



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

November 22, 2017

Mr. Linwood Bubar, President  
Detroit Renewable Power, LLC  
5700 Russell St.  
Detroit, MI 48211-2545

SRN: M4148, Wayne County

Dear Mr. Bubar:

**VIOLATION NOTICE**

On November 15, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the Third Quarter 2017 Continuous Emissions Monitoring Systems Report for Detroit Renewable Power located at 5700 Russell, Detroit, Michigan. During partial review of the quarterly 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 review of facility files, it was also identified that the 40 Code of Federal Regulations (CFR) Part 60, Subpart Cb semiannual report was not submitted.

As a result of reviews, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Boilers 11, 12, 13	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII.5.b  40 CFR 60.7(d)	The 3 <sup>rd</sup> Quarter 2017 report provided did not include information required per 40 CFR 60.7(d).
	ROP No. MI-ROP-M4148-2011a, GC 18  R336.1213(3)(c)	The 3 <sup>rd</sup> Quarter 2017 report did not include certification by the responsible official.
	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII.7 and 8  40 CFR 60.59b(g) and 60.59b(h)	The facility failed to submit the 40 CFR Part 60 Subpart Cb semiannual report by September 15, 2017.

The Third Quarter 2017 Continuous Emissions Monitoring Systems report received on November 15, 2017 is missing information previously provided as part of the quarterly reporting. 40 CFR 60.7(d) specifies that the report shall contain the information and be in the format as specified in 40 CFR 60.7, Figure 1. The emission data summary and CMS performance summary were not included in the quarterly report. This is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII.5.b and 40 CFR 60.7(d).

The Third Quarter report also did not include a certification by the responsible official. This is a violation of MI-ROP-M4148-2011a, general condition 18 and R 336.1213(3)(c).

Additionally, the report does not include cylinder gas audit (CGA) and opacity calibration audits summary sheets (Appendix C in previously submitted quarterly reports) and operational data and exceedance information on steam flow, fabric filter inlet temperature, boiler combustion oxygen, and combustion zone temperature (Appendix D in previously submitted quarterly reports). The AQD requests that all information previously submitted in quarterly reports be provided in the submittal.

During review of facility files, it was identified that the Subpart Cb semiannual report pursuant to 40 CFR 60.59b(g) and 40 CFR 60.59b(h) was not submitted. This is a violation of MI-ROP-M4148-2011a, SC VII.7 and 8, 40 CFR 60.59b(g), and 40 CFR 60.59b(h). Per MI-ROP-M4148-2011a, SC VII.7 and 8, the semiannual report for reporting period January 1 through June 30, 2017 shall be postmarked on or before September 15, 2017. At this time, the AQD has not received the Subpart Cb semiannual report.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 13, 2017 (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.

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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,



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

cc: Mr. Damian Doerfer, DRP  
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. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ