



**VIA CERTIFIED MAIL**

September 22, 2016

Todd Zynda, Environmental Engineer  
Michigan Department of Environmental Quality  
Air Quality Division  
3058 W. Grand Boulevard  
Suite 2300  
Detroit, MI 48202

**RE: Detroit Renewable Power – Response to Violation Notices dated September 2, 2016**

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) received on September 2, 2016 for allegedly not conducting the Calibration Gas Audits (CGAs) in second quarter as required by ROP No. MI-ROP-M4148-2011A, Table FGBOILERS011-013 Condition VI. 12., 15., 23., 29., 34., and 47. CGAs are also required by 40 CFR 60.58b(e)(13), (h)(11), (i)(12), and (b)(5).

**The following is in response to the violation notice:** The violation notice references "failure to conduct the cylinder gas audit of each CEMS", however the CGAs were completed in second quarter. The second quarter Calibration Gas Audits (CGAs) for Units 12 and 13 were conducted on June 30, 2016. The CGA for Unit 11 was conducted on June 1, 2016 for all components except Oxygen (O2) due to not having the EPA calibration gas. Once the O2 calibration gas was received, Unit 11 was shut down for scheduled maintenance and electricity was shutoff to the unit and the unit's CEMS. Therefore, the full CGA with O2 was completed on July 4, 2016 when electricity was restored to the unit.

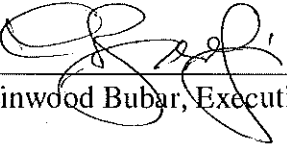
As a result of the CGAs being done at the end of the quarter, the CEMS experienced a high amount of downtime in second quarter. The excessive downtime is a result of the CGAs not being completed and not a result of inadequate data. The data from the CEMS for second quarter is available and daily validations show the data is accurate.

The Calibration Gas Audits (CGAs) were not completed in first quarter 2016 and a corresponding violation notice was issued on June 9, 2016. Therefore, DRP would like to request a retraction of this violation notice on grounds that the violation notice is a duplicate.

If you have questions concerning this response, please feel free to contact Tabettha Peebles at (313) 972-4336.

Sincerely,

Detroit Renewable Power



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Linwood Bubar, Executive V.P.

cc: Tom Maza via email