copy Scott Miller ([millers@michigan.gov](mailto:millers@michigan.gov)), Jackson District Supervisor, EGLE, Chris Ethridge ([ethridgec@michigan.gov](mailto:ethridgec@michigan.gov)), Field Operations Manager, EGLE, and Kelly Orent, ([orentk@michigan.gov](mailto:orentk@michigan.gov)), EGLE.

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