

DTE St. Bernard, LLC

5189 Spring Grove Avenue
Cincinnati, Ohio 45217
(513) 482-4800 Fax (513) 482-6558

July 24, 2015

Ms. Jennifer Van Vlerah, DAPC SIP Section
Ohio Environmental Protection Agency
Lazarus Government Center
Division of Air Pollution Control
P.O. Box 1049
Columbus, Ohio 43216-1049

Re: DTE St. Bernard, LLC
Unofficial Letter of Intention to Convert to Natural Gas

Dear Ms. Van Vlerah:

DTE St. Bernard, LLC (the "Company") currently operates three boilers at the facility. Emission Unit B022 is a 450 MMBtu coal fired and natural gas fired boiler, B043 is a 245 MMBtu natural gas fired boiler with fuel oil backup, and B045 is a 165 MMBtu natural gas fired boiler. To comply with the Industrial Boiler MACT rules, the Company is converting Emission Unit B022 to natural gas only, removing all coal firing capabilities. In addition, fuel oil backup is being added to Emission Unit B045. Both Emission Units B043 and B045 are being permitted to restrict fuel oil firing during natural gas curtailments only. The Company does not have an exact date for conversion; however the estimated date is November 30, 2015. After the conversion, coal will no longer be fired in Emission Unit B022.

Due to the conversion to natural gas, DTE St. Bernard, LLC will emit less than 100 tons per year (TPY) sulfur dioxide (SO₂) as described below by the potential to emit (PTE):

Emission Unit	PTE SO ₂ (TPY)	2012 Reported SO ₂ TPY
B022	1.2	1719.77
B043	54.2 (permit limit)	0.008199
B045	0.2 (permit limit)	0.004908
Total SO ₂ for Facility	55.6	1719.783

$$B022 \text{ PTE SO}_2 = \text{Maximum Annual Natural Gas Use (3865 MMscf)} \times \text{SO}_2 \text{ AP-42 Emission Factor Section 1.4 Table 1.4-2 (0.6 lb/MMscf)} / (2000 \text{ lb/ton}) = 1.2 \text{ TPY}$$

Based on the total sulfur dioxide PTE after the conversion is complete, DTE St. Bernard, LLC will emit, facility-wide, less than 100 TPY SO₂ and therefore should not be required to perform monitoring or modeling under the US EPA's draft Data Requirements Rule.

If you should have any questions regarding the information provided, please contact myself at 734-913-2464 or nydamm@dteenergy.com

Sincerely,

A handwritten signature in black ink that reads "Mary Nydam". The signature is written in a cursive, flowing style.

Mary Nydam
Environmental Engineer
DTE Energy Resources

cc: Chris Beekman, Ohio EPA
Mengyu Cai, Ohio EPA
Fadi Mourad, DTE Energy Resources
Robert Sanch, DTE Energy Resources
Mark Zatlokowicz, DTE St. Bernard, LLC.
Robert Young, DTE Energy Resources
Env File: St Bernard/Air Matters/Regulatory Communications
