



November 14, 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 October 12, 2018**

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power’s (DRP) response to the Violation Notice (VN) dated October 12, 2018 for an alleged violation based upon Michigan Department of Environmental Quality, Air Quality Division (AQD) observations during stack testing on October 2, 2018.

The following table summarizes the AQD alleged violations along with DRP’s response.

Process Description	Rule/Permit Condition	Summary of AQD Comments	DRP Response
EUASH-HANDLING	ROP No. MI-ROP-M4148-2011a, EUASH-HANDLING SC IX.1	Ash buildup outside of the ash conveyor enclosure and ash storage building.	The ash was wetted to prevent its introduction to the outer air and was disposed of properly along with the other facility ash following cleanup.

The ash outside of the ash conveyor and ash storage building was wetted and disposed in a manner to minimize introduction to the outer air. The accumulation of ash outside of the conveyor system is the result of a temporary equipment malfunction of the ash conveyor scraper. As AQD noted, the ash was wet. DRP wetted the ash and collected it in a sump under the ash conveyor. The excess water prevented introduction of the ash to the outdoor air so that it could be collected in a sump located under the conveyor and managed appropriately with other ash at the facility.

Mr. Todd Zynda  
November 14, 2018  
Page 2 of 2

As a result, DRP believes the observations do not constitute a violation of ROP No. MI-ROP-M4148-2011a, EUASH-HANDLING SC IX.1 because the ash was handled and disposed to prevent introduction of air contaminants to the outer air.

For future operations, DRP plans to implement additional training and repairs to prevent accumulation on the conveyor scrapers, which resulted in the initial buildup.

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  
Jenine Camilleri, Enforcement Unit Supervisor, AQD, MDEQ