



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

December 11, 2017

Mr. Craig Rice
Executive Fleet Manager
Great Lakes Water Authority
Central Services Facility
6425 Huber Street
Detroit, Michigan 48211

SRN: M4845, Wayne County

Dear Mr. Rice:

VIOLATION NOTICE

On August 25, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of the Great Lakes Water Authority (GLWA) Central Services Facility, located at 6425 Huber Street in Detroit. The purpose of this inspection was to determine GLWA'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 administrative rules; and the terms and conditions of Permits to Install (PTI) that have been issued to this facility.

During the inspection, DEQ AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
A diesel fuel-fired Caterpillar engine used for emergency power at the facility, designated as FG-ENGINES in PTI No. 121-02A.	PTI No. 121-02A, Special Condition (SCs) VI.1 and VI.3;	Records of the calculation of nitrogen oxides (NOx) emissions from the engines (SC VI.1), and records of the amount of diesel fuel used in the engines (SC VI.3) are not being kept, as required by the PTI
Three Generac natural gas-fired generators.	R 336.1201(1)	The three generators were installed without first obtaining a PTI from DEQ AQD.

PTI No. 121-02A limits the amount of diesel fuel that can be fired in FG-ENGINES to 328,333 gallons per 12-month rolling time period (SC II.2). SC VI.3 puts forth the recordkeeping requirements associated with the fuel usage limit in SC II.2. SC VI.3 requires that the permittee (GLWA) keep monthly and 12-month rolling time period fuel use records for FG-ENGINES. The records must indicate the total amount of fuel used in FG-ENGINES, and the records shall be made available to DEQ upon request. SC

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VI.1 requires that the permittee keep monthly and 12-month rolling time period NOx emission calculation records for FG ENGINES, and make these records available to DEQ upon request. During my inspection, these records were not available. The records have not been made available to DEQ AQD in the time since the inspection.

In addition, three Generac natural gas-fired generators were installed at the facility. Information relating to these generators was not provided to DEQ AQD prior to their installation in order to determine whether the installation and operation of these generators requires a PTI.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 1, 2018. The written response should include: the dates that the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of the facility. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Stephen Weis
Senior Environmental Engineer
Air Quality Division
313-456-4688

cc: Mr. Paul Max, City of Detroit BSEED
cc/via e-mail: Mr. Majid Khan, GLWA
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