

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : DETROIT WASTEWATER TREATMENT PLANT	SRN : B2103
Location : 9300 W. JEFFERSON AVE	District : Detroit
	County : WAYNE
City : DETROIT State: MI Zip Code : 48209	Compliance Status : Compliance
Source Class : MAJOR	Staff : Stephen Weis
FCE Begin Date : 05/24/2016	FCE Completion Date : 5/24/2017
Comments : FCE report for the Great Lakes Water Authority Water Resource Recovery Facility.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
05/24/2017	Scheduled Inspection	Compliance	Compliance inspection of the Great Lakes Water Authority's Water Resource Recovery Facility (f/k/a WWTP). The facility is scheduled for inspection in FY 2017.
05/17/2017	Telephone Notes	Compliance	Phone conversation on Wednesday, May 17, 2017.
05/15/2017	Other	Compliance	Review of the RY2016 MAERS submittal.

03/23/2017	ROP SEMI 2 CERT	Compliance	<p>The reported deviations for the second semi-annual period of 2016 (July 1 – December 31) consisted of five different types of reported issues. The facility experienced a fire in Complex 2 of the incineration building on March 4, 2016, so all of the incinerator deviations in the 2nd semi-annual period of 2016 relate to the Complex 1 incinerators.</p> <p>The first type of deviation involves a deviation relating to the 24 hour average hearth #1 temperature. There were 11 reported occurrences between July 2 and December 30, and it was stated that the cause was unknown.</p> <p>There was one reported deviation of the type involving a deviation in the 8-hour average differential pressure across the scrubber system, all associated with Complex 1. There were 11 reported occurrences between August 14 and September 1. The report states that the cause is unknown.</p> <p>Relating to the Complex 2 fire, GLWA reported the use of the remaining Complex 1 incinerators past the permitting shutdown date for these incinerators (March 21, 2016) as a deviation.</p> <p>The remaining 5 deviations reported for this semi-annual period involve the MAP PM (malfunction abatement plan/preventative maintenance), specifically some of the tasks required by the MAP PM not being done. Also, there were six instances of baghouse inspections associated with lime storage not being completed, and one instance in which the washing of the wheels of a sludge hauling truck was not properly logged. Due to the upgrades being implemented for the Complex 2 incinerators, and the pending closure of the Complex 1 incinerators, GLWA has been crafting new maintenance procedures for the incinerators. The common reason provided for the MAP/PM task and baghouse</p>
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03/23/2017	ROP SEMI 2 CERT	Compliance	<p>inspections not being performed is that the reason is not in WAM, where WAM stands for Work and Asset Management. WAM is an internal system that tracks work tasks. For this reporting period, GLWA was working to repair the damage to Complex 2 from the fire, including ensuring that the upgrades to the Complex 2 incinerators and their control equipment are complete.</p> <p>A violation notice was sent to GLWA in 2016 to address the non-compliant operations at the facility, including the continued operation of the Complex 1 incinerators. A Consent Order is currently being finalized by DEQ-AQD Enforcement staff.</p>
03/23/2017	ROP Annual Cert	Compliance	This report includes the total deviations for both semi-annual periods of 2016.
02/16/2017	NSPS (Part 60)	Compliance	<p>The 40 CFR Subpart M MMM Semi-Annual Deviation report was submitted, in accordance with the requirements of 40 CFR 60.5235 (d). This report covers the second semi-annual period of 2016 (July 1 - December 31).</p> <p>Given the fire that took place in Complex 2 of the incineration building on March 4, 2016, the incinerators that are subject to the Subpart did not operate much during this semi-annual period. The reported deviation involved the operation of the Complex 1 incinerators after March 21, 2016, which is the effective date of Subpart M MMM, and also the date by which these incinerators were required to permanently shut down by the facility's permit.</p>
11/15/2016	Complaint Investigation	Compliance	Odor complaint.

10/13/2016	ROP Semi 1 Cert	Compliance	<p>The reported deviations consisted of six different types of reported issues. The facility experienced a fire in Complex 2 of the incineration building on March 4, 2016.</p> <p>The first type of deviation involves a deviation relating to the 24 hour average hearth #1 temperature. There were two reported occurrences, and it was stated that on both occasions, the incinerator was in-service for a short duration (57 minutes on one of the days, 353 minutes on the other).</p> <p>There was one reported deviation of the type involving a deviation in the 8-hour average differential pressure across the scrubber system, all associated with Complex 1. There were 49 occurrences. The report states that for 80 percent of the occurrences, the pressure drop was 17 inches (standards is 18 inches), and for 96% of them, the pressure drop was between 16 and 17 inches of water. GLWA provided that none of these deviations were known to cause opacity deviations.</p> <p>There were 5 reported opacity deviations, and they were all reported to have lasted for 12 minutes (two 6 minute blocks). The deviation report includes the corrective actions taken, and according to the information in the deviation report, each incident appears to have been promptly addressed by facility staff. These all involved Complex 1 incinerators, which were in operation due to the Complex 1 fire.</p> <p>One deviation relates to temporary bypasses of the scrubber on an operating incinerator that occurred on 7 occasions – 1/30, 2/6, two times on 3/1 for Complex incinerators, and on 1/3, 1/19 and 3/1 on Complex 2 incinerators. These deviations were also previously reported to AQD-Detroit via faxed notifications. The entry in the deviation report states that</p>
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10/13/2016	ROP Semi 1 Cert	Compliance	<p>on each of these occasions, interlocks stopped the sludge feed, and the operator responded to correct the problem promptly or the incinerator unit was taken out of service. The three occasions associated with Complex 2 were of a relatively short duration (under 15 minutes), while the other 4 associated with Complex 1 ranged from one at 45 minutes, one at 85 minutes and the remaining two lasting for 90 minutes (the last three to burn out the remaining biosolids in the incinerators). The Complex 1 incinerators were scheduled to permanently cease operation on March 21, 2016, but they continued to operate past that date due to the Complex 2 fire.</p> <p>Relating to the Complex 2 fire, GLWA reported the use of the remaining Complex 1 incinerators past the permitting shutdown date for these incinerators (March 21, 2016) as a deviation.</p> <p>The remaining 11 deviations reported for this semi-annual period involve the MAP PM (malfunction abatement plan/preventative maintenance), specifically some of the tasks required by the MAP PM not being done, and baghouse inspections associated with lime storage and ash handling not being completed. Due to the upgrades being implemented for the Complex 2 incinerators, and the pending closure of the Complex 1 incinerators, GLWA has been crafting new maintenance procedures for the incinerators. The common reason provided for the MAP/PM task and baghouse inspections not being performed is that the reason is not in WAM, where WAM stands for Work and Asset Management. WAM is an internal system that tracks work tasks. For this reporting period, GLWA was working to repair the damage to Complex 2 from the fire, including ensuring that the upgrades to the Complex 2 incinerators.</p> <p>A violation notice was sent to</p>
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10/13/2016	ROP Semi 1 Cert	Compliance	GLWA to address the non-compliant operations at the facility, including the continued operation of the Complex 1 incinerators. A Consent Order is currently being drafted by DEQ-AQD Enforcement staff.
08/16/2016	NSPS (Part 60)	Compliance	<p>The first 40 CFR Subpart Mmmm Semi-Annual Deviation report was submitted, in accordance with the requirements of 40 CFR 60.5235 (d). This report covers the first semi-annual period of 2016 (January 1 - June 30).</p> <p>Given the fire that took place in Complex 2 of the incineration building on March 4, 2016, the incinerators that are subject to the Subpart did not operate much during this semi-annual period. The reported deviation involved the operation of the Complex 1 incinerators after March 21, 2016, which is the effective date of Subpart Mmmm, and also the date by which these incinerators were required to permanently shut down by the facility's permit.</p>
07/19/2016	Telephone Notes	Compliance	Summary of phone conversation with NEFCO staff regarding a fire on July 19, 2016.
05/26/2016	Other	Compliance	Review of RY2015 MAERS report.

Name: Andrew Date: 9/15/17 Supervisor: JK