



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

December 2, 2013

Mr. Samuel Smalley
Assistant Director-WWOG
Detroit Water and Sewerage Department
9300 West Jefferson
Detroit, Michigan 48209

SRN: B2103, Wayne County

Dear Mr. Smalley:

VIOLATION NOTICE

The Department of Environmental Quality (DEQ), Air Quality Division (AQD), reviewed the quarterly excess emission report submitted by the Detroit Water and Sewerage Department, Waste Water Treatment Plant (DWSD-WWTP) located at 9300 West Jefferson, Detroit, Michigan. The Renewable Operating Permit number 199600412 requires the facility to monitor and record the opacity of the emissions from the incinerators in FGCOMPLEX1 and FGCOMPLEX2 on a continuous basis in a manner and with instrumentation acceptable to the AQD.

The third quarter 2013 excess emissions report indicated that there was an extended period of monitor downtime. Specifically, the reported opacity monitor downtime as a percentage of the operating time for the quarter was 7.2% for Incinerator 3; 9.8% for Incinerator 4; 11.2% Incinerator 8 and 6.2% for Incinerator 14.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
Incinerator 3	TABLE F-1.3 (VI) (1)	Failure to continuously monitor.
Incinerator 4	TABLE F-1.3 (VI) (1)	Failure to continuously monitor
Incinerator 8	TABLE F-1.4 (VI) (1)	Failure to continuously monitor
Incinerator14	TABLE F-1.4 (VI) (1)	Failure to continuously monitor

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 23, 2013 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and

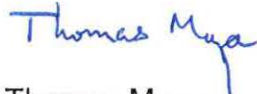
Mr. Samuel Smalley
Page 2
December 2, 2013

are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If DWSD-WWTP 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Thomas Maza
Environmental Quality Analyst
Air Quality Division
313-456-4709

cc: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ