



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GRETHNER  
DIRECTOR

October 11, 2018

Mr. Dave Monette, Division Head  
Warren Wastewater Treatment Plant  
32360 Warkop Avenue  
Warren, Michigan 48093

SRN: B1792, Macomb County

Dear Mr. Monette:

**SECOND VIOLATION NOTICE**

On August 13, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the "City of Warren Sewage Sludge Incinerator NOx and CO Emissions Test Report" for the emission test conducted at the Warrant Wastewater Treatment Plant (Warren WWTP) located at 32360 Warkop Avenue, Warren, Michigan. The emissions test was conducted to verify Warren Wastewater Treatment Plant Sludge Incineration Unit's (EU) Incinerator-NSPS-MMMM compliance with the conditions of facility's Renewable Operating Permit (ROP) number MI-ROP-B1792-2016 and "Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units" codified under 40 CFR 60, Subpart MMMM. During the test the emissions of Carbon monoxide (CO), Oxides of Nitrogen (NOx) was measured along with visible emissions from the ash handling process.

On August 29, 2018, the AQD sent Warren WWTP a Violation Notice citing violation discovered as a result of the stack test report review and requested your written response by September 19, 2018.

On September 19, 2018, AQD received a response from Warren WWTP for the Violation Notice. AQD reviewed the response and determined that the response is not adequate to address the violation. AQD is pleased with the actions that Warren WWTP took to prevent recurrence of such deviations. However, in order to comply with the requirements of Warren WWTP's ROP No. MI-ROP-B1792-2016, and "Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units" codified under 40 CFR 60, Subpart MMMM, AQD requests that Warren WWTP re-test the sewage sludge incinerator emissions for Carbon monoxide (CO), and Oxides of Nitrogen (NOx) within 60 days from the date of this letter.

Please be advised that failure to respond in writing and identifying actions Warren WWTP will take to resolve the cited violation may result in escalated enforcement action by the AQD.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Second Violation Notice by October 25, 2018 (which coincides with 14 calendar days from the date of this letter).

Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violation or the action necessary to bring Warren WWTP into compliance, please contact me at the number listed below.

Sincerely,



Sebastian G. Kallumkal  
Senior Environmental Engineer  
Air Quality Division  
586-753-3738

cc: Mr. Aaron Keatley, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Joyce Zhu, DEQ