



VIA CERTIFIED MAIL

September 21, 2017

Todd Zynda, Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard
Suite 2300
Detroit, MI 48202

RE: Detroit Renewable Power – August 31, 2017 Violation Notice Response

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's (DRP) response to the Violation Notice (VN) received on August 31, 2017 for allegedly violating the Carbon Monoxide (CO), Nitrogen Oxides (NOx), visible emissions and combustion zone temperature requirements. The VN was issued based on the review of the Second Quarter 2017 Continuous Emissions Monitoring Systems (CEMS) Reports.

The permit conditions are defined in ROP No. MI-ROP-M4148-2011a. Each item from the VN is in a table followed by DRP's response:

Rule/Permit Condition Allegedly Violated	MDEQ Comments
Boiler 11 ROP No. MI-ROP-M4148- 2011a, FGBOILERS011-013, SC 1.14.b	The facility reports visible emissions were greater than 20% opacity on 6/4/2017 (21%).

DRP Response:

Opacity emissions were greater than 20% opacity for a total of 31 minutes (19:55 to 20:26) on the date in question as the boiler was shutting down. The 11-H baghouse was showing a high differential pressure. We isolated that compartment within 30 minutes and subsequently that compartment was repaired.

Rule/Permit Condition Allegedly Violated	MDEQ Comments
Boiler 12, ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC III.2	The facility reports that the combustion zone was less than 1800°F and 1600°F on 5/20/2017.
Boiler 13, ROP No. MI-ROP-M4148- 2011a, FGBOILERS011-013, SC 111.2	The facility reports that the combustion zone was less than 1800°F on 5/24/2017 for two hours.

DRP Response: The minute data is attached for the times and dates listed in the VN. At no time on May 20, 2017 were the temperatures in Boiler #12 out of compliance while RDF was in the boiler. On May 24, 2017 on Boiler 13, we experienced Furnace temp sensor issues as noted in the attached copy of the control room log. A work order was written and the Furnace Temp probe sensor and control card was replaced.

Rule/Permit Condition Violated	MDEQ Comments
Boiler 13 ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.11.b	CO emissions based on a 1-hour block average exceeded 267 ppmv for three consecutive hours on 4/2/2017, 23:00 to 24:00 (344 ppmv) and 4/3/2017 0:00 to 2:00 - 290 ppmv and 457 ppmv).
Boiler 13 ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC I.13.a	NOx emissions based on a 1-hour block average exceeded 247 ppmv on 6/2/2017 (4:00 to 5:00 - 248 ppmv).

DRP Response: The cause of the CO exceedance was due to an auger feed issue (wet fuel) and plugged chutes. The operators responded as soon as possible by lowering the boiler load, adding ignitors, clearing the chute, correcting the auger issue, and adjusting the air and fuel.

The NOx 1-hour block average was calculated and reported incorrectly as 248 ppm. The four 15-minute blocks making up that hour show NOx values of

06/02/2017 04:00 248
 06/02/2017 04:15 231
 06/02/2017 04:30 251
 06/02/2017 04:45 255

The average of those 4 15-minute blocks is 246.25 which should have been reported as 246. We therefore dispute that a violation occurred for NOx on that day.

I trust that this letter is a satisfactory response to the August 31, 2017 VN. If you have questions concerning the information discussed above, please feel free to contact me at 313-963-3394.

Sincerely,

Detroit Renewable Power


Damian Doerfer, Director EHS

Attachments

