



DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON-DETROIT ARSENAL
6501 E. ELEVEN MILE ROAD
DETROIT ARESENAL MI 48397-5000

Directorate of Public Works



Ms. Kaitlyn Leffert
Environmental Quality Analyst
Michigan Department of Environment, Great Lakes & Energy
Air Quality Division
27700 Donald Court
Warren, Michigan 48909-7760

Dear Ms. Leffert:

This letter is in response to the Violation Notice issued by your office on or about 08 January 2021, in which you have requested: "the dates 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."

As stated previously, on or about 17 December 2020, the United States Army Garrison-Detroit Arsenal (USAG-DTA) self-reported an exceedance of a 100 hour run time limitation on one, 335 horsepower (hp) diesel-fired emergency generator. An internal investigation indicates the generator in question exceeded the 100 hour limit on or about 27 November 2020. The generator was immediately taken off-line to prevent additional emissions. The cause of the exceedance was determined to be a programming error after a power shutdown. The generator had been programmed to shut down after a scheduled maintenance event, during which the generator had been used to provide temporary power to mission critical infrastructure. The emergency generator was inadvertently put into a weekly "recurring" mode, causing the generator to be energized each weekend, ultimately leading to the exceedance.

To prevent a recurrence, the recurrence mode has been shut off. The Standard Operating Procedure has been modified by adding a step to verify the program is not in recurrence mode and the Army will track generator run times on a monthly basis. All of the above response actions were implemented prior to the close of calendar year 2020.

Copies of this letter are herein furnished to the following: Commander, U.S. Army Tank-automotive and Armaments Command, ATTN: Steven Whittington (AMSTA-LA), 6501 E. 11 Mile Rd., Detroit Arsenal, MI 48397-5000, Mr. William Giezie, Director of Public Works, U.S. Army Garrison-Detroit Arsenal (IMMI-PW), 6501 E. 11 Mile Rd., Warren, MI 48397-5000, and Ms. Jenine Camilleri, Enforcement Unit Supervisor, EGLE, AQD, P.O. Box 30260, Lansing, MI 48909-7760.

Please contact us if there are any questions or you require additional information. The point of contact for this effort is Peter L. Schappach, Air Quality Program Manager, at peter.l.schappach.civ@mail.mil or (586) 282-8345.

Sincerely,

MEAD.CARRIE.ELIZA
BETH.1097702183

Digitally signed by
MEAD.CARRIE.ELIZABETH.1097702183
Date: 2021.01.26 15:48:21 -05'00'

Carrie Mead
Garrison Manager