VIA CERTIFIED MAIL

August 15, 2018

Todd Zynda, Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard, Suite 2-300
Detroit, MI 48202-6058

RE: M4148 Detroit Renewable Power – Response to Violation Notice dated July 26, 2018

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's (DRP) response to the Violation Notice (VN) dated July 26, 2018 for alleged violations based upon Michigan Department of Environmental Quality, Air Quality Division (AQD) review of the Fourth Quarter 2017 Continuous Emissions Monitoring Systems (CEMS) Reports and additional information provided to the AQD.

The following table summarizes the alleged violations along with DRP's response to each event. Explanation of the causes and duration of any reported excess emissions, as well as a summary of corrective actions implemented, is provided after the table.

Process Description	Rule/Permit Condition	Summary of AQD Comments	DRP Response
Boilers 11 and 13 -	ROP No. MI-ROP-M4148- 2011a, FGBOILERS011-013 SC VII. 7.a.ii 40 CFR Part 60, Section §60.39b Section §60.59b(g)(1)(ii) 40 CFR Part 62.14109	Failure to list the highest emission level recorded for Boiler 11 (Sulfur dioxide [SO_2] at 66 ppmv on 12/31/2017) and Boiler 13 (carbon monoxide [CO] at 204 ppmv on 12/29/2017).	On 12/31/2017, Boiler 11 was down for a period of time, creating a Partial Block Period. On 12/29/2017, Boiler 13 experienced a period of malfunction creating a Partial Block Period. As provided in the ROP, "[e]mission standards or limitations applicable to block periods are not applicable to partial block periods."

The following summarizes the response of each of the items listed in the above table.

Boiler 11 SO_2 Emissions Based on a 24-Hour Daily Geometric Mean
The ROP defines "Partial Block Period (for block periods greater than one-hour)" as follows:

> A block period that does not have MSW continuously burning due to startup or shutdown or the unit being off line, or which has an exemption of data use due to startup, shutdown or malfunction exclusion provisions under the Emission Guidelines. The exemption of data use under the Emission Guidelines may create a partial block period. **Emission standards or limitations applicable to block periods are not applicable to partial block periods.**
> [Emphasis added.]

On December 31, 2017, Boiler 11 was down until 14:47, creating a Partial Block Period, as defined above. As the definition of Partial Block Period clearly states, emission standards or limitations applicable to block periods are not applicable to partial block periods. Therefore, there was no emission exceedance on December 31, 2017 for Boiler 11 nor should this Partial Block Period be considered in determining the highest emission level recorded.

Boiler 13 CO Emissions Based on a 24-Hour Block Average
As noted above, the definition of Partial Block Period in the ROP clearly states that emission standards or limitations applicable to block periods are not applicable to partial block periods. On December 29, 2017, Boiler 13 experienced a malfunction period as described in the June 8, 2018 Response to Violation Notices dated February 26, and April 11, 2018 as presented below:

> DRP did implement appropriate and timely corrective action by addition of fuel oil at 20:14 during a process upset event of the soot blowers operations causing higher CO emissions. The appropriate corrective action of the addition of fuel oil at 20:14 and corresponding reduction of RDF is considered timely. As presented in the attached [attached to the original violation response] minute data, Boiler 13 experienced a couple minutes with exceptional high CO concentrations, which resulted in a skewed CO average emission rate. Averaging the CO emission rate for the remaining of the hour minutes results in a CO concentration of 166 ppmv. The actions taken by DRP were considered timely and according to the SSM plan.

This malfunction period results in a Partial Block Period according to the exclusion provisions under the Emission Guidelines for CO (ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013 SC I.11.a),

> "...based on a 24-hour block daily arithmetic average except during periods of startup, shutdown, and **malfunction** as explained in 40 CFR 60.58b(a)(1) and referenced by 40 CFR 60.38b" [emphasis added].

Based on this exclusion provision for malfunctions, the readings during this period are excluded from calculation of the 24-hour block daily arithmetic average resulting in a Partial Block Period; therefore,

there was no 24-hr CO emission exceedance on December 29, 2017 nor should this Partial Block Period be considered in determining the highest emission level recorded.

As presented in the DRP Response to Violation Notice dated July 20, 2018, our research indicates that similar provisions for Partial Block Periods can be found in the ROP for the Kent County Waste-to-Energy Facility (MI-ROP-N1604-2018) and in permits issued by the New York State Department of Environmental Conservation (Covanta Hempstead Company, No. 1-2820-01727/00028 and Islip Resource Recovery Agency, No. 1-4728-00185/00012). See also Indiana Department of Environmental Management Part 70 Operating Permit 097-35573-00123 (Covanta Indianapolis, Inc.).

To avoid future misunderstandings regarding Partial Block Periods that are not reported as block periods in quarterly and semi-annual reports and to clarify shutdown, startup, and malfunction periods, DRP plans to include supplemental information in future NSPS Cb semi-annual report and NSPS 60.7 excess emission and monitoring system performance quarterly reports. This information will be provided in Appendix B and include an explanation of the Partial Block Period, the CEMS reading during the startup/shutdown/malfunction (SSM) event, and an applicable exclusion provision for the specific pollutant.

If you have questions concerning this response, please feel free to contact Mark Fletcher at (313) 963-3394.

Sincerely,

Detroit Renewable Power

Robert Suida, Plant Manager

cc: Mark Fletcher, EHS Manager