



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

October 24, 2018

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

SRN: M4148, Wayne County

Dear Mr. Suida:

**VIOLATION NOTICE**

On October 18, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), observed the relative accuracy testing audit (RATA) of Boiler 11 for carbon monoxide at Detroit Renewable Power (DRP) located at 5700 Russell, Detroit, Michigan. As part of the RATA observation, the AQD evaluated DRP's 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 observation of the RATA, the following violation was identified.

Process Description	Rule/Permit Condition Violated	Comments
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.

During the October 18, 2018 RATA observation, the AQD observed the ash conveyor enclosure area and Boiler 11 sampling port. At that time there was excessive ash buildup in the area underneath the ash conveyor enclosure, exposing ash to the outer air. Excessive ash buildup was also observed on the ladder leading up boiler 11 sampling port. Photos were collected and provided to DRP on October 24, 2018. During the RATA observation, some of the ash buildup outside the conveyor enclosure was wet (indicating it was newer), while some ash areas were completely dry, indicating that this issue of ash buildup outside of the conveyor enclosure has been occurring for some extended period of time. Based on the observations on October 18, 2018, it is apparent that DRP is not disposing of ash in a manner which minimizes introduction of air contaminants to the outer air. This is a violation of MI-ROP-M4148-2011a, EUASH-HANDLING, Special Condition (SC) IX.1. SC IX.1 reads as follows.

“Permittee shall dispose of collected ash in a manner which minimizes the introduction of air contaminants to the outer air”.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 14, 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.

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.  
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  
Mr. Jon Lamb, DEQ