



VIA FEDERAL EXPRESS

February 25, 2016

Joyce Zhu, Senior Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard
Suite 2300
Detroit, MI 48202

RE: Detroit Renewable Power – Violation Notice Response – Boiler #11 Particulate Matter Stack Test Failure

Dear Ms. Zhu:

This correspondence is Detroit Renewable Power's response to the Violation Notice received on February 12, 2016 for exceeding the Particulate Matter (PM) emission limit, 0.010 grains/dscf corrected to 7% oxygen, per ROP No. MI-ROP-M4148-2011a Table FGBOILER011-013, Condition I.1. This emission limit is also specified in 40 CFR 62 Subpart FFF 62.14103(a)(1) & 62.14109, 40 CFR 60 Subpart Cb 60.33b(a)(1), 40 CFR 60 Subpart Db 60.43(b)(1), and 40 CFR 60 Subpart Eb 60.58b(a)(1). The Violation Notice was issued based on the failure of a PM stack test at Boiler #11 performed on December 2, 2015. The results of the stack test were submitted to your office on February 9, 2016. The following information is required to be included in the response:

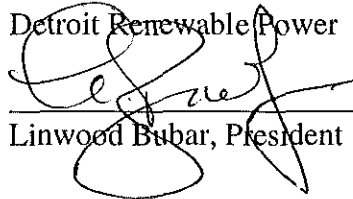
- 1. Dates the violation occurred:** The stack test was conducted on December 2, 2015 beginning at 11:00 am, this is presumed to be the start time of the violation based on the stack test results. Therefore, the boiler ran the following timeframes during and after the stack test (times are approximate):
 - 12/02/15 at 11:00 am through 12/03/15 at 8:30 am
 - 12/11/15 at 8:00 pm through 12/13/15 at 1:30 pm
 - 12/14/15 at 6:00 pm through 12/17/15 at 12:00 am
 - 12/17/15 at 4:30 pm through 01/15/16 at 12:00 am (excluding 1 hour on 01/08/16)
 - 01/17/16 at 6:00 pm through 01/27/16 at 4:00 pm
 - 01/31/16 at 7:00 pm through 02/07/16 at 5:00 pm (excluding 4 hours on 02/02/16)
 - 02/11/16 at 2:00 am through 02/18/16 at 1:00 am

2. **Explanation of the causes and duration of the violation:** A contractor specializing in dust collection systems reviewed the process and made an assessment. However, DRE completed their own inspection of the system and found a glaring issue which was not identified by the contractor. The dust collection system is set up with flue gas bypass dampers which allow the flue gas to bypass the dust collection system and go straight to the stack. DRE found these dampers to be severely corroded with approximately a 13" by 2" gap going straight to the stack and bypassing the dust collection system. Another damper was developing a crack but not to the extent of the first one.
3. **Whether the violation is ongoing:** The violation is presumed to have stopped following the repairs to the flue gas bypass damper on February 20, 2016.
4. **Summary of the actions that have been taken and are proposed to be taken to correct the violation:** DRE determined the use of the bypass dampers are obsolete and welded a bracket in place to prevent the flow of flue gas to the stack from the openings.
5. **Dates by which these actions will take place:** The repairs have been made and retesting of PM has taken place on February 24, 2016.
6. **What steps are being taken to prevent a reoccurrence:** As a preventative measure Boiler #12 and #13 flue gas bypass dampers will be inspected following the next shutdown of these two units.

If you have questions concerning this issue, please feel free to contact Tabettha Peebles at (313) 972-4336.

Sincerely,

Detroit Renewable Power



Linwood Bubar, President

Attachments: Renewable Operating Permit Report Certification
 Renewable Operating Permit Deviation Report