



**VIA CERTIFIED MAIL**

October 16, 2018

Todd Zynda, Environmental Engineer  
 Michigan Department of Environmental Quality  
 Air Quality Division  
 3058 W. Grand Boulevard, Suite 2-300  
 Detroit, MI 48202-6058

**RE: M4148 Detroit Renewable Power – Response to Violation Notice dated September 28, 2018**

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power’s (DRP) response to the Violation Notice (VN) dated September 28, 2018 for alleged violations based upon Michigan Department of Environmental Quality, Air Quality Division (AQD) review of the 1<sup>st</sup> Half 2018 (1H2018) Subpart Cb Report in conjunction with the 1<sup>st</sup> Quarter 2018 (1Q2018) Continuous Emissions Monitoring Systems (CEMS) Report.

The following table summarizes the AQD alleged violations along with DRP’s response to each event. Explanation of the causes and corrective actions implemented, as applicable, is provided after the table.

Process Description	Rule/Permit Condition	Summary of AQD Comments	DRP Response
Boilers 12 and 13	ROP No. MI-ROP-M4148- 2011a, FGBOILERS011-013, SC VII. 7.a.ii  40 CFR 60.39b  40 CFR 60.59b(g)(1)(ii)  40 CFR 62.14109	Failure to list the highest emission level recorded for Boiler 12 (Sulfur dioxide [SO <sub>2</sub> ] at 38 ppmv on 1/15/2018 and carbon monoxide [CO] at 283 ppmv on 1/30/18) and Boiler 13 (SO <sub>2</sub> at 33 ppmv on 1/23/2018).	The revised Subpart Cb Report Appendix A is enclosed with the highest emissions levels represented by partial block 24hr averages included for information.

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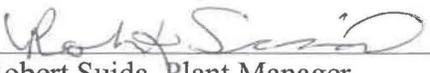
As previously explained in DRP's response to the violation notice response dated August 10, 2018, the definition of a partial block period in MI-ROP-M4148-2011a excludes block averages of less than 24-hrs from comparison with the 24-hr limits for CO and SO2. That being said, please find a revised version of Appendix A for 1H2018 which includes these three partial block emission levels with notes explaining their partial block nature.

DRP will continue to provide these partial block periods with notation for quarterly, biennial, and annual reporting. In addition, DRP intends to review the original permit application files as well as the history and development of the applicable NSPS to understand the underlying applicable requirements and what may have been the original intent of the 24-hr block periods.

If you have questions concerning this response, please feel free to contact Mark Fletcher at (313) 963-3394.

Sincerely,

Detroit Renewable Power

  
Robert Suida, Plant Manager

cc: Mark Fletcher, EHS Manager

Enclosures

1H2018 Subpart Cb Report – Appendix A, revised