

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> ST. CLAIR / BELLE RIVER POWER PLANT	<b>SRN :</b> B2796
<b>Location :</b> 4505 King Road	<b>District :</b> Warren
	<b>County :</b> SAINT CLAIR
<b>City :</b> CHINA TWP <b>State:</b> MI <b>Zip Code :</b> 48054	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Mark Dziadosz
<b>FCE Begin Date :</b> 7/1/2022	<b>FCE Completion Date :</b> 9/7/2023
<b>Comments :</b> Full compliance evaluation.	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
08/29/2023	MACT (Part 63)	Compliance	Annual RATA testing of CEMS on two natural gas-fired turbines at DTE Electric Blue Water Energy Center. Report indicates compliance. CEMS on both units passed RATA.
08/01/2023	MACT (Part 63)	Compliance	40 CFR Part 63, Subpart YYYY – Semi-Annual Compliance Report for DTE Electric Company Blue Water Energy Center. Report indicates compliance. No deviations reported.
08/01/2023	ROP Semi 1 Cert	Compliance	Belle River Fuels Company. Zero deviations reported. Facility has not operated since December 27, 2021.
08/01/2023	ROP Semi 1 Cert	Compliance	St. Clair Fuels Company. Zero deviations reported. Facility is no longer in operation. Verified during inspection on July 25, 2023.
08/01/2023	Excess Emissions (CEM)	Compliance	2nd Quarter 2023 Opacity Excess Emission Reports for DTE Dean Peakers. Report indicates compliance. No excess emissions reported.
08/01/2023	Excess Emissions (CEM)	Compliance	2nd Quarter 2023 Opacity Excess Emission Reports for Belle River CTG Peakers. No excess emissions reported.

Activity Date	Activity Type	Compliance Status	Comments
08/01/2023	Excess Emissions (CEM)	Compliance	2nd Quarter 2023 Opacity Excess Emission Reports for DTE Belle River Power Plant. There was one hour of excess emissions during startup/shutdown. The limit of 0.7 lb/MMBtu was exceeded on April 7, 2023 for 1 hour (0.84 lb/MMBtu). A VN will not be issued due to length of excess emissions.
08/01/2023	Excess Emissions (CEM)	Compliance	2nd Quarter 2023 Excess Emission Reports for DTE Blue Water Energy Center. Report indicates compliance. No excess emissions reported for EUCTGHRSG1 or EUCTGHRSG1.
08/01/2023	MACT (Part 63)	Compliance	2nd Quarter Test Report for HCl on EU-BOILER2-BR (Unit 2), conducted on June 19, 2023. Results indicate compliance. Result: 0.0004 lb/MMBtu, Limit: 0.002 lb/MMBtu.
08/01/2023	MACT (Part 63)	Compliance	2nd Quarter Test Report for HCl on EU-BOILER1-BR (Unit 1), conducted on June 19, 2023. Report indicates compliance. Result: 0.0006 lb/MMBtu; Limit: 0.002 lb/MMBtu
07/25/2023	On-site Inspection	Compliance	FY 2023 Inspection.
05/24/2023	Telephone Notes	Compliance	Mark Grigereit called with notification that the cooling tower drift loss test will be scheduled approximately 7/5/23. This will not meet the 60 day notification requirement. Mark indicated this date is subject to change. A VN will not be sent for this.
05/08/2023	MAERS	Compliance	MAERS Report Submission. Report indicates compliance.
05/03/2023	Excess Emissions (CEM)	Compliance	1st Quarter 2023 Opacity Excess Emissions for Blue Water Energy Center. Report indicated 7 hrs of excess emissions on January 12, 2023 from 02:00-07:00 with a value of 2.1 ppm NOx (limit 2.0 ppm). The facility sent a Abnormal condition report on 1/20/23 and a VN was issued for the excess emissions on 1/25/23. There were no additional excess emissions after 1/12/23.
05/02/2023	Excess Emissions (CEM)	Compliance	1st Quarter 2023 Opacity Excess Emission Reports for DTE Belle River Power Plant. Report indicates compliance.

Activity Date	Activity Type	Compliance Status	Comments
05/02/2023	Excess Emissions (CEM)	Compliance	1st Quarter 2023 Opacity Excess Emission Reports for the Belle River CTG Peakers. Report indicates compliance. Unit 13-1 NOx had 8.11% (6 hours) downtime for the quarter. However, the unit only operated 74 hours. O2 sensor in the CEMS was replaced. No VN will be sent.
05/01/2023	Excess Emissions (CEM)	Compliance	1st Quarter 2023 Opacity Excess Emission Reports for DTE Dean Peakers. Report indicates compliance.
04/04/2023	MACT (Part 63)	Compliance	Relative Response Audit (RRA) Test Report for PM CEMs for Unit 2; Belle River Power Plant - EU-BOILER2-BR. Report indicates compliance.
04/04/2023	MACT (Part 63)	Compliance	1st Quarter Test Report for HCl on EU-BOILER1-BR (Unit 1), conducted on February 9, 2023. Report indicates compliance. Result-0.0007 lb/MMBtu; MATS limit-0.002.
04/04/2023	MACT (Part 63)	Compliance	1st Quarter Test Report for HCl on EU-BOILER2-BR (Unit 2), conducted on February 16, 2023. Report indicates compliance. Result-0.0006 lb/MMBtu; MATS limit-0.002.
03/29/2023	MAERS	Compliance	MAERS Certification and 2022 MAERS Supplemental Control Template (SCT) submitted for Sections 1,3, 6 and 7. St. Clair/Belle River Power Plant, Belle River Fuels, St. Clair Fuels. Report received on time.
03/29/2023	ROP SEMI 2 CERT	Compliance	St. Clair Power Plant. SCPP had opacity excess emissions on Unit 3 on 4/11 & Unit 7 on 3/10 and 4/24. A VN will not be sent. Opacity Monitor downtime was reported on Unit 2 on 5/3 & 5/24, Unit 3 on 5/4, Unit 6 on 4/1, and Unit 7 on 4/26, 5/1, and 5/5. A VN will not be sent. FG-ASH-Hand: contractor failed to record of all sweeping activity. Record insufficient. Fly ash hauling is discontinued. A VN not be sent.

Activity Date	Activity Type	Compliance Status	Comments
03/29/2023	ROP Annual Cert	Compliance	St. Clair Power Plant. SCPP had opacity excess emissions on Unit 3 on 4/11 & Unit 7 on 3/10 and 4/24. A VN will not be sent. Opacity Monitor downtime was reported on Unit 2 on 5/3 & 5/24, Unit 3 on 5/4, Unit 6 on 4/1, and Unit 7 on 4/26, 5/1, and 5/5. A VN will not be sent. FG-ASH-Hand: contractor failed to record of all sweeping activity. Record insufficient. Fly ash hauling is discontinued. A VN will not be sent.
03/29/2023	CAM Excursions/Exceedances	Compliance	Saint Clair Power Plant - FG-BLR-GEN-SC, VII.7. No excursions reported.
03/29/2023	CAM monitor downtime	Compliance	Saint Clair Power Plant - FG-BLR-GEN-SC, VII.8. No excursions reported.
03/29/2023	ROP Annual Cert	Compliance	Belle River Power Plant. BRPP had NOx/Opacity excess emissions on Unit 1 on 6/18 due to start up/shut down and NOx excess emissions on 11/14/22 and Unit 2 on had opacity excess emissions on 2/13/22, NOx, SO2, and Opacity excess emissions on 4/4/22-4/5/22 due to instrument failure, and opacity excess emissions 10/22/22. A VN will not be sent.
03/29/2023	ROP SEMI 2 CERT	Compliance	Belle River Power Plant. BRPP had NOx/Opacity excess emissions on Unit 1 on 6/18 due to start up/shut down and NOx excess emissions on 11/14/22 and Unit 2 on had opacity excess emissions on 2/13/22, NOx, SO2, and Opacity excess emissions on 4/4/22-4/5/22 due to instrument failure, and opacity excess emissions 10/22/22. A VN will not be sent.
03/29/2023	CAM monitor downtime	Compliance	Saint Clair Power Plant - Belle River Power Plant FG-BOILERS-BR, VII.9. No excursions reported.
03/29/2023	CAM Excursions/Exceedances	Compliance	Saint Clair Power Plant - Belle River Power Plant FG-BOILERS-BR, VII.8. No excursions reported.
03/21/2023	ROP Annual Cert	Compliance	St. Clair Diesel Generator Peakers. Zero deviations reported.

Activity Date	Activity Type	Compliance Status	Comments
03/21/2023	ROP Annual Cert	Compliance	Belle River Power Plant - Belle River Peakers. Zero deviations reported.
03/21/2023	ROP SEMI 2 CERT	Compliance	Belle River Power Plant - Belle River Peakers. Zero deviations reported.
03/21/2023	ROP Annual Cert	Compliance	Dean Peakers Zero deviations reported.
03/21/2023	ROP SEMI 2 CERT	Compliance	Dean Peakers Zero deviations reported.
03/16/2023	MACT (Part 63)	Compliance	Compliance Test Report for Relative Response Audit (RRA) PM CEMS for EU-BOILER1- BR Belle River Power Plant, Unit 1. Results indicate compliance.
03/16/2023	MACT (Part 63)	Compliance	Compliance Test Report for Relative Accuracy Test Audit (RATA) Report for Mercury (Hg) Sorbent Trap Monitoring System (STMS); EU-BOILER2-BR (UNIT 2), Belle River Power Plant. Results indicate compliance.
03/16/2023	MACT (Part 63)	Compliance	Compliance Test Report for Relative Accuracy Test Audit (RATA) Report for Mercury (Hg) Sorbent Trap Monitoring System (STMS); EU-BOILER1-BR (UNIT 1), Belle River Power Plant. Results indicate compliance.
03/07/2023	NSR Emissions Report	Compliance	2022 NSR Emissions Report for Belle River Power Plant for Units 1 and 2.
02/28/2023	NSR Emissions Report	Compliance	2022 NSR Emissions Report for Saint Clair Power Plant for Units 6 and 7. Report indicates compliance. Since all units are now retired, this will be final NSR report for SCPP.
02/14/2023	Excess Emissions (CEM)	Compliance	RESUBMITTED CORRECTED COPY: 4th Quarter 2022 Opacity Excess Emission Reports for DTE Dean Peakers. Original report had 9 hours of excess emissions reported for EUCTG-11-1. Upon review, this time should've been reported as monitor downtime. DTE resubmitted the report.
02/08/2023	ROP Annual Cert	Compliance	Belle River Fuels Company, LLC Zero deviations reported. The site ceased operations on December 27, 2021.

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02/08/2023	ROP SEMI 2 CERT	Compliance	Belle River Fuels Company, LLC Zero deviations reported. The site ceased operations on December 27, 2021.
02/08/2023	ROP Annual Cert	Compliance	Section 7, St. Clair Fuels Company. Zero deviations. The site is removed from service and did not operate in 2022.
02/08/2023	ROP SEMI 2 CERT	Compliance	Section 7, St. Clair Fuels Company. Zero deviations. The site is removed from service and did not operate in 2022.
01/31/2023	Excess Emissions (CEM)	Compliance	4th Quarter 2022 Excess Emission Reports for DTE Belle River Power Plant. Unit 1 had excess emissions due to start up shut down. Unit was coming out of outage. NOx ppm never exceeded limit but due to low CO2%, the lb/MMBtu showed an exceedance. Unit 2 had a 6-minute opacity exceedance due to ESP failure for 0.0% of time. A VN will not be sent.
01/31/2023	Excess Emissions (CEM)	Compliance	4th Quarter 2022 Opacity Excess Emission Reports for DTE Belle River Peakers. Report indicates compliance. There was no downtime or excess emissions.
01/31/2023	Excess Emissions (CEM)	Compliance	4th Quarter 2022 Opacity Excess Emission Reports for DTE Dean Peakers. Marked compliance for now. Reported 9 hours excess emissions on EU-CTG01-DP-11-1. Contacted DTE to get further information. 9 hours should of been reported as monitor downtime. Amended report was received on 2/8/23.
01/31/2023	Excess Emissions (CEM)	Non Compliance	4th Quarter 2022 Excess Emission Reports for DTE Blue Water Energy Center. DTE reported 26 hours of excess emissions on EUCTGHRSG1. This was due to control equipment failure. A violation notice was sent. Upon receiving the EER, EUCTGHRSG2 also had excess emissions. Another VN was sent. DTE can respond to both VNs in one letter.

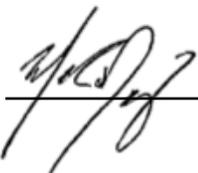
Activity Date	Activity Type	Compliance Status	Comments
12/27/2022	CEM RATA	Compliance	Compliance Test Report for the annual RATA testing of CEMS on the exhausts of EU-CTG02-DP and EU-CTG04-DP at Dean Peakers. Report indicates compliance. CTG02-NOx lb/MMBtu RA 0.001 (limit 0.015); CO RA 1.6 ppm (limit 5 ppm). CTG04- NOx lb/MMBtu RA 0.002 (limit 0.015); CO RA 1.2 ppm (limit 5).
12/27/2022	CEM RATA	Compliance	Compliance Test Report for the annual testing of CEMS on the exhausts of EU-CTG01-DP and EU-CTG03-DP at Dean Peakers. Report indicates compliance. CTG01-NOx 0.003 RA (limit-0.015), CO-1.6 RA (limit- 5 ppm); CTG03-NOx 0.002 RA (limit-0.015), CO-0.4 RA (limit- 5 ppm).
12/13/2022	MACT (Part 63)	Compliance	4th Quarter Test Report for HCl on EU-BOILER1-BR (Unit 1), conducted on November 16, 2022. Report indicates compliance. Results-0.0005 lb/MMBtu (limit-0.0020)
12/13/2022	MACT (Part 63)	Compliance	4th Quarter Test Report for HCl on EU-BOILER2-BR (Unit 2), conducted on November 9, 2022. Report indicates compliance. Results-0.0004 lb/MMBtu (limit-0.0020)
12/01/2022	Excess Emissions (CEM)	Compliance	Blue Water Energy Center Quarterly Excess Emissions & Monitoring System Performance Reports. Report indicates compliance.
12/01/2022	CEM RATA	Compliance	DTE Blue Water Energy Center Unit CT11 CEMS Linearity Test Results - 3rd Quarter 2022. QA/QC (CGA & Linearity for EUCTGHRSG1 & EUCTGHRSG2) for 3rd quarter CEMS. Report indicates compliance.
11/30/2022	Excess Emissions (CEM)	Compliance	3rd Quarter 2022 Opacity Excess Emission Reports for DTE Belle River Power Plant. Report indicates compliance. Both unit opacity monitors had downtime (Unit 1-150 minutes; Unit 2-30 minutes) for instrument maintenance. A violation notice will not be issued.

Activity Date	Activity Type	Compliance Status	Comments
11/30/2022	Excess Emissions (CEM)	Compliance	3rd Quarter 2022 Excess Emission Report for DTE St. Clair Power Plant. Units are retired. EER report indicates Units did not operate in the 3rd quarter. Report indicates compliance.
11/23/2022	MACT (Part 63)	Compliance	DTE Electric Company – Blue Water Energy Center Cooling Tower Drift Loss Rate Test Report for PTI 19-18. Blue Water Energy Center Cooling Tower Drift Loss Rate Test Report for PTI 19-18. Drift loss test report indicated drift loss of 0.00078%. The permit requires drift loss of 0.0005%. Vendor certifies drift loss of 0.0005%. Modifications will be made to the drift eliminators. The drift eliminators will be reinforced with additional packing material and should provide a drift rate of 0.0003%. A retest will be competed in the spring after vendor repairs when weather conditions are favorable for this type of testing. The PM/PM10/PM2.5 emissions have remained compliant. A VN will not be issued.
11/01/2022	Excess Emissions (CEM)	Compliance	3rd Quarter 2022 Opacity Excess Emission Reports for DTE Belle River Peakers. Report indicates compliance.
11/01/2022	Excess Emissions (CEM)	Compliance	3rd Quarter 2022 Opacity Excess Emission Reports for DTE Dean Peakers. Report indicates compliance.
11/01/2022	ROP Other	Compliance	Blue Water Energy Center Emissions Test Report for 40 CFR Part 63, Subpart YYY Formaldehyde (CH <sub>2</sub> O) on EUCTGHRSG1 and EUCTGHRSG2. Test report indicates compliance. EUCTGHRSG1-7.1 ppb @15% O <sub>2</sub> ; EUCTGHRSG2-4.5 ppb@15%O <sub>2</sub> . Limit-91 ppb@15% O <sub>2</sub> .

Activity Date	Activity Type	Compliance Status	Comments
10/28/2022	Other Non ROP	Compliance	Cooling Tower Drift loss Rate Alternate Test Method Request. Addendum: Per meetings with DTE, the permittee will be using the permit specified test method. This submittal also contains the Blue Water Energy Center, Cooling Tower Inspection and Maintenance Program (BWE-3011).
10/25/2022	ROP Other	Compliance	ROP Emissions Test Report - CO, EU-BOILER1-BR. Results indicate compliance. CO tested at High and Mid loads. There are no associated ROP limits. Testing is an ROP requirement. High load: 0.0025 lb/MMBtu; Mid load: 0.000 lb/MMBtu.
10/25/2022	MACT (Part 63)	Compliance	3rd Quarter Test Report for HCl on EU-BOILER1-BR (Unit 1), conducted on September 7, 2022. Report indicates compliance. Result: 0.0005 lb/MMBtu. Limit: 0.002 lb/MMBtu.
10/25/2022	MACT (Part 63)	Compliance	3rd Quarter Test Report for HCl on EU-BOILER2-BR (Unit 2), conducted on September 8, 2022. Report indicates compliance. Result: 0.0004 lb/MMBtu. Limit: 0.002 lb/MMBtu.
10/04/2022	CEM RATA	Compliance	Annual RATA testing of CEMS on three natural gas-fired turbines. Report indicates compliance. All CEMS passed the RATA.
09/27/2022	ROP Other	Compliance	Blue Water Energy Center Cooling Tower Drift Loss Rate Test Report for PTI 19-18. Drift loss test report indicated drift loss of 0.00088%. The permit requires drift loss of 0.0005%. Vendor certifies drift loss of 0.0005%. A retest was rescheduled and completed the week of 9/19 after vendor repairs. The PM/PM10/PM2.5 emissions have remained compliant. A VN will not be issued.
09/27/2022	ROP Semi 1 Cert	Compliance	St. Clair Power Plant. Report indicates compliance.
09/27/2022	CAM monitor downtime	Compliance	St. Clair Power Plant. CAM Opacity Monitor Downtime Reports, per FG-BLR-GEN-SC, VII.8 Report indicates compliance.

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09/27/2022	CAM Excursions/Exceedances	Compliance	CAM Excursion Reports, per FG-BLR-GEN-SC, VII.7 Report indicates compliance.
09/27/2022	ROP Semi 1 Cert	Compliance	St. Clair Power Plant - St. Clair Diesel Generator Peakers. Zero deviations reported.
09/27/2022	ROP Semi 1 Cert	Compliance	Belle River Power Plant - Belle River Peakers. Zero deviations reported.
09/27/2022	ROP Semi 1 Cert	Compliance	Dean Peakers. Zero deviations reported.
09/27/2022	MACT (Part 63)	Compliance	Belle River Power Plant - 2nd Quarterly Test Report for HCl on the exhaust of EU-BOILER1-BR (Unit 1) for compliance with MATS emission limits. Report indicates compliance. HCl results=0.0004 lb/MMBtu; MATS limit=0.002 lb/MMBtu.
09/27/2022	CAM monitor downtime	Compliance	Saint Clair Power Plant - Belle River Power Plant FG-BOILERS-BR, VII.9 Report indicates compliance.
09/27/2022	CAM Excursions/Exceedances	Compliance	Saint Clair Power Plant - Belle River Power Plant FG-BOILERS-BR, VII.8. Report indicated compliance.
09/27/2022	ROP Semi 1 Cert	Compliance	St. Clair Power Plant - Belle River Power Plant. 2nd quarter NOx Unit #1 downtime was reported at 32.8%. According to facility, this was due to difficulty during startup/shutdown and the facility. The CO2 failed linearity, leading to data being invalidated. A violation notice was issued.
09/27/2022	MACT (Part 63)	Compliance	Belle River MATS Semi-Annual Compliance Report. Report indicates compliance.
09/08/2022	ROP Semi 1 Cert	Compliance	DTE Electric Company - Belle River Fuels Company, LLC No deviations reported. The facility ceased operations on 12/27/21.
09/08/2022	ROP Semi 1 Cert	Compliance	DTE Electric Company - St. Clair Fuels Company, LLC No deviations reported. The facility has been removed from service.
08/18/2022	ROP Semi 1 Cert	Compliance	DTE Electric Company - Blue Water Energy Center No deviations reported
08/11/2022	On-site Inspection	Compliance	FY 2022 inspection

Activity Date	Activity Type	Compliance Status	Comments
08/10/2022	Excess Emissions (CEM)	Compliance	2nd Quarter 2022 Excess Emission Report for DTE St. Clair Power Plant. Report indicates compliance.
08/10/2022	Excess Emissions (CEM)	Compliance	2nd Quarter 2022 Opacity Excess Emission Reports for DTE Belle River Power Plant. Report indicates compliance.
08/02/2022	Excess Emissions (CEM)	Compliance	2nd Quarter 2022 Opacity Excess Emission Reports for DTE Dean Peakers. Report indicated compliance.
08/02/2022	Excess Emissions (CEM)	Compliance	2nd Quarter 2022 Opacity Excess Emission Reports for DTE Belle River Peakers. Report indicates compliance.
07/06/2022	MACT (Part 63)	Compliance	2nd Quarter Test Report for HCl on EU-BOILER6-SC (Unit 6), conducted on May 18, 2022. Results indicate compliance. HCl emissions=0.0007 lb/MMBtu; MATS limit=0.002.
07/06/2022	MACT (Part 63)	Compliance	2nd Quarter Test Report for HCl on EU-BOILER3-SC (Unit 3), conducted on May 17, 2022. Results indicate compliance. HCl emissions=0.0006 lb/MMBtu; MATS limit=0.002.
07/06/2022	MACT (Part 63)	Compliance	2nd Quarter Test Report for HCl on EU-BOILER2-SC (Unit 2), conducted on May 16, 2022. Results indicate compliance. HCl emissions=0.0008 lb/MMBtu; MATS limit=0.002.
07/06/2022	MACT (Part 63)	Compliance	2nd Quarter Test Report for HCl on EU-BOILER2-BR (Unit 2), conducted on May 23, 2022. Results indicate compliance. HCl emissions=0.0013 lb/MMBtu; MATS limit=0.002.

Name: 

Date: September 7, 2023

Supervisor: 