

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

SOUTHEAST MICHIGAN DISTRICT OFFICE



October 29, 2018

Mr. Sree Mullapudi, PE Director of Wastewater Operations & Compliance Ypsilanti Community Utilities Authority 2777 State Road Ypsilanti, MI 48198

Dear Mr. Mullapudi:

SRN: B6237, Washtenaw County

VIOLATION NOTICE

On September 11, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the Relative Accuracy Test Audit (RATA) results of the continuous emission monitoring system (CEMS) at the Ypsilanti Community Utilities Authority (YCUA) facility located at 2777 State Road, Ypsilanti, MI. 40 CFR Part 503 requires the facility to monitor carbon monoxide (CO) emissions from EU-FBSSI on a continuous basis.

The CO CEMS did not meet the performance criteria of Performance Specification (PS) 4. Specifically, the relative accuracy of the CEMS was greater than 10% of the average reference method value. The monitor is considered out of control from the date of the failed RATA and any data recorded is invalid until the analyzer successfully passes the quality assurance procedures outlined in PS 4.

The monitor requirement violations include the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-FBSSI	40 CFR Part 503 Subpart E 503.40(c)(1)	Failure to continuously monitor for CO.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 19, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates 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 YCUA believes 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.

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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,

Mark Dziadosz

Environmental Quality Analyst

Air Quality Division (586)753-3745

cc: Ms. Mary Ann Dolehanty, DEQ

Mr. Craig Fitzner, DEQ

Mr. Christopher Ethridge, DEQ

Ms. Jenine Camilleri, DEQ

Mr. Scott Miller, DEQ