



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

December 12, 2018

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

SRN: M4148, Wayne County

Dear Mr. Suida:

VIOLATION NOTICE

On August 22, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), requested the Startup, Shutdown, and Malfunction Abatement Plan (SSM) records required under Consent Order Air Quality Division (AQD) No. 6-2017 for Detroit Renewable Power (DRP) located at 5700 Russell, Detroit, Michigan. On September 17, 2018, DRP provided SSM records via Barr Engineering FTP site. The purpose of the SSM records review was to determine DRP's 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; MI-ROP-M4148-2011a; and Administrative Consent Order (ACO) AQD No. 6-2017.

As a result of the inspection and review of inspection records, the following violation were identified.

Process Description	Rule/Permit Condition Violated	Comments
FGBOILERS011-013	ACO AQD No. 6-2017, Paragraph 9.B.1 and Paragraph 13	Records for the Startup/Shutdown Malfunction Abatement Plan were not maintained for various checklists on various dates.

ACO AQD No. 6-2017, Exhibit A – Startup, Shutdown Malfunction Abatement Plan

ACO AQD No. 6-2017, Paragraph 9.B.1 requires that “on and after the effective date of this Consent Order, the Company shall fully comply with the approved Startup, Shutdown, and Malfunction Plan (SSM), dated November 4, 2016 and revisions thereto attached as Exhibit A, incorporated by reference and made an enforceable part of the Consent Order.” The below missing records are subject to stipulated fines per ACO AQD No. 6-2017, Paragraph 13.

Startup, Shutdown, Malfunction Checklist

The facility provided Start-up, Shutdown, Malfunction Checklist records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). The following Start-up, Shutdown, Malfunction Checklist records were missing.

Boiler 11 – Startup (7/6/17), Shutdown (7/16/17), Shutdown (7/27/17), Startup/Shutdown (8/1/2017), Shutdown (8/24/17), Startup (8/30/17), Shutdown (9/24/17), Startup (9/28/17), Shutdown (11/3/17), Shutdown (11/30/17), Shutdown (11/30/17), Startup (12/31/17), Startup/Shutdown (1/7/18), Shutdown (1/28/18), Shutdown (2/1/18), Startup (5/14/18), Startup (6/21/18), Startup (6/29/18), Startup (7/5/18), Shutdown (7/17/18), Startup (8/8/18), Shutdown (8/11/18), and Startup (8/15/18).

Boiler 12 – Shutdown (7/6/17), Startup (7/13/17), Startup/Shutdown (7/14/17), Shutdown (7/21/17), Startup (7/31/17), Shutdown (8/6/17), Startup (8/10/17), Shutdown (8/20/17), Startup (8/25/17), Shutdown (8/28/17), Startup (8/29/17), Shutdown (9/11/17), Startup (9/12/17), Shutdown (9/18/17), Startup (9/23/17), Startup (9/29/17), Shutdown (10/3/17), Shutdown (10/7/17), Startup (10/13/17), Shutdown (10/19/17), Shutdown (12/20/17), Startup (1/1/18), Startup/Shutdown (1/19/18), Startup (2/1/18), Shutdown (5/6/18), Startup (5/7/18), Shutdown (5/14/18), Shutdown (6/29/18), Startup (6/30/18), Shutdown (7/9/18), Shutdown (7/19/18), Startup (8/11/18), and Shutdown (8/21/18).

Boiler 13 – Shutdown (7/6/17), Startup (7/26/17), Shutdown (7/31/17), Startup (8/6/17), Startup/Shutdown (8/8/17), Shutdown (8/12/17), Startup (8/21/17), Shutdown (8/25/17), Startup (8/27/17), Shutdown (8/30/17), Startup (9/20/17), Shutdown (9/23/17), Startup (9/25/17), Shutdown (9/29/17), Shutdown (10/17/17), Startup (10/19/17), Startup (10/26/17), Shutdown (11/24/17), Shutdown (1/1/18), Shutdown (1/23/18), Startup (2/12/18), Shutdown (5/5/18), Startup (5/8/18), Shutdown (5/14/18), Startup (5/16/18), Shutdown (5/25/18), Shutdown (6/22/18), Shutdown (7/14/18), Startup (7/20/18), Shutdown (7/25/18), Shutdown (8/9/18), and Shutdown (8/15/18).

RDF Boiler Startup, Appendix 1 – Turbine Operator Startup

The facility provided available records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Appendix 1 – Turbine Operator Startup records were not provided for boiler startup on the following dates.

Boiler 11 – 7/6/17, 7/7/17, 7/22/17, 8/1/17, 8/30/17, 9/8/17, 12/1/17, 12/7/17, 1/7/18, 1/19/18, 2/3/18, 5/14/18, 6/4/18, 6/21/18, 7/18/18, 8/8/18, and 8/15/18;

Boiler 12 – 7/2/17, 7/7/17, 7/13/17, 7/14/17, 8/29/17, 9/12/17, 9/29/17, 10/6/17, 11/28/17, 12/8/17, 12/24/17, 1/1/18, 1/19/18, 1/21/18, 2/18/18, 5/5/18, 5/7/18, 6/30/18, 8/11/18, and 8/19/18;

Boiler 13 – 7/1/17, 7/4/17, 7/17/17, 8/8/17, 9/20/17, 9/25/17, 10/8/17, 11/4/17, 12/28/17, 1/21/18, 1/25/18, 2/12/18, 5/16/18, 5/22/18, 5/28/18, 6/2/18, 6/9/18, 7/20/18, and 8/10/18.

Unit Startup, Appendix 2 – Grate Operator Walkdown

The facility provided available records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Appendix 2 – Grate Operator Walkdown records were not provided for boiler startup on the following dates.

Boiler 11 – 7/6/17, 7/7/17, 7/22/17, 8/1/17, 8/30/17, 9/8/17, 12/1/17, 1/7/18, 1/19/18, 2/3/18, 5/14/18, 6/21/18, 7/18/18, 8/8/18, and 8/15/18;

Boiler 12 – 7/2/17, 7/7/17, 7/13/17, 7/14/17, 8/29/17, 9/12/17, 9/29/17, 10/6/17, 10/13/17, 11/28/17, 12/8/17, 12/24/17, 1/1/18, 1/19/18, 1/21/18, 2/18/18, 2/21/18, 5/5/18, 5/7/18, 6/30/18, 8/11/18, and 8/19/18;

Boiler 13 – 7/1/17, 7/4/17, 7/17/17, 8/8/17, 9/20/17, 9/25/17, 10/8/17, 11/4/17, 12/28/17, 1/8/18, 1/21/18, 2/12/18, 5/16/18, 5/22/18, 5/28/18, 6/2/18, and 8/10/18.

Unit Startup, Appendix 3 – Ash Operator Walk Down/Baghouse Penthouse

The facility provided available records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Appendix 3 – Ash Operator Walk Down/Baghouse Penthouse records were not provided for boiler startup on the following dates.

Boiler 11 – 7/6/17, 7/7/17, 7/22/17, 8/1/17, 8/30/17, 9/8/17, 12/1/17, 1/7/18, 1/19/18, 2/3/18, 5/14/18, 6/4/18, 6/21/18, 7/18/18, 8/8/18, and 8/15/18;

Boiler 12 – 7/2/17, 7/7/17, 7/13/17, 7/14/17, 8/29/17, 9/12/17, 9/29/17, 10/6/17, 11/28/17, 12/8/17, 12/24/17, 1/1/18, 1/15/18, 1/19/18, 1/21/18, 2/18/18, 2/21/18, 5/5/18, 5/7/18, 6/30/18, 7/25/18, 8/11/18, and 8/19/18;

Boiler 13 – 7/1/17, 7/4/17, 7/17/17, 8/8/17, 9/20/17, 9/25/17, 10/8/17, 11/4/17, 12/28/17, 1/21/18, 2/12/18, 2/25/18, 5/16/18, 5/22/18, 6/2/18, and 8/10/18.

Unit Startup, Appendix 4 – Slaker Operator Walk Down List/8thFloor SDA Penthouse

The facility provided available records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and

evaluated as part of the May 2018 inspection]). Appendix 4 – Slaker Operator Walk Down List/8thFloor SDA Penthouse records were not provided for boiler startup on the following dates.

Boiler 11 – 7/6/17, 7/7/17, 7/22/17, 8/1/17, 8/30/17, 9/8/17, 12/1/17, 1/7/18, 1/19/18, 1/30/18, 2/3/18, 5/14/18, 6/4/18, 6/21/18, 7/18/18, 8/8/18, and 8/15/18;

Boiler 12 – 7/2/17, 7/7/17, 7/13/17, 7/14/17, 7/31/17, 8/29/17, 9/12/17, 9/29/17, 10/6/17, 11/28/17, 12/8/17, 12/24/17, 1/18/18, 1/19/18, 1/21/18, 2/18/18, 2/21/18, 5/5/18, 5/7/18, 6/30/18, 7/11/18, 7/25/18, 8/11/18, and 8/19/18;

Boiler 13 – 7/1/17, 7/4/17, 7/17/17, 8/8/17, 9/20/17, 9/25/17, 10/8/17, 11/4/17, 12/28/17, 1/21/18, 2/12/18, 5/16/18, 5/22/18, 5/28/18, 6/2/18, 7/20/18, and 8/10/18.

Unit Startup, Appendix 5 – Auger Walk Down

The facility provided available records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Appendix 5 – Auger Walk Down records were not provided for boiler startup on the following dates.

Boiler 11 – 7/6/17, 7/7/17, 7/22/17, 8/1/17, 8/30/17, 9/8/17, 12/1/17, 1/7/18, 1/19/18, 1/27/18, 2/3/18, 5/14/18, 6/4/18, 6/21/18, 7/18/18, 8/8/18, and 8/15/18;

Boiler 12 – 7/2/17, 7/7/17, 7/13/17, 7/14/17, 8/29/17, 9/12/17, 9/29/17, 10/6/17, 11/28/17, 12/8/17, 12/24/17, 1/1/18, 1/18/18, 1/19/18, 1/21/18, 2/18/18, 5/5/18, 5/7/18, 6/30/18, 7/11/18, 7/25/18, 8/11/18, and 8/19/18;

Boiler 13 – 7/1/17, 7/4/17, 7/17/17, 8/8/17, 8/27/17, 9/20/17, 9/25/17, 10/8/17, 11/4/17, 12/28/17, 1/21/18, 1/30/18, 2/12/18, 2/25/18, 5/8/18, 5/16/18, 5/22/18, 5/28/18, 6/2/18, and 8/10/18.

Unit Startup, Appendix 6 – Operator Walk Down List Doors

The facility provided available records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Appendix 6 – Operator Walk Down List Doors records were not provided for startup on the following dates.

Boiler 11 – 7/6/17, 7/7/17, 7/22/17, 7/28/17, 8/1/17, 8/30/17, 9/8/17, 9/28/17, 10/23/17, 11/7/17, 12/1/17, 12/7/17, 1/7/18, 1/19/18, 2/3/18, 5/14/18, 6/4/18, 6/21/18, 7/14/18, 7/18/18, 8/8/18, and 8/15/18;

Boiler 12 – 7/2/17, 7/7/17, 7/13/17, 7/14/17, 8/10/17, 8/25/17, 8/29/17, 9/12/17, 9/23/17, 9/29/17, 10/6/17, 10/13/17, 11/28/17, 12/8/17, 12/24/17, 1/1/18, 1/19/18,

1/21/18, 2/11/18, 2/18/18, 2/21/18, 5/5/18, 5/7/18, 6/30/18, 7/11/18, 7/25/18, 8/11/18, and 8/19/18;

Boiler 13 – 7/1/17, 7/4/17, 7/17/17, 8/6/17, 8/8/17, 8/21/17, 8/27/17, 9/6/17, 9/20/17, 9/25/17, 10/8/17, 10/16/17, 11/3/17, 12/27/17, 12/28/17, 1/21/18, 1/25/18, 2/12/18, 2/25/18, 5/16/18, 5/22/18, 5/28/18, 6/2/18, 6/25/18, 7/20/18, and 8/10/18.

Unit Startup, Appendix 7 – E&I

The facility provided available records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Appendix 7 – E&I records were not provided for boiler startup on the following dates.

Boiler 11 – 7/6/17, 7/7/17, 8/1/17, 8/12/17, 8/30/17, 9/8/17, 11/7/17, 11/20/17, 12/1/17, 12/31/17, 1/7/18, 1/19/18, 2/3/18, 2/16/18, 5/14/18, 6/4/18, 6/21/18, and 7/18/18;

Boiler 12 – 7/7/17, 7/13/17, 7/14/17, 8/29/17, 9/12/17, 9/23/17, 9/29/17, 11/25/17, 11/28/17, 12/8/17, 12/24/17, 1/15/18, 1/18/18, 1/19/18, 1/21/18, 2/18/18, 2/21/18, 5/7/18, 6/22/18, 6/27/18, 6/30/18, 7/25/18, 8/1/18, and 8/19/18;

Boiler 13 – 7/1/17, 7/4/17, 7/17/17, 8/27/17, 9/20/17, 9/25/17, 11/4/17, 11/15/17, 12/28/17, 1/21/18, 1/25/18, 1/30/18, 2/12/18, 2/25/18, 5/8/18, 5/16/18, 5/22/18, 6/25/18, 7/9/18, 7/31/18.

Unit Startup, Appendix 8 – CEMS Checklist

The facility provided available records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Appendix 8 – CEMS Checklist records were not provided for startup on the following dates.

Boiler 11 – 7/6/17, 7/7/17, 7/22/17, 7/28/17, 8/1/17, 8/30/17, 9/8/17, 9/28/17, 10/7/17, 10/20/17, 10/23/17, 11/7/17, 11/20/17, 12/1/17, 12/7/17, 12/14/17, 12/19/17, 12/31/17, 1/7/18, 1/17/18, 1/19/18, 1/27/18, 1/30/18, 2/3/18, 2/16/18, 5/14/18, 5/20/18, 6/4/18, 6/20/18, 6/21/18, 6/29/18, 7/5/18, 7/14/18, 7/18/18, 8/8/18, and 8/15/18;

Boiler 12 – 7/2/17, 7/7/17, 7/13/17, 7/14/17, 7/23/17, 7/31/17, 8/10/17, 8/25/17, 8/29/17, 9/12/17, 9/23/17, 9/29/17, 10/6/17, 10/13/17, 11/25/17, 11/28/17, 12/8/17, 12/22/17, 12/24/17, 1/1/18, 1/15/18, 1/18/18, 1/19/18, 1/21/18, 2/1/18, 2/11/18, 2/18/18, 2/21/18, 5/5/18, 5/7/18, 6/22/18, 6/27/18, 6/30/18, 7/11/18, 7/25/18, 8/1/18, 8/11/18, and 8/19/18;

Boiler 13 – 7/1/17, 7/4/17, 7/17/17, 7/26/17, 8/6/17, 8/8/17, 8/21/17, 8/27/17, 9/6/17, 9/20/17, 9/25/17, 10/2/17, 10/8/17, 10/16/17, 10/19/17, 10/26/17, 11/3/17, 11/4/17, 11/15/17, 12/28/17, 1/5/18, 1/8/18, 1/21/18, 1/25/18, 1/30/18, 2/12/18, 2/25/18, 5/8/18, 5/16/18, 5/22/18, 5/28/18, 6/2/18, 6/9/18, 6/25/18, 7/9/18, 7/20/18, 7/31/18, and 8/10/18.

Boiler Inspection/Shutdown Checklist

The facility provided available records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Boiler Inspection/Shutdown Checklist records were not provided for boiler shutdown on the following dates.

Boiler 11 – 7/4/17, 7/7/17, 7/16/17, 7/27/17, 8/1/17, 8/9/17, 8/24/17, 9/2/17, 9/24/17, 10/2/17, 10/16/17, 10/21/17, 11/3/17, 11/12/17, 11/30/17, 12/4/17, 12/11/17, 12/16/17, 12/25/17, 1/7/18, 1/14/18, 1/18/18, 1/21/18, 1/28/18, 2/1/18, 2/11/18, 2/25/18, 5/7/18, 5/16/18, 6/2/18, 6/14/18, 6/20/18, 6/27/18, 7/3/18, 7/9/18, 7/17/18, 8/1/18, and 8/11/18;

Boiler 12 – 7/1/17, 7/6/17, 7/12/17, 7/14/17, 7/21/17, 7/25/17, 8/6/17, 8/20/17, 8/28/17, 9/11/17 (incomplete), 9/18/17 (incomplete), 9/27/17, 10/3/17, 10/7/17, 10/19/17, 11/28/17, 12/8/17, 12/20/17, 12/24/17, 12/29/17, 1/8/18, 1/16/18, 1/19/18, 1/21/18, 1/30/18, 2/3/18, 2/17/18, 2/18/18, 5/6/18, 5/14/18, 6/24/18, 6/29/18, 7/9/18, 7/19/18, 7/31/18, 8/6/18, 8/17/18, and 8/21/18;

Boiler 13 – 7/2/17, 7/6/17, 7/31/17, 8/8/17, 8/12/17, 8/25/17, 8/30/17, 9/8/17, 9/23/17, 9/29/17, 10/7/17, 10/12/17, 10/17/17, 10/24/17, 10/31/17, 11/3/17, 11/14/17, 11/24/17, 12/27/17, 1/1/18, 1/5/18, 1/18/18, 1/23/18, 1/27/18, 2/8/18, 2/15/18, 5/5/18, 5/14/18, 5/21/18, 5/25/18, 6/1/18, 6/4/18, 6/22/18, 6/28/18, 7/14/18, 7/25/18, 8/9/18, and 8/15/18.

SDA Maintenance Weekly Checks

The facility provided available records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). According to DRP the check list was divided into two separate lists (one for maintenance and one for “Ops”). Records were not provided or were incomplete for following weeks (ending). Weeks ending 7/1/17, 7/8/17 (missing maintenance checklist), 7/15/17, 7/22/17 (missing maintenance checklist), 7/29/17 (missing maintenance checklist), 8/5/17 (missing maintenance checklist), 8/12/17 (missing maintenance checklist), 8/19/17 (missing maintenance checklist), 8/26/17 (missing maintenance checklist), 9/2/17 (missing maintenance checklist), 9/9/17 (missing maintenance checklist), 9/16/17 (missing maintenance checklist), 9/23/17 (missing maintenance checklist), 9/30/17, 10/7/17 (missing maintenance checklist), 10/14/17 (missing maintenance checklist), 10/21/17 (missing maintenance checklist), 10/28/17 (missing maintenance checklist), 11/4/17, 11/11/17 (missing maintenance checklist), 11/18/17 (missing maintenance checklist), 11/25/17

(missing maintenance checklist), 12/2/17 (missing maintenance checklist), 12/9/17 (missing maintenance checklist), 12/16/17 (missing maintenance checklist), 12/23/17 (missing maintenance checklist), 12/30/17, 1/6/18 (missing maintenance checklist), 1/13/18 (missing maintenance checklist), 1/20/18 (missing maintenance checklist), 1/27/18 (missing maintenance checklist), 2/10/18 (missing maintenance checklist), 2/17/18 (missing maintenance checklist), 2/24/18 (missing maintenance checklist), 6/9/18 (missing Ops checklist), 7/7/18 (missing Ops checklist), 7/14/18 (missing maintenance checklist), 8/4/18 (missing maintenance checklist), 8/11/18 (missing maintenance checklist), 8/18/18 (missing maintenance checklist).

SDA Preventative Maintenance Monthly Checks

The facility provided available records for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). According to DRP the check list was divided into two separate lists (one for maintenance and one for "E&I"). Records were not provided or were incomplete for following Months. July 2017 (missing maintenance checklist), August 2017 (missing maintenance checklist), September 2017, October 2017 (missing maintenance checklist), November 2017 (missing maintenance checklist), December 2017 (missing maintenance checklist), January 2018 (missing maintenance checklist), February 2018 (missing E&I checklist), May 2018 (missing maintenance checklist), June 2018, July 2018.

Baghouse Preventative Maintenance Weekly Checks

Records were provided for provided for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Records were not provided or were incomplete for following weeks. Week ending (WE) 7/15/17, 12/2/17, 12/30/17, and 5/12/18.

Baghouse Preventative Maintenance Monthly Checks

Baghouse Preventative Maintenance Monthly Checks were provided for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Records were not provided or were incomplete for following Months. September 2017, December 2017, and January 2018.

AO Grate Log

AO Grate logs were provided for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Records were not provided or were incomplete for following dates: 6/24/17, 6/25/17, 6/29/17, 7/5/17/, 7/20/17, 7/21/17, 8/5/17, 8/6/17, 8/7/17, 8/8/17, 8/15/17, 8/19/17, 8/20/17, 8/21/17, 8/22/17, 8/23/17, 9/21/17, 10/20/17, 11/13/17, 2/2/18, 5/5/18, 5/6/18, 5/7/18, 5/8/18, 5/9/18, 5/10/18, 5/11/18, 5/12/18, 5/13/18, 5/14/18, 5/15/18, 5/16/18, 5/28/18, 6/21/18, 6/23/18, 7/27/18, 7/28/18, 7/29/18, 8/11/18, 8/13/18, and 8/17/18.

AAO Slaker Log

AAO Slaker logs were provided for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Records were not provided or were incomplete for following dates: 8/2/17, 8/6/17, 8/7/17, 8/8/17, 8/15/17, 8/19/17, 8/20/17, 8/21/17, 8/22/17, 8/23/17, 11/30/17, 12/21/17, 1/7/18, 1/23/18, 2/11/18, 2/12/18, 2/20/18, 2/21/18, 5/5/18, 5/6/18, 5/8/18, 5/9/18, 5/10/18, 5/11/18, 5/13/18, 5/14/18, 5/15/18, 5/16/18, 5/20/18, 5/28/18, 6/1/18, 6/3/18, 6/7/18, 6/21/18, 6/23/18, 6/25/18, 6/27/18, 7/5/18, 7/6/18, 7/10/18, 7/29/18, 8/1/18, 8/7/18, 8/8/18, 8/10/18, 8/11/18, 8/17/18, and 8/18/18.

Michigan Waste Energy Control Room Log

Control room logs were provided for June 19, 2017 through August 21, 2018 (with the exception of March 1, 2018 through May 1, 2018 [previously submitted and evaluated as part of the May 2018 inspection]). Records were not provided the following days: 7/5/17, 7/6/17, 7/7/17, 7/11/17, 7/12/17, 7/24/17, 7/25/17, 7/26/17, 7/28/17, 7/29/17, 7/30/17, 7/31/17, August 2017 (31 days), September 2017 (30 days), 10/8/17, 10/9/17, 10/10/17, 10/11/17, 10/12/17, 10/18/17, 11/15/17, 11/22/17, 11/23/17, 12/2/17, 12/29/17, 5/7/18, 5/8/18, 5/9/18, 5/10/18, 5/11/18, 5/12/18, 5/13/18, 5/14/18, 5/15/18, 5/16/18, and 6/23/18.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 2, 2019 (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.

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If DRP 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.

Mr. Robert Suida
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December 12, 2018

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,

A handwritten signature in black ink, appearing to read 'Todd Zynda', written over a light blue horizontal line.

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

cc: Mr. Mark Fletcher, DRP
Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ