



RECEIVED

FEB -8 2018

Air Quality Division
Detroit Office

VIA CERTIFIED MAIL

February 14, 2018

Mr. Todd Zynda, P.E.
Senior Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
3058 West Grand Boulevard
Detroit, Michigan 48202-6058

RE: Detroit Renewable Power – Response to Violation Notice dated January 24, 2018

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) dated January 24, 2018 concerning unanticipated and unavoidable delays in DRP's annual emission testing and relative accuracy test audit (RATA) for 2017. As you know from your experience with our facility, DRP typically conducts annual emission testing for carbon monoxide, sulfur dioxide, fluorides, volatile organic compounds, nitrogen oxides, dioxin/furan and several metals each year in the autumn. DRP also typically conducts the required relative accuracy test audit for its continuous emission monitoring system (CEMS) at the same time as the annual emission testing. It generally takes three weeks to complete all the necessary tests. DRP has performed such testing annually since at least 1999 and has an excellent record of demonstrating compliance with its emission limits during the annual testing.¹

In 2017, however, as AQD was timely notified by DRP on multiple occasions, the annual testing was repeatedly delayed by an unusual and unexpected series of circumstances beyond DRP's control. The following is a brief narrative summary of these circumstances followed by a detailed chronology. Most of this information is already documented in AQD's files.

First, as AQD was informed beginning in September 2017, DRP experienced frustrating delays in getting essential replacement components from its baghouse vendor. DRP ordered replacement baghouse bags on 7/18/2017 in accordance with its maintenance schedule and was promised delivery by September 15, 2017. Accordingly, DRP scheduled the annual testing to begin October 2, 2017 and submitted a test plan to MDEQ 60 days in advance of the scheduled testing on August 3, 2017.

Despite assurances from the baghouse vendor, the replacement components were not delivered by September 15, 2017 as promised and expected. When it became apparent that the baghouse bag replacement could not be completed by the end of September 2017 due to the delay in delivery of

¹ The only notable exception in recent memory is the December 2015 particulate matter testing. The excess particulate matter emissions were eventually traced to a previously undetected (and, frankly, difficult to detect) flue damper malfunction that was corrected in early 2016. Despite this, the December 2015 stack test results for eleven other parameters, including five metals, were all within permit limits.

Despite assurances from the baghouse vendor, the replacement components were not delivered by September 15, 2017 as promised and expected. When it became apparent that the baghouse bag replacement could not be completed by the end of September 2017 due to the delay in delivery of the replacement bags, DRP promptly notified AQD on September 20, 2017 that the testing would be delayed. Because DRP continued to receive assurances that the replacement bags would be delivered in the near future, DRP rescheduled the testing **three times** in a good faith attempt to complete the testing as soon as possible. Each time it rescheduled the testing, DRP only requested the minimum extension of time it believed would be required and DRP appreciates AQD's flexibility in responding to the multiple schedule changes. The replacement components began to arrive on 11/17/2017 and the necessary baghouse bag replacement was completed on December 30, 2017. Even while this was occurring, DRP was able to begin the first phase of testing (Boiler #12) on December 4, 2017 and completed testing Boiler #12 on December 6, 2017. DRP was also able to test Process Line #100 and Ash House visible emissions during December 2017.

Because of these unforeseen delays beyond DRP's control, the testing of Boilers #11 and #13 had to be pushed back to January 2-7, 2018. Unfortunately, an unusual "polar vortex" brought extremely cold weather during December 26, 2017 through January 7, 2018, which made testing during this period impossible. DRP serves as the source of heat for many businesses and government offices in the Midtown and Downtown areas.

Despite operational difficulties that were created by the extreme weather at the end of December and beginning of January, DRP was able to complete the testing of Boiler #13 on January 25 and 26, 2018. However, a water line leak required the testing of Boiler #11 to be moved to February 6 and 7, 2018 (anticipated).

Obviously, this entire series of events has been extremely frustrating to DRP, which had planned to complete this testing in early October 2017, and we sincerely appreciate AQD's flexibility to accommodate the repeated schedule changes. These conditions, which were both unanticipated and beyond DRP's control, constitute a *force majeure* event that delayed the 2017 testing. At all stages, DRP has worked diligently to complete the testing as soon as possible and kept AQD fully informed as to the status, starting with the test plan that was first submitted on August 2, 2017.

DRP is proud of its long and excellent history of demonstrating compliance with a dozen emission limits for each of its three boilers each year. As you know, in addition to the annual emission testing, DRP's compliance with its emission limits is also confirmed by CEMS for sulfur dioxide, nitrogen oxides and carbon monoxide and a COMS for opacity. The COMS units were serviced by Babcock & Wilcox on October 25 and the CEMS units were serviced on December 5, 2017 and cylinder gas audits were also performed on December 5, 2017. Emissions for Q4 2017 (3,918 boiler operating hours) were under our permit limits greater than 98% of the time for carbon monoxide and sulfur dioxide and greater than 99% of the time for nitrogen oxides and opacity.

The following Chronology is intended to further elaborate on the discussion above.

Chronology

7/18/2017 Baghouse replacement bags ordered.

8/3/2017 Test plan was submitted to MDEQ for approval. October 2nd was the scheduled start date.

9/15/2017 Original promised completion date by baghouse bag supplier.

9/20/2017 Communicated with MDEQ need to re-schedule stack test because of delays from baghouse supplier.

9/28/2017 Test start date moved to October 12th. MDEQ approved this date via an e-mail from Tom Gasloli, MDEQ.

10/4/2017 Test start date moved to 11/13/17, communicated to MDEQ via e-mail.

10/16 and 10/18/2017 Test start date moved to 12/4/2017, communicated to MDEQ via e-mails.

11/17/2017 Baghouse bags for #12 arrive.

12/4 – 12/6/2017 Tested Boiler #12.

12/5/2017 Q4 CGA for #11 and #12 CEMS.

12/21/2017 Tested Process line #100 and ash house visible emissions.

12/27/2017 Tentative schedule of 1/2 – 1/4/18 for Boiler #13 and 1/5 – 1/7/18 for Boiler #11, communicated via e-mail to MDEQ.

12/30/2017 Baghouse bag replacement for Boilers #11 and #13 completed.

1/3/2018 Delayed tests for Boilers #11 and #13 due to extreme weather, communicated to MDEQ via e-mail and hard copy mailed via USPS.

1/25 – 1/26/2018 Tested Boiler #13.

1/28/2017 Delay in testing Boiler #11 due to underground leak in ID and FD fans cooling water line.

2/6 – 2/7/18 Test Boiler #11.

Completion of Testing and Final Report submission

DRP expects to complete testing of Boiler #11 by February 7, 2018. The final report for Boiler #12 will be sent by February 4, 2018, for Boiler #13 by March 27, 2018, and for Boiler #11 by April 7, 2018 (tentative).

Corrective Actions

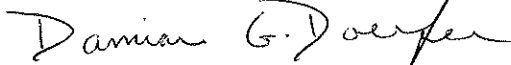
Boiler #13 was tested on Jan. 25 and 26, 2018. Boiler #11 is scheduled for testing on February 6-7, 2018.

Testing for all units for 2018 has been scheduled and confirmed with RWDI for October 22 –
November 16, 2018.

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

Sincerely,

Detroit Renewable Power

A handwritten signature in black ink that reads "Damian G. Doerfer". The signature is written in a cursive style with a large, sweeping initial 'D'.

Damian Doerfer, Director EHS