



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

December 11, 2017

Mr. Biren Saparia
Field Service Director
Great Lakes Water Authority
Central Services Facility – North Administration Building
6425 Huber Street
Detroit, Michigan 48211

SRN: N8174, Wayne County

Dear Mr. Saparia:

VIOLATION NOTICE

On August 2, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of the Great Lakes Water Authority (GLWA) Conner Creek Combined Sewer Overflow (CSO) Retention Treatment Basin (RTB), located at 11900 Freud Street in Detroit. The purpose of this inspection 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 this facility.

During the inspection, DEQ AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
A diesel fuel-fired Caterpillar engine used for emergency power at the facility, designated as FG-ENGINES in PTI No. 346-08.	PTI No. 346-08, Special Condition (SC) 1.11	Records of the amount of diesel fuel used in the engine are not being kept, as required by the PTI.

PTI No. 346-08 limits the amount of diesel fuel that can be fired in FG-ENGINES to 136,000 gallons per 12-month rolling time period (SC 1.4). SC 1.11 puts forth the recordkeeping requirements associated with the fuel usage limit in SC 1.4. SC 1.11 requires that the permittee (GLWA) keep monthly and 12-month rolling time period fuel use records for FG-ENGINES. The records must indicate the total amount of fuel used in FG-ENGINES, they shall be kept on file for a period of a least five years, and the records shall be made available to DEQ upon request. During my inspection, these records were not available. The records have not been made available to DEQ AQD in the time since the inspection.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 1, 2018. The written response should include: the dates that 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 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 GLWA believes the above observations or statements are inaccurate or do not constitute a violation 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 and for the cooperation that was extended to me during my inspection of the facility. 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,



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
Mr. Luther Blackburn, 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