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VIA CERTIFIED MAIL

January 16, 2019

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 December 12, 2018

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power’s (DRP) response to the Violation Notice (VN) dated December 12, 2018 for alleged violations based upon Michigan Department of Environmental Quality, Air Quality Division (AQD) request for records for the period from June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018) which were requested on August 22, 2018 and provided via an FTP site on September 17, 2018.

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
FGBOILERS011-013	ACO AQD No. 6-2017 Paragraph 9.B.1 and Paragraph 13	Records for the Startup/Shutdown Malfunction Abatement Plan were not maintained for various checklists on various dates.	DRP concurs that records have not been fully retained or organized. Since the original submittal on September 17, 2018, DRP has located additional records, which will be provided via FTP site as before.

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ACO AQD No. 6-2017, Exhibit A – Startup, Shutdown Malfunction Abatement Plan

DRP acknowledges that records were unavailable in the original submittal except as noted below. In addition, DRP has enclosed additional records which were located following the original submittal date. DRP continues to implement additional measures for recordkeeping and training. DRP recently hired an environmental specialist who is focused on maintaining records including those required by the SSM plan.

The additional records provided via FTP are summarized below.

Startup, Shutdown, Malfunction Checklist

U11: 7/17/18 Shutdown and 8/15/18 Startup

U12: 10/3/17 through 10/19/17 and 5/7/18 Startup

U13: 7/26/17 through 9/29/17, 5/8/18 Startup, and 5/14/18 Shutdown

RDF Boiler Startup, Appendix 1 – Turbine Operator Startup

Boiler 11: 6/4/18

RDF Boiler Startup, Appendix 2 – Grate Operator Walkdown

Boiler 12: 5/5/18

RDF Boiler Startup, Appendix 3 – Ash Operator Walk Down/Baghouse Penthouse

Boiler 12: 5/5/18

RDF Boiler Startup, Appendix 4 – Slaker Operator Walk Down/8th Floor SDA Penthouse

Boiler 12: 5/5/18

Boiler 13: 5/8/18

RDF Boiler Startup, Appendix 5 – Auger Walk Down

Boiler 13: 5/8/18

RDF Boiler Startup, Appendix 6– Operator Walk Down List Doors

Boiler 11: 7/14/18,

Boiler 12: 5/5/18

Unit Startup, Appendix 7 – E&I

The E&I checklists are often completed prior to boiler startups so the date indicated on the checklist may be prior to the actual startup event.

Boiler 11: 5/13/18 (for startup on 5/14/18)

Boiler 12: 5/4/18 (for startup on 5/7/18), 6/20/18 (for startup on 6/22/18), 6/26/18 (for startup on 6/27/18), and 6/29/18 (for startup on 6/30/18)

Boiler 13: 5/8/18, 5/14/18 (for startup on 5/16/18), and 7/8/18 (for startup on 7/9/18)

Appendix 8 – CEMS Checklist

DRP keeps daily CEMS records which contain a portion of the information located on the CEMS checklist for startup, but is not comprehensive. It appears that these logs were inadvertently combined

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at some point because the daily checklist would be more routinely completed, though the entirety of the startup checklist was not recorded.

Baghouse Preventative Maintenance Weekly Checks

Week ending 5/12/18

AO Grate Log

5/5/18 through 5/16/18

AO Slaker Log

5/5/18 through 5/16/18

In cooperation with AQD, DRP is also working to make revisions to the SSM plan and attachments to streamline the accumulation of paper records and move towards a consolidated approach to reduce the number of paper records while maintaining DRP's strong record in mitigating emissions during startups and shutdown events. While there are missing records, the emissions which occurred during the startup and shutdown events during this time period demonstrate that DRP starts and stops the boilers to effectively mitigate excess emissions. As shown in the attached summary table, "Startup/Shutdown Carbon Monoxide Emission Trends," CO emissions are well below the 2,500 ppm emission limit during these events (the maximum emission rate observed during this period is 14% of the limit).

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
Jenine Camilleri, Enforcement Unit Supervisor, AQD, DEQ

Enclosed
Startup/Shutdown Carbon Monoxide Emission Trends