



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

June 9, 2016

Mr. Linwood Bubar
Detroit Renewable Power
5700 Russell St.
Detroit, MI 48211

SRN: M4148, Wayne County

Dear Mr. Bubar:

VIOLATION NOTICE

On March 17, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the NSPS Subpart Cb annual and semiannual reports; and on May 6, 2016, the AQD received the quarterly emission report for the first quarter of 2016 from Detroit Renewable Power, located at 5700 Russell St., Detroit, Michigan.

The NSPS Subpart Cb annual and semiannual reports identified the sulfur dioxide emission limit violation. The first quarter 2016 excess emissions report indicated that cylinder gas audits had not been performed that quarter and there was an extended period of monitor downtime. Specifically, the EUBOILER013 NO_x, CO, SO₂ and O₂ monitor downtime was reported at 10.8% of the operating time for the quarter. During the review of the reports, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Refuse-derived fuel (RDF) fired boiler #11	1. ROP No. MI-ROP-M4148-2011A, Table FGBOILERS011-013, Condition I. 9.; 2. 40 CFR 52.21(j); 3. 40 CFR 62.14013(b)(1); 4. 40 CFR 60.33(b)(3)(i); 5. R 336.1932.	The sulfur dioxide (SO ₂) emission based on a 24-hour geometric mean average was 42 ppm on 7/20/15. These emissions exceeded the corresponding ROP limit of 29 ppmv.
Refuse-derived fuel (RDF) fired boilers #11 - #13	1. ROP No. MI-ROP-M4148-2011A, Table FGBOILERS011-013 Condition VI. 12; 2. 60.58b(e)(13).	Failed to conduct the cylinder gas audits for the SO ₂ CEMS
Refuse-derived fuel (RDF) fired boiler #11 - #13	1. ROP No. MI-ROP-M4148-2011A, Table FGBOILERS011-013 Condition VI. 15; 2. 60.58b(h)(11).	Failed to conduct the cylinder gas audits for the NO _x CEMS.

Refuse-derived fuel (RDF) fired boilers #11 - #13	1. ROP No. MI-ROP-M4148-2011A, Table FGBOILERS011-013 Condition VI. 23; 2. 60.58b(i)(12).	Failed to conduct the cylinder gas audits for the CO CEMS
Refuse-derived fuel (RDF) fired boilers #11 - #13	1. ROP No. MI-ROP-M4148-2011A, Table FGBOILERS011-013 Condition VI. 29 & 34; 2. 60.58b(b)(5).	Failed to conduct the cylinder gas audits for the O2 CEMS.
Refuse-derived fuel (RDF) fired boilers #13	1. ROP No. MI-ROP-M4148-2011A, Table FGBOILERS011-013 Condition VI. 47.	Failure to continuously monitor CO, NOx, SO2 and O2 due to CEMS downtime.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 30, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: an explanation of the causes of the violation; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Detroit Renewable Power believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Joyce Zhu
Senior Environmental Engineer
Air Quality Division
586-753-3748

cc: Mr. Damian Doerfer, DRP
Ms. LaReina Wheeler, City of Detroit, BSEED

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ