

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : DETROIT RENEWABLE POWER, LLC		SRN :	M4148
Location : 5700 RUSSELL ST		District :	Detroit
		County :	WAYNE
City : DETROIT	State: MI	Zip Code : 48211	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Joyce Zhu		
FCE Begin Date : 9/1/2014	FCE Completion Date :	9/25/2015	
Comments :			

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/25/2015	ROP Semi 1 Cert	Non Compliance	The company has reported 41 deviation incidents during the period. Out of the 41 deviations, 35 of them are regarding to CO exceedences. 5 of the CO deviations occurred during startup period & were in compliance with the corresponding emission limit. Since the total hours of the CO deviation was < 1% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period. The other three deviation was for SO2 exceedences based on 24-hr geometric average. NV was issued in June for the SO2 exceedences. Another 3 deviations were related to the malfunction of the roof exhaust filter, velometer, & the MSW door closing. The company has corrected the problems.

Activity Date	Activity Type	Compliance Status	Comments
09/25/2015	NSPS (Part 60)	Non Compliance	The company has reported 38 deviation incidents during the period. Out of the 38 deviations, 35 of them are regarding to CO exceedences. 5 of the CO deviations occurred during startup period & were in compliance with the corresponding emission limit. Since the total hours of the CO deviation was < 1% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period. The other three deviation was for SO2 exceedences based on 24-hr geometric average. NV was issued in June for the SO2 exceedences.
09/25/2015	NSPS (Part 60)	Non Compliance	The company has reported 38 deviation incidents during the period. Out of the 38 deviations, 35 of them are regarding to CO exceedences. 5 of the CO deviations occurred during startup period & were in compliance with the corresponding emission limit. Since the total hours of the CO deviation was < 1% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period. The other three deviation was for SO2 exceedences based on 24-hr geometric average. NV was issued in June for the SO2 exceedences.
09/25/2015	ROP Qrtly Cert	Compliance	The company has reported 14 excess emission incidents during the period. Out of the 14 incidents, 3 of them was due to start-up/shut-down during which period, there is higher emission limit; as a result, those emissions during such period were within the corresponding permit limits. Since the total hours of the deviation was < 0.5% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period.
09/23/2015	Complaint Investigation	Compliance	September 23, 2015 Complaint Investigation

Activity Date	Activity Type	Compliance Status	Comments
09/22/2015	Complaint Investigation	Compliance	September 22, 2015 Complaint Investigation
09/21/2015	Complaint Investigation	Compliance	September 21, 2015 Complaint Investigation
09/21/2015	Complaint Investigation	Compliance	PEAS No. 13467 Complaint Investigation
09/20/2015	Complaint Investigation	Compliance	Complaint Investigation
08/31/2015	Complaint Investigation	Unknown	odor survey
08/20/2015	Complaint Investigation	Non Compliance	August 20, 2015 Complaint Investigation
08/09/2015	Complaint Investigation	Compliance	August 9, 2015 Complaint Investigation
08/08/2015	Complaint Investigation	Compliance	August 8, 2015 Complaint Investigation
08/06/2015	Complaint Investigation	Compliance	August 6, 2015 Complaint Investigation
07/31/2015	Scheduled Inspection	Non Compliance	Annual inspection. The noncompliance status due to non resolved odor problems.
07/27/2015	Complaint Investigation	Non Compliance	July 27, 2015 Complaint Investigation
07/26/2015	Complaint Investigation	Compliance	Investigation to resolve multiple odor complaints received by the DEQ PEAS call center on July 26, 2015 and verbal complaints recorded in voice mails.
07/11/2015	Complaint Investigation	Compliance	PEAS No 13086 and 13089 Complaint Investigation
07/11/2015	Complaint Investigation	Non Compliance	PEAS odor complaint investigation
07/09/2015	Complaint Investigation	Compliance	PEAS No. 13079 Complaint Investigation
07/03/2015	Complaint Investigation	Non Compliance	Odor complaint investigation

Activity Date	Activity Type	Compliance Status	Comments
06/26/2015	ROP Qrtly Cert	Non Compliance	The company has reported 24 deviation incidents during the period. Out of the 24 deviations, 21 of them are regarding to CO exceedences. Two of the CO deviations occurred during startup period & were in compliance with the corresponding emission limit. Since the total hours of the CO deviation was < 1% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period. The other three deviation was for SO2 exceedences based on 24-hr geometric average. NV will be issued on 6/29 for the SO2 exceedences.
06/26/2015	Other	Compliance	visible emission complaint
06/21/2015	Complaint Investigation	Non Compliance	Odor complaint investigation
06/20/2015	Complaint Investigation		PEAS No. 12892 Complaint Investigation
06/19/2015	Complaint Investigation	Compliance	Investigation of odor complaint.
06/15/2015	ROP SEMI 2 CERT	Compliance	The company has reported 17 deviations during the period. Out of the 17 incidents, 5 of them was opacity exceedences; however, the total hours of these deviation was < 0.5% of the total operational hours, 1 of them was due to start-up/shut-down during which period, there is higher emission limit; as a result, those emissions during such period were within the corresponding permit limits. Since the total hours of the deviation was < 1% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period.
06/15/2015	NSPS (Part 60)	Compliance	The company has reported 17 deviations during the period. Out of the 17 incidents, 5 of them was opacity exceedences; however, the total hours of these deviation was < 0.5% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
06/15/2015	ROP Annual Cert	Compliance	The company has reported 75 excess emission incidents during the period. Out of the 75 incidents, 2 of them was due to start-up/shut-down during which period, there is higher emission limit; as a result, those emissions during such period were within the corresponding permit limits. Since the total hours of the deviation was < 1% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period.
06/06/2015	Complaint Investigation	Non Compliance	PEAS odor complaint investigation
05/31/2015	Complaint Investigation	Non Compliance	Odor observation
05/26/2015	MAERS	Compliance	Completed the MAERS auditing. Changed PM emission for Process Line 100 primary as well as secondary shredders. The changes were based on the most recent stack test data (2012). JZ
05/22/2015	Complaint Investigation	Compliance	PEAS No. 12727 Complaint Investigation
05/17/2015	Complaint Investigation		PEAS No. 12695 Complaint Investigation
05/16/2015	Complaint Investigation		PEAS No. 12677 - Odor Complaint Investigation conducted on May 16, 2016
05/12/2015	Complaint Investigation		May 12, 2015 Complaint Investigation
05/06/2015	ROP Other	Compliance	2014 MAERS Report/ROP Certification Form
05/05/2015	Complaint Investigation	Compliance	Complaint Investigation
04/30/2015	ROP Qrtly Cert	Compliance	The company has reported 11 deviation incidents during the period. Since the total hours of the deviation was < 1% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period.
04/25/2015	Complaint Investigation		odor survey
04/10/2015	Complaint Investigation	Compliance	Investigation of odor complaint.
02/21/2015	Complaint Investigation	Compliance	PEAS No. 12378 Complaint Investigation

Activity Date	Activity Type	Compliance Status	Comments
02/04/2015	Stack Test Observation	Compliance	There are multiple dates of stack test observations. I conducted the observation on 12/1 - 12/4, 12/8/14, & 2/4/15.
01/21/2015	ROP Qrtly Cert	Compliance	The company has reported 13 excess emission incidents for CO emissions & opacity during the period. Out of the 13 incidents, 5 of them were for CO excess emissions from Boiler #11; 1, for CO from Boiler #12; & 3, for CO from Boiler #13. 4 of the incidents were for opacity exceeded 6-minute average limit. Since the total duration of those incident was less than 1% of the total operating time of each boiler, the company was expected to operate in compliance with the ROP requirements during the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
10/06/2014	ROP Semi 1 Cert	Compliance	<p>The company has reported 67 excess emission incidents for CO emissions during the period. Out of the 67 incidents, 2 of them was due to start-up/shut-down during which period, there is higher emission limit; as a result, those emissions during such period were within the corresponding permit limits. Since the total hours of the deviation was < 1% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period. In addition to the CO exceedance, the company also reported opacity exceedance for Boiler No. 11. One of the incidents lasted about 36 minutes on 4/22/2014. This was only 0.074% of operating time during the quarter. I consider DRP to be in substantive compliance with these conditions, at this time. I have notified the company to monitor the excessive emissions closely & correct the opacity problems ASAP.</p> <p>Please note that the company has submitted the ROP certification late; however, the same deviations have been reported in the NSPS report submitted on 9/11/2014. This is just the paper violation. I have warned the company to submit the certification on time. No action will be taken at this point. If this becomes a pattern, I'll issue a VN.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/29/2014	NSPS (Part 60)	Compliance	The company has reported 67 excess emission incidents for CO emissions during the period. Out of the 67 incidents, 2 of them was due to start-up/shut-down during which period, there is higher emission limit; as a result, those emissions during such period were within the corresponding permit limits. Since the total hours of the deviation was < 1% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period. In addition to the CO exceedance, the company also reported opacity exceedance for Boiler No. 11. One of the incidents lasted about 36 minutes on 4/22/2014. This was only 0.074% of operating time during the quarter. I consider DRP to be in substantive compliance with these conditions, at this time. I have notified the company to monitor the excessive emissions closely & correct the opacity problems ASAP.
09/24/2014	Complaint Investigation	Unknown	September 24, 2014 Complaint Investigation
09/22/2014	Scheduled Inspection	Non Compliance	annual inspection
09/08/2014	Complaint Investigation	Unknown	September 8, 2014 Complaint Investigation
09/07/2014	Complaint Investigation	Unknown	September 7, 2014 Complaint Investigation
09/04/2014	Excess Emissions (CEM)	Compliance	The company has reported 37 excess emission incidents for CO emissions during the period. Out of the 37 incidents, 1 of them was due to start-up/dhut-down during which period, there is higher emission limit; as a result, those emissions during such period were within the corresponding permit limits. Since the total hours of the deviation was < 1% of the total operational hours, the company was expected to operate in compliance with the ROP requirements during the reporting period.

Name: J. Zhu / um Date: 9/25/15 Supervisor: WM