

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

B281527830

FACILITY: DTE - Electric Company Harbor Beach Power Plant		SRN / ID: B2815
LOCATION: 755 N. Huron, HARBOR BEACH		DISTRICT: Saginaw Bay
CITY: HARBOR BEACH		COUNTY: HURON
CONTACT: Dave Huxhold ,		ACTIVITY DATE: 11/17/2014
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Compliance Inspection or ROP. Facility had not run since November 2013 and was in the process of decommissioning emission units. glm		
RESOLVED COMPLAINTS:		

I conducted a scheduled site inspection at the DTE-Harbor Beach Power Plant (B2815). The purpose of the site inspection was to determine compliance with the facility's Renewable Operating Permit (MI-ROP-B2815-2012) and air quality regulations. I met with Dave Huxhold, Sr. Environmental Engineer and he provided a tour of the plant.

#### Facility Description

The facility is located at 755 N. Huron Road, Harbor Beach, Huron County, and operated as a pulverized coal fired boiler rated at 1034 MMBTU/HR. The plant is currently in the process of decommissioning all units. When the plant was fully operational it either produced electricity for sale to the grid, peaking plant, or cycling plant. The last day the plant ran was November 11, 2013.

#### Compliance Determination-Section 1

##### *EU-00*

*Consisted of one 1034 million BTU per hour heat input, pulverized coal-fired boiler with fuel oil startup capabilities, also referred to as No. 1 Boiler.*

The boiler has been removed from the facility. Asbestos notification was sent 12/12/2013 for removal of the boiler. There was not any coal on site at the time of my inspection. The facility was working on removing the coal bed and was planning to remove soil down to the clay layer. CEMS have been removed from the stack and the CEMS controls have also been removed.

##### *Reporting*

The District received annual and semiannual deviation reports and certification for 2013 and 2014 within the respected time frames.

Monthly sulfur dioxide emission rate averages were received within 30 days of the end of each quarter for 2013 and 2014.

Requirements for CEMS reporting in accordance with 40 CFR Part 75 have been met for 2013 and 2014. The facility has met the reporting requirements for CAM in 2013 and 2014.

##### *EU-01*

*Coal handling system including storage area, feeders, crusher, conveyor belts and coal bunkers.*

At the time of the inspection this equipment was still in place. Compliance reporting requirements for this emission unit have been fulfilled for 2013 and 2014.

##### *EU-02*

*Flyash handling system for Boiler No. 1 including transport system from hoppers to flyash silo, unloading system, dust collector and water sprays.*

The components to this emission unit have been decommissioned. Compliance reporting requirements for this emission unit have been fulfilled for 2013 and 2014.

#### **FGCOLDCLEANERS**

*Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285 (iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.*

I did not view the cold cleaners while I was onsite. Mr. Huxhold said that they had been removed from the facility. According to MAERS emission report for 2013 the cold cleaners did not operate for the year.

I did not review the Acid Rain Permit requirements, nor the CAIR Permit requirements.

Compliance Determination-Section 2

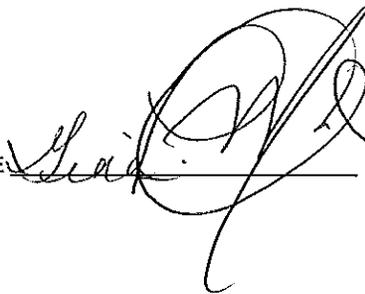
FG-02

*Diesel generator peaking units DG11-1 and DG11-2 used to supply power to the grid in addition to the coal fired unit.*

These units are still housed on site, but have been decommissioned. The oil has been drained in the engines as well as the diesel storage tank. DTE is in the process of requesting the tank to be delisted with LARA. In addition the service panels for these engines have also been decommissioned. The engines are considered no longer operable.

At the time of my inspection the facility was in compliance with its ROP (MI-ROP-B2815-2012) and the air quality regulations.

NAME



DATE

11/21/2014

SUPERVISOR



DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> DTE - Electric Company Harbor Beach Power Plant	<b>SRN :</b> B2815
<b>Location :</b> 755 N. Huron	<b>District :</b> Saginaw Bay
	<b>County :</b> HURON
<b>City :</b> HARBOR BEACH	<b>State:</b> MI <b>Zip Code :</b> 48441 <b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Gina McCann
<b>FCE Begin Date :</b> 1/1/2013	<b>FCE Completion Date :</b> 11/21/2014
<b>Comments :</b> Facility is in the process of decommissioning. All emission units are not operable. glm	

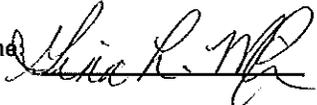
**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
11/17/2014	Scheduled Inspection	Compliance	Compliance Inspection or ROP. Facility had not run since November 2013 and was in the process of decommissioning emission units. glm
10/29/2014	Excess Emissions (CEM)	Compliance	Quarterly Excess Opacity Emissions Report-Boiler ahs not operated. glm
10/29/2014	Excess Emissions (CEM)	Compliance	Sulfur Dioxide Monthly Emission Rate Average Report- Boiler has not operated. glm
09/10/2014	ROP Semi 1 Cert	Compliance	Semi-Annual deviations cert., no deviations to report. glm
09/10/2014	CAM Excursions/Exceedances	Compliance	CAM Excursion Report; CAM Opacity Monitor Downtime Report- No downtime or excursion reported. glm
07/18/2014	Excess Emissions (CEM)	Compliance	Boilers did not operate. No emissions to report. glm
05/06/2014	Excess Emissions (CEM)	Compliance	Quarterly excess opacity emissions report, per EU-00.VII.4. Sulfur Dioxide monthly emission rate average report, per EU-00.VII.4. 0% Opacity, Boilers did not operate. glm

Activity Date	Activity Type	Compliance Status	Comments
03/19/2014	ROP SEMI 2 CERT	Compliance	7/15/2014 Stack 1-Opacity instrument maintenance (7:54-8:06) -12 minutes 7/16/2014 Stack 1-Instrument Maintenance (8:48-8:54)- 6 minutes 7/16/2014 Stack 1-Instrument Maintenance (22:36-22:42) 6 minutes Total downtime for this monitor: 24 minutes. glm
03/19/2014	CAM Excursions/Exceedances	Compliance	No CAM Excursions. glm
03/19/2014	CAM monitor downtime	Compliance	7/15/2014 Stack 1-Opacity instrument maintenance (7:54-8:06) -12 minutes 7/16/2014 Stack 1-Instrument Maintenance (8:48-8:54)- 6 minutes 7/16/2014 Stack 1-Instrument Maintenance (22:36-22:42) 6 minutes Total downtime for this monitor: 24 minutes. glm
03/19/2014	MAERS	Unknown	MAERS electronically submitted 3/12/2014. glm
03/19/2014	ROP Annual Cert	Compliance	Opacity exceeded limits specified in Rule 301. Excess emissions reported 7/13, 10/13, and 1/14. glm
10/31/2013	Excess Emissions (CEM)	Compliance	3rd Qtr. 2013 Opacity and SO2 excess emissions report. Excess opacity emissions reported for 0.1% of the time due to startup/shutdown and CEM instrument maintenance. No SO2 excess emissions reported. SO2 monthly average emission rates below limit.
09/25/2013	ROP Semi 1 Cert	Compliance	Opacity exceeded limits specified in Rule 301. See excess emission report from 7/12 for details.
09/25/2013	CAM Excursions/Exceedances	Compliance	No CAM excursions/exceedances reported.
09/25/2013	ROP Semi 1 Cert	Compliance	No deviations reported.
09/25/2013	CAM monitor downtime	Compliance	No CAM monitor downtime reported.

Activity Date	Activity Type	Compliance Status	Comments
07/30/2013	Excess Emissions (CEM)	Compliance	2nd Qtr. 2013 Opacity and SO2 excess emissions report. Excess opacity emissions reported for 0.1% of the time due to process problems. No opacity monitor downtime reported. No SO2 excess emissions or monitor downtime reported. SO2 monthly average emission rates below limit.
07/25/2013	Excess Emissions (CEM)	Compliance	0.1% opacity exceedances & 0% monitor downtime. 0% SO2 exceedances & 0.4% monitor downtime due to calibration.
07/25/2013	Stack Test	Compliance	Particulate Matter Emission Rate Test Report
07/25/2013	Excess Emissions (CEM)	Compliance	0.3% opacity exceedances and 0.4% monitor downtime due to maintenance & QA/QC activities. 0% SO2 exceedances & 7.6% monitor downtime due to calibration, routine maintenance, no calibration and calibration target outside of the valid target range.
07/25/2013	ROP Other	Compliance	No. 1 Boiler NOx Allowance Deduction Information per NOx Budget Permit
07/25/2013	Excess Emissions (CEM)	Compliance	0.1% opacity exceedances & 0.0% monitor downtime. 0% SO2 exceedances & 0.1% monitor downtime.
07/25/2013	Excess Emissions (CEM)	Compliance	0% opacity exceedances & monitor downtime. 0% SO2 exceedances & 0.7% monitor downtime due to routine maintenance.
07/25/2013	Excess Emissions (CEM)	Compliance	0% opacity exceedances & monitor downtime. 0% SO2 exceedances & monitor downtime.
07/25/2013	Excess Emissions (CEM)	Compliance	0% opacity exceedances & monitor downtime. 0% SO2 exceedances & monitor downtime.
07/22/2013	Scheduled Inspection	Compliance	Scheduled Inspection
07/01/2013	ROP Annual Cert	Compliance	Opacity exceedances - listed deviation. See previously submitted excess emission reports.
07/01/2013	CAM Excursions/Exceedances	Compliance	No CAM excursions reported.

Activity Date	Activity Type	Compliance Status	Comments
07/01/2013	CAM monitor downtime	Compliance	No opacity monitor downtime recorded for 1st, 2nd and 4th quarter. There were 246 minutes of opacity monitor downtime during the 3rd quarter due to either calibration or QA/QC activities.
07/01/2013	ROP SEMI 2 CERT	Compliance	Opacity exceedances - listed deviation. See previously submitted excess emission reports.
06/27/2013	MACT (Part 63)	Compliance	Initial Notification - 40 CFR 63, Subpart DDDDD - The affected emission unit is Auxiliary Boiler #1.
06/27/2013	Excess Emissions (CEM)	Compliance	0% opacity exceedances & monitor downtime. 0% SO2 exceedances & 1.3% monitor downtime due to routine maintenance.
05/10/2013	MAERS	Compliance	MAERS Report Certification
04/15/2013	ROP Other	Compliance	Ozone Season 2012 Oxide of Nitrogen Allowance Deduction Information for the Harbor Beach Power Plant
04/15/2013	NSR Emissions Report	Compliance	2012 NSR Emissions Report for Harbor Beach Plant
03/01/2013	ROP Annual Cert	Compliance	Annual ROP Compliance Certification Report for Section No. 2 of the Permit.
03/01/2013	ROP SEMI 2 CERT	Compliance	Semi-Annual ROP Compliance Certification Report for Section No. 2 of the Permit.
02/04/2013	Excess Emissions (CEM)	Compliance	No opacity exceedances & no monitor downtime. No SO2 exceedances & 0.4% monitor downtime due to calibration.
01/25/2013	MACT (Part 63)	Compliance	Initial Notification - 40 CFR Part 63, Subpart DDDDD (Boiler MACT) - Boiler No. 1
01/25/2013	ROP Annual Cert	Compliance	ROP Annual Certification
01/25/2013	ROP SEMI 2 CERT	Compliance	ROP Semi-Annual Certification

Name:  Date: 11/21/2014 Supervisor: 

**Michigan Department of Environmental Quality  
Air Quality Division  
Reports Received Log**

<b>SRN:</b>	B2815	<b>District:</b>	Saginaw Bay
<b>Facility Name:</b>	DTE - Electric Company Harbor Beach Power Plant	<b>County:</b>	HURON
<b>Address:</b>	755 N. Huron	<b>EPA Class:</b>	MAJOR
<b>City:</b>	HARBOR BEACH		

**REPORT INFORMATION**

Date Received:	Report Type:	Start Date:	End Date:	Report late?:	No. of Deviations:	ROP Section:	Date Reviewed:	Staff:	Compliance Status:
10/20/2014	EXCESS EMIS	7/1/2014	9/30/2014	N	0		10/29/2014	MCCANNG2	COMP
<i>Comments: Quarterly Excess Opacity Emissions Report-Boiler ahs not operated. glm</i>									
10/20/2014	EXCESS EMIS	7/1/2014	9/30/2014	N	0		10/29/2014	MCCANNG2	COMP
<i>Comments: Sulfur Dioxide Monthly Emission Rate Average Report- Boiler has not operated. glm</i>									
8/28/2014	CAM EXCUR	1/1/2014	6/30/2014	N	0		9/10/2014	MCCANNG2	COMP
<i>Comments: CAM Excursion Report; CAM Opacity Monitor Downtime Report-No downtime or excursion reported. glm</i>									
8/28/2014	ROP SEMI1	1/1/2014	6/30/2014	N	0		9/10/2014	MCCANNG2	COMP
<i>Comments: Semi-Annual deviations cert., no deviations to report. glm</i>									
7/14/2014	EXCESS EMIS	4/1/2014	6/30/2014	N	0		7/18/2014	MCCANNG2	COMP
<i>Comments: Boilers did not operate. No emissions to report. glm</i>									
5/1/2014	EXCESS EMIS	1/1/2014	3/31/2014	N	0		5/6/2014	MCCANNG2	COMP
<i>Comments: Quarterly excess opacity emissions report, per EU-00.VII.4. Sulfur Dioxide monthly emission rate average report, per EU-00.VII.4. 0% Opacity, Boilers did not operate. glm</i>									
2/26/2014	NSR			N	0			MCCANNG2	COMP
<i>Comments: 2013 NSR Annual Emissions Report. Actual Emissions reported for 2013 were below the baseline actual emissions established between 1/2004 and 12/2005. No baseline for CO2 had been established, baseline will be established in the next NSR outage notification. glm</i>									
2/19/2014	ROP OTHER	1/1/2013	12/31/2013	N	0			MCCANNG2	
<i>Comments: No 1 Boiler NOx Allowance Deduction Information</i>									

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1/28/2014	EXCESS EMIS	10/1/2013	12/31/2013	N	0			MCCANNG2
		<i>9/11</i> Comments: Quarterly Excess Opacity Emissions Report, per EU-00.V OPAC: Unit #1 12 control problems. ESP Problems 2 exceedances of limit (27), 1 at 6:42 (30) and 1 at 6:48 (28). glm						
1/28/2014	ROP OTHER			N	0			MCCANNG2
		Comments: Sulfur Dioxide Monthly Emission Rate Average Report, per EU-00.VII.4 Did not operate October 2013 and December 2013, November 2013 SOx monthly emission rate 0.78 lbx.SO2/mmBtu, below ROP limit 1.67 lb/mmBtu. glm						
12/2/2013	ROP OTHER			N	0			MCCANNG2
		Comments: No. 1 Boiler Allowance Deduction Information, amount of credits they have in their account. glm						
3/14/2014	CAM EXCUR	1/1/2013	12/31/2013	N	0	1	3/19/2014	MCCANNG2 COMP
		Comments: No CAM Excursions. glm						
3/14/2014	CAM MON	1/1/2013	12/31/2013	N	0	1	3/19/2014	MCCANNG2 COMP
		Comments: 7/15/2014 Stack 1-Opacity instrument maintenance (7:54-8:06) -12 minutes 7/16/2014 Stack 1-Insturment Maintenance (8:48-8:54)- 6 minutes 7/16/2014 Stack 1-Instrument Maintenance (22:36-22:42) 6 minutes Total downtime for this monitor: 24 minutes. glm						
3/14/2014	MAERS	1/1/2013	12/31/2013	N	0	1	3/19/2014	MCCANNG2 UNKNOWN
		Comments: MAERS electronically submitted 3/12/2014. glm						
3/14/2014	ROP ANNUAL	1/1/2013	12/31/2013	N	0	1	3/19/2014	MCCANNG2 COMP
		Comments: Opacity exceeded limits specified in Rule 301. Excess emissions reported 7/13, 10/13, and 1/14. glm						
3/14/2014	ROP SEMI2	7/1/2013	12/31/2013	N	3	1	3/19/2014	MCCANNG2 COMP
		Comments: 7/15/2014 Stack 1-Opacity instrument maintenance (7:54-8:06) -12 minutes 7/16/2014 Stack 1-Insturment Maintenance (8:48-8:54)- 6 minutes 7/16/2014 Stack 1-Instrument Maintenance (22:36-22:42) 6 minutes Total downtime for this monitor: 24 minutes. glm						
10/28/2013	EXCESS EMIS	7/1/2013	9/30/2013	N	0	1	10/31/2013	MCCANNG2 COMP
		Comments: 3rd Qtr. 2013 Opacity and SO2 excess emissions report. Excess opacity emissions reported for 0.1% of the time due to startup/shutdown and CEM instrument maintenance. No SO2 excess emissions reported. SO2 monthly average emission rates below limit.						

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9/10/2013	CAM EXCUR	1/1/2013	6/30/2013	N	0	1	9/25/2013	LANGJ1	COMP
<i>Comments: No CAM excursions/exceedances reported.</i>									
9/10/2013	CAM MON	1/1/2013	6/30/2013	N	0	1	9/25/2013	LANGJ1	COMP
<i>Comments: No CAM monitor downtime reported.</i>									
9/10/2013	ROP SEMI1	1/1/2013	6/30/2013	N	1	1	9/25/2013	LANGJ1	COMP
<i>Comments: Opacity exceeded limits specified in Rule 301. See excess emission report from 7/12 for details.</i>									
<del>7/29/2013</del>	<del>EXCESS EMIS</del>	4/1/2013	6/30/2013	N	0	1	7/30/2013	LANGJ1	COMP
<i>Comments: 2nd Qtr. 2013 Opacity and SO2 excess emissions report. Excess opacity emissions reported for 0.1% of the time due to process problems. No opacity monitor downtime reported. No SO2 excess emissions or monitor downtime reported. SO2 monthly average emission rates below limit.</i>									
9/10/2013	ROP SEMI1	1/1/2013	6/30/2013	N	0	2	9/25/2013	LANGJ1	COMP
<i>Comments: No deviations reported.</i>									

*2/27/2013  
ROP Semi 2  
+  
ROP Annual*

<b>1. Notification</b> 201401760-R0				
Date of Notification:    12/12/2013	Date of Revision(s):			
Notification Type:        Original	Project Type:                      Planned Renovation			
<b>2. Project Schedule</b>	<b>Work Schedule</b>			
Renovation:                      - Begin                      End                      Days of the week                      Work Hours	Renovation:			
Asb. Removal:                      1/1/2014                      12/31/2014	Asb. Removal:			
Demolition:	Demolition:			
<b>3. Abatement Contractor</b>	<b>4. Demolition Contractor</b>			
Name:                      RAND ENVIRONMENTAL SERVICES	Name:			
Mailing Address:                      35555 GENRON COURT	Mailing Address:			
City/State/Zip:                      ROMULUS MI , 48174	City/State/Zip:                      ,			
E-mail:                      TDYL@RANDENVIRONMENTAL.COM	E-mail:			
Contact:                      TOM DYL	Contact:			
Phone:                      (734) 442-1100	Phone:                      ( ) -			
<b>5. Facility Owner:</b>	<b>9. Ordered Demolitions</b>			
Name:                      DTE ENERGY	Gov't Agency Ordering Demo:			
Mailing Address:                      ONE ENERGY PLAZA	Name/ Title of Person Signing Order:			
City/State/Zip:                      DETROIT MI , 48226	Date of Order:			
E-mail:	Date Ordered to Begin:			
Contact:                      MARK VANDERHEUVEL				
Phone:                      (810) 324-3218				
<b>6. Facility Description:</b>				
Facility Name:                      DTE - Electric Company Harbor Beach Power Plant	# of Units:			
Location Address:                      755 N. Huron	# of Floors:			
City/State/Zip:                      HARBOR BEACH MI , 48441	Floor Number:			
Nearest Crossroads:                      M-25 & M-142	Size (sq. ft.):			
Present Use:	Age:                      46			
Prior Use:				
Specific Location(s) in Facility:				
Yes				
<b>10. Is Asbestos Present?</b> Yes                      To be removed prior to demolition:                      No				
Non-friable ACM not removed prior to demo				
RACM to be Removed	RACM to be Encapsulated	Category I	Category II	Unit of Measure
400				Linear Feet
200				Square Feet

**11. Project Description**

**A) Renovation**

- Piping       Fittings       Boiler(s)       Tank(s)       Beam(s)  
 Tunnel(s)       Ceiling Tile(s)       Mag Block       Duct(s)  
 Other:

**Method of Removal**

- Glove Bag       Negative Pressure Containment       Cut into Sections  
 Hand Scraping       Dry removal  
 Other:

**B) Demolition**

Type:

**Method of Demolition**

- Excavator or other heavy equipment       Disassembly by hand       Explosive  
 Other:

**12. Engineering Controls**

- Water spray used to control dust       Adequatley wet material  
 Place in leak tight containers until proper disposal  
 Other:

**13. Unexpected Asbestos**

- Stop Work       Wet Material       Revise Notification       Contact DEQ and Adbatement Contractor  
 Other:

**14. Procedure(s) used to detect the presence of Asbestos**

**A) Indicate how you determined whether or not asbestos is in the facility.**

- All suspect materials sampled and analyzed using Polarized Light Microscopy (PLM)  
 Other:

**B) Name, Address, and Telephone Number of the company performing the asbestos survey:**

Company Name:  
Address:  
City/State/Zip:  
Telephone Number: ( ) -

**C) Inspection Information**

Inspector Name:  
Accreditation Number:  
Inspection Date:

**7. Disposal Site**

Site Name: WOODLAND MEADOWS  
Location Address: 5900 HANNAN RD  
City/State/Zip: WAYNE MI , 48184

**8. Waste Transports**

Transporter Name	Address	City	State	Zip	Phone Extended
MARINE POLLUTION CONTROL	8631 WEST JEFFERSON	DETROIT	MI	48209	( ) -

**15. Emergency Renovations**

Date of Emergency:

Time of Emergency:

**Description of the sudden, unexpected event:**

**How it caused unsafe conditions, equipment damage, and/or unreasonable financial burden:**

**Comments**

**Comment Date    Comment Text**