



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

September 19, 2018

Mr. Robert Suida, Plant Manager  
Detroit Renewable Power, LLC  
5700 Russell St.  
Detroit, MI 48211-2545

SRN: M4148, Wayne County

Dear Mr. Suida:

**VIOLATION NOTICE**

On May 14, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Detroit Renewable Power (DRP) located at 5700 Russell, Detroit, Michigan. On June 8, 2018, DRP provided facility inspection records and an Information Request Response Summary. The purpose of the May 14, 2018 inspection and review of inspection records was to determine DRP's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; MI-ROP-M4148-2011a; and Administrative Consent Order (ACO) AQD No. 6-2017.

As a result of the inspection and review of inspection records, the following violations were identified.

Process Description	Rule/Permit Condition Violated	Comments
FGMSWPROC-LINES	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.
FGMSWPROC-LINES	ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SC IV.8  Odor Management Plant dated June 2017, Section 2.2g	The facility did not provide records of monthly roof exhaust filter inspections.

FGMSWPROC-LINES	<p>ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SC IV.3</p> <p>Fugitive Dust Management Plan dated February 2011, Section 4.4.3</p> <p>Odor Management Plant dated June 2017, Section 2.2a</p>	Records provided from March 1, 2018 through May 10, 2018 indicate that the negative pressure is not maintained at Tip East 5.
FGBOILERS011-013	ACO AQD No. 6-2017, Paragraph 9.B.1 and Paragraph 13	Records for the Startup/Shutdown Malfunction Abatement Plan were not maintained for various checklists on various dates.

**Primary and Secondary Baghouse Pressure Drop - FGMSWPROC-LINES, SC IV.1, VI.3 and VI.13**

FGMSWPROC-LINES, SC IV.1 requires that EUMSWPROC-LINE1, EUMSWPROC-LINE2 or EUMSWPROC-LINE3 not be operated unless the designated cyclones and baghouses for process lines are installed and operating properly. FGMSWPROC-LINES, SC VI. 3 requires that applicable emission unit not operate 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. SC VI. 13 requires that any repairs or corrective action needed to address the causes of malfunction or failure of the control equipment be performed immediately.

Correspondence provided by the facility via email on May 3, 2017 indicates the operating pressure drop range is 2 inches water to 10 inches water (Greater Detroit Resource Recovery, Instruction Book for Ray-Jet Dust Collectors). The most recent stack testing event occurred on December 21, 2017 on process line 1 with pressure drop as follows: Primary 300 – 3.3 inches water, Secondary 300 – 9.6 inches water.

In review of the records provided for November 29, 2017 through May 2, 2018, the pressure drop readings for the primary and secondary baghouses were out of the operating range on multiple days over a 155 day period (November 29, 2017 through May 2, 2018) as outlined in the below table.

<b>Baghouse</b>	<b>days out of operating range</b>	<b>% days outside operating range</b>	<b>lowest reading outside of operating range</b>	<b>highest reading outside of operating range</b>
Primary Baghouse -Line 1 (107)	70	45	0	NA
Primary Baghouse -Line 2 (207)	67	43	0	12
Primary Baghouse -Line 3 (307)	136	87	0	12
Secondary Baghouse - Line 1 (135)	86	55	0	14.5
Secondary Baghouse - Line 2 (235)	48	31	NA	13
Secondary Baghouse - Line 3 (335)	1	<1	1	NA

Primary and secondary baghouses have multiple days with pressure drop readings outside the manufacturer operating range and the range established during the most recent stack test. This is a violation of FGMSWPROC-LINES SC IV.1 and VI.3.

FGMSWPROC-LINES SC VI. 13 requires that “any repairs and corrective action needed to address the causes of malfunction or failure of the control equipment shall be performed immediately.” Maintenance records were not provided as part of the facility inspection records. The facility provided baghouse inspection preventative maintenance scheduling, but no maintenance records documenting the events took place. As described above, the facility continues to operate the baghouses when the pressure drop is out of the specified operating range. This is a violation of FGMSWPROC-LINES SC VI. 13.

**Roof Exhaust Filters - FGMSWPROC-LINES, SC IV.8 and Odor Management Plant, Section 2.2g**

FGMSWPROC-LINES, SC IV.8 requires that the facility “inspect the roof exhaust filters in the ventilators, at a minimum, once per month for damages and replace as required.” As part the of the facility inspection, records were requested for March 1, 2018 through May 10, 2018. According to DRP’s Information Request Response Summary, “Forms for certain days in the requested period are not available.” This is a violation of SC VI. 8 and Odor Management Plan Section 2.2g.

**Negative Pressure at Solid Waste Receiving and Storage Rooms - FGMSWPROC-LINES, SC IV.3, Fugitive Dust Management Plan, Section 4.4.3, and Odor Management Plant, Section 2.2a**

FGMSWPROC-LINES, SC IV.3, requires that a negative pressure is maintained in the solid waste receiving, processing, and storage rooms. The Fugitive Management Plan dated February 2011, Section 4.4.3 states that a hand held velometer will be used to “ensure inward flow is maintained.” The Odor Management Plan dated June 2017, Section 2.2a states that the MSW building is maintained under negative pressure.

Records provided from March 1, 2018 through May 10, 2018 indicate that the negative pressure is not maintained at Tip East 5 (the upper tipping floor entrance door). Velocity readings indicate a measurement for wind speed going out Tip East 5 for nearly all readings provided from March 1, 2018 through May 10, 2018. This is a violation of FGMSWPROC-LINES, SC IV.3, Fugitive Dust Management Plan, Section 4.4.3, and Odor Management Plant dated June 2017, Section 2.2a.

**ACO AQD No. 6-2017, Exhibit A – Startup, Shutdown Malfunction Abatement Plan**

ACO AQD No. 6-2017, Paragraph 9.B.1 requires that “on and after the effective date of this Consent Order, the Company shall fully comply with the approved Startup, Shutdown, and Malfunction Plan (SSM), dated November 4, 2016 and revisions thereto attached as Exhibit A, incorporated by reference and made an enforceable part of this Consent Order.”

The facility provided Start-up, Shutdown, Malfunction Checklist records for March 1, 2018 through May 1, 2018. The following Start-up, Shutdown, Malfunction Checklist records were missing. Per ACO AQD No. 6-2017, Paragraph 13, these violations are also subject to stipulated fines.

**RDF Boiler Startup, Appendix 1 – Turbine Operator Startup**

The facility provided available records for March 1, 2018 through May 1, 2018. Appendix 1 – Turbine Operator Startup records were not provided for boiler startup on the following dates. Boiler 11 – 3/1/18, 3/13/18, 3/18/18, 3/24/18, 4/3/18, and 4/17/18; Boiler 12 – 3/4/18, 3/12/18, 3/15/18, 3/21/18, 3/31/18, 4/2/18, 4/11/18, 4/18/18, and 4/26/18; Boiler 13- 3/9/18, 4/7/18, 4/13/18, 4/14/18, 4/19/18, and 4/30/18.

**Unit Startup, Appendix 2 – Grate Operator Walkdown**

The facility provided available records for March 1, 2018 through May 1, 2018. Appendix 2 – Grate Operator Walkdown records were not provided for boiler startup on the following dates. Boiler 11 – 3/1/18, 3/13/18, 3/18/18, 3/24/18, 4/3/18, and 4/17/18; Boiler 12 – 3/4/18, 3/12/18, 3/15/18, 3/21/18, 3/31/18, 4/2/18, 4/11/18, 4/18/18, and 4/26/18; Boiler 13- 3/9/18, 4/7/18, 4/13/18, 4/14/18, 4/19/18, and 4/30/18.

Unit Startup, Appendix 3 – Ash Operator Walk Down/Baghouse Penthouse

The facility provided available records for March 1, 2018 through May 1, 2018. Appendix 3 – Ash Operator Walk Down/Baghouse Penthouse records were not provided for boiler startup on the following dates. Boiler 11 – 3/1/18, 3/13/18, 3/18/18, 3/24/18, 4/3/18, and 4/17/18; Boiler 12 – 3/4/18, 3/12/18, 3/15/18, 3/21/18, 3/31/18, 4/2/18, 4/11/18, 4/18/18, and 4/26/18; Boiler 13- 3/9/18, 4/7/18, 4/13/18, 4/14/18, 4/19/18, and 4/30/18.

Unit Startup, Appendix 4 – Slaker Operator Walk Down List/8thFloor SDA Penthouse

The facility provided available records for March 1, 2018 through May 1, 2018. Appendix 4 – Slaker Operator Walk Down List/8thFloor SDA Penthouse records were not provided for boiler startup on the following dates. Boiler 11 – 3/1/18, 3/13/18, 3/18/18, 3/24/18, 4/3/18, and 4/17/18; Boiler 12 – 3/4/18, 3/12/18, 3/15/18, 3/21/18, 3/31/18, 4/2/18, 4/11/18, 4/18/18, and 4/26/18; Boiler 13- 3/9/18, 4/7/18, 4/13/18, 4/14/18, 4/19/18, and 4/30/18.

Unit Startup, Appendix 5 – Auger Walk Down

The facility provided available records for March 1, 2018 through May 1, 2018. Appendix 5 – Auger Walk Down records were not provided for boiler startup on the following dates. Boiler 11 – 3/1/18, 3/13/18, 3/18/18, 3/24/18, 4/3/18, and 4/17/18; Boiler 12 – 3/4/18, 3/12/18, 3/15/18, 3/21/18, 3/31/18, 4/2/18, 4/11/18, 4/18/18, and 4/26/18; Boiler 13- 3/9/18, 4/7/18, 4/13/18, 4/14/18, 4/19/18, and 4/30/18.

Unit Startup, Appendix 6 – Operator Walk Down List Doors

The facility provided available records for March 1, 2018 through May 1, 2018. Appendix 6 – Operator Walk Down List Doors records were not provided for startup on the following dates. Boiler 11 – 3/1/18, 3/13/18, 3/18/18, 3/24/18, 4/3/18, and 4/17/18; Boiler 12 – 3/4/18, 3/12/18, 3/15/18, 3/21/18, 3/31/18, 4/2/18, 4/11/18, 4/18/18, and 4/26/18; Boiler 13- 3/7/18, 3/9/18, 4/7/18, 4/13/18, 4/14/18, 4/19/18, and 4/30/18.

Unit Startup, Appendix 7 – E&I

The facility provided available records for March 1, 2018 through May 1, 2018. Appendix 7 – E&I records were not provided for boiler startup on the following dates. Boiler 11 – 3/1/18, 3/13/18, 3/18/18, 3/24/18, 4/3/18, and 4/17/18; Boiler 12 – 3/4/18, 3/12/18, 3/15/18, 3/21/18, 3/31/18, 4/2/18, 4/11/18, 4/18/18, and 4/26/18; Boiler 13- 3/9/18, 4/7/18, 4/13/18, 4/14/18, 4/19/18, and 4/30/18.

Unit Startup, Appendix 8 – CEMS Checklist

The facility provided available records for March 1, 2018 through May 1, 2018. Appendix 8 – CEMS Checklist records were not provided for startup on the following dates. Boiler 11 – 3/1/18, 3/13/18, 3/18/18, 3/24/18, 4/3/18, and 4/17/18; Boiler 12 – 3/4/18, 3/12/18, 3/15/18, 3/21/18, 3/31/18, 4/2/18, 4/11/18, 4/18/18, and 4/26/18; Boiler 13- 3/7/18, 3/9/18, 4/7/18, 4/13/18, 4/14/18, 4/19/18, and 4/30/18.

#### Boiler Inspection/Shutdown Checklist

The facility provided available records for March 1, 2018 through May 1, 2018. Boiler Inspection/Shutdown Checklist records were not provided for boiler shutdown on the following dates. Boiler 11 – 3/7/18, 3/16/18, 3/21/18, 3/31/18, and 4/5/18; Boiler 12 – 3/1/18, 3/9/18, 3/13/18, 3/19/18, 3/29/18, 4/10/18, 4/18/18, 4/19/18, and 4/28/18; Boiler 13- 3/4/18, 3/8/18, 3/13/18, 4/12/18, 4/17/18, and 4/25/18.

#### SDA Maintenance Weekly Checks

During review of the SDA Preventative Maintenance Weekly Checks provided for March 2018 and April 2018 it was identified that the weekly checklist was modified and is missing eight checklist lines as required under Exhibit A of ACO No. AQD No. 6-2017. A similar compliance issue was documented in the violation notice dated July 20, 2018 for the Fourth Quarter 2017 and First Quarter 2018. Within violation notice response dated August 10, 2018 from DRP, the facility provided additional SDA Weekly Check Records to fill in the remaining lines that were missing from the original form. According to DRP the check list was divided into two separate lists (one for maintenance and one for "Ops"). The following weeks were identified as missing in the VN response dated August 10, 2018 for "SDA Monthly by Maintenance": week ending (WE) 4/7/18, WE 3/31/18, WE 3/24/18, and WE 3/17/18.

#### SDA Preventative Maintenance Monthly Checks

During review of the SDA Preventative Maintenance Monthly Checks it was identified that the monthly checklist was modified and is missing 15 checklist lines as required under Exhibit A of ACO No. AQD No. 6-2017. A similar compliance issue was documented in the violation notice dated July 20, 2018 for the Fourth Quarter 2017 and First Quarter 2018. Within violation notice response dated August 10, 2018 from DRP, the facility provided additional SDA Monthly Check Records to fill in the remaining lines that were missing from the original form. According to DRP the check list was divided into two separate lists (one for maintenance and one for "Ops"). Monthly records for SDA checks by maintenance were not provided for March 2018 or April 2018.

#### Baghouse Preventative Maintenance Weekly Checks

Records were provided for January 5, 2018 through April 28, 2018. Records indicate that for the week ending March 3, 2018 that the Baghouse Preventative Maintenance Weekly Check was not conducted.

#### Baghouse Preventative Maintenance Monthly Checks

Records were requested for March 1, 2018 through May 1, 2018. The response summary provided by the company indicates that no records are available for this period.

#### Michigan Waste Energy Control Room Log

Records were provided for February 1, 2018 through May 6, 2018. According to the records provided, there are no daily control room log records for February 27, 2018 through April 30, 2018 (63 days).

Mr. Robert Suida  
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 10, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If DRP believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Todd Zynda, P.E.  
Senior Environmental Engineer  
Air Quality Division  
313-456-2761

cc: Mr. Mark Fletcher, DRP  
Mr. Paul Max, City of Detroit BSEED  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ