



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYHER
DIRECTOR

December 11, 2017

Mr. Terry Daniel
Water Operations Director
Great Lakes Water Authority
Water Works Park - Water Treatment Plant
10100 East Jefferson Avenue
Detroit, Michigan 48214
SRN: N7545, K5497, M4838, Wayne County

Dear Mr. Daniel:

VIOLATION NOTICE

The Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted inspections of Water Treatment Plant facilities that are operated by the Great Lakes Water Authority (GLWA). Specifically, DEQ AQD staff visited the Water Works Park - Water Treatment Plant (SRN N7545) on August 25, 2017; the Southwest Treatment Plant (SRN K5497) on August 31, 2017; and the Springwells Water Treatment Plant (SRN M4838) on September 6, 2017. The purpose of these inspections was to determine GLWA's 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 administrative rules; and the terms and conditions of Permits to Install (PTI) that have been issued to these facilities.

As a result of these inspections, DEQ AQD staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
Four diesel fuel-fired engines at the Water Works Park facility (N7545).	PTI No. 108-06, Special Condition (SC) 1.5, 1.6 and 1.8;	The required calculations are not being calculated (SC 1.5), records of the calculation of nitrogen oxides (NOx) emissions from the engines are not being kept in a satisfactory manner (SC 1.6), and records of the amount of diesel fuel used in the engines are not being kept (SC 1.8), as required by the PTI

Four diesel fuel-fired engines at the Southwest Water Treatment facility (K5497).	PTI No. 254-99B, SCs VI.1, and VI.3;	Records of the calculation of NOx emissions from the engines (SC VI.1), and records of the amount of diesel fuel used in the engines (SC VI.3) are not being kept, as required by the PTI.
Five diesel fuel-fired engines at the Springwells Water Treatment Plant (M4838).	PTI No. 256-99B, SCs VI.1, and VI.3;	Records of the calculation of NOx emissions from the engines (SC VI.1), and records of the amount of diesel fuel used in the engines (SC VI.3) are not being kept, as required by the PTI.

All of the GLWA facilities addressed in this notice have been issued PTIs that address the installation and operation of diesel fuel-fired engines at each of these facilities. These PTIs serve to place federally enforceable conditions on the operation of the engines. Each of the PTIs includes specific conditions that limit the potential emissions of NOx from the operation of the engines to below major source thresholds. The limits in the PTIs serve to opt their respective facilities out of the major source requirements of Title V of the Clean Air Act. These PTIs include requirements that the permit holder (GLWA) maintain specific information, identified in the permit conditions, to demonstrate that the operation of the engines at each of these facilities is in compliance with the terms and conditions of the PTIs. Among these are the requirement to track and keep records of the amount of diesel fuel that is being used by the engines at each of the facilities, and the requirement to calculate and keep records of the NOx emissions associated with the use of these engines. GLWA is currently not complying with these requirements.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 1, 2018. 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspections of the GLWA facilities. 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. Paul Max, City of Detroit BSEED
cc/via e-mail: Mr. Majid Khan, GLWA
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ