

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

B280650001

FACILITY: DTE Electric Company - Superior Peaking Facility		SRN / ID: B2806
LOCATION: 6000 FIRST STREET, SUPERIOR TWP		DISTRICT: Jackson
CITY: SUPERIOR TWP		COUNTY: WASHTENAW
CONTACT:		ACTIVITY DATE: 08/13/2019
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Stefanie Ledesma  
Phone: 734-308-9668  
Email: stefanie.ledesma@dteenergy.com

**Purpose**

I arrived at the facility and met with Stefanie Ledesma of DTE Energy to conduct an inspection to determine the compliance of the DTE Electric Company - Superior Peaking Station with ROP MI-ROP-B2806-2018.

**Background**

The Detroit Edison Superior Peaking Facility has four oil-fired combustion turbines that were installed in 1966 and are rated at approximately 19 MW each. Unit 1 has a 300 hp black start engine connected to it, which is used to start the unit, that is subject to the RICE MACT. These units are only used when DTE Energy requires more power to the electrical grid or for maintenance purposes.

**Compliance Inspection**

FGPEAKERS

This facility was not operating at the time of the inspection. Stefanie provided me with the monthly totals of fuel usage and the hours of operation for the time period of January 2019 through July 2019 which was 71,581 gallons and 51 hours for all the units combined (see attachment 1). This is in compliance with SC VI.1 which requires that they record their monthly fuel usage. They get the monthly usage for each unit and compile the usage totals at their headquarters in Detroit. She also sent me a copy of the Fuel Oil Supply Agreement that contains fuel specifications of the fuel that they use (see attachment 2). They are using ultra-low sulfur diesel fuel that has a sulfur content of 15 ppm (0.0015%), which is well below their limit of 1.5% sulfur by weight per SC II.1. I determined that they are complying with the requirements of this table.

EU-BLKSTART11-1

They have a 300 HP black start engine which is used to start Unit 1. This is subject to 40 CFR 63 Subpart ZZZZ as an area source. They had last changed the oil and filter and inspected the hoses, belts, and air filter on October 1, 2018 as required by SC III.1(see attachment 3). They are operating and maintaining this unit by doing annual inspections, doing required maintenance, and recording that activity in the DTE database per SC III.2 and recording the activity per SC VI.2 (see attachment 4). They are not doing the oil analysis in lieu of specified oil change requirement that is optional per SC III.3. They also have an operation instruction manual for this emission unit that specifies how to operate and maintain the unit (see attachment 5). They are minimizing the time spent at idle at startup and the time needed for appropriate and safe loading of the engine per SC III.5 (see attachment 1). I determined that they are in compliance with the requirements of this MACT and this table.

**Compliance Determination**

Based on the inspection, annual and semi-annual certifications, and MAERS submittals, I determined that they are in compliance with their ROP. I thanked Stefanie for her time and left.

NAME Brian Carley

DATE 8/21/19

SUPERVISOR [Signature]