



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

June 26, 2017

Mr. Linwood Bubar, President
Detroit Thermal Beacon Heating Plant
541 Madison
Detroit, MI 48226

SRN: B2814, Wayne County

Dear Mr. Bubar:

VIOLATION NOTICE

On April 26, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the First Quarter 2017 Predictive Emissions Monitoring System (PEMS) Reports for the for Detroit Thermal Beacon Heating Plant (Detroit Thermal), located at 541 Madison, Detroit, Michigan. The purpose of the review of the First Quarter 2017 PEMS Reports was to determine Detroit Thermal's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; the conditions of Renewable Operating Permit (ROP) number MI-ROP-B2814-2014; and Consent Order AQD No. 24-2016.

As a result of the review, the following violation was identified:

Process Description	Rule/Permit Condition Violated	Comments
FG-BOILER_6,7 (Boiler 6 and Boiler 7)	ROP No. MI-ROP-B2814-2014, FG-BOILER_6,7, Special Condition I.1.1d Consent Order AQD No. 24-2016, Conditions 9.A.1	The NOx emission limit (0.036 lb/MMBtu) was exceeded at Boiler 6 (7 hours) and Boiler 7 (3 hours) during the First Quarter 2017.

PEMS data provided on June 22, 2017 for January 1, 2017 through January 7, 2017 indicates the nitrogen oxide (NOx) emission limit (0.036 lb/MMBtu) was exceeded on an hourly basis for a combined 10 hours at Boilers 6 and 7 as follows.

Boiler 6

- 1/2/2017 – 2 hrs (5:00 – 0.302 lb/MMBtu and 12:00 – 0.273 lb/MMBtu)
- 1/3/2017 – 1 hr (3:00 – 0.204 lb/MMBtu)
- 1/4/2017 – 1 hr (5:00 – 0.165 lb/MMBtu)
- 1/5/2017 – 1 hr (9:00 – 0.250 lb/MMBtu)
- 1/6/2017 – 2 hrs (5:00 – 0.169 lb/MMBtu and 9:00 – 0.274 lb/MMBtu)

Mr. Linwood Bubar
Page 2
June 26, 2017

Boiler 7

1/2/2017 – 1 hr (18:00 – 0.058 lb/MMBtu)

1/3/2017 – 2 hrs (3:00 – 0.084 lb/MMBtu and 14:00 – 0.059 lb/MMBtu)

The hourly NOx exceedances are a violation of MI-ROP-B2814-2014, FG-BOILER_6,7, SC I.1.1d (emission limit of 0.036 lb/MMBtu NOx) and Consent Order AQD No. 24-2016, Condition 9.A.1.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 17, 2017 (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.

If Detroit Thermal 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. Should you require any further information, please contact me.

Sincerely,



Todd Zynda, P.E.
Environmental Engineer
Air Quality Division
313-456-2761

cc: Mr. Damian Doerfer, DRP
Ms. LaReina Wheeler, City of Detroit, BSEED
cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeffrey Korniski, DEQ