



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

October 21, 2016

Mr. Linwood Bubar
Detroit Renewable Power
5700 Russell Street
Detroit, Michigan 48211

SRN: M4148, Wayne County

Dear Mr. Bubar:

VIOLATION NOTICE

This violation notice amends the violation notice dated September 2, 2016. That notice alleged that Detroit Renewable Power had not conducted cylinder gas audits during the second quarter 2016. In the letter dated September 22, 2016, Detroit Renewable Power noted that during the second quarter 2016 a cylinder gas audit had been performed on each pollutant monitor and 2 oxygen monitors. This response is acceptable to the Air Quality Division (AQD).

The Department of Environmental Quality (DEQ), AQD reviewed the quarterly excess emission report submitted by Detroit Renewable Power, LLC located at 5700 Russell Street, Detroit. The Renewable Operating Permit number MI-ROP-M4148-2011a requires the facility to monitor and record carbon monoxide (CO), oxides of nitrogen (NOx), sulfur dioxide (SO2) and oxygen (O2) emissions from EUBOILER011, EUBOILER012 and EUBOILER013 on a continuous basis in a manner and with instrumentation acceptable to the AQD. This unit is also subject to Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart Cb.

The second quarter 2016 excess emissions report indicated that there was an extended period of monitor downtime. Specifically, as a percentage of the operating time during the quarter the reported CO, NOx and SO2 monitor downtime for Boiler 11 was 100%; the reported CO, NOx and SO2 monitor downtime for Boiler 12 was 99% and the reported CO, NOx and SO2 monitor downtime for Boiler 13 was 99%.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
FGBOILERS011-013 comprised of EUBOILER011, EUBOILER012, EUBOILER013	ROP-M4148-2011a Table FGBOILERS011-013 Conditions VI. 8a and 8b	Failed to monitor SO2 emissions in the unit of ppmdv at 7% O2

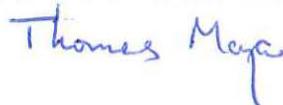
FGBOILERS011-013	ROP-M4148-2011a Table FGBOILERS011-013 Conditions VI. 17a and 17b	Failed to monitor NOx emissions in the unit of ppmdv at 7% O2
FGBOILERS011-013	ROP-M4148-2011a Table FGBOILERS011-013 Conditions VI. 26 and 27	Failed to monitor CO emissions in the unit of ppmdv at 7% O2

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 11, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates 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 Detroit Renewable Power 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 violations cited above. 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,



Thomas Maza
Environmental Quality Analyst
Air Quality Division
313-456-4709

cc: Ms. LaReina Wheeler, City of Detroit BSEED
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ