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**VIA CERTIFIED MAIL**

September 19, 2019

Todd Zynda, Environmental Engineer  
Department of the Environment, Great Lakes, and Energy  
Air Quality Division  
3058 West Grand Boulevard, Suite 2-300  
Detroit, MI 48202-6058

**RE: M4148 Detroit Renewable Power – Response to Violation Notice dated August 29, 2019**

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power’s (DRP) response to the Violation Notice (VN) dated August 29, 2019 for an alleged violation based upon Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) review of the Second Quarter 2019 Continuous Emissions Monitoring System (CEMS) report.

The following table summarizes the AQD alleged violation along with DRP’s response to the 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   |
|---------------------|---|---|--|
| Boiler 11           | ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.b | Boiler 12 CO emissions based on a 1-hour block average exceeded 267 ppmv for two consecutive hours on 5/23/19 (8:00 to 10:00 -434 ppmv and 299 ppmv). | The excess emissions were the result of erratic combustion during fuel oil-only operation. The fuel oil injection guns tripped while cleaning individual guns to correct a low fuel oil header pressure alarm. |

**Boiler 11 CO 1-hour Block Average**

From May 22 through May 24, 2019, DRP operated the boilers using fuel oil (no refuse derived fuel) to generate auxiliary steam during a planned outage at other Detroit Thermal plants. During the 08:00 and 09:00 hours on May 23, 2019, the DRP plant responded to a low fuel oil header pressure issue. This included cleaning individual fuel oil injectors which in turn caused a trip of the fuel oil injectors resulting in an upset in combustion and a period of excess carbon monoxide (CO) emissions. DRP finished cleaning the fuel oil injectors and returned them to service to stabilize combustion.

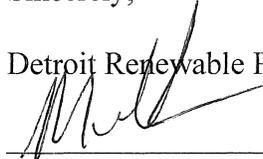
The boilers have been idled since this period of operation in May 2019.

Mr. Todd Zynda  
September 19, 2019  
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If you have questions concerning this response, please feel free to contact Mark Fletcher at (313) 963-3394.

Sincerely,

Detroit Renewable Power



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Mark Fletcher, EHS Manager

cc: Mark Fletcher, EHS Manager  
Jenine Camilleri, Enforcement Unit Supervisor, AQD, EGLE