

January 31, 2018

Ms. Todd Zynda, P.E.
Senior Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
3058 West Grand Boulevard
Detroit, Michigan 48202-6058

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FEB -5 2018

Air Quality Division Detroit Office

RE: Detroit Thermal - Response to Violation Notice dated January 10, 2018

Dear Mr. Zynda:

This correspondence is Detroit Thermal's response to the Violation Notice (VN) dated January 10, 2018.

Process Description	Rule/Permit	MDEQ Comments	Detroit Thermal
	Condition allegedly		Response
	violated		1 550
FG-BOILER_6,7 (Boiler 6)	ROP No. MI-ROP- B2814-2014, FG- BOILER_6,7, Special Condition 1.1.1d	The NOx emission limit (0.036 lb./MMBtu) was exceeded at Boiler 6 (6 hours) during the Third Quarter 2017.	Five of the six hours with excess NOx emissions were during periods of start-up or shut-down. Please see the table below.

BOILER#6

	Lb. NOx per MM BTU	Date and Time (15 minute blocks)
	0.0188	8/8/2017 4:00
Unit came off-line a 0427.	0.0976	8/8/2017 4:15
	0.0000	8/8/2017 4:30
	0.0000	8/8/2017 4:45
	0.0159	8/9/2017 5:45
	0.0467	8/9/2017 6:00
Unit came off-line a 0618.	0.0293	8/9/2017 6:15
	0.0000	8/9/2017 6:30
	0.0000	8/9/2017 6:45



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BOILER#6

Date and Time (15 minute blocks)	Lb. NOx per MM BTU	
8/8/2017 4:00	0.0188	
8/8/2017 4:15	0.0976	Unit came off-line at 0427.
8/8/2017 4:30	0.0000	
8/8/2017 4:45	0.0000	
8/9/2017 5:45	0.0159	
8/9/2017 6:00	0.0467	
8/9/2017 6:15	0.0293	Unit came off-line at 0618.
8/9/2017 6:30	0.0000	
8/9/2017 6:45	0.0000	

8/18/2017 4:00	0.0000	
		Unit came on-line at
8/18/2017 4:15	0.0759	0423.
8/18/2017 4:30	0.0644	
8/18/2017 4:45	0.0837	
8/18/2017 5:00	0.0353	
		Unit came off-line at
8/18/2017 5:15	0.0140	0518.
8/20/2017 15:00	0.0000	
		Unit came on-line at
8/20/2017 15:15	0.0866	1522.
8/20/2017 15:30	0.0179	
8/20/2017 15:45	0.0335	
8/20/2017 16:00	0.1399	
8/20/2017 16:15	0.1402	
8/20/2017 16:30	0.0675	
8/20/2017 16:45	0.0882	
8/20/2017 17:00	0.1747	
8/20/2017 17:15	0.0877	
8/20/2017 17:30	0.0252	
		Unit came off-line at
8/20/2017 17:45	0.0180	1943

If you have questions concerning this response, please feel free to contact Damian Doerfer at (313) 269-2806.

Sincerely,

Detroit Thermal

Damian Doerfer, Director EHS