



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

REPLY TO THE ATTENTION OF

APR 12 2016

Annette Switzer  
Permit Section Supervisor  
Department of Environmental Quality  
Air Quality Division  
P.O. Box 30260  
Lansing, Michigan 48909-7760

Dear Ms. Switzer:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft construction permit for DTE Electric Company Trenton Channel Power Plant. (Permit numbers 227-15 and 125-11C). On Thursday, April 12, 2016, my staff held a conference call with your staff to discuss our comments. Below are our comments:

Comments on 227-15:

- 1) The Fact Sheet for the draft permit contains a description of process and operational restrictions with a limitation that only three of the five new natural gas-fired boilers may be operated at any one time. Additionally, the Fact Sheet states that records are to be kept showing when and for how long each boiler is operated. The draft permit does not contain such permit conditions explicitly restricting the use of only three of five boilers at any one time. Please include a process/operational condition in which "only three of the five new natural gas-fired boilers may be operated at any one time", and a monitoring/recordkeeping condition requiring that records be kept showing when and for how long each boiler is operated.
- 2) The draft permit contains a nitrogen oxides (NO<sub>x</sub>) emission limit of 6.99 pounds per hour. EPA believes that a lower NO<sub>x</sub> limit is likely achievable by the new boilers. EPA proposes that MDEQ consider an appropriate lower NO<sub>x</sub> emission limit in the draft permit that is achieved in practice by similar units.

Comments on 125-11C:

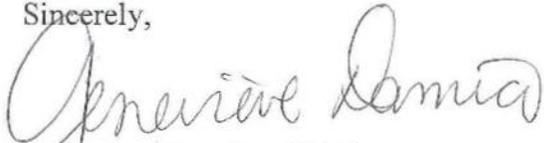
- 1) On page 10 of the draft permit, it contains a sulfur dioxide (SO<sub>2</sub>) emission limit of 23,841 tons per year (tpy), on a 12-month rolling time period, effective January 1, 2017. EPA has reviewed historic actual emissions from EU-BOILER\_9A that have been reported as part of the Acid Rain Program from the years 2010-2015. The actual emissions have ranged from

approximately 12,000 tpy to 17,000 tpy. EPA believes that a SO<sub>2</sub> emission limit of 19,000 tpy is achievable by this unit, based on the emissions reported from 2010-2015 and better represents the expected emissions.

- 2) Under EPA's April 2014, SO<sub>2</sub> Nonattainment Guidance, attainment demonstrations for the 2010 SO<sub>2</sub> standard should demonstrate future attainment and maintenance of the National Ambient Air Quality Standards (NAAQS) in the entire area designated as nonattainment (i.e., not just at the violating monitor) by using air quality dispersion modeling to show that the mix of sources and enforceable emission rates in an identified area will not lead to a violation of the SO<sub>2</sub> NAAQS. Please submit modeling that demonstrates compliance with the 1 hour SO<sub>2</sub> standard.
- 3) EU-BOILER\_9A is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Part 63, Subpart UUUUU, establishing mercury and air toxics standards (MATS) for coal and oil fired electric utility steam generating units. However, the permit does not contain the necessary detail about EU-BOILER\_9A's requirements under this regulation. Per today's discussion, MDEQ stated that the conditions from this subpart will be incorporated in detail in the renewable operating permit at a later date. Given that the NESHAPs Subpart UUUUU has an effective date of April 16, 2016 and the purpose of permit 125-11C is to incorporate the new MATS standards, EPA expects this subpart language be included in detail as part of this permitting action.
- 4) EU-BOILER\_9A, SC. III. Process/Operational Restriction. The process/operational restrictions for EU-BOILER\_9A include language requiring that the emission unit not operate without the proper operation of the pollution control equipment (low NO<sub>x</sub> burner and electrostatic precipitator (ESP)). There is no definition in the draft permit conditions to detail what constitutes the proper operation of the pollution control equipment. Without such information, this condition is not practically enforceable. Please verify whether there are specific applicable requirements (i.e., manufacturer's specifications, operations and maintenance plan, etc.) or provisions in an applicable plan, and include those in the permit as appropriate.
- 5) EU-BOILER\_9A, SC. III.4 Process/Operational Restriction. The condition states that the permittee shall maintain and implement a Malfunction Abatement Plan (MAP) for EU-BOILER\_9A. The condition further states that the MAP shall address the low NO<sub>x</sub> burners and the ESP. Please verify whether there are no specific applicable requirements, or provisions within the MAP that are necessary to assure compliance (i.e., voltage levels or temperature requirements) and include those in the permit as appropriate.

We would like to thank you again for working with us in making sure that these issues are resolved in a timely manner. If you have any further questions, please feel free to contact Constantine Blathras at (312) 886-0671 or Sarah Rolfes at (312) 886-6551.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the printed name and title.

Genevieve Damico, Chief  
Air Permits Section