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Air Quality Division  
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VIA CERTIFIED MAIL

November 3, 2017

Mr. Todd Zynda, Environmental Engineer  
Michigan Department of Environmental Quality  
Air Quality Division  
3058 W. Grand Boulevard  
Suite 2300  
Detroit, MI 48202

**RE: Detroit Renewable Power – Violation Notice Response**

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power’s (DRP) response to the Violation Notice (VN) dated October 13, 2017 for alleged violations resulting from an October 2, 2017 Rule 912 – Carbon Monoxide (CO) Notification. The conditions are defined in ROP No. MI-ROP-M4148-2011a.

Rule/Permit Condition Violated	MDEQ Comments	Permit Condition
ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SCI.11.b	CO emissions based on a 1-hour block average exceeded 267 ppmv for three consecutive hours on 10/2/2017.	267 ppmv of exhaust gases (dry basis) corrected to 7% oxygen based on a 1-hour block average except during periods of startup or shutdown.

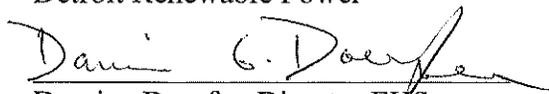
**DRP Response:** At the beginning of the exceedance, a tube failed in Boiler #11. This requires all available personnel to attend to Boiler #11 to safely and quickly shut down the boiler. This is done both for the safety of the employees and to ensure that there are no significant environmental impacts.

While DRP personnel were tending to Boiler #11, clogged chutes on Boiler #12 caused variable combustion. Once the tube failure on #11 was attended to, the employees could clear the chutes and smooth out the feed rates on #12. The feed rates became more uniform leading to emissions of CO that were under the permit limits. The 24-hr. average for CO for that day was 148 ppm COsc.

I trust that this letter is a satisfactory response to the October 13, 2017 VN. If you have questions concerning the information discussed above, please feel free to contact Damian Doerfer at 313-963-3394.

Sincerely,

Detroit Renewable Power

  
Damian Doerfer, Director EHS