



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



PHILLIP D. ROOS  
DIRECTOR

October 14, 2024

Majid Khan, Director of Operations  
Great Lakes Water Authority  
Wastewater Operating Services  
9300 West Jefferson Avenue  
Detroit, Michigan 48209

SRN: B2103, Wayne County

Dear Majid Khan:

**VIOLATION NOTICE**

On September 24, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a stack test report from the Great Lakes Water Authority (GLWA) Water Resource Recovery Facility (WRRF) located at 9300 West Jefferson Avenue, Detroit, Michigan. The stack test report provided results for compliance emissions testing of sewage sludge incinerators 12, 13 and 14 (EUINC12, EUINC13 and EUINC14) that took place from July 23-25, 2024. The compliance emissions testing is required by Special Condition (SC) V.3 of the FG4M-INCIN flexible group within the facility's Renewable Operating Permit (No. MI-ROP-B2103-2014d). AQD staff reviewed the results of the compliance emissions testing to determine the compliance of the GLWA WRRF 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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B2103-2014d.

The compliance emissions testing performed on July 23-25, 2024 revealed the following air pollution violation:

Process Description	Rule/Permit Condition Violated	Comments
A multiple hearth sewage sludge incinerator (SSI) designated in the facility's permit as EUINC13. The SSI vents to a venturi scrubber followed by an impingement tray scrubber and a mist eliminator, and a stack.	ROP No. MI-ROP-B2103-2014d, FGAQCI, SC I.4; ROP No. MI-ROP-B2103-2014d, FG4M-INCIN, SC I.2; 40 CFR Part 60, Subpart MMMM, §60.5165 and in Table 2; R 336.1224; R 336.1972	The three run average hydrogen chloride (HCl) emissions from EUINC13, measured during testing performed on July 25, 2024, was 18.33 ppmvd @ 7% O <sub>2</sub> . The applicable HCl emission limit for EUINC13 is 1.2 ppmvd @ 7% O <sub>2</sub> .

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 4, 2024 (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 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.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Blvd., Suite 2-300, Detroit, Michigan 48202 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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.

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,



Stephen Weis  
Senior Environmental Engineer  
Air Quality Division  
313-720-5831

cc: Mark Baron, City of Detroit BSEED  
Crystal Gilbert-Rogers, City of Detroit BSEED  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Dr. April Wendling, EGLE  
Jeff Korniski, EGLE