

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : DTE - Electric Company RIVER ROUGE	SRN : B2810
Location : 1 BELANGER PARK DR	District : Detroit
	County : WAYNE
City : RIVER ROUGE State: MI Zip Code : 48218	Compliance Status : Compliance
Source Class : MAJOR	Staff : C. Nazaret Sandoval
FCE Begin Date : 6/2/2016	FCE Completion Date : 6/2/2017
Comments : FCE FY2017	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
06/02/2017	Excess Emissions (CEM)	Compliance	1st Quarter 2016 quarterly report: AQD counts (3) deviations from 6-minute opacity standards and (1) deviations for COMS/CEMS downtimes. See report M281041700
06/02/2017	Excess Emissions (CEM)	Compliance	2nd Quarter 2016 quarterly report: AQD counts (0) deviations from 6-minute opacity standards and (2) deviations for COMS/CEMS downtimes. See report M281041700
06/02/2017	Excess Emissions (CEM)	Compliance	3rd Quarter 2016 quarterly report: AQD counts (1) deviation from 6-minute opacity standards and (2) deviations for COMS/CEMS downtimes. See report M281041700
06/02/2017	Excess Emissions (CEM)	Compliance	4th Quarter 2016 quarterly report: AQD counts (2) deviations from 6-minute opacity standards and (3) deviations for COMS/CEMS downtimes. See report M281041700
06/02/2017	Excess Emissions (CEM)	Compliance	1st Quarter 2017 quarterly report: AQD counts (3) deviations from 6-minute opacity standards and (3) deviations for COMS/CEMS downtimes. See report M281041700
06/02/2017	MACT (Part 63)	Compliance	MATS semiannual compliance report covering the period from 4/16/2016 through 12/31/2016. See report B281041711.

Activity Date	Activity Type	Compliance Status	Comments
06/02/2017	Stack Test	Compliance	Quarterly report for HCl testing on the exhaust of Unit 3 for the 1st quarter of year 2017. Testing required per the Mercury and Air Toxics Standard (MATS), 40 CFR Part 63, Subpart UUUUU. Report received 5/11/2017. Testing was conducted on March 7, 2017 at average load conditions of 182 GMW. Results of the three 60-minute runs show an average HCl emissions of 0.22 ppm and an average rate of 0.0004 lbs/MMBtu, which is in compliance with the MATS limit of 0.002 lbs./ MMBtu.
06/02/2017	Scheduled Inspection	Compliance	FY 2017 - Targeted Inspection
06/02/2017	Other	Compliance	Review of 1st Quarter 2016 through 1st Quarter 2017 (1/1/2016 through 3/31/2017) Monitoring Reports. Report B281041700
06/02/2017	Other	Compliance	Review of MATS semiannual compliance report (4/16/2016 through 12/31/2016). Report B281041711
03/31/2017	MAERS	Compliance	MAERS report received 3/13/2017. ROP certification postmarked 3/15/2017. MAERS audit was completed on 5/31/2017. For audit details see report No. CA B281034737
03/15/2017	ROP Other	Compliance	2016 MAERS ROP Certification Form postmarked 3/15/2017
03/14/2017	ROP SEMI 2 CERT	Compliance	ROP Section 1 Semiannual Certification Report for period 7/1/2016 through 12/31/2016, postmarked 3/14/2017.
03/14/2017	ROP Annual Cert	Compliance	ROP Section 1 Annual Certification Report for period 1/1/2016 through 12/31/2016, postmarked 3/14/2017.

Activity Date	Activity Type	Compliance Status	Comments
03/08/2017	NSR Emissions Report	Unknown	A revised 2016 NSR Emissions Report for Unit 3 was received by AQD Detroit Office on 3/8/2017. The report was revised by DTE on 3/6/2017. The revisions included modifications of the NOX and CO2 (BAE) and the Capacity Factor (AE). The original report dated 3/1/2017 was received by AQD on 3/2/2017. The compliance status is indeterminate at this time, though it is noted that reported emissions for NOx, PM, SO2, and CO2 are all below their respective reported baselines.
03/07/2017	ROP SEMI 2 CERT	Compliance	ROP Section 2 Semiannual Certification Report for period 7/1/2016 through 12/31/2016 postmarked 3/7/2017.
03/07/2017	ROP Annual Cert	Compliance	ROP Section 2 Annual Certification Report for period 1/1/2016 through 12/31/2016, postmarked 3/07/2017.
12/19/2016	Stack Test	Compliance	Quarterly report for HCl testing on the exhaust of Unit 3 were submitted by DTE in compliance with the Mercury and Air Toxics Standard (MATS), 40 CFR Part 63, Subpart UUUUU. Report received on 12/19/2016 for the fourth quarter of 2016. Testing was conducted on November 8, 2016 at normal load conditions of 246 GMW. Triplicate 60-minute test runs were performed. Results show average emissions below FTIR's (the method) minimum detectable concentration for HCl of 0.35 ppm and a rate of less than 0.0006 lbs/MMBtu, which is in compliance with the MATS limit of 0.002 lbs./ MMBtu.
12/07/2016	ROP Other	Compliance	ROP Report Certification received by AQD on Dec 5, 2016 Pursuant to Rule 336.1805: "Standard Requirements of Oxide of Nitrogen Budget Trading Program". CAIR NOx emissions information received for the 2016 ozone season. DTE River Rouge claims compliance with CAIR requirements.

Activity Date	Activity Type	Compliance Status	Comments
10/27/2016	Stack Test	Compliance	<p>Quarterly report for HCl testing of Unit 3 for the third quarter of year 2016. Testing required per the Mercury and Air Toxics Standard (MATS), 40 CFR Part 63, Subpart UUUUU. Testing was conducted on September 14, 2016 at normal load conditions of 245 GMW. Results of the three 60-minutes runs show an average HCl emissions of 0.79 ppm and a rate of 0.0012 lbs/MMBtu , which is in compliance with the MATS limit of 0.002 lbs./ MMBtu.</p>
10/11/2016	MACT (Part 63)	Compliance	<p>On August 8, 2016 AQD received a revised report for the PS-11 Correlation Testing of the PM CEMS on Unit 3. The testing was conducted for the purpose of certifying and verifying the accuracy of the PM CEMS to comply with 40 CFR Part 63, Subpart UUUUU. The sampling program was conducted from 06/01/15 to 06/03/16. AQD inspector did not witness the test but reviewed and evaluated the results. The results showed that the PMCEMS meets the PS11 correlation for different models with acceptable performance certification. The linear model was selected, with a correlation coefficient of 0.983, confidence interval 5.35 % and tolerance interval 17.6 %. For details refer to compliance report No. CA_B281040553</p>
09/15/2016	ROP Semi 1 Cert	Compliance	<p>Semiannual Deviation Report (1/1/2016 through 6/30/2016) postmarked 9/15/2016. Zero deviations reported.</p>
09/15/2016	ROP Semi 1 Cert	Compliance	<p>Semiannual Deviation Report (1/1/2016 through 6/30/2016) postmarked 9/15/2016. One deviation reported. Facility considered to be in compliance.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/13/2016	MACT (Part 63)	Compliance	<p>MACT UUUUU - Notification and ROP Certification of Compliance Status for Mercury and Air Toxic Standards (MATS) required by 40CFR63.10011(a) and 40CFR63.9(h) - Postmarked 8/25/16</p> <p>The "Notification of Compliance Status" contains the results of the initial compliance demonstration, in accordance with §63.10030(e) (1) to (4) .</p> <p>The results of the HCl testing conducted on 6/24/16 had been reported on the submittal postmarked 8/23/16. They showed emissions of 0.0006 lb/mmbtu (average of 3 testing runs at one hour per test). The testing results are below the MATS emission limit on Table 2 = 0.002 lb/mmbtu.</p>
09/13/2016	Stack Test	Compliance	<p>Quarterly Test Report for HCl on the exhaust of Unit 3 for compliance with MATS emission limits in 40 CFR Part 63, Subpart UUUUU.</p> <p>The HCl emission testing for the 2nd quarter of 2016 was conducted on June 24,2016. The summary results reported HCl emissions of 0.0006 lbs. /MMBTU, which are less than the MATS limits of 0.002 lbs./MMBTU.</p>
09/13/2016	CEM RATA	Compliance	<p>Review of the Annual Continuous Opacity Monitor System (COMS) Audit for Unit 3 per ROP Section D-S1, VII.7.</p> <p>The audit of the COMS was completed on September 2, 2016. An electronic copy of the report with the results of the audit was received by AQD on 9/6/16. A hard copy was received on 9/9/16. The results revealed that the COMS for visible emission is within the recommended tolerances. AQD/ TPU reviewed the report and passed the audit on 9/9/2016</p>

Activity Date	Activity Type	Compliance Status	Comments
08/19/2016	Malfunction Abatement Plan	Compliance	<p>Revision to the Malfunction Abatement Plan (MAP). The submittal was received (postmarked) by AQD on August 19, 2016.</p> <p>A cover letter dated August 16, 2016 accompanied the revised MAP report with revision date of August 11, 2016. The cover letter indicated that the MAP associated with boilers 2 and 3 has been modified to remove all references to Unit 2. DTE retired Boiler 2 in April 2016 and a modification to remove the unit from the ROP was submitted. AQD reviewed the MAP report. The revisions to the MAP are considered appropriate.</p>
08/08/2016	Other	Compliance	<p>Review of the report for the PS-11 Correlation Testing of the PM CEMS on Unit 3. Test was conducted 6/1/16 to 6/3/16. Refer to report CA_B281040553</p>

Activity Date	Activity Type	Compliance Status	Comments
07/25/2016	MACT (Part 63)	Compliance	<p>Notification of Compliance Status and ROP Certification Form for MATS 40 CFR 63, Subpart UUUUU - for DTE RR Unit 3, received (postmarked) on July 25, 2016.</p> <p>The submittal included a complete "Notification of Compliance Form", supporting records, and the ROP certification form.</p> <p>To fulfill the requirements cited under 40 CFR 63 Subpart A and in accordance with 63.9 (h) and 63.10011(a), the notification was submitted for the compliance demonstration that began on the first day with valid hours of operation and continued for 30 boiler-operating-days as defined by MATS following the compliance date of April 16, 2016.</p> <p>The demonstration was conducted from 5/11/16 to 6/15/16 using Continuous Emission Monitoring (CEM) for Particulate Matter (PM) and during the period 5/13/16 to 6/17/2016 using Sorbent Trap Systems (STSM) for monitoring Mercury (Hg).</p> <p>The notification seemed to be adequate. The average emissions for Hg a PM were reported as, Hg = 0.8 lb /Tbtu and PM = 0.01 lb /mmbtu. These values are below the permit limits of Hg=1.2 lb /Tbtu and PM=0.03 lb /mmbtu.</p>

Name: C. Handovae Date: 9/28/2017 Supervisor: JK