



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

April 6, 2017

Mr. Linwood Bubar, President  
Detroit Renewable Power, LLC  
5700 Russell St.  
Detroit, MI 48211-2545

SRN: M4148, Wayne County

Dear Mr. Bubar:

**VIOLATION NOTICE**

On November 2, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the Third Quarter 2016 Continuous Emissions Monitoring Systems Report for Detroit Renewable Power located at 5700 Russell, Detroit, Michigan. The Fourth Quarter 2016 Continuous Emissions Monitoring Systems Report was received on January 20, 2017. In addition, the 2016 Annual and 2016 Semi-Annual (07/1/2016 through 12/31/2016) report certifications for MI-ROP-M4148-2011a were received on January 31, 2017. During review of the quarterly reports and Semi-Annual and Annual report certifications, the AQD evaluated compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and MI-ROP-M4148-2011a.

During the review of the Third Quarter 2016 and Fourth Quarter 2016 Continuous Emissions Monitoring Systems Reports, and review of the Semi-Annual and Annual report certifications, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Boiler 11 – Third Quarter 2016	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC III.3	The facility reports the flue gas oxygen content less than 4% on various dates in the Third Quarter 2016.
	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC III.2	The facility reports that the combustion zone was less than 1800°F and 1600°F on 7/2/2016 (7-hours consecutively) and 9/22/2016 (1-hour).

Boiler 11 – Fourth Quarter 2016	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.b	CO emissions based on a 1-hour block average exceeded 267 ppmv for two consecutive hours on 11/10/16 (5:00 to 7:00 – 280 ppmv and 281 ppmv).
Boiler 13 – Fourth Quarter	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.13.a	NOx emissions based on a 1-hour block average exceeded 247 ppmv on 10/09/2016 (4:00 to 5:00 – 252 ppmv).
Boiler 11 – Fourth Quarter	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC III.3	The facility reports the flue gas oxygen content less than 4% on various dates in the Fourth Quarter 2016.
FGBOILERS011-013	ROP No. MI-ROP-M4148-2011a, A. GC 21.c  R336.1213(3)(c)(i)	Failure to report combustion zone excursions and flue gas oxygen content excursions in Semi-Annual and Annual Certification Reports.

Flue Gas Oxygen Content - FGBOILERS011-013, SC III.3

During review of the Third Quarter 2016 and Fourth Quarter 2016 Continuous Emissions Monitoring Systems Reports it was identified that on several occasions the flue gas oxygen content at Boiler 11 has been less than 4 percent by volume on a 1-hour average as listed below.

Third Quarter 2016

- 8/22/16 (1-hour) – 3.9%
- 9/13/16 (2-hours) – 3.5%, 3.9%
- 9/14/16 (3-hours) – 3.6%, 3.4%, 3.8%
- 9/15/16 (1-hour) – 3.8%
- 9/16/16 (1-hour) – 3.7%
- 9/17/16 (6-hours) – 3.3%, 3.5%, 3.9%, 3.9%, 3.9%, 3.8%
- 9/18/16 (9-hours) - 3.8%, 3.1%, 3.1%, 3.9%, 3.1%, 3.8%, 3.8%, 3.7%, 3.6%
- 9/21/16 (1-hour) - 3.7%
- 9/22/16 (1-hour) – 3.6%
- 9/23/16 (6-hours) – 3.7%, 3.9%, 3.6%, 3.3%, 3.8%, 3.9%
- 9/24/16 (1-hour) – 3.7%

Fourth Quarter 2016

- 10/10/16 (5-hours) - 3.7%, 3.4%, 3.6%, 3.7%, 3.7%
- 10/11/16 (1-hour) – 3.8%
- 10/13/16 (1-hour) – 3.9%
- 10/15/16 (1-hour) – 3.8%
- 10/16/16 (2-hours) – 3.5%, 3.8%
- 10/23/16 (1-hour) - 3.9%
- 10/30/16 (1-hour) – 3.8%
- 10/31/16 (1-hour) – 3.6%
- 11/1/16 (4-hours) – 3.9%, 3.8%, 3.9%, 3.9%
- 11/2/16 (3-hours) - 3.9%, 3.6%, 3.9%
- 11/3/16 (8-hours) – 3.8%, 3.9%, 3.6%, 3.5%, 3.1%, 3.8%, 3.2%, 3.9%
- 11/4/16 (7-hours) – 3.9%, 3.9%, 3.4%, 3.9%, 3.9%, 3.2%, 3.9%
- 11/5/16 (3-hours) – 3.8%, 3.8%, 3.3%
- 11/6/16 (9-hours) – 3.7%, 3.5%, 3.4%, 3.4%, 3.9%, 3.9%, 3.1%, 3.2%, 3.7%

The above listed occurrences are a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, Special Condition (SC) III.3.

Combustion Zone Temperature - FGBOILERS011-013, SC III.2

During review of the Third Quarter 2016 Continuous Emissions Monitoring Systems Report it was identified that the 1-hour average combustion zone temperature on Boiler 11 was less than both 1800°F and 1600°F on July 2, 2016 for 7 hours consecutively (reported combustion zone temperature range of 740°F to 741°F). Additionally, Boiler 11 did not meet the combustion zone temperature requirement for one hour (reported combustion zone temperature of 1556°F) on September 22, 2016. These occurrences are a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC III.2.

Carbon Monoxide 1-hour Block Average - FGBOILERS011-013, SC I.11.b

On November 10, 2016, Boiler 11 exceeded the 1-hour block average CO emission limit (267 ppmv) for two consecutive hours (280 ppmv and 281 ppmv); indicating corrective action was not implemented in a timely manner. This is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.b.

Nitrogen Oxide 1-hour Block Average - FGBOILERS011-013, SC I.13.a

On October 9, 2016, Boiler 13 exceeded the 1-hour block average NOx emission limit (247 ppmv) for one hour (4:00 to 5:00 – 252 ppmv). This exceedance did not occur during startup for shutdown scenarios and appears to be new emission limit exceedance that has not been reported recently. This is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.13.a.

Mr. Linwood Bubar

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Semi-Annual and Annual Reporting

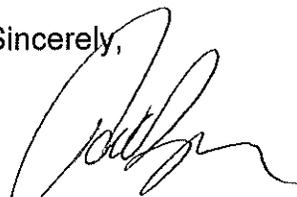
During review of the 2016 Annual and 2016 Semi-Annual (07/1/2016 through 12/31/2016) report certifications for MI-ROP-M4148-2011a, it was identified that the facility did not report deviations relating to combustion zone excursions and flue gas oxygen content excursions. This is a violation of R336.1213(3)(c)(i) and ROP No. MI-ROP-M4148-2011a, General Condition 21.c.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 27 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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,



Todd Zynda, P.E.  
Environmental Engineer  
Air Quality Division  
313-456-2761

cc: Mr. Damian Doerfer, DRP

Ms. LaReina Wheeler, City of Detroit, BSEED

cc via email: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Mr. Christopher Ethridge, DEQ

Mr. Thomas Hess, DEQ

Ms. Wilhemina McLemore, DEQ

Mr. Jeff Korniski, DEQ