



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYHER
DIRECTOR

January 24, 2018

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

SRN: M4148, Wayne County

Dear Mr. Bubar:

VIOLATION NOTICE

On August 7, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the 2017 Source Testing Program Plan for Detroit Renewable Power located at 5700 Russell, Detroit, Michigan. Stack testing originally slated to begin October 2, 2017, has been delayed multiple times for Boilers 11 and 13. During review of testing requirements and deadlines, 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 the review, the following violation was identified:

Process Description	Rule/Permit Condition Violated	Comments
Boilers 11 and 13	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC V.1	Testing has not been completed within 15 months following the previous performance test.
	40 CFR Part 60, Appendix F, 5.1.1	The RATAs for CO, NOx, SO ₂ and O ₂ have not been completed at least once every four calendar quarters.

ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC V.1 requires the following.

“Once each calendar year (no less than 9 months and no more than 15 calendar months following the previous performance test), permittee shall verify the particulate matter, cadmium, hexavalent chromium, total chromium, lead, mercury, dioxin/furan, inlet and outlet sulfur dioxide, inlet and outlet fluorides, carbon monoxide, volatile organic compounds and nitrogen oxide emission rates from each boiler, when firing only RDF at the maximum allowable load level rate by testing, at owner’s expense, in accordance with Air Quality Division requirements.”

Mr. Linwood Bubar

Page 2

January 24, 2018

The 2016 Source Testing Program Final Report dated December 15, 2016 indicates that testing of Boiler 11 was conducted October 11 through 13, 2016 and the testing of Boiler 13 was conducted October 5 through 7, 2016. Based on the 2016 test completion dates, Boiler 11 and 13 were required to be tested for the above listed pollutants no later than January 13, 2018 (Boiler 11) and January 7, 2018 (Boiler 13). At this time, testing has not been completed. This is a violation of MI-ROP-M4148-2011a, FGBOILERS011-013, SC V.1.

40 Code of Federal Regulations (CFR) Part 60, Appendix F, 5.1.1 requires that a relative accuracy test audit (RATA) be conducted at least once every four calendar quarters. Based on the above 2016 testing completion dates for Boiler 11 and Boiler 13, the RATAs for carbon monoxide (CO), oxides of nitrogen (NO_x), sulfur dioxide (SO₂), and oxygen (O₂) were to be completed by the end of the fourth quarter 2017. At this time, the RATAs have not been completed. This is a violation of 40 CFR Part 60, Appendix F, 5.1.1.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 14, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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.

Mr. Linwood Bubar
Page 2
January 24, 2018

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. Damian Doerfer, DRP
Mr. Paul Max, City of Detroit, 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. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ