



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

August 29, 2019

Mr. Mark Fletcher, Director EHS  
Detroit Renewable Power, LLC  
5700 Russell St.  
Detroit, MI 48211-2545

SRN: M4148, Wayne County

Dear Mr. Fletcher:

**VIOLATION NOTICE**

On August 1, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the Second Quarter 2019 Continuous Emissions Monitoring Systems (CEMS) Report for Detroit Renewable Power (DRP) located at 5700 Russell, Detroit, Michigan. Hourly CEMS data for the Second Quarter 2019 was provided via email on August 16, 2019. During review of the Second Quarter 2019 CEMS 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; and MI-ROP-M4148-2011a.

During the review of the Second Quarter 2019 CEMS Report and CEMS data, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Boiler 11	ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.b	Boiler 11 CO emissions based on a 1-hour block average exceeded 267 ppmv for two consecutive hours on 5/23/19 (8:00 to 10:00 – 434 ppmv and 299 ppmv).

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 on May 23, 2019 (8:00 to 10:00 – 434 ppmv and 299 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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 19, 2019 (which coincides with 21

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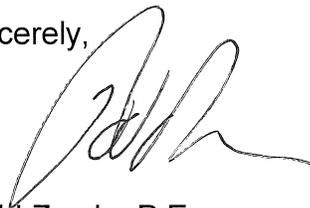
calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the 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 EGLE, 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 EGLE, 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.

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. Todd Grzech, DRP  
Mr. Paul Max, City of Detroit BSEED  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Wilhemina McLemore, EGLE  
Mr. Jeff Korniski, EGLE