

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

B281629016

FACILITY: DTE Electric Company - Monroe Power Plant		SRN / ID: B2816
LOCATION: 3500 E FRONT ST, MONROE		DISTRICT: Jackson
CITY: MONROE		COUNTY: MONROE
CONTACT: ATIRA MABIN		ACTIVITY DATE: 03/09/2015
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled Inspection on March 9th and 10th, 2015		
RESOLVED COMPLAINTS:		

Facility Contact: Atira Mabin  
Telephone: 734-384-2559  
Email: [mabina@dteenergy.com](mailto:mabina@dteenergy.com)

I arrived at the facility and met with Atira Mabin and Lisa Bates of DTE. I gave Atira the Environmental Inspection pamphlet and quickly went over the inspection process. I then gave them copies of the spreadsheets that I made for the data that I wished to collect during this inspection. The first spreadsheet covered the current emissions of Units 2, 3, and 4. At the time of the inspection, Unit 1 was not operating due to a boiler tube leak that was still being repaired, so I will get the data from their MAERS submittal. I then went over what other information that I would want for my compliance determination. It was decided that while Atira and I were out doing my inspection of the equipment that was covered under PTI #27-13A, Lisa would gather the information that I wanted. 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**

Unit 1 was not 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 1 that was approved on December 4, 2013 (S.C. III.1 & 3). Unit 1 operated at 41,978,506 mmBtu for 8016 hours, which equals 5,237 mmBtu/hr for 2014 and 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). Lisa 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 installed a PM monitor and I am waiting for a PM monitor certification report to be submitted. Until the PM CEMS has been certified by AQD, they have been doing quarterly PM stack tests per S.C. VI.3. The last PM stack on Unit 1 took place on 4/25/14 and Unit 1 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 SO<sub>2</sub>, NO<sub>x</sub>, CO, CO<sub>2</sub> 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). Lisa was able to provide me the status of the control equipment and load (gross MW) for March 4, 2015 at 9:30 am, which was during the last time this unit was in operation (see attached). I told her that I would get the emissions information from their MAERS submittal since this unit was not operating at the time of the inspection (see MAERS submittal). 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). Due to new requirements in MATS concerning monitoring during startup/shutdown, they have requested and received an extension of compliance with the MATS requirements, which moves their compliance date to April 16, 2016 (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-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 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 2 that was approved on December 4, 2013 (S.C. III.1 & 3). Unit 2 operated at 28,129,509 mmBtu for 5,497 hours, which equals 5,117 mmBtu/hr for 2014 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). 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 installed a PM CEMS 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 2 took place on 3/25/14 and Unit 2 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 SO<sub>2</sub>, NO<sub>x</sub>, CO, CO<sub>2</sub> 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). Lisa was able to provide me the status of the control equipment and the CEMS for NO<sub>x</sub> (ppm), SO<sub>2</sub> (ppm), CO<sub>2</sub> (%), CO (ppm), flow rate (kscfm), duct opacity (%), and load (Gross MW) for March 9, 2015 at 9:30 am as required per S.C. VI.1, 7, 8, 9, 10, 11, and 12 (see attached). 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). Due to new requirements in MATS concerning monitoring during startup/shutdown, they have requested and received an extension of compliance with the MATS requirements, which moves their compliance date to April 16, 2016 (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). 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 44,969,049 mmBtu for 8208 hours which equals 5,478 mmBtu/hr for 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). 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 CEMS 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 SO<sub>2</sub>, NO<sub>x</sub>, CO, CO<sub>2</sub> 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). Lisa was able to provide me the status of the control equipment and the CEMS for NO<sub>x</sub> (ppm), SO<sub>2</sub> (ppm), CO<sub>2</sub> (%), CO (ppm), flow rate (kscfm), duct opacity (%), and load (Gross MW) for March 9, 2015 at 9:30 am as required per S.C. VI.1, 7, 8, 9, 10, 11, and 12 (see attached). 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). Due to new requirements in MATS concerning monitoring during startup/shutdown, they have requested and received an extension of compliance with the MATS requirements, which moves their compliance date to April 16, 2016 (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-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). Unit 4 operated at 36,786,171 mmBtu for 71776 hours which equals 5,126 mmBtu/hr for 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). 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 installed a PM CEMS and I am waiting for a PM monitor certification report to be submitted. Until the PM CEMS has been certified by AQD, 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 SO<sub>2</sub>, NO<sub>x</sub>, CO, CO<sub>2</sub> 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). Lisa was able to provide me the status of the control equipment and the CEMS for NO<sub>x</sub> (ppm), SO<sub>2</sub> (ppm), CO<sub>2</sub> (%), CO (ppm), flow rate (kscfm), duct opacity (%), and load (Gross MW) for March 9, 2015 at 9:30 am as required per S.C. VI.1, 7, 8, 9, 10, 11, and 12 (see attached). 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). Due to new requirements in MATS concerning monitoring during startup/shutdown, they have requested and received an extension of compliance with the MATS requirements, which moves their compliance date to April 16, 2016 (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 oil analysis 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. 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**

We then went to the roof to see the exhaust vents for the Cascades room, which is a coal handling system that is covered under EU-CASCADES-S1. I was able to observe one of the exhaust vents in operation on the Unit 3-4 side of the plant. I was not able to see any opacity coming from the vent and I did not see any accumulation of any particulate on the roof below the vent (SC I.1 and 2). 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 of 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 (see attached daily shift report). They have not done the upgrades to the dust collectors, which they are currently planning on doing October 2015 and 2016. Once they do the upgrades they will be required to conduct a PM 2.5 stack test on the equipment (SC V.1). Based on the information and my inspection, I determined that they are 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. Atira did inform me that the dust collectors were no longer in use and that they were using wet spray for these areas. This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II.1 & 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 PM<sub>2.5</sub> 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 PM<sub>2.5</sub> limit of 2.74 lb/hr for this unit. They have not modified this emission as of the time of 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 in operation at the time of the inspection. This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II.1 & 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. II.1 & 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. II.1 & 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 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. II.1 & 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. 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 I reviewed the 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. Units 1 and 2 do not burn pet coke due to the specifications required for the fly ash from Headwaters, who they sell the ash to. This unit has an approved MAP and an approved fugitive dust plan on file (S.C. II.1 & 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. II.1 & 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). 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 are 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. II.1 & 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 attached). 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. II.1 & 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). 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 are 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 2014 Annual Emission Analysis Report on 3/2/14 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-S1**

We first went to see the two auxiliary boilers that were covered under FGAUXBOILERS-S1. At the time of the inspection, auxiliary boiler #1 was operating and auxiliary boiler #2 was not. 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 (see attached laboratory analysis) 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 laboratory analysis 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.

#### **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 (see attached). 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). I have determined that they are in compliance.

NAME Brian CarleyDATE 6/1/15SUPERVISOR [Signature]