



VIA CERTIFIED MAIL

June 30, 2017

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 – June 9, 2017 Violation Notice Response

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power’s (DRP) response to the Violation Notice (VN) dated June 9, 2017 for alleged violations as a result of the annual inspection and review of the First Quarter 2017 CEMS Report. The conditions are defined in ROP No. MI-ROP-M4148-2011a, the Fugitive Dust Management Plan, and the Odor Management Plan. Each item from the VN is in a table with the Permit Condition from the ROP and followed by DRP’s response:

Rule/Permit Condition Violated	MDEQ Comments	Permit Condition (from ROP)
ROP No. MI-ROP-M4148- 2011a, FGMSWPROC-LINES, SC IV.1, VI.3 and VI.13	Primary and secondary baghouses have multiple days with pressure drop readings outside the recommended operating range and the range established during the most recent stack test.	IV.3 Permittee shall not operate [the process lines 1-3] unless the designated cyclones and baghouses for the process lines are installed and operating properly. VI.3 Permittee shall monitor and keep records, at least once per day, of the pressure drop across each of the three primary and secondary baghouses. Permittee shall not operate the applicable emission unit if the particulate control equipment pressure drop falls out of the range established during the most recent stack test and/or per the manufacturer’s recommended operating pressure drop range. VI.13 Any repairs and corrective actions needed to address the causes of malfunction or failure of the control equipment shall be performed immediately.

DRP Response: Previously DRP relied on daily inspections of the baghouses and the stack testing results to ensure the process lines met the PM limits. On a day-to-day basis, operations review the structural integrity of the baghouses to determine the condition of the bags to determine if work is required. If the baghouse clogs with material, then operations would be alerted via the control room panel stating there was an “overload.” The pressure drop range established by the manufacturer’s recommendation is now being included on the current recordkeeping form (ROP-Form-006) since the date of this letter, along with a requirement to ensure any occurrence resulting in “an out of range” will be corrected as soon as possible. A copy of the updated form is included in Appendix A.

Rule/Permit Condition Violated	MDEQ Comments	Permit Condition (from ROP)
ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SCIV.3 Fugitive Dust Management Plan 4.4.3 Odor Management Plan 2.2g	Records provided from October 3, 2016 through April 18, 2017 indicate negative pressure is not maintained at Tip East 5.	Permittee shall maintain a negative pressure in the solid waste receiving, processing and storage rooms during facility operations to minimize discharges of odor, dust and other materials. A velometer shall be used to periodically check open doors to ensure that inward airflow is maintained. The doors to the tipping floor shall be kept closed to the maximum extent practicable during refuse receiving periods. Each day when the receipt of solid waste has ceased, the doors to the MSW processing facility shall be kept continuously closed until the next morning when solid waste receiving resumes.

DRP Response: All equipment was operating as designed and the required records were all maintained. There have been no reported visible emissions in the last year

Rule/Permit Condition Violated	MDEQ Comments	Permit Condition
ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.b	CO emissions based on a 1-hour block average exceeded 267 ppm for two consecutive hours on March 26, 2017 (8:00 to 10:00 -274 ppm and 297 ppm).	267 ppmv of exhaust gases (dry basis) corrected to 7% oxygen based on a 1-hour block average except during periods of startup or shutdown.

DRP Response: The 2 hours of excess CO emissions were reported in the 1st Quarter CEMS Downtime and Excess Emissions Report. The cause of the CO exceedance was due to the composition of the RDF. You stated in a telephone conversation that the reason this exceedance was identified in the Violation Notice is due to the two hour duration indicating that the issue was not addressed in a timely fashion. DRP has included the 1-minute CEMS data in Appendix B which demonstrates the 8:00 hour was within the permit limit until 8:46, when it had a spike of 752 ppm. Operations reacted to the issue at 8:46 and resolved the issue by 9:45, or within an hour. Therefore, although two one-hour block periods were impacted, the actual duration was less than an hour.

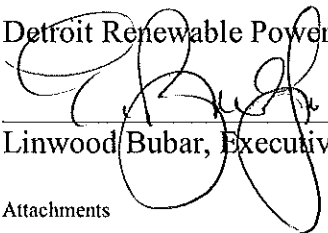
Rule/Permit Condition Violated	MDEQ Comments	Permit Condition
ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC.III.10 and SC.VI.59	(1) Lime slurry density and (2) pounds per hour of pebble lime was not maintained during SO2 CEMS downtime. - the SO2 CEMS was down 2-14-16, 2-15-16, 7-2-16 through 7-4-16, 11-23-16, 11-24-16, 12-1-16, 12-2-16, 12-5-16, 12-6-16, and 12-14-16	(1) The lime slurry feed system shall be modulated by interfacing with the sulfur dioxide continuous emission monitor. In the event of a malfunction or failure of the sulfur dioxide continuous emission monitor, the Permittee shall operate the lime slurry feed system such that, at a minimum, 800 pounds per hour of pebble lime shall be added. Once daily, during the period of monitor malfunction or failure, the permittee shall manually determine the slurry density. (2) Permittee shall record the date, time, and duration of a malfunction event or failure of the sulfur dioxide continuous emission monitor, the amount of pebble lime added per hour, the lime slurry density, and lime slurry flow rate.

DRP Response: Upon revision of the Startup, Shutdown, and Malfunction (SSM) Plan, operations updated their daily logs to ensure lime slurry density is documented daily (the new SSM forms started on 12-3-16). However, employees continued to use the old forms that did not include a place for lime slurry. An example of the correct form is included in Appendix C. In addition, DRP would like to provide the lime usage for several of the days in which the SO2 CEMS was down. This information is included in Appendix D. The average lime feed rate exceeded 800 lbs. per hour, which means that, although we do not have records to demonstrate the precise hourly feed rate during each CEMS downtime, we are highly confident that a feed rate of 800 lbs. per hour or greater was maintained throughout the event.

I trust that this letter is a satisfactory response to the June 9, 2017 VN. If you have questions concerning the information discussed above, please feel free to contact Damian Doerfer at 313-963-3394.

Sincerely,

Detroit Renewable Power



Linwood Bubar, Executive V.P.

Attachments

Cc via email: Ms. LaReina Wheeler, City of Detroit, BSEED
 Ms. Lynn Fiedler, DEQ
 Ms. Mary Ann Dolehanty, DEQ
 Mr. Christopher Ethridge, DEQ
 Mr. Thomas Hess, DEQ
 Ms. Wilhemina McLemore, DEQ
 Mr. Jeff Komiski, DEQ
 Mr. Damian Doerfer, DRP

Appendix A

DAILY Environmental Documentation - must keep for five years

ROP-Form-006
Revision 2
06/13/2017

Municipal Solid Waste (MSW) - Baghouse Readings

Recordkeeping for the Renewable Operating Permit (ROP) (MI-ROP-M4148-2011a): FGMSWPROC-LINES Section VI.2

Instructions:

1. Record the pressure drop across each of the three primary and secondary baghouses.
2. Document all of the required information below.
3. Contact your Supervisor if the pressure drop is less than 2" or greater than 10", correct the issue, and document corrective action at the bottom/back of the page.
4. Submit completed forms to Environmental Manager.

Date	Time	Observer Name	Observer Signature	DP	Reading	Pulse Air
				107		on / off
				207		on / off
				307		on / off
				135		on / off
				235		on / off
				335		on / off
				107		on / off
				207		on / off
				307		on / off
				135		on / off
				235		on / off
				335		on / off
				107		on / off
				207		on / off
				307		on / off
				135		on / off
				235		on / off
				335		on / off
				107		on / off
				207		on / off
				307		on / off
				135		on / off
				235		on / off
				335		on / off
				107		on / off
				207		on / off
				307		on / off
				135		on / off
				235		on / off
				335		on / off
				107		on / off
				207		on / off
				307		on / off
				135		on / off
				235		on / off
				335		on / off

Corrective action:

Appendix B

Data Summary Report

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



Data Group: U-13>1Min Computed
 Report Name: No Title
 Start of Report: 03/26/2017 08:00
 End of Report: 03/26/2017 10:00

Validation: Valid Data Only

Group#-Channel#	G37-C34	G37-C9	G37-C10	G37-C36
Long Descrip.	U13 Stack	U-13-1Min	U-13-1Min	U13 Stack
Short Descrip.	13 CO ug	RDFFlow	SteamFl	13 CO @7%
Units	ppm	K#/Hr	K#/Hr	ppmc
Range	0-2000	0-200	0-500	0-5000
03/26/2017 08:00	266.0	98	337	346
03/26/2017 08:01	254.0	101	347	315
03/26/2017 08:02	172.0	103	354	213
03/26/2017 08:03	161.0	106	362	203
03/26/2017 08:04	149.0	106	360	190
03/26/2017 08:05	63.0	103	352	83
03/26/2017 08:06	51.0	101	345	69
03/26/2017 08:07	64.0	100	342	85
03/26/2017 08:08	63.0	99	338	85
03/26/2017 08:09	59.0	98	337	78
03/26/2017 08:10	147.0	99	339	191
03/26/2017 08:11	197.0	100	343	258
03/26/2017 08:12	162.0	101	346	207
03/26/2017 08:13	241.0	101	348	305
03/26/2017 08:14	173.0	102	348	225
03/26/2017 08:15	249.0	102	349	315
03/26/2017 08:16	128.0	99	338	176
03/26/2017 08:17	81.0	98	333	116
03/26/2017 08:18	165.0	98	332	223
03/26/2017 08:19	270.0	98	335	354
03/26/2017 08:20	322.0	99	339	411
03/26/2017 08:21	230.0	100	342	296
03/26/2017 08:22	173.0	101	344	225
03/26/2017 08:23	118.0	101	345	153
03/26/2017 08:24	106.0	101	343	142
03/26/2017 08:25	95.0	99	335	132
03/26/2017 08:26	65.0	92	313	98
03/26/2017 08:27	40.0	81	305	66
03/26/2017 08:28	50.0	83	301	78
03/26/2017 08:29	58.0	89	299	84
03/26/2017 08:30	43.0	90	302	62
03/26/2017 08:31	159.0	94	318	205
03/26/2017 08:32	280.0	97	330	344
03/26/2017 08:33	148.0	98	336	187
03/26/2017 08:34	198.0	100	343	248
03/26/2017 08:35	200.0	101	348	253
03/26/2017 08:36	97.0	101	344	131
03/26/2017 08:37	48.0	101	345	64
03/26/2017 08:38	45.0	100	340	59

Group#-Channel#	G37-C34	G37-C9	G37-C10	G37-C36
Long Descrip.	U13 Stack	U-13-1Min	U-13-1Min	U13 Stack
Short Descrip.	13 CO ug	RDFFlow	SteamFl	13 CO @7%
Units	ppm	K#/Hr	K#/Hr	ppmc
Range	0-2000	0-200	0-500	0-5000
03/26/2017 08:39	47.0	97	331	65
03/26/2017 08:40	42.0	97	330	56
03/26/2017 08:41	77.0	97	332	97
03/26/2017 08:42	98.0	95	321	129
03/26/2017 08:43	60.0	90	303	90
03/26/2017 08:44	72.0	87	294	114
03/26/2017 08:45	276.0	88	297	396
03/26/2017 08:46	752.0	92	312	977
03/26/2017 08:47	1371.0	96	327	1672
03/26/2017 08:48	1479.0	101	344	1728
03/26/2017 08:49	931.0	105	359	1106
03/26/2017 08:50	721.0	107	361	887
03/26/2017 08:51	313.0	97	348	431
03/26/2017 08:52	73.0	92	341	108
03/26/2017 08:53	80.0	86	320	120
03/26/2017 08:54	38.0	80	303	64
03/26/2017 08:55	32.0	75	286	57
03/26/2017 08:56	33.0	74	285	56
03/26/2017 08:57	34.0	75	289	51
03/26/2017 08:58	39.0	78	299	55
03/26/2017 08:59	41.0	80	308	55
03/26/2017 09:00	44.0	82	314	59
03/26/2017 09:01	45.0	81	309	63
03/26/2017 09:02	32.0	78	300	48
03/26/2017 09:03	34.0	82	291	54
03/26/2017 09:04	35.0	82	279	57
03/26/2017 09:05	35.0	82	279	57
03/26/2017 09:06	31.0	82	279	46
03/26/2017 09:07	43.0	84	288	59
03/26/2017 09:08	180.0	85	290	232
03/26/2017 09:09	258.0	85	289	359
03/26/2017 09:10	268.0	86	293	373
03/26/2017 09:11	268.0	86	293	373
03/26/2017 09:12	859.0	93	316	1126
03/26/2017 09:13	1043.0	98	333	1283
03/26/2017 09:14	1235.0	101	346	1480
03/26/2017 09:15	921.0	104	354	1143
03/26/2017 09:16	750.0	103	351	939
03/26/2017 09:17	399.0	102	346	523
03/26/2017 09:18	134.0	101	341	184
03/26/2017 09:19	72.0	98	332	99
03/26/2017 09:20	65.0	95	322	93
03/26/2017 09:21	40.0	94	319	57
03/26/2017 09:22	37.0	94	318	51
03/26/2017 09:23	61.0	95	324	83
03/26/2017 09:24	168.0	95	325	220
03/26/2017 09:25	329.0	97	332	423
03/26/2017 09:26	389.0	96	330	505
03/26/2017 09:27	196.0	95	322	267
03/26/2017 09:28	71.0	87	322	96

Group#-Channel#	G37-C34	G37-C9	G37-C10	G37-C36
Long Descrip.	U13 Stack	U-13-1Min	U-13-1Min	U13 Stack
Short Descrip.	13 CO ug	RDFFlow	SteamFl	13 CO @7%
Units	ppm	K#/Hr	K#/Hr	ppmc
Range	0-2000	0-200	0-500	0-5000
03/26/2017 09:29	248.0	86	329	325
03/26/2017 09:30	1009.0	86	329	1264
03/26/2017 09:31	348.0	84	318	479
03/26/2017 09:32	103.0	80	303	154
03/26/2017 09:33	40.0	77	292	62
03/26/2017 09:34	39.0	72	277	62
03/26/2017 09:35	40.0	69	265	67
03/26/2017 09:36	40.0	69	265	67
03/26/2017 09:37	55.0	65	251	93
03/26/2017 09:38	82.0	65	250	137
03/26/2017 09:39	72.0	65	250	119
03/26/2017 09:40	77.0	67	257	124
03/26/2017 09:41	170.0	68	263	260
03/26/2017 09:42	239.0	71	274	365
03/26/2017 09:43	187.0	74	285	277
03/26/2017 09:44	376.0	78	299	507
03/26/2017 09:45	419.0	81	309	539
03/26/2017 09:46	251.0	74	308	339
03/26/2017 09:47	93.0	71	305	139
03/26/2017 09:48	39.0	68	295	63
03/26/2017 09:49	34.0	63	278	57
03/26/2017 09:50	27.0	60	267	48
03/26/2017 09:51	26.0	58	260	45
03/26/2017 09:52	26.0	59	261	43
03/26/2017 09:53	27.0	61	271	43
03/26/2017 09:54	27.0	63	277	43
03/26/2017 09:55	28.0	64	283	43
03/26/2017 09:56	28.0	65	283	43
03/26/2017 09:57	27.0	65	284	43
03/26/2017 09:58	28.0	66	289	44
03/26/2017 09:59	30.0	69	301	45
03/26/2017 10:00	35.0	71	307	51
Period Average =	202.6	88	315	264
Period Max Value =	1479.0	107	362	1728
Period Min Value =	26.0	58	250	43
Period Totals =	2.4511E+4	1.0607E+4	3.8069E+4	3.1931E+4
Period % Recovery =	100.0	100.0	100.0	100.0

Appendix C

AAO SLAKER LOG 1

DATE: 6-20-17

1380 GPM / 1800 RPM	03:00	07:00	11:00	15:00	19:00	23:00
LOW FLOW ALARM 480 GPM						
1A CONDENSATE PUMP						
DISCHARGE PSI	350	370	370	370	350	350
OIL LEVEL	1/2	1/2	1/2	1/2	1/2	1/2
1B CONDENSATE PUMP						
DISCHARGE PSI	/	400	400	400	380	365
OIL LEVEL	/	1/2	1/2	1/2	1/2	1/2
1A CLOSED CYCLE COOLING						
DISCHARGE PRESSURE	/	/	/	/		
OIL LEVEL	/	/	/	/		
1B CLOSED CYCLE COOLING						
DISCHARGE PRESSURE	25	25	23	26	26	26
OIL LEVEL	1/2	1/2	1/2	1/2	1/2	1/2
600 GPM/1750 RPM						
1A BUILDING HEAT PUMP						
DISCHARGE PRESSURE		/	/	/		
OIL LEVEL		/	/	/		
SYSTEM TEMPERATURE		/	/	/		
EXPANSION TANK LEVEL		/	/	/		
1B BUILDING HEAT PUMP						
DISCHARGE PRESSURE		/	/	/		
OIL LEVEL		/	/	/		
SYSTEM TEMPERATURE		/	/	/		
EXPANSION TANK LEVEL		/	/	/		
1A AIR COMPRESSOR 790 cfm						
H.P. AIR TEMP OUT 180 F MAX						
OIL TEMPERATURE 158 F MAX						
OIL PRESSURE 20 PSIG MIN						
OIL LEVEL	1/2	1/2	1/2	1/2	1/2	1/2
WATER TEMPERATURE						
AIR DISCHARGE TEMPERATURE	84	182	182	182	182	180
AIR FILTER DIFFERENTIAL						
AIR DISCHARGE PSI 100 PSIG	115	110	105	115	115	110
1B AIR COMPRESSOR 790 cfm						
H.P. AIR TEMP OUT 180 F MAX						
OIL TEMPERATURE 158 F MAX						
OIL PRESSURE 20 PSIG MIN	35	/	/	/		
OIL LEVEL	1/2	/	/	/		
WATER TEMPERATURE	90	/	/	/		
AIR DISCHARGE TEMPERATURE		/	/	/		
AIR FILTER DIFFERENTIAL	8	/	/	/		
AIR DISCHARGE PSI 100 PSIG	115	/	/	/		
1C AIR COMPRESSOR Atlas Copco						
INJECTION TEMPERATURE 40-60 F		/	/	/		
DISCHARGE AIR TEMPERATURE 100 F		/	/	/		
DISCHARGE AIR PRESSURE 110 PSI		/	/	/		
OIL LEVEL		/	/	/		
SLURRY SPECIFIC GRAVITY		1.12	1.12	1.12	1.14	

DAY SHIFT SIGNATURE: _____

NIGHT SHIFT SIGNATURE: *Much...*

Appendix D

**DRP - Lime Usage for SO2 CEMS Downtime per
Violation Notice**

Date	Boiler #	Hours SO2 CEMS Down	Lime Usage (tons)*	Lime Usage (lbs)	Lime Usage (lbs/hr)	Lime Usage (lbs/hr) for each boiler	Lime Usage (lbs/ton RDF)*	
2/12/2016	11	6	16	32000	1333	667	18.5	
2/12/2016	13	10						
2/13/2016	13	24	38	76000	3167	1583	38.5	
2/14/2016	13	24	20	40000	1667	833	22.3	
2/15/2016	13	2	40	80000	3333	1667	52.8	
2/18/2016	11	1	20	40000	1667	833	22.4	
2/22/2016	11	2	34	68000	2833	1417	32.13	
3/13/2016	11	1	28	56000	2333	1167	30	
3/17/2016	13	3	28	56000	2333	1167	28.7	
7/2/2016	11	13	36	72000	3000	1500	42.8	
7/3/2016	11	24	36	72000	3000	1500	39.6	
7/4/2016	11	12	32	64000	2667	1333	38.0	
7/26/2016	13	2	45	90000	3750	1875	47.9	
7/27/2016	13	3	24	48000	2000	1000	26.3	
7/28/2016	13	3	31	62000	2583	1292	45.2	
8/7/2016	13	20	28	56000	2333	1167	30.7	
8/8/2016	13	8	36	72000	3000	1500	38.9	
8/23/2016	13	7	20	40000	1667	833	22.2	
9/29/2016	12	3	No data available					
11/23/2016	13	8	20	40000	1667	833	35.1	
11/24/2016	12	4	32	64000	2667	1333	31.5	
11/24/2016	13	9						
12/2/2016	11	1	22	44000	1833	917	35.5	
12/2/2016	13	3						
12/5/2016	11	1	No data available					
12/6/2016	11	1						
12/6/2016	12	1						
12/14/2016	12	2						

*Represents total lime usage for all operating boilers on the corresponding calendar day.