



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GRETHUR
DIRECTOR

August 29, 2018

Mr. David Monette, Division Head
Warren Waste Water Treatment Plant
32360 Warkop Avenue
Warren, Michigan 48093

SRN: B1792, Macomb County

Dear Mr. Monette:

VIOLATION NOTICE

On August 13, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the "City of Warren Sewage Sludge Incinerator NOx and CO Emissions Test Report" for the emission test conducted at the Warren Wastewater Treatment Plant located at 32360 Warkop Avenue, Warren, Michigan. The emissions test was conducted to verify Warren Wastewater Treatment Plant Sludge Incineration Unit's (EUIncinerator-NSPS-MMMM) compliance with the conditions of facility's Renewable Operating Permit (ROP) number MI-ROP-B1792-2016 and "Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units" codified under 40 CFR 60, Subpart MMMM. During the test the emissions of Carbon monoxide (CO), Oxides of Nitrogen (NOx) was measured along with visible emissions from the ash handling process.

A review of the test report showed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUIncinerator-NSPS-MMMM	40 CFR 60, Subpart MMMM; MI-ROP-B1792-2016	The test report showed that the NOx emissions (237 ppmV) verified through the stack test exceeded the NOx emissions limit (220 ppmV) specified in MI-ROP-B1792-2016 and 40 CFR 60, Subpart MMMM.

The submitted "City of Warren Sewage Sludge Incinerator NOx and CO Emissions Test Report" demonstrates that actual emissions of Oxides of Nitrogen from the sludge incinerator (EUIncinerator-NSPS-MMMM) are 237 ppmV which exceeds the emission limit (220 ppmV) specified in the facility's Renewable Operating Permit No. MI-ROP-B1792-2016 and "Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units" codified under 40 CFR 60, Subpart MMMM.

Mr. David Monette

Page 2

August 29, 2018

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 19, 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.

Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Warren Wastewater Treatment Plant 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 violation cited above and for the cooperation that was extended to me during my inspection of Warren Wastewater Treatment Plant. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Sebastian G. Kallumkal
Senior Environmental Engineer
Air Quality Division
586-753-3738

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Joyce Zhu, DEQ