



CITY OF DETROIT
WATER AND SEWERAGE DEPARTMENT
WASTEWATER TREATMENT PLANT

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December 19, 2013

HAND DELIVERED

Mr. Thomas Maza
Michigan Department of Environmental Quality
Cadillac Place, Suite 2-300
3058 West Grand Boulevard
Detroit, Michigan 48202



RE: Response to December 2, 2013 Violation Notice

Dear Mr. Maza:

The Detroit Water and Sewerage Department (DWSD) submitted a quarterly excess emission report on October 8, 2013 indicating that there was an extended period of monitor downtime on Incinerator Unit Nos. 3, 4, 8, and 14, as outlined in the violation notice dated December 2, 2013. However, DWSD has been, and still is, monitoring and recording the opacity readings continuously for each incinerator. We have attached daily opacity reports for Incinerator Unit Nos. 3, 4, 8, and 14. Complete records are available for review at your convenience.

DWSD has installed new Teledyne Opacity monitors on each incinerator to continuously record the opacity values. Each monitor is designed with a remote common alarm to notify personnel of an alarm issue with the monitor. The common alarm is reported as downtime on the emissions monitoring system reports, regardless of what caused the common alarm. During these alarms, the operator performed visual investigations at the monitoring equipment in the field (which indicated individual statuses that caused the common alarm), and found that a purge air differential pressure reading was erroneously alarming quite frequently. This nuisance purge air alarm caused the common fault alarm to become active. The common fault was reported as downtime when, in fact, the opacity monitor was functioning properly.

DWSD is still experiencing some nuisance purge alarms on incinerators, and we are currently working with the manufacturer to correct these types of alarms. The manufacturer is currently changing the pressure switches on each unit. This modification is expected to be completed by the end of this month. Until that time, the control system historical reporting software package will continue to collect and store all opacity and other data readings for review.

Since there was no failure to continuously monitor opacity, it would be appropriate to remove this violation from our record. If you have any questions, please call Melvin Dacres at (313) 297-0363.

Sincerely,

Samuel A. Smalley
Assistant Director-WWOG

SAS/MD/md

cc: Wendy Barrott
Parvez Jafri
Karen Kajiya-Mills – MDEQ

James Urbanik
Melvin Dacres
Mark Jacobs - Dykema Gossett