



October 12, 2022

Ms. Joyce Zhu  
EGLE – Air Quality Division  
27700 Donald Court  
Warren, MI 48092

**RE: DTE Electric Company Response to the EGLE-AQD Violation Notice of September 27, 2022 Issued to Belle River Power Plant**

This letter is in response to the Violation Notice (VN) issued by EGLE-AQD to DTE Electric Company on September 27, 2022 to Belle River Power Plant related to oxides of nitrogen (NOx) continuous emission monitor (CEM) downtime on Unit 1. The VN cited the following:

Process Description	Rule/Permit Condition Violated	Comments
Belle River Stack 1	40 CFR Part 75, Subpart H	Failure to continuously monitor intermittently from June 3, 2022 to June 10, 2022

DTE Electric’s response provides its review of the situation and identifies actions taken and proposed to be taken to prevent recurrence. DTE Electric Company reported 32.8% downtime for the Unit 1 NOx monitor in the 2<sup>nd</sup> quarter excess emission report (EER) that was submitted to EGLE on July 26, 2022. Although 32.8% downtime was reported, the downtime occurred intermittently during a period of unit startup after an extended unit maintenance outage. Unit 1 operated for just 241 hours during the 2<sup>nd</sup> quarter, much of which was during the startup period. The NOx monitor downtime was 79 hours during the period in question. The 79 hours of monitor downtime occurred intermittently from June 2, 2022 at 1400 through June 17, 2022 at 1059 as reported in the 2<sup>nd</sup> quarter EER. As unit operation was limited in the 2<sup>nd</sup> quarter, the 79 hours accounted for 32.8% of the operating hours in the quarter.

During the unit outage, maintenance on the monitor dilution system was performed. This included replacing the probe filter, O-rings, and critical orifice. The replacement of the critical orifice, which controls flow during sampling, necessitated that a linearity test be performed on the monitor once the unit returned to service. Unit 1 experienced some operational issues during startup which delayed the ability to complete the linearity on the NOx monitor. A probationary calibration of the monitor was completed and passed during startup. However, when the linearity test was attempted as soon as possible once the unit returned to operation, the initial linearity test failed. A 3-point calibration was performed after the failure of the linearity test and another linearity was performed. Although the second linearity test was

performed and completed within a few hours after the initial failure, all NOx monitoring system operation between startup and the successful linearity test was considered “out of control” and resulted in monitor downtime due to the initial linearity test failure. After the passed linearity test, the NOx monitor was considered “in control” and returned to normal monitoring operation as of June 17, 2022 at 1100.

Once the failed linearity test was observed, actions were taken to complete another linearity test as soon as possible, which passed. In addition to the corrective actions taken to address this issue, the Company has taken additional steps to ensure that similar events do not result in monitor downtime in the future. It is not unexpected to experience operational issues during unit startups following extended unit outages for maintenance. As such, the Company has taken steps to minimize maintenance on the emissions monitoring system during unit outages that would require linearity or other testing upon unit startup. While not all monitoring system maintenance can be delayed, there are certain maintenance procedures that do not impact monitor operation that can be delayed until after the unit returns to operation. This will allow for linearity and/or other testing to be performed once the unit has achieved steady-state operation rather than during transient operations during unit startup.

If you have any questions on the information in this letter or would like further information, please contact me at [Barry.Marietta@dteenergy.com](mailto:Barry.Marietta@dteenergy.com) or (810) 343-6391.

Sincerely,

*Barry Marietta*

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