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

B281624690

FACILITY: DTE - Electric Company MONROE POWER		**SRN / ID:** B2816
LOCATION: 3500 E FRONT ST, MONROE		**DISTRICT:** Jackson
CITY: MONROE		**COUNTY:** MONROE
CONTACT: Kelly Johnson , Environmental Engineer		**ACTIVITY DATE:** 03/24/2014
STAFF: Brian Carley	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled Inspection - March 24th and 25th		
RESOLVED COMPLAINTS:		

I arrived at the facility and met with Kelly Johnson, DTE Energy. We first discussed the status of how DTE was planning to propose how they were going to get back into compliance with the stacks that did not meet the minimum height requirements as set in PTI #27-13. At this time, they were still proceeding with venting the emissions from EU-LIMESTONE-S1 back into the building but she did not know the timetable for this to occur at the time of this inspection. The stack for EU-HYDRATEDLIME-S1 was still being discussed whether they will apply for a permit modification or if they can raise it to the required level. They had until April 4, 2014 to respond to the March 14, 2014 violation notice concerning these stack height violations. We were then joined by Mark Grigereit, DTE Energy Corporate Services, and he wished to discuss the need for visible emission readings during stack tests for PM that were required by S.C. VI.3. This special condition requires PM testing to be conducted on a quarterly basis until they have installed an acceptable PM continuous monitoring system and this must be done no later than January 1, 2015. In that condition, there is no requirement to also conduct VE observations during that PM emission testing, unless it is for testing required under S.C. V.1, which it is for initial testing and for compliance testing once every 5 years. I sent an email to Kelly and Mark stating that they do not have to do VE readings during the quarterly PM tests unless it is also being done for their compliance testing required under S.C. V.1. They were setting up to conduct a stack test on Unit 3 the next day, which I was planning on observing as I finished my inspection. This facility is operating under ROP #MI-ROP-B2816-2009, PTI #27-13, and PTI #178-08.

The following compliance determinations of the emission units permitted under PTI #27-13 unless otherwise noted.

EU-UNIT1-S1 (see also FGUNITS1&2TEMP)
Unit 1 was still in startup and shakedown at the time of the inspection, so it was subject to pre-FGD emission limits. The last PM stack test on Unit 1 had a PM emission rate of 0.06 lb/mmBtu, which is below their PM emission limit of 0.12 lb/mmBtu (S.C. I.3). They also had a SO2 emission rate at the time of the inspection of 0.0295 lb/mmBtu, which is below their SO2 emission limit of 1.6 lb/mmBtu (S.C. I.7). Once they have completed the startup and shakedown period for Unit 1, they will be subject to the remaining emission limits in Section I. They are currently only combusting bituminous and sub-bituminous coal with the REF sorbents in this unit to generate electricity (S.C. II.2). They will be testing the use of pet coke in their fly ash to see if it meets the requirements of Headwaters who is purchasing it. 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). Unit 1 operated at 4,161,484 mmBtu for 653 hours which equals 6,373 mmBtu/hr for the month of February, 2014, 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 will be starting the process of initial compliance testing on March 27th for this unit that is required by Section V of this table. Kelly gave me copies of the records that they are required per S.C. VI.1, 7, 8, 9, 10, 11, and 12 for all four units (see attached). 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). They have not installed a PM monitor at the time of the inspection, but they have until 1/1/15 to install one. They will be doing their initial PM emission compliance test that will also count as a quarterly PM test in early April, 2014 as required by S.C. VI.3. 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 have submitted their notice of completion of the installation of the FGD on 1/29/14 as required by S.C. VII.2. They are currently in compliance with Acid Rain and CAIR requirements (S.C. IX.1 and 2). They have stated that they will be in

compliance with the MATS requirements when they go into effect on April 16, 2015 (S.C. IX.3). They completed the startup and shakedown period for the FGD on April 2, 2014 (S.C. IX.4). Based on the information gathered during this inspection and subsequent additional information requested and received, I have determined that they are in compliance with the conditions set forth in this table.

EU-UNIT2-S1 (see also FGUNITS1&2TEMP)
Unit 2 was in a scheduled outage at the time of the inspection. They are currently in the process of connecting the FGD to Unit 2. They will be connecting the SCR to Unit 2 later this year. Because of this, they are still under the requirements of pre-FGD and SCR installation. Unit 2 is only allowed to combust bituminous and sub-bituminous coal with the REF sorbents (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). Unit 2 operated at 3,234,174 mmBtu for 595 hours which equals 5,436 mmBtu/hr for the month of February, 2014, 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 are not required to do the testing required under Section V of this table until both the FGD and SCR are installed and operating and the startup and shakedown period has been completed. They will have to do the required testing within 180 days after the startup and shakedown period has ended. As stated in the EU-UNIT1-S1 discussion, Kelly gave me copies of the records that they are required per S.C. VI.1, 7, 8, 9, 10, 11, and 12 for all four units (see attached). They have certified SO2, NOx, CO, CO2, and flow monitors (S.C. VI.4 & 6). They will be required to monitor mercury when both the FGD and SCR have completed their startup and shakedown periods. They are planning on monitoring mercury with sorbent tubes as they are doing on Units 1, 3, and 4 (S.C. VI.5). They have been submitting quarterly excess emission reports as required by S.C. VII.1 (see MACES report received). They will be required to submit a notice of completion within 30 days once the FGD starts operating and another notice within 30 days once the SCR is connected and operating (S.C. VII.2). They are currently in compliance with Acid Rain and CAIR requirements (S.C. IX.1 & 2). They have stated that they will be in compliance with the MATS requirements when they go into effect on April 16, 2015 (S.C. IX.3). Based on the information gathered during this inspection and subsequent additional information requested and received, I have determined that they are in compliance with the conditions set forth in this table.

EU-UNIT3-S1
Unit 3 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). They are keeping track of the amount of pet coke that they are burning in Unit 3 and it is below the limit of 23,652 tons per calendar month (see attached). 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). Unit 3 operated at 4,427,318 mmBtu for 672 hours which equals 6,588 mmBtu/hr for the month of February, 2014, 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). Kelly gave me copies of the records that they are required per S.C. VI.1, 7, 8, 9, 10, 11, and 12 for all four units (see attached). 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). They have not installed a PM monitor at the time of the inspection, but they have until 1/1/15 to install one. Until they have installed a PM CEMS, they have been doing quarterly PM stack tests per S.C. VI.3. The last PM stack on Unit 3 took place on 3/25/14 and Unit 3 averaged 0.008 lb/mmBtu, which is well below their limit of 0.011 lb/mmBtu (see files for stack test reports). 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). I asked Kelly in an email sent 4/28/14 requesting additional information concerning emission data that I was not able to discern from the information that she had provided during the inspection. I requested data for the dates of March 14and 21, 2014. Below is a table of emissions that she submitted (see attached for email response).

14-Mar	21-Mar	Comment	
Nox (ton/month)	82.7		12-month rolling average through March 2014
CO (lb/day)	0.014	0.014	30-day rolling average
Hg (lb/GW-hr)	0.009		12-month rolling average through March 2014
Hg (lb/year)	39.7		12-month rolling average through March 2014

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 CAIR requirements (S.C. IX.1 & 2). They have stated that they will be in compliance with the MATS requirements when they go into effect on April 16, 2015 (S.C. IX.3). On the second day of the inspection, I was able to observe Run #3 of the quarterly PM stack test on Unit 3. Mark Grigereit, Tom Snyder, and Fred Meinecke were the stack test crew that was conducting the stack test today. They had already started Run #3 when I arrived at the stack test site. They showed me the filters and the acetone wash from the previous two runs and they looked very clean. I was able to watch as they passed their post leak check for Run #3. I asked Kelly for the information that they were required to gather on Unit 3 and its control equipment during each run, which she sent me in an email (see attached). Based on the information gathered during this inspection and subsequent additional information requested and received, I have determined that they are 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). They are keeping track of the amount of pet coke that they are burning in Unit 4 and it is below the limit of 23,652 tons per calendar month (see attached). 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). Unit 4 operated at 317,799 mmBtu for 78 hours which equals 4,074 mmBtu/hr for the month of February, 2014, 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). Kelly gave me copies of the records that they are required per S.C. VI.1, 7, 8, 9, 10, 11, and 12 for all four units (see attached). 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). They have not installed a PM monitor at the time of the inspection, but they have until 1/1/15 to install one. Until they have installed a PM CEMS, they have been doing quarterly PM stack tests per S.C. VI.3. The last PM stack on Unit 4 took place on 3/4/14 and Unit 4 averaged 0.001 lb/mmBtu, which is well below their limit of 0.011 lb/mmBtu (see files for stack test reports). 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). I asked Kelly in an email sent 4/28/14 requesting additional information concerning emission data that I was not able to discern from the information that she had provided during the inspection. I requested data for the dates of March 14and 21, 2014. Below is a table of emissions that she submitted (see attached for email response).

14-Mar	21-Mar	Comment	
NOx (ton/month)	73.6		12-month rolling average through March 2014
CO (lb/day)	0.068	0.077	30-day rolling average
Hg (lb/GW-hr)	0.009		12-month rolling average through March 2014
Hg (lb/year)	41.4		12-month rolling average through March 2014

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 CAIR requirements (S.C. IX.1 & 2). They have stated that they will be in compliance with the MATS requirements when they go into effect on April 16, 2015 (S.C. IX.3). Based on the information gathered during this inspection and subsequent additional information requested and received, I have determined that they are 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 (see attached fuel supplier certification required by S.C. VI.3). 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 partial example attached). Kelly showed me the last few times they ran and it was for less than 30 minutes each time and was run for monthly QA checks. 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, 3, and 4, which are EU-WFGD-QP3, EU-WFGD-QP1, and EU-WFGD-QP2 respectively (S.C. IX.2). I have determined that they are in compliance with the requirements of this table.

EU-CASCADES-S1
This emission unit covers all coal handling operation in the Cascades Room and 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). The Fuel Systems 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 (S.C. IV.1 and VI.2 & 3). All external conveyors are hooded and they are being maintained (S.C. IV.2). They enter their observations into the fuel systems shift report on a daily basis (see attached). 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 are in compliance with the requirements of 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 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). The Fuel Systems 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 (S.C. IV.1 and VI.2 & 3). They enter their observations into the fuel systems shift report on a daily basis (see attached). 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. They have not modified this emission as of the time of this this inspection. I have determined that they are 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 that corrective actions must be taken and 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 on a daily basis (see attached). They did a PM 2.5 stack test on the Dumper House on July 10-13, 2012 with the results of 1.01 lb/hour, which is below their limit of 6.44 lb/hr (S.C. V.1). I have determined that they are 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 and 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 (see attached). All the external conveyors are hooded and they are being maintained (S.C. IV.2). I have determined that they are in compliance with the requirements of this table.

EU-CRUSHERHS-S1
This unit covers the coal handling operations in the crusher house and this emission unit 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). The Fuel Systems 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 (S.C. IV.1 and VI.2 & 3). All external conveyors are hooded and they are being maintained (S.C. IV.2). They enter their observations into the fuel systems shift report on a daily basis (see attached). 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 are 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). The Fuel

Systems 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 (S.C. IV.1 and VI.2 & 3). They enter their observations into the fuel systems shift report on a daily basis (see attached). All the external conveyors are hooded and they 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 documentation stored on site. Per 60.255 (f)(1)(iii) and pending compliance with (f)(1)(i) and PTI 27-13, the next Method 9 test will occur in 2018 for the REF control equipment. I have determined that they are 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, only Units 3 and 4 were including pet coke as part of the fuel blend for those boilers. Once Unit 1 had finished its startup and shakedown period, they were going to begin trial burns utilizing the pet coke. 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 attached). The Fuel Systems 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 (S.C. IV.1 and VI.2 & 3). They enter their observations into the fuel systems shift report on a daily basis (see attached). I was able to observe pet coke being loaded on the conveyors and did not see any fugitive emissions from the pile, the loader, and the conveyors. They are still constructing the permanent equipment and are still using temporary conveyors and will notify AQD when they finish construction of the permanent equipment (S.C. IV.2 and VII.1). I have determined that they are 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 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). All external conveyors are hooded and they are being maintained (S.C. IV.2). They enter their observations into the fuel systems shift report on a daily basis (see attached). 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). However, they have three limestone silos with its own dust collector and exhaust bin vents that exhaust out of the side of the Reagent Building and down instead of the single stack that was to be unobstructed vertically upwards to the ambient air and to be at least 145 feet above the ground. The exhaust vents were not being exhausted vertically and were not at least 145 feet above the ground. They are planning on disconnecting the exhaust vents from the dust collector for each silo and vent exhaust from each dust collector indoors, but they had not done that at the time of the inspection. I have determined that they are not 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, but at this time they are waiting for the frost laws to be lifted so they start hauling the gypsum out of their storage building. Since the frost laws went into effect, they have not been able to haul much gypsum out and because of that they are being operated for well under than 16 hours per day as required by S.C. III.3 and VI.3. All external conveyors are hooded and they are being maintained (S.C. IV.2). I have determined that they are 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 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). The associated enclosures are installed and they are being maintained (S.C. IV.2). However, 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 instead of the single stack that was to be unobstructed vertically upwards to the ambient air and to be at least 145 feet above the ground. The exhaust vents were not being exhausted vertically and were not at least 145 feet above the ground. They are planning on either installing a stack that meets the requirements or applying for a modification of PTI #27-13. They should be letting AQD know which option they have chosen by the end of May, 2014. I have determined that they are not in compliance with the requirements of this table.

FG-ProjectPC1-4
This emission unit 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 2013 Annual Emission Analysis Report on 2/27/14 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 are in compliance with this table.

FGAUXBOILERS-D1
This flexible group covers the north and south auxiliary boilers, which were not operating at the time of the inspection. These two boilers only burn diesel fuel with a sulfur content of 15 ppm per S.C. II.1 (see attached fuel supplier certification 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 attached). I have determined that they are in compliance with this table.

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 (see attached fuel supplier certification required by S.C. VI.3). 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 attached). 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 are in compliance with this table.

FGUNITS1&2TEMP
This flexible group covers Units 1 and 2 until they have installed and completed the startup and shakedown period of the FGD and SCR (Unit 2 only). Once each unit has completed the installation and startup and shakedown period, that unit will then be subject to requirements of EU-UNIT1-S1 or EU-UNIT2-S1, as required. They currently have a COMS in the stack for Unit 2 and a COMS in the duct work before the FGD that is currently going through its FGD startup and shakedown period for Unit 1 (S.C. VI.1). They also have a NOx and CO2 CEMS, one set for each unit, that they are reporting the emissions to Clean Air Market Division of EPA per 40 CFR Part 75 (S.C. VI.3 & 4 and VII.2). They are submitting quarterly excess emission reports, which none have been submitted late (S.C. VII.1). After reviewing NOx data, the highest 12 month rolling average for the time period of January 2011 through December 2013 was 603 tons/month, which is well under their limit of 1,641.6 tons per month based on a 12 month rolling average as determined each calendar month. I have determined that they are 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, nor did I see any emissions coming from the truck that was being loaded 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, is considered to be 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 are 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. I have determined that they are in compliance with this table.

They have submitted all the reports required by MI-ROP-B2816-2009, PTIs #27-13 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, with non-compliance of the stacks for EU-LIMESTONE-S1 and EU-HYDRATEDLIME-S1, I have determined that they are not in compliance until stack height violations are resolved.

NAME Brian Conley DATE 5/22/14 SUPERVISOR