

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY DETROIT



DAN WYANT DIRECTOR

November 9, 2015

Mr. Linwood Bubar Detroit Renewable Power 5700 Russell St. Detroit, MI 48211

SRN: M4148, Wayne County

Dear Mr. Bubar:

VIOLATION NOTICE

On Nov. 6, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the Notification of Excess Carbon Monoxide (CO) Emissions report. Also, AQD staff has observed onsite Relative Accuracy Test Audits of the Continuous Emission Monitoring Systems at Detroit Renewable Power, located at 5700 Russell St., Detroit, Michigan. During the observation of the audits & review of the notification report, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Refuse-derived fuel (RDF) fired boiler #11	 ROP No. MI-ROP-M4148-2011, Table FGBOILERS011-013, Condition I. 11; 40 CFR 60 Subpart Cb, Section 60.34b; R336.1932; 40 CFR 62 Subpart FFF, Section 62.14104(a). 	The CO emission based on a 24-hour arithmetic mean average exceeded 200 ppmv on 10/28/15, 10/29/15 & 11/3/15.
RDF fired boiler #11	ROP No. MI-ROP-M4148-2011, Table FGBOILERS011-013, Condition I. 11.	The CO emission based on a 1-hour block average exceeded 267 ppmv for some of the operating hours during 10/27/15, 10/28/15 & 10/29/15.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 30, 2015 (which coincides with 21 calendar days from the date of this letter). Although in your notification of November 6, 2015, you provided some of the explanation of the cause of the violation, the written response should include: if you identified additional causes of the violation; 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 reoccurrence.

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If Detroit Renewable Power 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,

Joyce Zhu Senior Environmental Engineer Air Quality Division 586-753-3748

cc: Mr. Damian Doerfer, DRP Ms. LaReina Wheeler, City of Detroit, BSEED cc/via e-mail: Ms. Lynn Fiedler, DEQ Ms. Mary Ann Dolehanty, DEQ Ms. Teresa Seidel, DEQ Mr. Thomas Hess, DEQ Ms. Wilhemina McLemore, DEQ Mr. Jeff Korniski, DEQ