



**VIA CERTIFIED MAIL**

March 18, 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 #12 Carbon Monoxide Excess Emissions**

Dear Ms. Zhu:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) received on March 4, 2016 for exceeding the Carbon Monoxide (CO) emission limit of 200 ppmv based on a 24-hour block daily arithmetic average, and 267 ppmv based on a 1-hour block average, both corrected to 7% oxygen per ROP No. MI-ROP-M4148-2011a Table FGBOILER011-013, Condition I.11. This emission limit is also specified in 40 CFR 62 Subpart FFF 62.14104(a) & 62.14109, 40 CFR 60 Subpart Cb 60.34b & 60.58b(a)(1) & 60.38(b). The VN was issued based on the internal review of process data which was reported to your office on 02/17/2016 as required by Rule 912. Note the table on page 1 of the VN incorrectly states the date of the excess emissions as 02/14/15 in the "Comments" column, the correct date for the event was 02/14/16. The following information is required to be included in the response:

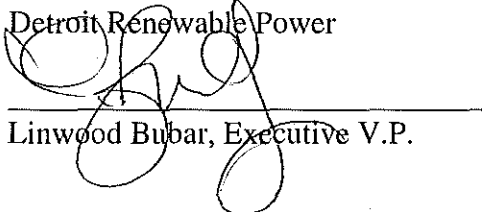
- 1. Dates the violation occurred:** The excess emission event occurred on 02/14/16 at approximately 3:00am until approximately 4:00pm.
- 2. Explanation of the causes and duration of the violation:** Boiler #12 experienced uneven refuse derived fuel (RDF) feed from the metering bin to the boiler due to a broken auger. During this time the CO exceeded the permitted limits.
- 3. Whether the violation is ongoing:** The violation stopped following the process adjustments made on 02/14/16.

4. **Summary of the actions that have been taken and are proposed to be taken to correct the violation:** DRP reduced the feed of RDF and added oil to improve combustion. The under-grate air and over-fire air flows were adjusted and grate speeds were increased and decreased to adjust the fuel bed. Auger speeds were increased and reversed to maintain consistent fuel feed.
5. **Dates by which these actions will take place:** The process adjustments were made 02/14/16.
6. **What steps are being taken to prevent a reoccurrence:** The unit was taken off-line to inspect the metering bin and clear the auger. The metering bin and feed chutes were inspected and all under-grate and over-fire dampers were inspected and tested for proper position. Note that the metering bins and dampers are inspected during scheduled outages.

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

Sincerely,

Detroit Renewable Power



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Linwood Bubar, Executive V.P.

Attachments: Renewable Operating Permit Report Certification

### RENEWABLE OPERATING PERMIT REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Natural Resources and Environment, Air Quality Division upon request.

Source Name Detroit Renewable Power County Wayne

Source Address 5700 Russell Street City Detroit

AQD Source ID (SRN) M4148 ROP No. MI-ROP-M4148-2011a ROP Section No. D

Please check the appropriate box(es):

Annual Compliance Certification (Pursuant to Rule 213(4)(c))

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.
2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

Other Report Certification

Reporting period (provide inclusive dates): From 02/14/16 To 02/14/16

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

Response to Violation Notice dated 03/04/16 for Carbon Monoxide (CO) excess emissions  
on Boiler #12 on 02/14/16.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

Linwood Bubar Executive V.P. 313-972-4641  
Name of Responsible Official (print or type) Title Phone Number

 Signature of Responsible Official 3-15-16 Date