



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

January 7, 2021

Peter L. Schappach, Environmental Protection Specialist
U.S. Army Garrison - Detroit Arsenal
Building 205 / MS 117
6501 East 11 Mile Rd.
Detroit Arsenal, MI 48397-5000

SRN: B2763, Macomb County

Dear Mr. Schappach:

VIOLATION NOTICE

On December 17th, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) received notification that a violation had occurred at U.S. Army Garrison-Detroit Arsenal, located at 6501 E Eleven Mile Rd, Warren, Michigan.

Based on the notification received, staff identified the following:

Process Description	Rule/Permit Condition Violated	Comments
Emergency Generator	40 CFR 60.4211(f)(2)	The facility operated a 335 hp, diesel-fired emergency generator, installed December 2011, for a total of 106.7 hours for non-emergency situations, maintenance and testing, and emergency demand response during calendar year 2020. This is 6.7 hours over the allowed 100 hours of operating time.

The notification received from the company indicated that one of the diesel-fired emergency generators at the facility exceeded the 100 hour run time limitation in 40 CFR Subpart ZZZZ, 63.6640(2). The exceedance occurred due to a programming error, and as a result the generator was regularly switching on and off during weekends throughout the fall and winter of this year. According to the notification from the facility, the programming error has already been corrected and the facility's Standard Operating Procedure was updated to prevent this violation from recurring in the future.

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The requirements of 40 CFR 63 Subpart ZZZZ are met by meeting the requirements in 40 CFR 60 Subpart IIII for new (commenced construction on or after June 12, 2006), compression ignition, engines. It appears the U.S. Army Garrison - Detroit Arsenal operated an engine in violation of 40 CFR 60.4211(f)(2). 40 CFR 60.4211(f) allows emergency stationary engines to operate for a maximum of 100 hours per calendar year for non-emergency situations, maintenance and testing, and emergency demand response.

Please submit a written response to this Violation Notice by January 28, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: 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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If U.S. Army Garrison - Detroit Arsenal 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kaitlyn Leffert
Environmental Quality Analyst
Air Quality Division
586-249-6505

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Ms. Sarah Marshall, USEPA