



VIA CERTIFIED MAIL

June 9, 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 – May 19, 2016 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 May 19, 2016 for allegedly exceeding the Sulfur Dioxide (SO₂) emission limit for Boiler #12 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 on April 4 and 21, 2016. The VN was issued based on the Rule 912 Excess Emission Reports submitted on April 11 and April 28, 2016.

On April 4, 2016 at approximately 3:00pm Boiler #12 experienced an SO₂ spike during the startup of a clean spray machine which was just put in to service following the nozzles becoming plugged on the slurry spray machine. These spray machines inject the slurry for SO₂ control. The nozzles continued to plug on the spray machines and operations continued to backflush the system and clean the spray machines until 9:55pm. The removal and cleaning of the spray machines took place while the boiler was operating. During this time SO₂ exceeded the permitted limit. Note that the boiler was not operating the full 24 hours and the permit limit is based on a 24 hour geometric mean average. The boiler operated 19 hours of the day on April 4, 2016. As a preventative measure, DRP operators will perform back flushes on the system. This is done by flowing cleaner through the machine and cleaning the inlet strainers to the system.

On April 21, 2016 Boiler #12 experienced elevated SO₂ due to the spray machine failing in place and when a new machine was put in to service there was fouling of the nozzles on the atomizing wheel due to the passing of debris that did not get captured in the strainer basket. DRP changed out the atomizing wheel and sprayer. DRP will be replacing the strainers (new housing) to prevent the grit from getting to the spray machine. Note that this particular malfunction is unique in DRP's recent experience.

According to 40 CFR 60.58b(a)(1) the Emission Guideline standards do not apply during startup, shutdown or malfunction periods, subject to a limit of three hours per occurrence. In addition, 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.


On April 4, 2016 the unit was starting up and experienced a malfunction therefore three hours can be excluded for the malfunction. Excluding the three hours for malfunction, the 24 hour geometric mean average emissions rate was 36ppm versus 44ppm without excluding the three hours.

On April 21, 2016 the unit experienced a malfunction (which is defined as "any sudden infrequent and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner.") Excluding the three hours for malfunction, the 24 hour geometric mean average emissions rate was 30ppm versus 35ppm without excluding the three hours.

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

Sincerely,

Detroit Renewable Power



Damian G. Doerfer for Linwood Bubar.

Linwood Bubar, Executive V.P.

Attachments: Renewable Operating Permit Report Certification

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: 04/04/2016 00:00

End of Report: 04/04/2016 23:59

Validation: Valid Data Only

Group#-Channel#	G23-C1	G23-C4	G23-C16	G26-C12
Long Descrip.	U-12-1Hr	U-12-1Hr	U-12-1Hr	U-12-24Hr
Short Descrip.	O2s	SO2s	SO2sc	SO2scGeo
Units	%	ppm	ppmc	ppmc Geo
Range	0-25	0-200	0-500	0-500
04/04/2016 00:00				44
04/04/2016 01:00				
04/04/2016 02:00				
04/04/2016 03:00				
04/04/2016 04:00				
04/04/2016 05:00	9.7	16.0	20	
04/04/2016 06:00	9.5	7.7	9	
04/04/2016 07:00	9.7	13.4	17	
04/04/2016 08:00	9.9	11.5	15	
04/04/2016 09:00	9.8 <	17.8 <	22 <	
04/04/2016 10:00	10.3	13.4	18	
04/04/2016 11:00	10.1	15.4	20	
04/04/2016 12:00	10.1	35.9	46	
04/04/2016 13:00	10.5	61.0	82	
04/04/2016 14:00	10.5	50.9	68	
04/04/2016 15:00	10.6	73.3	99	
04/04/2016 16:00	10.4	32.3	43	
04/04/2016 17:00	10.4	101.2	134	
04/04/2016 18:00	11.4	88.5	129	
04/04/2016 19:00	11.0	78.6	110	
04/04/2016 20:00	11.1	96.7	137	
04/04/2016 21:00	11.3	77.7	113	
04/04/2016 22:00	10.9	27.6	38	
04/04/2016 23:00	11.1	23.7	34	
Period Average =	10.4	44.3	61	44
Period Max Value =	11.4	101.2	137	44
Period Min Value =	9.5	7.7	9	44
Period Totals =	1.9830E+2	8.4260E+2	1.1540E+3	4.4000E+1
Period % Recovery =	79.2	79.2	79.2	100.0

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: 04/21/2016 00:00
 End of Report: 04/21/2016 23:59

Validation: Valid Data Only

Group#-Channel#	G23-C1	G23-C4	G23-C16	G26-C12
Long Descrip.	U-12-1Hr	U-12-1Hr	U-12-1Hr	U-12-24Hr
Short Descrip.	O2s	SO2s	SO2sc	SO2scGeo
Units	%	ppm	ppmc	ppmc Geo
Range	0-25	0-200	0-500	0-500
04/21/2016 00:00	11.2	11.0	16	35
04/21/2016 01:00	10.9	9.4	13	
04/21/2016 02:00	10.7	28.2	38	
04/21/2016 03:00	10.9	50.6	70	
04/21/2016 04:00	11.4	61.7	90	
04/21/2016 05:00	11.6	12.7	19	
04/21/2016 06:00	11.2	12.1	17	
04/21/2016 07:00	11.0	4.3	6	
04/21/2016 08:00	11.1	7.8	11	
04/21/2016 09:00	11.6 <	11.5 <	17 <	
04/21/2016 10:00	11.5	17.1	25	
04/21/2016 11:00	11.1	35.5	50	
04/21/2016 12:00	10.9	35.5	49	
04/21/2016 13:00	11.1	21.0	30	
04/21/2016 14:00	10.5	15.9	21	
04/21/2016 15:00	9.9	14.7	19	
04/21/2016 16:00	10.6	49.6	67	
04/21/2016 17:00	11.4	39.2	57	
04/21/2016 18:00	11.5	66.6	98	
04/21/2016 19:00	11.6	69.3	104	
04/21/2016 20:00	11.7	63.7	96	
04/21/2016 21:00	11.4	62.6	92	
04/21/2016 22:00	11.3	17.2	25	
04/21/2016 23:00	11.3	55.3	80	
Period Average =	11.1	32.2	46	35
Period Max Value =	11.7	69.3	104	35
Period Min Value =	9.9	4.3	6	35
Period Totals =	2.6740E+2	7.7250E+2	1.1100E+3	3.5000E+1
Period % Recovery =	100.0	100.0	100.0	100.0