



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

August 31, 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 July 30, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the Second Quarter 2017 Continuous Emissions Monitoring Systems Report for Detroit Renewable Power located at 5700 Russell, Detroit, Michigan. During review of the quarterly report, 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 Second Quarter 2017 Continuous Emissions Monitoring Systems Report the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Boiler 11	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.14.b	The facility reports visible emissions were greater than 20% opacity on 6/4/2017 (21%).
Boiler 12	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 5/20/2017.
Boiler 13	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 three consecutive hours on 4/2/2017, 23:00 to 24:00 (344 ppmv) and 4/3/2017 0:00 to 2:00 – 290 ppmv and 457 ppmv).

Boiler 13	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 6/2/2017 (4:00 to 5:00 – 248 ppmv).
Boiler 13	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC III.2	The facility reports that the combustion zone was less than 1800°F on 5/24/2017 for two hours.

Visible Emissions - FGBOILERS011-013, SC I.14.b

During review of the Second Quarter 2017 Continuous Emissions Monitoring Systems Report it was identified that the 20% opacity limit was exceeded for 0.1 hour (6 minutes) on June 4, 2017 from 19:54 to 20:00 at Boiler 11. According to records provided via email August 24, 2017, Boiler 11 was combusting fuel oil during 19:58 and 19:59. This is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, Special Condition (SC) I. 14b. SC I. 14.b requires emissions meet the 20% opacity limit at all times when firing fuel oil.

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

During review of the Second Quarter 2017 Continuous Emissions Monitoring Systems Report and additional information provided via email on August 24, 2017 it was identified that the 1-hour average combustion zone temperature on Boiler 12 was less than both 1800°F and 1600°F on May 20, 2017 for 1 hour (6:00 to 7:00 - 1551°F) while refuse derived fuel (RDF) was being combusted. Additionally, Boiler 13 did not meet the combustion zone temperature requirement on May 24, 2017 for two hours (3:00 to 4:00 [1335 °F] and 4:00 to 5:00 [1704 °F]) while RDF was being combusted. 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 April 2 and 3, 2017, Boiler 13 exceeded the 1-hour block average CO emission limit (267 ppmv) for three consecutive hours (April 2, 2017, 23:00 to 24:00 [344 ppmv] and April 3, 2017 0:00 to 2:00 [290 ppmv and 457 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 June 2, 2017, Boiler 13 exceeded the 1-hour block average NOx emission limit (247 ppmv) for one hour (4:00 to 5:00 – 248 ppmv). This exceedance did not occur during startup for shutdown scenarios. This is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.13.a.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 21, 2017 (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