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

OCT 29 2019

RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

MACES FILE _____ MAERS _____

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 St. Clair | County St. Clair |

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| 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>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 | |

| | |
|---|---|
| CONTACT INFORMATION | |
| Contact Name I Andrew Fadanelli | Title Principal Environmental Engineer |
| Phone number 313-235-6384 | E-mail address Ignatius.fadanelli@dteenergy.com |

| | | | | |
|--|--------------------|--------------------------|-------------------------------|-----------------------|
| This form must be signed and dated by a Responsible Official. | | | | |
| Responsible Official Name Leann Warner | | | Title Plant Manager | |
| Mailing address 4901 Pointe Drive | | | | |
| City St. Clair | 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 <i>Leann Warner</i> | | | Date <u>10-28-19</u> | |

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

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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 | 3. County St. Clair |
| 4. Stationary Source Name DTE Electric Company - St. Clair Power Plant | | |
| 5. Location Address 4901 Pointe Drive | 6. City St. Clair | |
| <p>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></p> <p><input type="checkbox"/> Rule 215(1) Notification of change. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 215(2) Notification of change. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 215(3) Notification of change. Complete Items 8 – 11 and 14</p> <p><input type="checkbox"/> Rule 215(5) Notification of change. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. Complete Items 8 – 10 and 14</p> <p><input checked="" type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions.</p> <p><input type="checkbox"/> Rule 216(2) Minor Modification. Complete Items 8 – 12 and 14</p> <p><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.</p> <p><input type="checkbox"/> Rule 216(4) State-Only Modification. Complete Items 8 – 12 and 14</p> | | |
| 8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> 10/29/2018 | | 9. Change in emissions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>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></p> <p>After undergoing a public comment period, PTI 149-18 was issued Oct 29, 2018 to reduce the NOx limits and PTE and provide NOx credits. The facility (DTE Electric - St. Clair / Belle River Power Plant) is submitting its ROP renewal application. The ROP renewal application is due before January 15, 2020. Since the ROP mod is within 24 months of the ROP renewal, DTE requests the enclosed Modification changes be made as part of the ROP renewal.</p> | | |
| 11. New Source Review Permit(s) to Install (PTI) associated with this application? | | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| If Yes, enter the PTI Number(s) 149-18 | | |
| 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 |
| 14. Contact Name I Andrew Fadanelli | Telephone No. 313-235-6384 | E-mail Address ignatius.fadanelli@dteenergy.com |
| 15. This submittal also updates the ROP renewal application submitted on ___/___/___ | | <input type="checkbox"/> Yes <input checked="" 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

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OCT 29 2019

DTE

October 25, 2019

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

MACES _____ MAERS _____
FILE _____

Subject: DTE Electric - St. Clair / Belle River Power Plant, Section 1 (SRN 2796)
Rule 216(1)(a)(v) ROP Modification

Dear Ms Owens:

DTE Electric submits this Rule 216(1)(a)(v) ROP Modification for PTI 149-18 (DTE Electric-St. Clair Unit 4). After undergoing a public comment period, the PTI was issued Oct 29, 2018 to reduce the NOx limits and PTE and provide NOx credits to another business in Southeast MI, due to the Ozone nonattainment area. Attached is the C-001 and M-001 forms.

The facility (DTE Electric - St. Clair / Belle River Power Plant) is submitting its ROP renewal application. The ROP renewal application is due before January 15, 2020 (DTE plans to send by November 30, 2019). Since the ROP mod is within 24 months of the ROP renewal, DTE requests the enclosed Modification changes be made as part of the ROP renewal.

In part, the main reason to allow the ROP renewal process to make the changes is that there are more changes involving Unit 4 since the issuance of the PTI 149-18. Unit 4 does not need the PTI changes posted to the ROP because Unit 4 has since been retired and is no longer active. DTE issued the Acid Rain Program, Retired Unit Exemption forms to EPA and AQD's Brian Carley on June 7, 2019. In fact, there is yet another PTI application in Lansing which removes Unit 4 entirely as an operating unit. Given these circumstances, there is no "red-line" of the mod changes attached, because DTE requests the enclosed Modification changes be made as part of the ROP renewal which will coordinate all these changes at one time.

Please contact me at (313) 235-6384 or ignatius.fadanelli@dteenergy.com with any questions.

Sincerely yours,



I. Andrew Fadanelli, Principal Engineer
DTE Energy, LLC, - Environmental Management & Resources

Enclosures

cc: Joyce Zhu, AQD Supervisor, Warren District Office
Robert Elmouchi, AQD-Air Permit Engineer
Rommy Sleiman, Environmental Engineer - DTE Energy
Alexis Thomas, Environmental Associate - DTE Energy
Lisa Fishbeck, Environmental Engineer - DTE Energy
Sharepoint: 2019 STCPP Rule 215(1)(a) ROP Modification, STC4 NOx limits PTI 149-18