

## STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY DETROIT



October 13, 2017

Mr. Linwood Bubar, President Detroit Renewable Power, LLC 5700 Russell St. Detroit, MI 48211-2545

Dear Mr. Bubar:

SRN: M4148, Wayne County

## **VIOLATION NOTICE**

On October 12, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the Rule 912 Notification — Carbon Monoxide (CO) Excess Emission Event October 2, 2017 for Detroit Renewable Power located at 5700 Russell, Detroit, Michigan. During review of the Rule 912 Notification, the AQD evaluated 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; and MI-ROP-M4148-2011a.

As a result of Rule 912 Notification review, the following violation was identified:

Process Description	Rule/Permit Condition Violated	Comments
Boiler 12	ROP No. MI-ROP-M4148- 2011a, FGBOILERS011-013, SC I.11.b	CO emissions based on a 1-hour block average exceeded 267 ppmv for three consecutive hours on 10/2/2017.

On October 2, 2017, Boiler 12 exceeded the 1-hour block average CO emission limit (267 ppmv) for three consecutive hours (1:00 to 2:00 - 459 ppmv, 2:00 to 3:00 - 283 ppmv, and 3:00 to 4:00 - 277 ppmv) indicating corrective action was not implemented in a timely manner. This is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.b.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 3, 2017 (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 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

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

cc: Mr. Damian Doerfer, DRP

Ms. LaReina Wheeler, City of Detroit, BSEED

cc via email: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ Mr. Christopher Ethridge, DEQ

Mr. Thomas Hess, DEQ

Ms. Wilhemina McLemore, DEQ

Mr. Jeff Korniski, DEQ