



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

May 18, 2018

Mr. Robert Suida, Plant Manager  
Detroit Renewable Power, LLC  
5700 Russell St.  
Detroit, MI 48211-2545

SRN: M4148, Wayne County

Dear Mr. Suida:

**VIOLATION NOTICE**

On April 30, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the First Quarter 2018 Continuous Emissions Monitoring Systems (CEMS) Report for Detroit Renewable Power (DRP) located at 5700 Russell, Detroit, Michigan. In addition, the 2017 Subpart Cb Annual and 2<sup>nd</sup> half 2017 Semi Annual report was received on March 28, 2018. During review of the First Quarter 2018 Report and Subpart Cb Annual and Semi Annual 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 First Quarter 2018 Report and Subpart Cb Annual and Semi Annual report, the following violations were identified:

| Process Description                                  | Rule/Permit Condition Violated  | Comments   |
|--|---|--|
| 1 <sup>st</sup> Quarter 2018 - Boilers 11, 12 and 13 | ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII. 5.b<br><br>40 CFR 60.7(d)                             | The First Quarter 2018 CEMS report does not include excess emission and monitoring downtime forms.   |
|  | ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII. 5.a. ii<br><br>40 CFR 60.7(c)(2)                      | The First Quarter 2018 CEMS report does not identify excess emissions that occur during startup, shutdown, and malfunction, and corrective actions or preventative measures adopted. |
| Subpart Cb – Boilers 11, 12, and 13                  | ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII. 7.c<br><br>40 CFR 60.59b(g)(3)<br>40 CFR 60.59b(h)(2) | The Subpart Cb report received does not include all data for each day excess emissions occurred.   |

1<sup>st</sup> Quarter 2018 CEMS Report

ROP No. FGBOILERS011-013, SC VII. 5.b states that the quarterly "summary report contain the information and be in the format shown in Figure 1 of 40 CFR 60.7(d). One summary form shall be submitted for each pollutant monitored." The First Quarter 2018 CEMS Report received on April 30, 2018 does not include this information. This is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII. 5.b and 40 CFR 60.7(d).

ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII. 5.a. ii states that the written report shall include "specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction, the corrective action taken or preventative measures adopted." The First Quarter 2018 CEMS Report does not include this information. This is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII. 5.a.ii and 40 CFR 60.7(c)(2).

Additionally, the AQD requests that the quarterly report format be in the format consistent with historical quarterly report submittals from DRP. The AQD requests that in addition the CEMS data provided, that DRP provide the consolidated one to two page summaries for gross steam production, operating hours, average boiler steam flow, fuel oil usage and refuse derived fuel processed for each boiler.

Subpart Cb 2017 Annual Second Half 2017 and 2<sup>nd</sup> half 2017 Semi Annual report

Appendix E of the Subpart Cb 2017 Annual Second Half 2017 and 2<sup>nd</sup> half 2017 Semi Annual report indicates that all data (sulfur dioxide, nitrogen oxides, carbon monoxide, MWC unit load level, particulate control device inlet temperature, and opacity) from Boilers 11 through 13 for each day excess emissions occurred is included. The Subpart Cb report received on March 28, 2018 does not include the referenced Appendix E. This is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII. 7.c, 40 CFR 60.59b(g)(3), and 40 CFR 60.59b(h)(2).

Appendix A of the Subpart Cb identifies two 24-hour block average CO exceedances at Boiler 11 (209 ppm) and Boiler 12 (279 ppm) during the 2<sup>nd</sup> half of 2017. These exceedances were not previously reported and the exact date of occurrence cannot be verified as Appendix E of the Subpart Cb report was not provided. The AQD requests that the Subpart Cb report be resubmitted with Appendix E data provided. The AQD requests that going forward the Subpart Cb Report format be in the format consistent with historical Subpart Cb report submittals from DRP, which includes all calendar day CEMS data for excess emissions.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 8, 2018 (which coincides with 21 calendar

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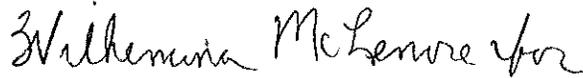
May 18, 2018

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.  
Senior Environmental Engineer  
Air Quality Division  
313-456-2761

cc: Mr. Damian Doerfer, Detroit Renewable Power

Mr. Paul Max, City of Detroit, BSEED

cc via email: Ms. Mary Ann Dolehanty, DEQ

Mr. Craig Fitzner, DEQ

Mr. Christopher Ethridge, DEQ

Mr. Malcolm Mead-O'Brien, DEQ

Ms. Wilhemina McLemore, DEQ

Mr. Jeff Korniski, DEQ