



DTE

December 23, 2020

Ms. Caryn Owens
Cadillac District Office
EGLE AQD
120 West Chapin Street
Cadillac, MI 49601-2158

Subject: Application for ROP Minor Modification for SRN #B2796
Rule 216(2) Minor Modification Change
DTE Electric Company – St. Clair Power Plant & Belle River Power Plant
Sections 1 and 3 of MI-ROP-B2796-2015c

Dear Ms. Owens,

DTE Electric Company hereby submits a ROP minor modification application under Rule 216(2) to ROP No: MI-ROP-B2796-2015c for St. Clair Power Plant located at 4901 Pointe Drive in East China Township, Michigan and Belle River Power Plant located at 4505 King Road in China Township, Michigan. Enclosed are the M-001 and C-001 forms, as required. This minor modification change affects EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, and EU-BOILER7-SC in Section 1 and EU-BOILER1-BR and EU-BOILER2-BR in Section 3 of the ROP.

Pursuant to #91 of Civil Action No. 2:10-cv-13101 (ECF No. 282) filed on July 22, 2020, DTE "shall apply for amendments of their Title V Permits, to include a schedule for all Unit-specific, plant-specific, and System-specific performance, operational, maintenance, and control technology requirements established by this Consent Decree: (a) all applicable definitions from Section III and (b) all Compliance Requirements contained in Section IV."

To satisfy this requirement, DTE proposes to add a Schedule of Compliance to Appendix 2 of Sections 1 and 3 of MI-ROP-B2796-2015c. Attached is an A-001 form and the ROP Mark-Up with the proposed tables for Appendix 2-SC of Section 1 for St. Clair Power Plant and Appendix 2-BR of Section 3 for Belle River Power Plant. This ROP is currently under renewal; these minor modification changes are requested to be made to the ROP in concurrence with the issuance of the new permit.

This application is considered timely as it is submitted by January 18, 2021 within 180 days after the date of entry of the consent decree.

Should you have any questions regarding this ROP minor modification application, please contact Lisa Fishbeck at lisa.fishbeck@dteenergy.com or (313) 235-3389.



DTE

Sincerely,



Jason Roggenbuck
Senior Environmental Engineer
DTE Energy - EM&S

Enclosure: MI-ROP-B2796-2015c Minor Modification Application comprised of:

1. *M-001: ROP Rule 216 Modification Application Form*
2. *C-001: ROP Application Certification Form for St. Clair Power Plant (Section 1)*
3. *C-001: ROP Application Certification Form for Belle River Power Plant (Section 3)*
4. *AI-001: Additional Information Form AI-ROPMARKUP*
5. *MI-ROP-B2796-2015c ROP Mark-Up: Appendix 2-SC of Section 1 and Appendix 2-BR of Section 3*

Cc: Ms. Caryn Owens, EGLE AQD, Cadillac District Environmental Engineer via email at owensc1@michigan.gov

Mr. Robert Elmouchi, EGLE AQD, Warren District Environmental Quality Analyst via email at elmouchir@michigan.gov

Ms. Joyce Zhu, EGLE AQD, Warren District Supervisor via email at zhuj@michigan.gov

Lezley Filzek, DTE, Fossil Generation, Plant Manager – Belle River Power Plant via email at Lezley.Filzek@dteenergy.com

Leann Warner, DTE, Fossil Generation, Plant Manager – St. Clair Power Plant via email at leann.warner@dteenergy.com

Barry Marietta, DTE, EM&S, Manager – Emissions Quality via email at Barry.Marietta@dteenergy.com

Lisa Fishbeck, DTE, EM&S, Senior Environmental Engineer – Emissions Quality via email at Lisa.Fishbeck@dteenergy.com

Andrew Fadanelli, DTE, EM&S, Principal Environmental Engineer – Emissions Quality via email at ignatius.fadanelli@dteenergy.com

File in SharePoint



RENEWABLE OPERATING PERMIT M-001: RULE 215 CHANGE NOTIFICATION RULE 216 AMENDMENT/MODIFICATION APPLICATION

This information is required by Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment.

1. SRN B2796	2. ROP Number MI-ROP-B2796-2015c Sections 1 & 3	3. County St. Clair
4. Stationary Source Name DTE Electric Company - St. Clair Power Plant & Belle River Power Plant		
5. Location Address 4901 Pointe Drive & 4505 King Road		6. City East China Township & China Township
7. Submittal Type - <i>The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.</i> <input type="checkbox"/> Rule 215(1) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 215(2) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 215(3) Notification of change. Complete Items 8 – 11 and 14 <input type="checkbox"/> Rule 215(5) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions. <input checked="" type="checkbox"/> Rule 216(2) Minor Modification. Complete Items 8 – 12 and 14 <input type="checkbox"/> Rule 216(3) Significant Modification. Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions. <input type="checkbox"/> Rule 216(4) State-Only Modification. Complete Items 8 – 12 and 14		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> 7/22/2020		9. Change in emissions? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
10. Description of Change - <i>Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).</i> Added a Schedule of Compliance in Appendix 2 of Sections 1 and 3 of the ROP. There are no changes in emissions or pollutants.		
11. New Source Review Permit(s) to Install (PTI) associated with this application? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, enter the PTI Number(s) _____ - _____ - _____ - _____ - _____		
12. Compliance Status - <i>A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.</i> a. Is the change identified above in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No c. If the change includes a future applicable requirement(s), will timely compliance be achieved? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
13. Operator's Additional Information ID - <i>Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.</i>		AI -ROPMARKUP
14. Contact Name Lisa Fishbeck	Telephone No. (313) 235-3389	E-mail Address lisa.fishbeck@dteenergy.com
15. This submittal also updates the ROP renewal application submitted on <u>10/19/2020 & 11/27/2019</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A <i>(If yes, a mark-up of the affected pages of the ROP must be attached.)</i>		

NOTE: A CERTIFICATION FORM (C-001) SIGNED BY A RESPONSIBLE OFFICIAL MUST ACCOMPANY ALL SUBMITTALS



Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.

This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN B2796
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Stationary Source Name DTE Electric Company - St. Clair Power Plant	
City East China Township	County St. Clair

SUBMITTAL CERTIFICATION INFORMATION	
1. Type of Submittal <i>Check only one box.</i>	
<input type="checkbox"/> Initial Application (Rule 210)	<input checked="" type="checkbox"/> Notification / Administrative Amendment / Modification (Rules 215/216)
<input type="checkbox"/> Renewal (Rule 210)	<input type="checkbox"/> Other, describe on AI-001
2. If this ROP has more than one Section, list the Section(s) that this Certification applies to <u>Section 1</u>	
3. Submittal Media <input checked="" type="checkbox"/> E-mail <input type="checkbox"/> FTP <input type="checkbox"/> Disk <input checked="" type="checkbox"/> Paper	
4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal.	
AI -ROPMARKUP	

CONTACT INFORMATION	
Contact Name Lisa Fishbeck	Title Senior Environmental Engineer
Phone number 313-235-3389	E-mail address lisa.fishbeck@dteenergy.com

This form must be signed and dated by a Responsible Official.				
Responsible Official Name Leann Warner			Title Plant Manager, Fossil Generation – St. Clair Power Plant	
Mailing address DTE Electric Company, 4901 Pointe Drive				
City East China Township	State MI	ZIP Code 48054	County St. Clair	Country USA
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.				
			<u>12-23-2020</u>	
Signature of Responsible Official			Date	



Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.

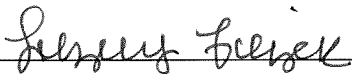
This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN B2796
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Stationary Source Name DTE Electric Company - Belle River Power Plant	
City China Township	County St. Clair

SUBMITTAL CERTIFICATION INFORMATION	
1. Type of Submittal <i>Check only one box.</i>	
<input type="checkbox"/> Initial Application (Rule 210)	<input checked="" type="checkbox"/> Notification / Administrative Amendment / Modification (Rules 215/216)
<input type="checkbox"/> Renewal (Rule 210)	<input type="checkbox"/> Other, describe on AI-001
2. If this ROP has more than one Section, list the Section(s) that this Certification applies to <u>Section 3</u>	
3. Submittal Media <input checked="" type="checkbox"/> E-mail <input type="checkbox"/> FTP <input type="checkbox"/> Disk <input checked="" type="checkbox"/> Paper	
4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal. AI -ROPMARKUP	

CONTACT INFORMATION	
Contact Name Lisa Fishbeck	Title Senior Environmental Engineer
Phone number 313-235-3389	E-mail address lisa.fishbeck@dteenergy.com

This form must be signed and dated by a Responsible Official.				
Responsible Official Name Lezley Filzek			Title Plant Manager, Fossil Generation – Belle River Power Plant	
Mailing address DTE Electric Company, 4505 King Road				
City China Township	State MI	ZIP Code 48054	County St. Clair	Country USA
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.				
 Signature of Responsible Official			12/23/2020 Date	



RENEWABLE OPERATING PERMIT APPLICATION

AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: B2796

Section Number (if applicable): 1 & 3

1. Additional Information ID

AI-ROPMARKUP

Additional Information

2. Is This Information Confidential?

 Yes No

Enclosed is the ROP Mark-up for MI-ROP-B2796-2015c. Changes were made to Appendix 2-SC and Appendix 2-BR of Section 1 and 3 of the ROP, respectively.

Please note that this ROP is currently under renewal. In the ROP renewal application submitted on November 27, 2019, Section 3 of the current ROP was requested to be moved up to Section 2 of the new ROP.

ROP No: MI-ROP-B2796-2015c

Section 1 – St. Clair Power Plant

Expiration Date: July 15, 2020

PTI No.: MI-PTI-B2796-2015c

Appendix 2-SC. Schedule of Compliance

The following schedule is required by Civil Action No. 2:10-cv-13101 (ECF No. 282) filed on July 22, 2020. This schedule of compliance is only applicable to Emission Unit IDs: EU-BOILER2-SC, EU-BOILER3-SC, EU-BOILER6-SC, & EU-BOILER7-SC. The paragraph number below references the Paragraph in the consent decree.

Compliance Date	Requirement	Paragraph
12/31/2022 ¹	Retrofit, refuel, or repower each unit	7
12/31/2021 ²	Notify Plaintiffs in writing which option (from Paragraph 7) is elected to be used for each unit	8
9/20/2020	Comply with the specified emission rates for each individual unit	9 & 24
7/22/2020	Continuously operate pollution controls	10
12/31/2020	Comply with the specified System-Wide Annual Tonnage Limitations for each calendar year	11
3/1/2022	Surrender, sell, bank, use, trade, or transfer NO _x and SO ₂ Allowances in accordance with Consent Decree, beginning in calendar year 2021	16, 19, 20, & 21
9/20/2020	Continuously operate each PM control device and use good air pollution control practices at all times each unit is in operation	23

¹ If MISO notifies DTE in writing that DTE is constrained from injecting and delivering the full generation output of the Blue Water Energy Center to the grid, and this would cause DTE to be short of meeting its Planning Reserve Margin Requirement or cause grid reliability problems, the compliance deadline shall be 12/31/2023.

² This compliance date is 365 days before the compliance date for Paragraph 7. Should the Paragraph 7 compliance date change to 12/31/2023 as stipulated above, the compliance date for Paragraph 8 shall be 12/31/2022.

Section 3 – Belle River Power Plant**Appendix 2-BR. Schedule of Compliance**

The following schedule is required by Civil Action No. 2:10-cv-13101 (ECF No. 282) filed on July 22, 2020. This schedule of compliance is only applicable to Emission Unit IDs: EU-BOILER1-BR & EU-BOILER2-BR. The paragraph number below references the Paragraph in the consent decree.

Compliance Date	Requirement	Paragraph
12/31/2030	Retrofit, refuel, or repower each unit	7
12/31/2029	Notify Plaintiffs in writing which option (from Paragraph 7) is elected to be used for each unit	8
9/20/2020	Comply with the specified emission rates for each individual unit	9 & 24
7/22/2020	Continuously operate pollution controls	10
12/31/2020	Comply with the specified System-Wide Annual Tonnage Limitations for each calendar year	11
3/1/2022	Surrender, sell, bank, use, trade, or transfer NO _x and SO ₂ Allowances in accordance with Consent Decree, beginning in calendar year 2021	16, 19, 20, & 21
9/20/2020	Continuously operate each PM control device and use good air pollution control practices at all times each unit is in operation	23