



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

July 26, 2018

Mr. Robert Suida, Plant Manager  
Detroit Renewable Power, LLC  
5700 Russell St.  
Detroit, MI 48211-2545

SRN: M4148, Wayne County

Dear Mr. Suida:

**VIOLATION NOTICE**

On March 28, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the Subpart Cb Annual and Semiannual Report (2017) pursuant to 40 CFR 60.59b(g), 40 CFR 60.59b(h), and Renewable Operating Permit No. MI-ROP-M4148-2011a for Detroit Renewable Power (DRP) located at 5700 Russell, Detroit, Michigan. Appendix E of the 2017 Subpart Cb Report dated June 15, 2018 was received on June 26, 2018. During review of the 2017 Subpart Cb Report and Appendix E, the AQD evaluated 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 Air Pollution Control Rules; and MI-ROP-M4148-2011a.

During the review of the 2017 Subpart Cb Report received on March 28, 2018 and Appendix E received on June 26, 2018, the following violation was identified:

Process Description	Rule/Permit Condition Violated	Comments
Boiler 11 and 13	MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII. 7.a.ii 40 CFR 60.39b 40 CFR 60.59b(g)(1)(ii) 40 CFR 62.14109	Failure to list the highest emission level recorded for Boiler 11 (Sulfur dioxide [SO <sub>2</sub> ] at 66 ppmv on 12/31/2017) and Boiler 13 (carbon monoxide [CO] at 204 ppmv on 12/29/2017).

Per ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, Special Condition (SC) VII. 7.a.ii and 40 CFR 60.59b(g)(1)(ii) the annual and semi-annual report shall include "a list of the highest emission level recorded for sulfur dioxide, nitrogen oxides, carbon monoxide...".

Within Appendix A of the Subpart Cb Report dated March 23, 2018, DRP reports the highest emission levels for the 2<sup>nd</sup> half 2017 as follows.

- Boiler 11 on December 31, 2017 – SO<sub>2</sub> 24-hour geometric mean of 26 parts per million (ppm) at 7% oxygen (O<sub>2</sub>)
- Boiler 13 on December 29, 2017 – CO 24-hour daily average of 194 ppm at 7% O<sub>2</sub>

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Continuous Emission Monitoring Systems (CEMS) data included in Appendix E of the submittal dated June 15, 2018 indicates that actual highest emissions levels as follows.

- Boiler 11 on December 31, 2017 – SO<sub>2</sub> 24-hour geometric mean of 66 ppm at 7% O<sub>2</sub>
- Boiler 13 on December 29, 2017 – CO 24-hour daily average of 204 ppm at 7% O<sub>2</sub>

DRP did not revise Appendix A within the submittal dated June 15, 2018 to reflect the highest emission level recorded. Failure to list the highest emission level recorded listed above is a violation of ROP No. MI-ROP-M4148-2011a, FGBOILERS011-013, SC VII. 7.a.i, 40 CFR 60.39b, 40 CFR 60.59b(g)(1)(ii), and 40 CFR 62.14109.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 16, 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; 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 recurrence.

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

If DRP 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,



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

cc: Mr. Mark Fletcher, DRP  
Mr. Paul Max, City of Detroit, BSEED  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ