detroit renewable power
A Detroit Renewable Energy LLC Company

VIA CERTIFIED MAIL

April 5, 2016

Joyce Zhu, Senior Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard
Suite 2300
Detroit, MI 48202

RE: Detroit Renewable Power – Violation Notice Response – Boiler #12 Sulfur Dioxide Excess Emissions

Dear Ms. Zhu:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) received on March 23, 2016 for allegedly exceeding the Sulfur Dioxide (SO2) emission limit of 29 ppmv based on a 24-hour geometric mean average, corrected to 7% oxygen per ROP No. MI-ROP-M4148-2011a Table FGBOILER011-013, Condition I.9. This emission limit is also specified in 40 CFR 52.21(j), 40 CFR 62.14013(b)(1), 40 CFR 60.33(b)(3)(i), & R 336.1932. The VN was issued based on the review of the Continuous Emission Monitoring System Performance Report for fourth quarter 2015. Note the table on page 1 of the VN incorrectly states the number of days the alleged excess emissions took place as 11/8 & 11/9/15. The 24 hour timeframe in question is only one day, November 8, 2015. Furthermore, Detroit Renewable Power believes the event does not constitute a violation, as outlined below.

On November 8, 2015 boiler #12 was not operating from 12:00am until 10:00pm. At approximately 10:00pm boiler #12 was started up. The 1-hour average for the 10:00pm to 11:00pm hour was 32 ppmv and the 1-hour average for the 11:00pm to 12:00am hour was 30 ppmv. These two hours occurred during the start-up of the boiler as defined in the ROP as the setting in operation of the affected facility for any purpose (40 CFR 60.2). According to 40 CFR 60.58b(a)(1) the Emission Guideline standards do not apply during startup periods, but are limited to 3 hours per occurrence. Lastly, 40 CFR 60.58b(a)(1)(i) states that during periods of startup, shutdown, or malfunction, monitoring data shall be dismissed or excluded from compliance calculations, but shall be recorded and reported.

Detroit Renewable Power supports the above argument that the event does not constitute a violation with the attached Data Summary Reports for November 7-9, 2015. The November 7, 2015 Data Summary Report shows no values since the boiler was not operating. The November 8, 2015 Data Summary Report shows 1-hour averages for Steam (used as an indication of the boiler operation) and SO2 for the last two hours of the day. November 9, 2015 is also being included to show the boiler was operating and there were no excess emissions.

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

Sincerely,

Detroit Renewable Power

Linwood Bubar, Executive V.P.

Attachments: Renewable Operating Permit Report Certification

Data Summary Report

detroit renewable power
A Detroit Renewable Energy LLC Company

Company: Detroit Renewable Power
5700 Russell Street
Detroit, MI 48211

Data Group: All Data Groups
Report Name: No Title
Start of Report: 11/07/2015 00:00
End of Report: 11/07/2015 23:59

Validation: Valid Data Only

Group#-Channel#	G23-C16	G26-C12	G23-C9
Long Descrip.	U-12-1Hr	U-12-24Hr	U-12-1Hr → boiler #12 1Hr or 24Hr average
Short Descrip.	SO2sc*	SO2scGeo▲	SteamFl - Steam Flow
Units	ppmc	ppmc Geo	K#/Hr
Range	0-500	0-500	0-500
11/07/2015 00:00			
11/07/2015 01:00			
11/07/2015 02:00			
11/07/2015 03:00			
11/07/2015 04:00			
11/07/2015 05:00			
11/07/2015 06:00			
11/07/2015 07:00			
11/07/2015 08:00			
11/07/2015 09:00			
11/07/2015 10:00			
11/07/2015 11:00			
11/07/2015 12:00			
11/07/2015 13:00			
11/07/2015 14:00			
11/07/2015 15:00			
11/07/2015 16:00			
11/07/2015 17:00			
11/07/2015 18:00			
11/07/2015 19:00			
11/07/2015 20:00			
11/07/2015 21:00			
11/07/2015 22:00			
11/07/2015 23:00			
Period Average =	0	0	0
Period Max Value =	****	****	****
Period Min Value =	****	****	****
Period Totals =	0.0000E+0	0.0000E+0	0.0000E+0
Period % Recovery =	0.0	0.0	0.0

* sc - stack corrected to 7% oxygen

▲ Geo - geometric mean average

Data Summary Report

Company: Detroit Renewable Power
5700 Russell Street
Detroit, MI 48211

Data Group: All Data Groups
Report Name: No Title
Start of Report: 11/08/2015 00:00
End of Report: 11/08/2015 23:59

Validation: Valid Data Only

Group#-Channel#	G23-C16	G26-C12	G23-C9
Long Descrip.	U-12-1Hr	U-12-24Hr	U-12-1Hr
Short Descrip.	SO2sc	SO2scGeo	SteamFl
Units	ppmc	ppmc Geo	K#/Hr
Range	0-500	0-500	0-500
11/08/2015 00:00		31<	
11/08/2015 01:00			
11/08/2015 02:00			
11/08/2015 03:00			
11/08/2015 04:00			
11/08/2015 05:00			
11/08/2015 06:00			
11/08/2015 07:00			
11/08/2015 08:00			
11/08/2015 09:00			
11/08/2015 10:00			
11/08/2015 11:00			
11/08/2015 12:00			
11/08/2015 13:00			
11/08/2015 14:00			
11/08/2015 15:00			
11/08/2015 16:00			
11/08/2015 17:00			
11/08/2015 18:00			
11/08/2015 19:00			
11/08/2015 20:00			
11/08/2015 21:00			
11/08/2015 22:00	32		294
11/08/2015 23:00	30		336
Period Average =	31	31	315
Period Max Value =	32	31	336
Period Min Value =	30	31	294
Period Totals =	6.2000E+1	3.1000E+1	6.3000E+2
Period % Recovery =	8.3	100.0	8.3

Data Summary Report

Company: Detroit Renewable Power
5700 Russell Street
Detroit, MI 48211

Data Group: All Data Groups
Report Name: No Title
Start of Report: 11/09/2015 00:00
End of Report: 11/09/2015 23:59

Validation: Valid Data Only

Group#-Channel#	G23-C16	G26-C12	G23-C9
Long Descrip.	U-12-1Hr	U-12-24Hr	U-12-1Hr
Short Descrip.	SO2sc	SO2scGeo	SteamFl
Units	ppmc	ppmc Geo	K#/Hr
Range	0-500	0-500	0-500
11/09/2015 00:00	34	16<	335
11/09/2015 01:00	32		325
11/09/2015 02:00	32		339
11/09/2015 03:00	34		333
11/09/2015 04:00	36		333
11/09/2015 05:00	34		329
11/09/2015 06:00	33		320
11/09/2015 07:00	33		325
11/09/2015 08:00	29		336
11/09/2015 09:00	28<		326
11/09/2015 10:00	26		323
11/09/2015 11:00	28		317
11/09/2015 12:00	24		311
11/09/2015 13:00			299
11/09/2015 14:00			310
11/09/2015 15:00	1		285
11/09/2015 16:00	0		319
11/09/2015 17:00	13		325
11/09/2015 18:00	7		333
11/09/2015 19:00	11		338
11/09/2015 20:00	11		338
11/09/2015 21:00	9		325
11/09/2015 22:00	10		324
11/09/2015 23:00	11		334
Period Average =	22	16	324
Period Max Value =	36	16	339
Period Min Value =	0	16	285
Period Totals =	4.7600E+2	1.6000E+1	7.7820E+3
Period % Recovery =	91.7	100.0	100.0