



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

January 10, 2018

Mr. Linwood Bubar, President  
Detroit Thermal Beacon Heating Plant  
541 Madison  
Detroit, MI 48226

SRN: B2814, Wayne County

Dear Mr. Bubar:

**VIOLATION NOTICE**

On November 15, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the Third Quarter 2017 Predictive Emissions Monitoring System (PEMS) Reports for the Detroit Thermal Beacon Heating Plant (Detroit Thermal), located at 541 Madison, Detroit, Michigan. On December 12, 2017, a violation notice was issued to Detroit Thermal for monitor downtime on Boiler 6 during the third quarter of 2017. On January 9, 2018, a response to the violation notice dated January 5, 2018 was received with supplemental information. The purpose of the review of the Third Quarter 2017 PEMS Reports and additional information provided in the violation notice response was to determine Detroit Thermal'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; the conditions of Renewable Operating Permit (ROP) number MI-ROP-B2814-2014; and Consent Order AQD No. 24-2016.

As a result of the review of the additional information provided as part of the violation notice response dated January 5, 2018, the following violation was identified:

Process Description	Rule/Permit Condition Violated	Comments
FG-BOILER_6,7 (Boiler 6)	ROP No. MI-ROP-B2814-2014, FG-BOILER_6,7, Special Condition I.1.1d  Consent Order AQD No. 24-2016, Conditions 9.A.1	The NOx emission limit (0.036 lb/MMBtu) was exceeded at Boiler 6 (6 hours) during the Third Quarter 2017.

The original third quarter 2017 report received on November 15, 2017 indicated zero excess emissions for Boiler 6. PEMS data provided on January 9, 2018 for August 8 through September 24, 2017 indicates the nitrogen oxide (NOx) emission limit (0.036 lb/MMBtu) was exceeded on an hourly basis for a combined 6 hours at Boiler 6 as follows.

Mr. Linwood Bubar  
Page 2  
January 10, 2018

Boiler 6

8/8/2017 – 1 hr (4:00 – 0.0582 lb/MMBtu)

8/9/2017 – 1 hr (6:00 – 0.0380 lb/MMBtu)

8/18/2017 – 1 hr (4:00 – 0.0747 lb/MMBtu)

8/20/2017 – 3 hrs (15:00 – 0.0460 lb/MMBtu, 16:00 - 0.1089 lb/MMBtu, 17:00 – 0.0764 lb/MMBtu)

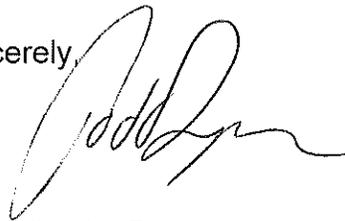
The hourly NOx exceedances are a violation of MI-ROP-B2814-2014, FG-BOILER\_6,7, SC I.1.1d (emission limit of 0.036 lb/MMBtu NOx) and Consent Order AQD No. 24-2016, Condition 9.A.1.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 31, 2018 (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.

If Detroit Thermal 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. Should you require any further information, please contact me.

Sincerely,



Todd Zynda, P.E.  
Senior Environmental Engineer  
Air Quality Division  
313-456-2761

cc: Mr. Damian Doerfer, DRP  
Mr. Paul Max, City of Detroit, BSEED  
cc via email: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeffrey Korniski, DEQ