



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

APR 20 2016

REPLY TO THE ATTENTION OF

Scott Miller  
Jackson District Supervisor  
Jackson District Office  
Michigan Department of Environmental Quality  
State Office Building, 4<sup>th</sup> Floor  
301 East Louis B Glick Highway  
Jackson, Michigan 49201

Dear Mr. Miller:

The U.S. Environmental Protection Agency has reviewed the draft renewal of the Renewable Operating Permit (ROP) for DTE Electric Company – Monroe Power Plan, State Registration Number B2816, located in Monroe County, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. Compliance Assurance Monitoring (CAM) applicability. Page 6 of the Staff Report states that EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4 are exempt from CAM for particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), and sulfur dioxide (SO<sub>2</sub>). Please provide additional information and verification regarding CAM applicability for each pollutant specific emission unit (PSEU) at the source in accordance with all criteria in 40 CFR § 64.2, and include CAM requirements in the permit as applicable. Also, in accordance with 40 CFR § 64.2(a)(1), PSEUs subject to both CAM exempt and nonexempt emission limitations or standards are subject to CAM for the nonexempt limitations or standards.
2. EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4 are subject to the National Emission Standards for Hazardous Air Pollutants Part 63, Subpart UUUUU, Mercury and Air Toxics Standards (MATS). The permit does not contain sufficient detail regarding the MATS requirements applicable to these units, as required by 40 CFR § 70.6(a)(1). The MATS compliance date has passed and is no longer a future effective standard with undetermined compliance options. See also 40 CFR § 70.5(b), duty to supplement or correct application.
3. EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4, SC. I Various Emission Limits. The monitoring/testing method for various pollutants for EU-UNIT-1, EU-UNIT2, EU-UNIT3, and EU-UNIT4 do not appear to reference the correct special condition. In addition, some of the time period/operating scenarios and monitoring/testing methods in the emission limit tables only address reference test requirements. Please review the list provided in Appendix A to ensure that the permit includes monitoring sufficient to ensure

compliance, and revise the special conditions references, as appropriate, per 40 CFR § 70.6(a)(3)(A), 40 C.F.R. § 70.6(a)(3)(B), and 40 C.F.R. § 70.6(c)(1).

4. Federal/state enforceability. Please review the hydrogen chloride and arsenic emission limits and associated requirements for EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4 to verify whether these conditions should reference footnote 2, federally enforceable pursuant to Rule 201(1)(a), or footnote 1, state only enforceable pursuant to Rule 201(1)(b).
5. Malfunction Abatement Plan (MAP). EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4, EU-CASCADES, EU-TRANSFERHS, EU-DUMPERHS, EU-COALUNLOAD, EU-CRUSHERHS, EU-PETCOKE, EU-LIMESTONE, EU-GYPSUMHAND, EU-HYDRATEDLIME, and EU-REFHS&BL require MAPs for process operations and associated control equipment. Please ensure that the MAPs are readily accessible in the permit record and available online with the source's permit program documentation. As addressed by EPA's March 5, 1996 "White Paper Number 2 for Improved Implementation of The Part 70 Operating Permits Program," information cited or cross-referenced in permits should be current and readily available to the permitting agency and to the public.
6. EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4, Pollution Control Equipment. The coal-fired cell burner boilers have several pollution control devices, including low-NOx burners, overfire air, sorbent system, sulfur trioxide and ammonia flue gas conditioning systems, selective catalytic reduction, electrostatic precipitators, and wet flue gas desulfurization. Conditions for each of these units indicates that the permittee shall not operate the unit unless a MAP is implemented and maintained. There are no specific operating parameters for any of pollution control equipment (for example, minimum voltage requirements for the electrostatic precipitators). Please include specific operating parameters for each of the pollution control devices and any other MAP requirements that are necessary to ensure compliance with the applicable limits and standards in the draft permit.
7. Fugitive Dust Control Program. EU-CASCADES, EU-TRANSFERHS, EU-DUMPERHS, EU-COALUNLOAD, EU-CRUSHERHS, EU-PETCOKE, EU-LIMESTONE, EU-GYPSUMHAND, EU-HYDRATEDLIME, and EU-REFHS&BL require fugitive dust control programs for material handling operations. Please ensure that the fugitive dust control programs are readily accessible in the permit record and available online with the source's permit program documentation. As addressed by EPA's March 5, 1996 "White Paper Number 2 for Improved Implementation of The Part 70 Operating Permits Program," information cited or cross-referenced in permits should be current and readily available to the permitting agency and to the public.
8. EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4, SC. VI.3-6 Monitoring/Recordkeeping. Conditions SC. VI.3-6 reference the installation, calibration, maintenance and operation of devices to continuously monitor emissions, exhaust gas flow rate, and energy output of the emission unit. These conditions all specify that the devices shall be operated in a "satisfactory manner." Please clarify the definition of "satisfactory manner." The

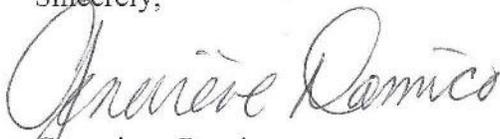
permittee should follow the recommendations of the device vendor/system designer to ensure proper installation, calibration, maintenance, and operation. Further, if a plan detailing the "satisfactory manner" of operation exists, it should be referenced in the draft permit and made available with the permit record.

9. EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4, SC. VI.7-10  
Monitoring/Recordkeeping. Conditions SC. VI.7-10 indicate that the permittee shall keep, in a satisfactory manner, hourly and 24-hour rolling average emission rate and mass records. Please clarify the definition of "satisfactory manner" as it relates to these conditions.
10. EU-CASCADES, SC. I Emission Limits. The majority of the emission limits reference SC. VI.3, which is not contained in the draft permit. Please review this reference and revise accordingly.
11. FGPEAKERS, SC. VI.1 Monitoring/Recordkeeping. The permittee shall complete all required calculations in a format acceptable to the District Supervisor. Please include the calculations required to maintain compliance with the emissions limits as part of the draft permit.
12. EU-REFHS&BL, SC. I.1-2 Emission Limits. The monitoring/testing method for opacity and PM reference SC. VI.2, which is not contained in the draft permit. Please review this reference and revise accordingly.
13. EU-REFHS&BL, SC. I. Emission Limits. Emission unit EU-REFHS&BL has emission limits for opacity, PM, PM<sub>2.5</sub>, and PM-10. There is no testing specific to any of the emission limits for PM, PM<sub>2.5</sub>, and PM-10 under the testing/sampling section of the emission unit. There is a reference to conducting non-certified visible emission observations on a daily basis, followed by an EPA Method 9 test if emissions are observed. A Method 9 test determines visual opacity. Please provide further information on how the permittee will demonstrate compliance with these emission limits.
14. EU-REFHS&BL, SC. IV.1 Design/Equipment Parameters. The special condition indicates that the permittee shall not operate any portion of EU-REFHS&BL unless the associated enclosures, fabric filters, and bin vent filter are installed, maintained and operated in a satisfactory manner. The draft permit does not contain any information detailing which enclosures, fabric filters and bin vent filters are associated with each portion of the emission unit. To ensure enforceability, please update the permit to include a complete description of the emission unit and associated pollution control equipment.
15. EU-FlyAshStorage. The draft permit indicates that the fly ash storage facility has filter receivers and bin vent filters as pollution control equipment. The draft permit does not include any information detailing the pollution control equipment (i.e., name, number, location, etc.). To ensure clarity and enforceability, please update the permit to contain a complete description of the emission units and air pollution control equipment included in this permit .

16. EU-FlyAshStorage, SC. IV.1-6 Design/Equipment Parameters. Conditions SC. IV.1-6 reference the installation, maintenance and operation of pollution control devices. These conditions all specify that the devices shall be operated in a "satisfactory manner." Please clarify the definition of "satisfactory manner." The permittee should follow the recommendations of the device vendor/system designer to ensure proper installation, maintenance, and operation. Further, if a plan detailing the "satisfactory manner" of operation exists, it should be referenced in the draft permit.
17. EU-FlyAshStorage, SC. I. Emission Limits. Emission unit EU-FlyAshStorage has emission limits for opacity, PM, and PM-10. There is no testing specific to any of the emission limits for PM and PM-10 under the testing/sampling section of the emission unit. There is a reference to conducting non-certified visible emission observations on a daily basis, followed by an EPA Method 9 test if emissions are observed. A Method 9 test determines visual opacity. Please provide further information on how the permittee will demonstrate compliance with these emission limits.
18. The term "REF sorbent system" is listed as one of the control technologies, however, REF is not defined. Please define this term in the permit.
19. EU UNITS 1-4 have a material limit for combusting petcoke at each unit of 23,652 tons of SO<sub>2</sub> per calendar month. Please explain how the facility will assure compliance with the individual ton per month limits in the draft permit.

Thank you for the opportunity to provide comments on this draft permit. If you have any questions, please contact me or any of my following staff: Constantine Blathras, 312-886-0671; Sarah Rolfes, 312-886-6551; or Beth Valenziano, 312-886-2703.

Sincerely,

  
Genevieve Damico  
Chief  
Air Permits Section

## Appendix A

### EU-UNIT1, EU-UNIT2, EU-UNIT3, EU-UNIT4 Monitoring/Testing Method References

The monitoring/testing method for various pollutants for EU-UNIT-1, EU-UNIT2, EU-UNIT3, and EU-UNIT4 do not appear to reference the correct special condition. Please review the list below to ensure that the draft permit includes monitoring sufficient to ensure compliance, and revise the special conditions references, as appropriate, per 40 CFR § 70.6(a)(3)(A), 40 CFR § 70.6(a)(3)(B), and 40 CFR § 70.6(c)(1).

- a. EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4, SC. I.5 sulfur dioxide (SO<sub>2</sub>). The monitoring testing method references SC. VI.4 and SC. VI. 8 which present conditions for monitoring mercury and nitrogen oxides (NO<sub>x</sub>) emissions, respectively. Please review this reference and revise, as appropriate.
- b. EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4, SC. I.6 SO<sub>2</sub>. The monitoring testing method references SC. VI.4 and SC. VI. 8 which present conditions for monitoring mercury and NO<sub>x</sub> emissions, respectively. Please review this reference and revise, as appropriate.
- c. EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4, SC. I.7 NO<sub>x</sub>. The monitoring testing method references SC. VI.4 and SC. VI. 9 which present conditions for monitoring mercury and carbon monoxide (CO) emissions, respectively. Please review this reference and revise, as appropriate.
- d. EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4, SC. I.8 NO<sub>x</sub>. The monitoring testing method references SC. VI.4 and SC. VI. 9 which present conditions for monitoring mercury and CO emissions, respectively. Please review this reference and revise, as appropriate.
- c. EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4, SC. I.9 CO. The monitoring testing method references SC. VI.4 and SC. VI.10 which present conditions for monitoring mercury emissions and emission rate, respectively. Please review this reference and revise, as appropriate.
- f. EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4, SC. I.10 CO. The monitoring testing method references SC. VI.4 and SC. VI.10 which present conditions for monitoring mercury emissions and emission rate, respectively. Please review this reference and revise, as appropriate.
- g. EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4, SC. I.18 Mercury. The monitoring testing method references SC. VI.5 and SC. VI.7 which present conditions for monitoring exhaust gas flow rate and SO<sub>2</sub> emissions, respectively. Please review this reference and revise, as appropriate.
- h. EU-UNIT1, EU-UNIT2, EU-UNIT3, and EU-UNIT4, SC. I.19 Mercury. The monitoring testing method references SC. VI.5 and SC. VI.7 which present conditions for monitoring exhaust gas flow rate and SO<sub>2</sub> emissions, respectively. Please review this reference and revise, as appropriate.