



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



GRETCHEN WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

April 23, 2019

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

SRN: M4148, Wayne County

Dear Mr. Suida:

**VIOLATION NOTICE**

On March 12, 2019 and April 17, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Detroit Renewable Power (DRP) located at 5700 Russell, Detroit, Michigan. On April 8, 2019, observations of the DRP's property were made during a complaint investigation. On March 22, 2019, DRP provided facility inspection records. The purpose of the March 12, 2019 and April 17, 2019 inspections, observations of DRP's property on April 8, 2019, and review of inspection records was to determine DRP'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 Air Pollution Control Rules; MI-ROP-M4148-2011a; Administrative Consent Order (ACO) AQD No. 6-2017; and Consent Judgment File No. 14-1184CE.

As a result of the inspections and review of inspection records, the following violations were identified.

Process Description	Rule/Permit Condition Violated	Comments
SOURCE-WIDE CONDITIONS – Plant Yard	ROP No. MI-ROP-M4148-2011a, SOURCE-WIDE CONDITIONS, SC IX.9  Fugitive Dust Management Plan dated February 2011, Section 4.1.2  Odor Management Plan dated June 2017, Section 2.3a	Excessive track out and debris observed in the facility yard and facility road on April 17, 2019.

<p>SOURCE-WIDE CONDITIONS – Plant Yard</p>	<p>ROP No. MI-ROP-M4148-2011a, SOURCE-WIDE CONDITIONS, SC IX.10</p> <p>Fugitive Dust Management Plan dated February 2011, Section 4.1.3</p>	<p>Garbage debris littering the fence line on March 12, 2019, April 8, 2019 and April 17, 2019.</p>
<p>FGMSWPROC-LINES</p>	<p>ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SC IV.1, VI.3 and VI.13</p>	<p>Secondary baghouses have multiple days with pressure drop readings outside the recommended operating range and the range established during the most recent stack test.</p>
<p>FGMSWPROC-LINES</p>	<p>ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SC IV.3</p> <p>Fugitive Dust Management Plan dated February 2011, Section 4.4.3</p> <p>Odor Management Plan dated June 2017, Section 2.2a</p>	<p>Records provided from February 1, 2019 through March 8, 2019 indicate that the negative pressure is not maintained at Tip East 5.</p>
<p>FGMSWPROC-LINES</p>	<p>ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SC IX.1</p> <p>Odor Management Plan dated June 2017, Section 2.3c</p> <p>Consent Judgment File No. 14-1184CE</p>	<p>The solid waste tipping floor, pit area, and processing equipment were not clean on April 17, 2019.</p>
<p>MSW Building</p>	<p>Odor Management Plan dated June 2017, Section 2.4b</p> <p>Consent Judgment File No. 14-1184CE</p>	<p>The odor neutralizer system was not in use in the MSW Building on April 17, 2019.</p>

**Track Out and Debris - SOURCE-WIDE CONDITIONS, SC IX.9, Fugitive Dust Management Plan Section 4.1.2, and Odor Management Plan, Section 2.3a**

SOURCE-WIDE CONDITIONS, SC IX.9 requires that all roadways and paved areas are swept, using water when weather permits, such that the fugitive dust emissions from the plant roadways and paved areas are minimized. The Fugitive Dust Management Plan, Section 4.1.2 states that "paved roadways will be cleaned daily when receiving MSW deliveries with a dry or wet mechanical or wet vacuum street cleaner. The Odor Management Plan, Section 2.3a states that "weather permitting, the wet spray street sweeper performs washing/cleaning of the facility roadways and asphalted areas that are used by waste delivery vehicles".

During the inspection on April 17, 2019 excessive track out was observed in the yard immediately north of the MSW building and the truck exit road on the west and north side of the facility. During the inspection, opacity was observed from trucks leaving the MSW Building on the road adjacent to the ash handling building. The amount of material observed on the paved areas near the MSW building and the exit roadway indicates that sweeping is not being conducted on a frequent enough basis. This is a violation of MI-ROP-M4148-2011a, SOURCE-WIDE CONDITIONS, SC IX.9, Fugitive Dust Management Plan Section 4.1.2, and Odor Management Plan, Section 2.3a.

**Yard Debris and Property Line Fence Litter - SOURCE-WIDE CONDITIONS, SC IX.10, and Fugitive Dust Management Plan, Section 4.1.3**

SOURCE-WIDE CONDITIONS, SC IX.10 requires that debris on the plant yard and along property line fences be picked up on a daily basis or other schedule approved. Fugitive Dust Management Plan, Section 4.1.3 requires that the fence-lines be cleaned daily. During the inspection on March 12, 2019, it was observed that garbage debris was littering the fence line on the east end of the facility. A subsequent visit outside property on April 8, 2019 and site inspection on April 17, 2019 observed similar debris along the fence line in addition to significant garbage debris in the plant yard. This is a violation of MI-ROP-M4148-2011a, SOURCE-WIDE CONDITIONS, SC IX.10, and Fugitive Dust Management Plan, Section 4.1.3.

**Primary and Secondary Baghouse Pressure Drop - FGMSWPROC-LINES, SC IV.1, VI.3 and VI.13**

FGMSWPROC-LINES, SC IV.1 requires that EUMSWPROC-LINE1, EUMSWPROC-LINE2 or EUMSWPROC-LINE3 not be operated unless the designated cyclones and baghouses for process lines are installed and operating properly. FGMSWPROC-LINES, SC VI. 3 requires that applicable emission unit not operate if the particulate control equipment pressure drop falls out of the range established during the most recent stack test and/or per the manufacturer's recommended operating pressure drop range. SC VI. 13 requires that any repairs or corrective action needed to address the causes of malfunction or failure of the control equipment be performed immediately.

Correspondence provided by the facility via email on May 3, 2017 indicates the operating pressure drop range is 2 inches water to 10 inches water (Greater Detroit Resource Recovery, Instruction Book for Ray-Jet Dust Collectors). The most recent stack testing event occurred on October 2, 2019 on process line 2 with pressure drop as follows: Primary 200 – 2.28 to 2.30 inches water, Secondary 200 – 2.04 to 3.09 inches water.

In review of the records provided for January 28, 2019 through March 10, 2019, the pressure drop readings for the secondary baghouse for Line 1 and the secondary baghouse for line 2 were out of the operating range on multiple days over a 41 day period (January 28, 2019 through March 10, 2019) as outlined in the below table.

<b>Baghouse</b>	<b>days out of operating range</b>	<b>% days outside operating range</b>	<b>lowest reading outside of operating range</b>	<b>highest reading outside of operating range</b>
Secondary Baghouse - Line 1 (135)	41	100	NA	14.5
Secondary Baghouse - Line 2 (235)	14	34	NA	11.8

Secondary baghouses for lines 1 and 2 have multiple days with pressure drop readings outside the manufacturer operating range and the range established during the most recent stack test. This is a violation of FGMSWPROC-LINES SC IV.1 and VI.3.

FGMSWPROC-LINES SC VI. 13 requires that “any repairs and corrective action needed to address the causes of malfunction or failure of the control equipment shall be performed immediately”. Maintenance records were not provided as part of the facility inspection records. The facility provided baghouse inspection preventative maintenance scheduling, but no maintenance records documenting the events took place. As described above, the facility continues to operate the baghouses when the pressure drop is out of the specified operating range. This is a violation of FGMSWPROC-LINES SC VI. 13.

**Negative Pressure at Solid Waste Receiving and Storage Rooms - FGMSWPROC-LINES, SC IV.3, Fugitive Dust Management Plan, Section 4.4.3, and Odor Management Plan, Section 2.2a**

FGMSWPROC-LINES, SC IV.3, requires that a negative pressure is maintained in the solid waste receiving, processing, and storage rooms. The Fugitive Management Plan dated February 2011, Section 4.4.3 states that a hand held velometer will be used to

“ensure inward flow is maintained”. The Odor Management Plan dated June 2017, Section 2.2a states that the MSW building is maintained under negative pressure.

Records provided from February 1, 2019 through March 8, 2019 indicate that the negative pressure is not maintained at Tip East 5 (the upper tipping floor entrance door). Velocity readings indicate a measurement for wind speed going out Tip East 5 for nearly all readings provided from February 1, 2019 through March 8, 2019. This is a violation of FGMSWPROC-LINES, SC IV.3, Fugitive Dust Management Plan, Section 4.4.3, and Odor Management Plant dated June 2017, Section 2.2a.

**FGMSWPROC-LINES, SC IX.1 Odor Management Plan, Section 2.3c, and Consent Judgment File No. 14-1184CE**

FGMSWPROC-LINES, SC IX.1 and Consent Judgment File No. 14-1184CE, Paragraph 3.14 include the same language as follows.

“Permittee/Defendants shall clean the solid waste receiving tipping floor, pit area, and processing equipment on a daily basis, or more often if required, such that odor from these sources is minimized.”

The Odor Management Plan Section 2.3c states that “each day, cleaning activities are performed on the visible and accessible areas of the tipping floors; floors in the Processing Building; stairs, handrails, and around conveyor motors and couplings; and processing equipment (mobile equipment, conveyors, and shredders).”

During the inspection on April 17, 2019, neither the tipping floor, pit area, or process equipment appeared to be cleaned. The tipping floor and pit area were observed to have standing water and excessive garbage buildup. The primary shredder area contained excessive garbage buildup on catwalks, stairways, and throughout the primary shredder area. During the inspection it was apparent that daily cleaning is not taking place in a sufficient manner. This is a violation of MI-ROP-M4148-2011a, FGMSWPROC-LINES, Special Condition (SC) IX.1, Odor Management Plan, Section 2.3c, and Consent Judgment File No. 14-1184CE, Paragraph 3.14.

**Odor Management Plan, Section 2.4b and Consent Judgment File No. 14-1184CE**

Consent Judgment File No. 14-1184CE, paragraph 3.13 requires operation of the “wet odor neutralizing system for the MSW processing area from April 15 through October 15 of each year.” The Odor Management Plan, Section 2.4 states that odor neutralizer systems will be activated during the odor season (i.e. April 15 through October 15). Section 2.4b states that “the wet odor neutralizer system in the MSW Building sprays a mixture of odor neutralizer and water in to the air above the MSW Building and around Building doors.”

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During the inspection on April 17, 2019, the odor neutralizer system was not in use in the MSW Building. This is a violation of the Odor Management Plan, Section 2.4b and Consent Judgment File No. 14-1184CE.

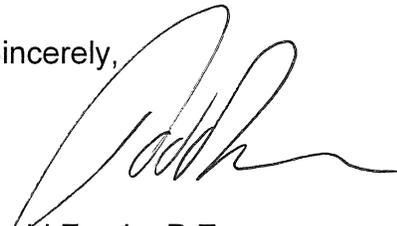
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 14, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the 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.

Please submit the written response to EGLE, 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 EGLE, 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  
Mr. Zachary Larsen, AG  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Wilhemina McLemore, EGLE  
Mr. Jeff Korniski, EGLE