



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



C. HEIDI GREETHER
DIRECTOR

August 17, 2017

Mr. Majid Khan
Director – Wastewater Operations
Great Lakes Water Authority
9300 West Jefferson Avenue, Suite 103
Detroit, Michigan 48209

SRN: B2103, Wayne County

Dear Mr. Khan:

VIOLATION NOTICE

From April 19-22 and April 24-25, 2017, emissions testing was conducted on sewage sludge incineration units 8-10 at the Great Lakes Water Authority (GLWA) Water Resource Recovery Facility (WRRF) stationary source located at 9300 West Jefferson Avenue in Detroit, Michigan. These incinerators are designated as EUINC08, EUINC09 and EUINC10 in the WRRF's Renewable Operating Permit (No. MI-ROP-B2103-2014c). The emissions testing is required at Special Condition (SC) V.1 of the FGAQCI flexible group, and SC V.3 of the FG4M-INCIN flexible group within the Renewable Operating Permit (ROP). The tests serve as a means to demonstrate compliance with the requirements of the federal Clean Air Act, including 40 CFR Part 60 Subpart M; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and the emission limitations set forth in SCs I.1 through I.15 in FGAQCI, and SCs I.1 through I.10 in FG4M-INCIN of the WRRF's ROP.

The Department of Environmental Quality, Air Quality Division (DEQ-AQD) is providing notice of the following violations associated with the above referenced emissions testing:

Process Description	Rule/Permit Condition Violated	Comments
Sewage sludge incinerator units 8-10	MI-ROP-B2103-2014c, General Condition 15; MI-ROP-B2103-2014c, FGAQCI, SC V.1	The report of test results associated with the emissions testing on units 8-10 was not submitted within 60 days following the last date of the emissions testing for this equipment.
Sewage sludge incinerator units 8-10	40 CFR 60.8(g)	Audit sample analysis for mercury associated with the emissions testing on units 8-10 was not within acceptable range.

General Condition 15 in MI-ROP-B2103-2014c requires that "Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test." Similarly, SC V.1 in the FGAQCI flexible group in the ROP requires that a complete report of the test results associated with the emissions tests required in this SC are to be submitted to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. DEQ-AQD did not receive the test report for the emissions tests performed on units 8-10 on April 19-22 and 24-25, 2017 within the required timeframe.

Regarding the audit sample analysis, 40 CFR 60.8(g) states that performance testing shall include a test method performance audit which consist of blind audit samples. Blind audit samples are provided by an accredited audit sample provider and are analyzed during the performance test. A blind audit sample was requested for mercury in impinger solution for incinerators 8-10, which indicated not acceptable results. A follow up report from the laboratory indicated the sample was run a second time with not acceptable results. The third time the sample was analyzed, the laboratory got acceptable results. 40 CFR 60.8(g) indicates retests are required when there is a failure to produce acceptable results. For this reason, the mercury results for incinerators 8-10 are invalid and DEQ-AQD is not accepting the results. DEQ-AQD is requesting a retest for mercury on incinerators 8-10.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 7, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates that 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.

If GLWA 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.

Mr. Majid Khan
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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,



Stephen Weis
Senior Environmental Engineer
Air Quality Division
313-456-4688

cc: Mr. Raymond Scott, City of Detroit, BSEED
Ms. LaReina Wheeler, City of Detroit, BSEED
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Karen Kajiya-Mills, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ