



CITY OF DETROIT
WATER AND SEWERAGE DEPARTMENT
WASTEWATER TREATMENT PLANT

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June 16, 2015

Mr. Thomas Maza
Michigan Department of Environmental Quality
Cadillac Place, Suite 2-300
3058 West Grand Boulevard
Detroit, Michigan 48202

HAND DELIVERED

RECEIVED

JUN 17 2015

Air Quality Division
Detroit Office

RE: Response to June 2, 2015 Violation Notice

Dear Mr. Maza:

The Detroit Water and Sewerage Department (DWSD) submitted a quarterly excess emission report on April 17, 2015 indicating that there was an extended period of monitor downtime on Incinerator Unit No. 1 as outlined in the violation notice dated June 2, 2015. The incinerator experienced monitor malfunctions during the following dates:

- March 3, 2015 for 1015 minutes
- March 4, 2015 for 270 minutes
- March 14, 2015 for 679 minutes
- March 15, 2015 for 1164 minutes
- March 16, 2015 for 557 minutes
- March 17, 2015 for 371 minutes
- March 19, 2015 for 746 minutes
- March 26, 2015 for 803 minutes

The main cause for the monitor malfunctions was a bad upscale calibration. The monitor also experienced out of range voltage values for the clear stack set, zero set, and reference. The following actions were taken in order to address each of these issues:

- March 4, 2015 - Instrument technician was sent to clear opacity fault alarm.
- March 16, 2015 - Instrument technician was sent to clear opacity fault alarm.
- March 17, 2015- Instrument technician was sent to clear opacity fault alarm.
- March 26, 2015- Incinerator was taken out of service. Instrument technician performed an unscheduled calibration on the opacity monitor. Fault was cleared, and incinerator was put back into service.
- April 5, 2015- Incinerator was taken out of service due to opacity fault issues.
- April 6, 2015- Instrument technician was able clear and correct fault issue. Incinerator was then put back into service.

Incinerator Unit No. 1 has not had any opacity monitor fault issues since April 6, 2015. In the future when an incinerator experiences a monitor malfunction, DWSD will investigate and correct the issue within an eight hour period. If the issue is not addressed within the eight hour period, then the incinerator will be taken out of service. All operational personnel have been reinstructed to not only take action to address the particular monitor malfunction issue, but to also document clearly the specific action taken in their log reports. Once the monitor malfunction has been resolved, the incinerator will be put back into service.

If you have any questions, please call Melvin Dacres at (313) 297-0363.



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Sincerely,

Wendy Barrott

Wendy Barrott
General Manager - WWTP

WB/MD/md

cc: David McNeeley
Richard Muntz
Ed Hogan
Karen Kajiya-Mills – MDEQ

Majid Khan
Christopher Vanpoppelen
Melvin Dacres
Mark Jacobs - Dykema Gossett