



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



LIESL EICHLER CLARK
DIRECTOR

February 25, 2019

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 February 5, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the Fourth Quarter 2018 Continuous Emissions Monitoring Systems (CEMS) Report for Detroit Renewable Power (DRP) located at 5700 Russell, Detroit, Michigan. Hourly CEMS data for Fourth Quarter 2018 was provided via email on February 8 and 15, 2019. On February 8, 2018 a Rule 912 Notification was received for a carbon monoxide (CO) excess emission event on January 31, 2019. Hourly CEMS data for the January 31, 2019 excess emission event was provided via email on February 11 and 18, 2019. During review of the Fourth Quarter 2018 CEMS Report, Rule 912 Report, and hourly CEMS data provided, 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; MI-ROP-M4148-2011a; and Administrative Consent Order (ACO) AQD No. 6-2017.

During the review of the Fourth Quarter 2018 CEMS Report, Rule 912 Notification, and CEMS data, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Boiler 12	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.9.a 40 CFR Part 60, Subpart Cb, §60.33b(b)(3)(i) 40 CFR Part 62, Subpart FFF, §62.14103(b)(1) ACO AQD No. 6-2017, Paragraph 13	Boiler 12 SO ₂ emissions based on a 24-hour daily geometric mean exceeded 29 parts per million by volume (ppmv) on 12/6/18 (37 ppmv).

Boiler 12	<p>ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.a</p> <p>40 CFR Part 60, Subpart Cb, §60.34b(a), Table 3</p> <p>ACO AQD No. 6-2017, Paragraph 13</p>	Boiler 12 CO emissions based on a 24-hour block average exceeded 200 ppmv on 1/31/19 (367 ppmv).
Boiler 12	<p>ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.b</p>	Boiler 12 CO emissions based on a 1-hour block average exceeded 267 ppmv for two consecutive hours or more on 1/31/19 (9:00 to 11:00 – 466 ppmv and 397 ppmv and 14:00 to 17:00 – 1055 ppmv, 383 ppmv, and 316 ppmv).
Boiler 11 – Fourth Quarter 2018	<p>ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VI. 26 and 27</p> <p>40 CFR Part 60, Subpart Cb, §60.38b</p> <p>40 CFR Part 60, Subpart Eb, §60.58b(i)(10)</p> <p>40 CFR Part 62, Subpart FFF, §62.14109</p>	Failure to maintain valid continuous monitoring system hourly averages (carbon monoxide) for 90% of the operating hours per calendar quarter. CO monitor downtime for the Fourth Quarter 2018 was 25.72% of the operating time.

Sulfur Dioxide 24-hour Daily Geometric Mean - FGBOILERS011-013, SC I.9.a

Boiler 12 SO₂ emissions based on a 24-hour daily geometric mean exceeded 29 ppmv on December 6, 2018, 2018 (37 ppmv). This exceedance is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.9.a and 40 CFR Part 60, Subpart Cb, §60.33b(b)(3)(i), and 40 CFR Part 62, Subpart FFF, §62.14103(b)(1). Per ACO AQD No. 6-2017, Paragraph 13, this violation is also subject to stipulated fines.

Carbon Monoxide 24-hour Block Average - FGBOILERS011-013, SC I.11.a

On January 31, 201, Boiler 12 exceeded the 24-hour block average CO emission limit (200 ppmv) at 367 ppmv.

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While there was a shutdown/startup of the boilers during this day and an hour of "bad" data, when excluding 3 hours for startup/shutdown and excluding the hour of bad data, the 24-hour block average is still greater than 200 ppmv. For further correspondence/guidance regarding the calculation of the 24-hour average, please see correspondence from the AQD dated September 26, 2018.

This exceedance is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.a and 40 CFR Part 60, Subpart Cb, §60.34b(a), Table 3. Per ACO AQD No. 6-2017, Paragraph 13, this violation is also subject to stipulated fines.

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

Boiler 11 exceeded the 1-hour block average CO emission limit (267 ppmv) for two consecutive hours or more on January 31, 2019 (9:00 to 11:00 – 466 ppmv and 397 ppmv and 14:00 to 17:00 – 1055 ppmv, 383 ppmv, and 316 ppmv) indicating corrective action was not implemented in a timely manner. Each incident is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.b.

Boiler 11 – CO Monitor Downtime - FGBOILERS011-013, SC VI. 26 and 27

The Fourth Quarter 2018 CEMS Report indicated that there was an extended period of monitor downtime for Boiler 11. Specifically, the CO monitor downtime was reported at 25.72% of the operating time for the quarter. This is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VI. 26 and 27, 40 CFR Part 60, Subpart Cb, §60.38b, 40 CFR Part 62, Subpart FFF, §62.14109, and 40 CFR Part 60, Subpart Eb, §60.58b(i)(10).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 18, 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.

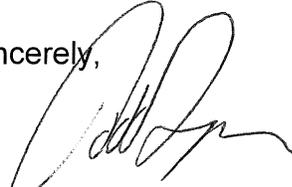
Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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.

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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. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Ms. Regina Angellotti, DEQ