



VIA CERTIFIED MAIL

July 14, 2017

Mr. Todd Zynda, Environmental Engineer  
Michigan Department of Environmental Quality  
Air Quality Division  
3058 W. Grand Boulevard  
Suite 2300  
Detroit, MI 48202

**RE: Detroit Renewable Power – Response to Violation Notice dated June 26, 2017**

Dear Mr. Zynda:

This correspondence is Detroit Thermal's response to the Violation Notice (VN) received on June 26, 2017 regarding alleged excess NOx emissions from Detroit Thermal Beacon Heating Plant's operation in violation of ROP No. MI-ROP-B2814-2014, FG-Boiler\_6,7, Special Condition I.1.1d and Consent Order AQD No. 24-2016, Conditions 9.A.1

**The following is in response to the violation notice:**

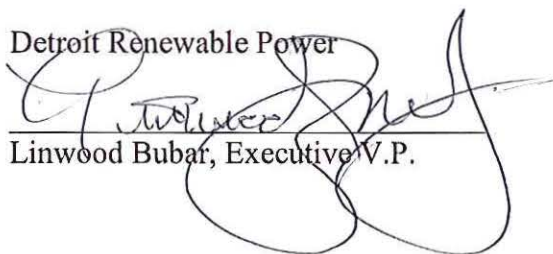
The minute data for the hours in question has been sent via e-mail to you. None of the minute data show an exceedance while the units were online and operating. Please see the tabs labeled "1 Min Emissions".

Our PEMS vendor incorrectly averaged values for the unit while it was offline. Please see the attached e-mail from Mike Maret.

If you have questions concerning this response, please feel free to contact Damian Doerfer at (313) 269-2806.

Sincerely,

Detroit Renewable Power

  
Linwood Bubar, Executive V.P.



## Damian Doerfer

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**From:** Mike Maret <MikeM@ampcherokee.com>  
**Sent:** Monday, July 17, 2017 1:14 PM  
**To:** Damian Doerfer; Chris Keller  
**Cc:** Clynch Varnadore  
**Subject:** RE: 1 minute data and 15 minute and 60 minute block averages - NEED ANSWER by 1:00 PM TODAY

Hi Damian,

Your analysis of the data is correct. The 1-minute values for PROCESS ONLINE and NOX/O2 VALID show that the boiler is in compliance.

When there is a PROCESS ONLINE bit in a 15-minute period, ALL of the 1-minute data (even the process is OFFLINE records) are being included in the 15-minute average.

As I recall, Tabettha Peebles pointed out this issue, and we applied a corrective action. We will have to review the procedures that were applied. Unfortunately Clynch Varnadore, the data processing technician who supported the PEMS at DRE, is out of the office.

We will review the data processing procedures with Clynch and get back to you as soon as we can.

Regards,

-M




**Michael D. Maret, PE**  
Product Development Manager  
AMP-Cherokee

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**From:** Damian Doerfer [<mailto:ddoerfer@detroitrenewable.com>]  
**Sent:** Monday, July 17, 2017 11:51 AM  
**To:** Chris Keller  
**Cc:** Clynch Varnadore; Mike Maret  
**Subject:** Re: 1 minute data and 15 minute and 60 minute block averages - NEED ANSWER by 1:00 PM TODAY

Thank you.

Damian Doerfer  
313-269-2806

On Jul 17, 2017, at 11:42 AM, Chris Keller <[chrisk@ampcherokee.com](mailto:chrisk@ampcherokee.com)> wrote:

Damian,

I got your email and I am looking into it and will get back to you as soon as possible but Clynch is out of the office this morning. and I am getting up to speed on this.

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**From:** Damian Doerfer [<mailto:ddoerfer@detroitrenewable.com>]  
**Sent:** Monday, July 17, 2017 10:53 AM  
**To:** Chris Keller  
**Cc:** Clynch Varnadore; Mike Maret  
**Subject:** 1 minute data and 15 minute and 60 minute block averages - NEED ANSWER by 1:00 PM TODAY

Chris,

I need help today understanding the data that Mike sent.

The ten (10) hours of concern are as follows:

Boiler 6            1/2/17 0500 and 1200  
                      1/3/17 0300  
                      1/4/17 0500  
                      1/5/17 0900  
                      1/6/17 0500 0900

Boiler 7            1/2/17 1800  
                      1/3/17 0300 and 1400

If you examine the minute data, it looks like we are in compliance for the time while the process is online.

It looks like the 15 minute and 60 minute averages are averaging values when the boiler is offline and the predicted values are substantially higher.

Damian Doerfer  
Director, EHS  
Detroit Renewable Energy  
[ddoerfer@detroitrenewable.com](mailto:ddoerfer@detroitrenewable.com)  
313.269.2806 (Cell)