Schaller, Andrea

From: Schaller, Andrea
Sent: Tuesday, October 12, 2021 11:44 AM
To: Aiello, Christine (EGLE)
Cc: Ackerman, Mark; Buckmaster, Tarek (DEQ); Rosenberg, Kathryn
Subject: RE: Review of NPDES Permit, DTE-Monroe Plant, Monroe, Michigan (MI0001848)

Christine,
Region 5 has reviewed revised draft Proposed National Pollutant Discharge Elimination System (NPDES) Permit, fact sheet, public notice and supporting documents for the DTE-Monroe Plant (MI0001848). Based on our review of the draft Permit, EPA has no objections and the Permit may be processed in accordance with the Memorandum of Agreement and pursuant to the Clean Water Act. The Region reserves the right to object to any other permit changes that have not been identified by the state or to any further permit changes that might occur prior to issuance of the final permit. The Region must be notified of any further changes made to the permit before finalization. Following the public notice and after the proposed permit is prepared, please forward one copy and any significant comments received during any public notice period along with the proposed permit to this office at r5NPDES@epa.gov. Please include the permittee name and permit number in the subject line and cc Kathryn Rosenberg.

Thank you
Andrea

Andrea Schaller (she/her)
Chief, Section 1
Permits Branch
USEPA-Region 5
77 W. Jackson Blvd, WP-16J
Chicago, IL 60604
schaller.andrea@epa.gov
312-886-0746

From: Aiello, Christine (EGLE) <AIELLOC@michigan.gov>
Sent: Monday, October 11, 2021 9:59 AM
To: Rosenberg, Kathryn <Rosenberg.Kathryn@epa.gov>
Cc: Ackerman, Mark <ackerman.mark@epa.gov>; Schaller, Andrea <schaller.andrea@epa.gov>; Buckmaster, Tarek (DEQ) <BUCKMASTERT@michigan.gov>
Subject: RE: Review of NPDES Permit, DTE-Monroe Plant, Monroe, Michigan (MI0001848)

Hi Katie,

Thank you for your follow-up review and additional comments on the draft permit/documents for DTE-Monroe. Please see the attached Public Notice Document, revised in response to your comments.

Regards,

Christine Aiello
Environmental Quality Specialist
Industrial and Storm Water Permits Unit
Permits Section | Water Resources Division
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From: Rosenberg, Kathryn <Rosenberg.Kathryn@epa.gov>
Sent: Thursday, September 30, 2021 11:32 AM
To: Aiello, Christine (EGLE) <AIELLOC@michigan.gov>
Cc: Ackerman, Mark <ackerman.mark@epa.gov>; Schaller, Andrea <schaller.andrea@epa.gov>
Subject: RE: Review of NPDES Permit, DTE-Monroe Plant, Monroe, Michigan (MI0001848)

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Hi Christine,

Thank you for providing response to comments on the DTE Monroe permit and for making the required and recommended changes to the permit, fact sheet, and permit record. The below comment has been partially addressed and will need additional information to be resolved:

Public Notice:

1. The permit includes an alternative thermal effluent limitation (ATEL) based on a Clean Water Act Section 316(a) demonstration study. Please revise the public notice document to incorporate the additional public notice requirements for facilities with ATELs as outlined at 40 C.F.R. § 124.57.

To fully comply with the requirements at 40 CFR 124.57, the public notice will need a quantitative statement of the alternative thermal effluent limits proposed. Attached is an example with the quantitative statement highlighted.

Thank you for your consideration and please let me know if you have any questions.

Best,

Katie Rosenberg (she/her)
Permits Branch | USEPA-Region 5
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Chicago, IL 60604
rosenberg.kathryn@epa.gov | 312-886-6774

From: Aiello, Christine (EGLE) <AIELLOC@michigan.gov>
Sent: Friday, September 10, 2021 12:22 PM
To: Miller, Deborah L. <miller.deborahl@epa.gov>
Cc: alexanderc2@michigan.gov; Buckmaster, Tarek (DEQ) <BUCKMASTERT@michigan.gov>
Subject: RE: Review of NPDES Permit, DTE-Monroe Plant, Monroe, Michigan (MI0001848)

Deborah,

Thank you for providing comments on the DTE-Monroe permit. EGLE's responses – organized and numbered in the same manner as the comments – are provided below, and the revised draft permit is attached. Following final review of this draft permit by DTE, we expect it to proceed to public notice.

If you have any questions or comments, please contact me.

Christine

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Public Notice

1. The following statement has been added to the Public Notice Document: The permittee previously conducted a demonstration pursuant to Section 316(a) of the Clean Water Act; this was approved by the Michigan Water Resources Commission on October 21, 1976, and is continued under this permit reissuance.

Permit

1. The limits for both oil & grease and TSS at monitoring point 001D have been changed to reflect those specified for low volume waste in 40 CFR 423.12(b)(3), and are expressed as concentration limits rather than loading rate limits as allowed for under the ELGs. Please see Part I.A.3. of the attached permit.

2. Monitoring point 001F has been revised to reflect the permit requirements that will go into effect for FATW beginning no later than January 1, 2024. Monitoring points 001A and 001H, which also authorize a discharge of FATW, have been similarly revised. Please see Part I.A.1., Part I.A.4., and Part I.A.6. of the attached permit.

3. The permit has been revised to specify that the EGLE will evaluate and determine the site-specific volume of BATW to be authorized in the permit, and a reopener provision has been added to the permit. Please see Part I.A.5., Part I.A.6., and Part I.A.15. of the attached permit.

Fact Sheet and Permit Record

1. The following statement has been added to the Basis for Decision Memo: For information pertaining to the non-attainment status for certain designated uses of the receiving water and how it informed the establishment of certain permit conditions, see the Department's document named "DECO Monroe fact sheet & PEL.pdf."

2. The following statement has been added to the Basis for Decision Memo: For information explaining which ELGs apply and the basis for this determination, as well as the calculations made in accordance with these ELGs, see the Department's document named "TTBEL Memo.doc."

3. The Treatment Technology-Based Effluent Limitation Guidelines Memo has been revised to include the following statements: There are four generating units at this facility: Unit 1, brought on line in May 1971; Unit 2, brought on line in June 1972; Unit 3, brought on line in March 1973; and Unit 4, brought on line in May 1974. The New Source date for direct dischargers under these federal effluent limitation guidelines is November 19, 1982 (see https://www.epa.gov/sites/default/files/2015-09/documents/pwm_app-d.pdf), meaning that none of the discharges from this facility are subject to New Source Performance Standards under 40 CFR 423.

Permit

1. Part I.A.20. – Cooling Water Intake Structures – Interim Approval, has been revised as requested. Please see Part I.A.20. of the attached permit.

2. Part I.A.19. – 316(a) Thermal Demonstration Update, has been revised as requested under parts a. and b. of this comment. Please see Part I.A.19. of the attached permit.

***

Christine Aiello
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From: Miller, Deborah L. <miller.deborahl@epa.gov>
Sent: Friday, July 9, 2021 3:05 PM
To: Alexander, Christine (EGLE) <ALEXANDERC2@michigan.gov>
Cc: Aiello, Christine (EGLE) <AIELLOC@michigan.gov>
Subject: Review of NPDES Permit, DTE-Monroe Plant, Monroe, Michigan (MI0001848)

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Letter and attachment.

Stay safe,

De'bo'rah L. Miller
Administrative Assistant
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