



VIA CERTIFIED MAIL

June 28, 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 – June 9, 2016 Violation Notice Response – Boiler #11 Sulfur Dioxide Excess Emissions and Incomplete Calibration Gas Audits for Continuous Emission Monitors (CEMS) in First Quarter 2016

Dear Ms. Zhu:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) received on June 9, 2016 for allegedly exceeding the Sulfur Dioxide (SO₂) emission limit for Boiler #11 of 29 ppmv based on a 24-hour geometric mean average, corrected to 7% oxygen per ROP No. MI-ROP-M4148-2011a, Table FGBOILER011-013, Condition I.9 on July 20, 2015. The VN was issued based on the NSPS Subpart Cb annual and semiannual reports dated March 17, 2016. In addition, the VN is in response to the first quarter 2016 CEMS downtime and excess emission report which stated the Calibration Gas Audits (CGAs) were not completed as required by ROP No. MI-ROP-M4148-2011A, Table FGBOILERS011-013 Condition VI. 12., 15., 23., 29., 34., and 47. CGAs are also required by 40 CFR 60.58b(e)(13), (h)(11), (i)(12), and (b)(5).

On July 20, 2015 at approximately 5:00am Boiler #11 was put on line. At approximately 12:00pm the boiler experienced an SO₂ spike. According to 40 CFR 60.58b(a)(1) the Emission Guideline standards do not apply during startup, shutdown or malfunction periods, subject to a limit of three hours per occurrence. In addition, 40 CFR 60.58b(a)(1)(i) states that during periods of startup, shutdown or malfunction, monitoring data shall be dismissed or excluded from compliance calculations, but shall be recorded and reported. Note that the boiler was not operating the full 24 hours and the permit limit is based on a 24 hour geometric mean average. The boiler operated 18 hours of the day on July 20, 2015.

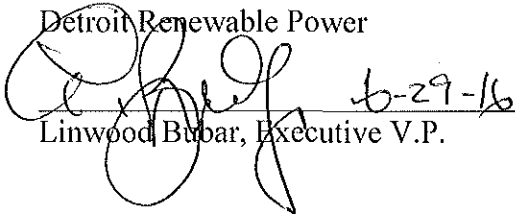
Also note, on July 20, 2015 the unit was starting up and experienced a malfunction therefore three hours can be excluded for the malfunction. Excluding the three hours for malfunction, the 24 hour geometric mean average emissions rate was 41ppm versus 49ppm without excluding the three hours. According to the Operations log, there was a series of malfunctions of the atomizer units. After several attempts to get one of the atomizer units on line were unsuccessful, the boiler was taken off-line before 11:00 pm.

In addition, the Calibration Gas Audits (CGAs) were not completed first quarter 2016. This was due to not having EPA Protocol tested calibration gases available. The lack of gases was discovered in late February and the lead time for receiving the EPA Protocol gases is 4-6 weeks. New calibration gas cylinders were ordered on March 24, 2016. Due to an error by the vendor, one of the cylinders was incorrect and that cylinder had to be reordered. The replacement cylinder is expected to be received on June 28, 2016 and the second quarter CGA will be completed on or about June 28, 2016. As a corrective action, these calibration gases are set up to reorder automatically once the current supply is nearly depleted. Note the current supply is expected to last for approximately 5 years.

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.