



VIA CERTIFIED MAIL

November 7, 2016

Tom Maza, Environmental Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard
Suite 2300
Detroit, MI 48202

RE: Detroit Renewable Power – Response to Violation Notice dated October 21, 2016

Dear Mr. Maza:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) received on October 21, 2016 for allegedly failing to monitor Sulfur Dioxide (SO₂), Carbon Monoxide (CO), and Nitrogen Oxides (NO_x) in boilers 11, 12, and 13 in second quarter 2016 as required by ROP No. MI-ROP-M4148-2011A, Table FGBOILERS011-013 Condition VI. 8a and 8b.

The following is in response to the violation notice: The violation notice references "failed to monitor SO₂, CO, and NO_x", however the data was collected continuously and reviewed on a daily basis in the second quarter. The data was only documented as "downtime" in the second quarter due to the missing first quarter Calibration Gas Audits (CGAs).

The excessive downtime is a result of the CGAs not being completed and not a result of inadequate data. The data from the CEMS for second quarter is available and daily validations show the data is accurate.

If you have questions concerning this response, please feel free to contact Tabettha Peebles at (313) 972-4336.

Sincerely,

Detroit Renewable Power

A handwritten signature in black ink, appearing to read "Linwood Bubaf", written over a horizontal line.

Linwood Bubaf, Executive V.P.

cc: Todd Zynda via email