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YPSILANTI COMMUNITY UTILITIES AUTHORITY

2777 STATE ROAD  
YPSILANTI, MICHIGAN 48198-9112  
TELEPHONE: 734-484-4600  
WEBSITE: www.ycua.org

November 16, 2018

**VIA CERTIFIED MAIL**

Mr. Mark Dziadosz  
Environmental Quality Analyst  
Air Quality Division  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
27700 Donald Court  
Warren, Michigan 48092-2793

RECEIVED  
NOV 16 2018  
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

Re: Violation Notice  
**YPSILANTI COMMUNITY UTILITIES AUTHORITY (SRN B6237)**

Dear Mr. Dziadosz:

The Ypsilanti Community Utilities Authority (YCUA) is in receipt of the Violation Notice dated October 29, 2018. The notice is in regards to the unsuccessful Relative Accuracy Test Audit (RATA) for CO-CEMS conducted on August 21, 2018. The notice requires YCUA to present the actions taken following the unsuccessful RATA. Please accept this letter and attached supporting information as YCUA's response to the violation notice. A chronology of the steps taken subsequent to the unsuccessful RATA for CO-CEMS is attached.

In conformance with the approved RATA protocol, YCUA conducted the RATA for SO<sub>2</sub>, O<sub>2</sub> and CO on August 21, 2018. The test was successful for SO<sub>2</sub> and O<sub>2</sub> and was unsuccessful for CO. Subsequently, the CO – RATA was retried on August 22, 2018 and was unsuccessful. During the retrial on August 22, 2018 it was evaluated and determined by both the Horiba Representative (the analyzer service technician) and the testing company that the YCUA's CO analyzer was reporting inflated CO readings due to interference due to CO<sub>2</sub>. However, the measured CO values even with the CO<sub>2</sub> interference were well within the regulatory limit for CO emissions. The DEQ was promptly notified via electronic mail communications on the status of the testing.

Subsequently, YCUA engaged a service technician from Horiba and replaced certain parts of the analyzer including cooler, light source and detector. Attached is an invoice/service work order. Upon replacement of the said parts, YCUA obtained a test cylinder containing both CO and CO<sub>2</sub> as advised by the testing company and the manufacturer of the analyzer and compensated any interference due to CO<sub>2</sub>. Following these repairs, YCUA contacted the testing company on October 8, 2018 and scheduled the RATA for CO again for December 6, 2018 in conjunction with the emissions testing on December 7, 2018. Notwithstanding these efforts, YCUA also contacted a few companies to rent a portable analyzer

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**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
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to verify the CO – CEMS. However, it is learnt that the portable analyzers are not reliable for low CO emissions.

Upon making the repairs to the analyzer and corrections, YCUA and the Horiba believe that the CO analyzer is reading the CO emissions without any interferences due to CO<sub>2</sub>. We would like to mention that YCUA conducted emissions testing in December 2016 which included CO testing and conducted RATA in September 2017 which also included CO-CEMS, both of which met the regulatory requirements. Please note that YCUA CO CEMS has been operational at all times during the processing of biosolids in the Fluid Bed Incinerator System (FBIS). Furthermore, the CO Emissions at all the times during the processing of biosolids in the FBIS were well within the regulatory limits for daily emissions.

YCUA has submitted a test protocol for repeating the RATA for CO-CEMS on December 6, 2018 and emissions testing on December 7, 2018. An approval of the test protocol was received on November 13, 2018. YCUA believes that it has taken all appropriate measures following the unsuccessful RATA in August 2018 to demonstrate the commitment to comply with the requirements.

Please contact me with any questions you may have regarding this correspondence by phone at 734-484-4600 Ext. 121 or by email at [smullapudi@ycua.org](mailto:smullapudi@ycua.org).

Sincerely,



SREE MULLAPUDI, Director of Wastewater Operations/Compliance  
Ypsilanti Community Utilities Authority

Encls: Chronology of follow up actions W/electronic mail correspondences  
Most recent CO CEMS

Ms. Diane Kavanaugh Vetort, DEQ-Jackson      Mr. Mark Dziadosz- TPU  
Ms. Valerie Guenther, TetraTech  
Mr. Jeff Castro      Mr. Alan Schock,      YCUA File  
YCUA File