



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



C. HEIDI GREYER
DIRECTOR

July 10, 2018

Mr. Majid Khan
Director – Wastewater Operations
Great Lakes Water Authority
9300 West Jefferson Avenue, Suite 103
Detroit, Michigan 48209

SRN: B2103, Wayne County

Dear Mr. Khan:

VIOLATION NOTICE

Compliance emissions testing was conducted on sewage sludge incineration units 7-14 at the Great Lakes Water Authority (GLWA) Water Resource Recovery Facility (WRRF) stationary source located at 9300 West Jefferson Avenue in Detroit, Michigan in 2017. These incinerators are designated as EUINC07, EUINC08, EUINC09, EUINC10, EUINC11, EUINC12, EUINC13 and EUINC14 in the WRRF's Renewable Operating Permit (No. MI-ROP-B2103-2014d). The emissions testing is required at Special Condition (SC) V.1 of the FGAQCI flexible group, and SC V.3 of the FG4M-INCIN flexible group within the Renewable Operating Permit (ROP). SC V.3 further requires, in accordance with 40 CFR 60.5205(a), that continuous compliance with the emission limits set forth in SCs I.1 through I.10 in FG4M-INCIN can be demonstrated with annual compliance emissions testing.

The Department of Environmental Quality (DEQ), Air Quality Division (AQD) is providing notice of the following violation associated with the above referenced compliance emissions testing:

Process Description	Rule/Permit Condition Violated	Comments
Sewage sludge incinerator (SSI) units 7 and 9-14	MI-ROP-B2103-2014d, FG4M-INCIN, SC V.3; 40 CFR 60.5205(a)	A compliance emissions test was not performed within 11-13 months of the last compliance emissions test for SSI units 7 and 9-14.

Special Condition V.3 in the FG4M-INCIN flexible group in MI-ROP-B2103-2014d requires, in part, that "If the permittee elects to choose the option of performance testing to demonstrate continuous compliance with the emission limits for the pollutants previously listed, performance tests shall be conducted on an annual basis for each pollutant (between 11 and 13 calendar months following the previous performance test), except as provided in 40 CFR 60.5205(a)(3) and (e)." The pollutants previously listed in

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SC V.3 are particulate matter, hydrogen chloride, carbon monoxide, dioxins/furans, mercury, nitrogen oxides (NO_x), sulfur dioxide, cadmium and lead.

For SSI units 11-14, compliance emissions testing that was conducted from May 15-18, 2017 (SSI units 11 and 12) and from May 22-25, 2017 (SSI units 13 and 14) served as the initial compliance test required in SC V.1 in FG4M-INCIN, as well as by 40 CFR 60.5185(a). The next compliance emissions test for SSI units 11-14, as required in SC V.3 in FG4M-INCIN, should have been conducted by June 2018 to meet the requirement to conduct the test within 11-13 months following the previous compliance emissions test.

SSI units 7, 9 and 10 were also tested in 2017; compliance emissions testing was conducted on SSI unit 7 from May 19-20, 2017, on SSI unit 9 from April 24-25, 2017, and on SSI unit 10 from April 19-22, 2017. These compliance emissions tests served as the required follow-up to the initial compliance test for these SSI units. Per the provisions put forth in 40 CFR 60.5205(a)(3), the measured emissions from the compliance emissions test for all of the pollutants that were tested, with the exception of nitrogen oxides, were below 75 percent of the applicable emission limit for both the initial and the follow-up compliance emissions tests. 40 CFR 60.5205(a)(3)(i) allows that if the compliance emissions test for a pollutant show that the measured emissions for that pollutant are at or below 75 percent of the applicable standard for that pollutant for at least two consecutive years, and if there are no changes in the operation of the affected source or air pollution control equipment that could increase emissions, then the compliance emissions test for that pollutant does not have to be performed for the next two years, and no more than 37 months after the date of the previous compliance emissions test. As such, for SSI units 7, 9 and 10, all of the pollutants except for nitrogen oxides do not need to be tested for up to 37 months after the date of the compliant 2017 compliance emissions tests. Emissions of nitrogen oxides from SSI units 7, 9 and 10 were measured in compliance with the applicable standard, but at greater than 75 percent of the applicable standard during the last compliance emissions tests. Therefore, NO_x emissions from these SSI units were required to have been tested within 11-13 months of the last compliance emissions tests.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 31, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates that the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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If GLWA believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Stephen Weis
Senior Environmental Engineer
Air Quality Division
313-456-4688

cc: Mr. Paul Max, City of Detroit, BSEED
cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ