



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT FIELD OFFICE



DAN WYANT  
DIRECTOR

April 14, 2014

Mr. Ronald Kentale  
Detroit Thermal Willis Heating Plant  
541 Madison St.  
Detroit, MI 48226

SRN: B3011, Wayne County

Dear Mr. Kentale:

### VIOLATION NOTICE

On January 15, 2014, Detroit Thermal Willis Plant, Detroit, MI was mailed a notification for the 2014 Administrative Rule 208a Registration Renewal from the Department of Environmental Quality (DEQ), Air Quality Division (AQD). The 208a Registration Renewal form was due on March 15, 2014. As of this date, the AQD has not received the 208a Registration Renewal.

Administrative Rule 208a(4) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires that the certification be renewed annually by submittal of a registration form in conjunction with the annual report of emissions.

In response to the non-submittal of the 208a Registration Renewal form, you are hereby notified that Detroit Thermal Willis Plant is in violation of Act 451, Rule 208a(4).

Since the DEQ has not received a 208a Registration Renewal, the current registration no longer serves as a legally enforceable restriction on potential to emit. As a result, Detroit Thermal Willis Plant is now subject to the Renewable Operating Permit (ROP) program. Please notify the AQD within (21) days from the date of this letter as to how the company proposes to comply. Notification must include the appropriate action which will be taken to comply and the date by which the action will be completed. Any of the following actions would constitute an appropriate compliance program:

- (a) Submit an administratively complete application for a ROP pursuant to R 336.1210 within twelve months of exceeding any emission threshold accepted as a limitation under Rule 208a(2).
- (b) Submit an application for a Permit to Install to otherwise obtain legally enforceable permit limits pursuant to R 336.1201 within (60) days from the date of this letter.
- (c) Submit an acceptable demonstration that the potential to emit of the stationary source does not exceed any major source emission threshold specified in R 336.1211(1)(a) within (21) days from the date of this letter.
- (d) If Detroit Thermal Willis Plant 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,

A handwritten signature in blue ink that reads "Hemben".

Terseer Hemben  
Environmental Engineer  
Air Quality Division  
313-456-4677

cc: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ