



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

September 25, 2018

Mr. Robert Suida, Plant Manager
Detroit Renewable Power, LLC
5700 Russell St.
Detroit, MI 48211-2545

SRN: M4148, Wayne County

Dear Mr. Suida:

VIOLATION NOTICE

On August 1, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the Second Quarter 2018 Continuous Emissions Monitoring Systems (CEMS) Report for Detroit Renewable Power (DRP) located at 5700 Russell, Detroit, Michigan. During review of the Second Quarter CEMS Report the AQD evaluated compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and MI-ROP-M4148-2011a.

During the review of the Second Quarter 2018 CEMS Report, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Boiler 13	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.b	CO emissions based on a 1-hour block average exceeded 267 ppmv for two consecutive hours on 6/15/18 (0:00 to 2:00 – 640 ppmv and 273 ppmv).
Boilers 11	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.13.a	NOx emissions based on a 1-hour block average exceeded 247 ppmv on 5/22/2018 (22:00 to 23:00 – 250 ppmv).
Boilers 11, 12, and 13	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC III.3	The facility reports the flue gas oxygen content less than 4% on various dates in the Second Quarter 2018.

Carbon Monoxide 1-hour Block Average - FGBOILERS011-013, SC I.11.b

On June 15, 2018, Boiler 13 exceeded the 1-hour block average CO emission limit (267 ppmv) for two consecutive hours (0:00 to 2:00 - 640 ppmv and 273 ppmv); indicating corrective action was not implemented in a timely manner. This incident is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.b.

Nitrogen Oxide 1-hour Block Average - FGBOILERS011-013, SC I.13.a

On May 22, 2018, Boiler 11 exceeded the 1-hour block average NOx emission limit (247 ppmv) for one hour (22:00 to 23:00 – 250 ppmv). This incident did not occur during startup or shutdown scenarios. This incident is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.13.a.

Flue Gas Oxygen Content - FGBOILERS011-013, SC III.3

During review of the First Quarter CEMS Report it was identified that on several occasions the flue gas oxygen content at Boiler 11, 12, and 13 has been less than 4 percent by volume on a 1-hour average as listed below.

- Boiler 11 – 4/5/18 (1 hour), 4/19/18 (5 hours), 5/3/18 (1 hour), 5/6/18 (3 hours)
- Boiler 12 – 4/12/18 (4 hours), 4/16/18 (1 hour), 4/18/18 (2 hours), 4/28/18 (3 hours)
- Boiler 13 – 4/10/18 (1 hour), 4/11/18 (4 hours), 4/12/18 (2 hours), 4/15/18 (3 hours), 4/16/12 (12 hours), 4/23/18 (1 hour), 4/24/18 (1 hour)

The above listed occurrences are a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, Special Condition (SC) III.3.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 16, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If DRP believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Mr. Robert Suida
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Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd Zynda', written over a light blue horizontal line.

Todd Zynda, P.E.
Senior Environmental Engineer
Air Quality Division
313-456-2761

cc: Mr. Mark Fletcher, DRP
Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ