

**DTE**

August 12, 2024

Ms. Kelly Orent
EGLE, Air Quality Division
Grand Rapids District Office
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503

Subject: Application for ROP Minor Modification for SRN #B2796
Rule 216(3) Significant Modification Change
DTE Electric Company – Blue Water Energy Center
Sections 3 of MI-ROP-B2796-2024

Dear Ms. Orent,

DTE Electric Company hereby submits a ROP significant modification application under Rule 216(3) to ROP No: MI-ROP-B2796-2024 for Blue Water Energy Center located at 4400 River Road in East China, Michigan. Enclosed are the M-001 and C-001 forms, as required. This significant modification change affects EU-EMENGINE-BW in Section 3 of the ROP.

EU-EMENGINE-BW is subject to 40 CFR Part 60 Subpart IIII and was installed as a certified engine. EU-EMENGINE-BW V.1(a) states performance testing is necessary when the engine is not operated according to the manufacturer's emission related written instructions or the permittee changes emission-related settings in a way that is not permitted by the manufacturer (then its considered a non-certified engine). DTE requests adding language to EU-EMENGINE-BW V.4 stating *"If the engine operates as a non-certified engine, then permittee shall verify the PM10 and PM2.5 emissions rates"*

DTE is also requests removing the following emission units from Section 3 of the ROP: EU-CTLUBEILOILTANKS-BW, EU-STLUBEILOILTANKS-BW, EU-STHYRDROOILTANK-BW, EU-STSEALOILTANK-BW, EU-BFPOILTANKS-BW, EU-GCLUBEILOILTNKS-BW and EU-COLDCLEANER-BW. This change would otherwise fall under Rule 215(1)(a) operational flexibility change, but DTE is requesting it be processed it with the significant modification.

EU-CTLUBEILOILTANKS-BW, EU-STLUBEILOILTANKS-BW, EU-STHYRDROOILTANK-BW, EU-STSEALOILTANK-BW, and EU-BFPOILTANKS-BW were permitted as tanks in the original PTI. However, these emission units are pipe expansions or oil reservoirs that do not have vents; therefore, not considered tanks. DTE is requesting to remove these emission units from the ROP. DTE is also requesting to remove EU-GCLUBEILOILTNKS-BW and EU-COLDCLEANER-BW from the ROP as these emission units were never installed.

Should you have any questions regarding this ROP significant modification application, please contact Alexis Thomas at alexis.thomas@dteenergy.com or (248) 794-9390.

Sincerely,

Alexis Thomas /s/

Alexis Thomas
Senior Environmental Engineer
Environmental Management & Safety
DTE Electric Company



Enclosure: MI-ROP-B2796-2024 Significant Modification Application comprised of:

1. *M-001: ROP Rule 216 Modification Application Form*
2. *C-001: ROP Application Certification Form (Section 3)*

Cc (via email):

Mark Dziadosz, EGLE-AQD
Lezley Filzek, DTE Electric Company
Jamie Stanislawski, DTE Electric Company
Lisa Lockwood, DTE Electric Company
Barry Marietta, DTE Electric Company

File in SharePoint

RENEWABLE OPERATING PERMIT
M-001: RULE 215 CHANGE NOTIFICATION
RULE 216 AMENDMENT/MODIFICATION APPLICATION

This information is required by Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment.

1. SRN B2796	2. ROP Number MI-ROP-B2796-2024, Section 3	3. County St. Clair
4. Stationary Source Name	DTE Electric Company, Blue Water Energy Center	
5. Location Address	4400 River Road	6. City East China
7. Submittal Type - The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the <input type="checkbox"/> Rule 215(1) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 215(2) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 215(3) Notification of change. Complete Items 8 – 11 and 14 <input type="checkbox"/> Rule 215(5) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions. <input type="checkbox"/> Rule 216(2) Minor Modification. Complete Items 8 – 12 and 14 <input checked="" type="checkbox"/> Rule 216(3) Significant Modification. Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions. <input type="checkbox"/> Rule 216(4) State-Only Modification. Complete Items 8 – 12 and 14		
8. Effective date of the change: 06-01-2024		9. Change in emissions? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
10. Description of Change - Describe any changes or additions to ROP, including any changes in emissions and/or pollutants. EU-EMENGINE-BW is subject to 40 CFR Part 60 Subpart IIII and was installed as a certified engine. EU-EMENGINE-BW V.1(a) states that performance testing is necessary when the engine is not operated according to the manufacturer's emission related written instructions or the permittee changes emission-related settings in a way that is not permitted by the manufacturer (then its considered a non-certified engine). DTE requests adding language to EU-EMENGINE-BW V.4 stating "If the engine operates as a non-certified engine, then permittee shall verify the PM10 and PM2.5 emissions rates" EU-CTLUBEOILTANKS-BW, EU-STLUBEOILTANKS-BW, EU-STHYRDROOILTANK-BW, EU-STSEALOILTANK-BW, and EU-BFPOILTANKS-BW were permitted as tanks in the original PTI. However, these emission units are pipe expansions or oil reservoirs that do not have vents; therefore, are not tanks. DTE requests removing these emission units from the ROP. DTE requests removing EU-GCLUBEOILTANKS-BW and EU-COLDCLEANER-BW from the ROP as these emission units were never installed.		
11. New Source Review Permit(s) to Install (PTI) associated with this application? If Yes, enter the PTI Number(s)		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
12. Compliance Status - A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No. a. Is the change identified above in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No b. Will change identified above continue to be in compliance with associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No c. If the change includes a future applicable requirement(s), will timely compliance be achieved? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
13. Operator's Additional Information ID - Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.		AI-
14. Contact Name Alexis Thomas	Telephone No. (248) 794-9390	E-mail Address Alexis.thomas@dteenergy.com
15. This submittal also updates the ROP renewal application submitted on (MM/DD/YY) (If yes, a mark-up of the affected pages of the ROP must be attached.)		___/___/___ <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A

NOTE: A CERTIFICATION FORM (C-001) SIGNED BY A RESPONSIBLE OFFICIAL MUST ACCOMPANY ALL SUBMITTALS



Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.

This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN B2796
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<u>Stationary Source Name</u> DTE Electric Company – Blue Water Energy Center	
<u>City</u> East China	<u>County</u> St. Clair

SUBMITTAL CERTIFICATION INFORMATION	
1. Type of Submittal <i>Check only one box.</i>	
<input type="checkbox"/> Initial Application (Rule 210)	<input checked="" type="checkbox"/> Notification / Administrative Amendment / Modification (Rules 215/216)
<input type="checkbox"/> Renewal (Rule 210)	<input type="checkbox"/> Other, describe on AI-001
2. If this ROP has more than one Section, list the Section(s) that this Certification applies to 3	
3. Submittal Media <input checked="" type="checkbox"/> E-mail <input type="checkbox"/> FTP <input type="checkbox"/> Disk <input checked="" type="checkbox"/> Paper	
4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal. AI	

CONTACT INFORMATION	
<u>Contact Name</u> Alexis Thomas	<u>Title</u> Senior Engineer - Environmental
<u>Phone number</u> (248) 794-9390	<u>E-mail address</u> Alexis.thomas@dteenergy.com

This form must be signed and dated by a Responsible Official.				
<u>Responsible Official Name</u> Lezley Filzek			<u>Title</u> Plant Manager, Energy Supply	
<u>Mailing address</u> DTE Electric Company, Blue Water Energy Center, 4400 River Road				
<u>City</u> East China	<u>State</u> MI	<u>ZIP Code</u> 48054	<u>County</u> St. Clair	<u>Country</u> USA
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.				
			8/20/2024	
Signature of Responsible Official			Date	