



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

September 2, 2016

Mr. Linwood Bubar
Detroit Renewable Power
5700 Russell Street
Detroit, Michigan 48211

SRN: M4148, Wayne County

Dear Mr. Bubar:

VIOLATION NOTICE

The Department of Environmental Quality (DEQ), Air Quality Division (AQD), reviewed the 2016 2nd quarterly excess emission report submitted by Detroit Renewable Power located at 5700 Russell Street, Detroit. Renewable Operating Permit number MI-ROP-M4148-2011a limits carbon monoxide (CO), oxides of nitrogen (NOx) and sulfur dioxide (SO₂) emissions from EUBOILER011, EUBOILER012 and EUBOILER013 and requires the facility to monitor and record emissions of CO, NOx and SO₂ and the oxygen (O₂) content of the exhaust gas on a continuous basis in a manner and with instrumentation acceptable to the AQD. The report identified the SO₂ emission limit violations and that some required quality assurance tests of the continuous emission monitoring systems were not completed. These units are also subject to Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart Cb.

The second quarter 2016 excess emissions report indicated that there was an extended period of monitor downtime. Specifically, as a percentage of the operating time during the quarter the reported CO, NOx, SO₂ and O₂ monitor downtime for Boiler 11 was 100%; the reported CO, NOx, SO₂ and O₂ monitor downtime for Boiler 12 was 99% and the reported CO, NOx, SO₂ and O₂ monitor downtime for Boiler 13 was 99%.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
FGBOILERS011-013 comprised of EUBOILER011 EUBOILER012 EUBOILER013	1. ROP-M4148-2011a Table FGBOILERS011-013 Conditions VI. 2, and 47 2. 60.58b (e)(13)	Failed to conduct the cylinder gas audit of each SO ₂ CEMS on EUBOILER011 EUBOILER012 and EUBOILER013

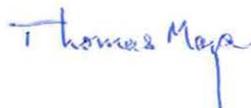
FGBOILERS011-013	1. ROP-M4148-2011a Table FGBOILERS011-013 Conditions VI.15 and 47 2. 60.58b (h)(11)	Failed to conduct the cylinder gas audit of each NOx CEMS on EUBOILER011 EUBOILER012 and EUBOILER013
FGBOILERS011-013	1. ROP-M4148-2011a Table FGBOILERS011-013 Conditions VI.23 and 47 2. 60.58b (i)(12)	Failed to conduct the cylinder gas audit of each CO CEMS on EUBOILER011 EUBOILER012 and EUBOILER013
FGBOILERS011-013	1. ROP-M4148-2011a Table FGBOILERS011-013 Conditions VI.34 and 47 2. 60.58b (b)(5)	Failed to conduct the cylinder gas audit of each O ₂ CEMS on EUBOILER011 EUBOILER012 and EUBOILER013

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 22, 2016 (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.

If Detroit Renewable Power 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.

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,



Thomas Maza
Environmental Quality Analyst
Air Quality Division
313-456-4709

Mr. Linwood Bubar
Page 3
September 1, 2016

cc: Ms. LaReina Wheeler, City of Detroit BSEED
cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Todd Zynda, DEQ