



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 20, 2021

Ms. Ericka Meah-Williams
Facilities and Construction Manager
Detroit Water and Sewerage Department
Central Services Facility
6425 Huber Street
Detroit, Michigan 48211

SRN: M4845, Wayne County

Dear Ms. Meah-Williams:

VIOLATION NOTICE

On July 15, 2021 the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the Detroit Water and Sewerage Department (DWSD) and Great Lakes Water Authority (GLWA) Central Services Facility, located at 6425 Huber Street in Detroit. The purpose of this inspection was to determine the compliance of DWSD and GLWA 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.

As a result of the inspection and subsequent discussions regarding facility records, EGLE-AQD staff noted the following violations:

Process Description	Rule/Permit Condition Violated	Comments
A diesel fuel-fired Caterpillar engine used for emergency power at the facility, designated as FGEngines 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

PTI No. 121-02A was issued to DWSD on December 1, 2008, and it serves to limit the potential emissions from the engine to below major source thresholds. The PTI limits emissions of nitrogen oxides (NOx) from FGEngines to 39.95 tons per 12 month rolling time period, as determined at the end of each calendar month (SC I.1). SC VI.1 puts forth the recordkeeping requirements associated with the emission limit in SC I.1, requiring that the permittee (DWSD) keep monthly and 12-month rolling time period NOx emission calculation records for FGEngines, and make these records available

to EGLE upon request. The PTI also limits the amount of diesel fuel that can be fired in FGENGINES 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 keep monthly and 12-month rolling time period records of the gallons of diesel fuel burned in FGENGINES. The records must indicate the total amount of fuel used in FG-ENGINES, and the records shall be made available to EGLE. During my inspection, these records were not available, and subsequent discussions provided that these records are not currently being maintained.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 10, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates that 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 EGLE, 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 EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If DWSD believes that 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 violation cited above. 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
313-720-5831

cc: Mr. Hosam Hassanian, City of Detroit BSEED
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olague, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE