



July 22, 2014

Ms. Joyce Zhu
Senior Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
Southeast Michigan District Office
27700 Donald Court
Warren, MI 48092-2793

**RE: RESPONSE OF DETROIT RENEWABLE POWER TO VIOLATION NOTICES
DATED JULY 1, 2014 ISSUED BY THE AIR QUALITY DIVISION**

Dear Ms. Zhu:

Detroit Renewable Power (“DRP”) submits this response to the July 1, 2014 Violation Notice (“VN”) issued by the Air Quality Division (“AQD”) of the Michigan Department of Environmental Quality. The VN alleges that DRP violated Rule 901(b) of Michigan’s Air Pollution Control Rules, MAC R 336.1901(b), and General Condition (A)(G.C.12(b)) of DRP’s Renewable Operating Permit due to odor observations made by AQD staff on June 29, 2014.

As you are well aware, DRP has conducted extensive odor investigations at and in the vicinity of the DRP facility and is in the process of implementing programs to reduce the generation of odors that have the potential to impact areas off-site. These programs have been described in detail in previous communications with AQD and at several meetings with AQD staff since September 2011.

As you are also well aware, DRP proposed a control plan to AQD that is expected to further reduce odors generated at the facility. The control plan includes a system for capturing air from DRP’s RDF processing operations and routing the air to the boilers for the destruction of odors. DRP is working with the state to incorporate the control plan into an acceptable settlement agreement and has taken initial steps toward implementation. DRP believes that implementation of the plan will achieve a substantial reduction of odors generated at the facility.

Given these efforts, and what DRP believes is substantial progress toward resolving AQD’s allegations with respect to odors, we are confounded that AQD continues to issue VNs for nuisance odors. Allow us to state once again that DRP is aware of and is attempting to address the community’s and AQD’s concerns.

Regarding the specific investigation underlying the July 1 VN, we note that, according to the AQD investigation report, the inspector once again did not detect odors at the

complainants' addresses. Nor did the inspector notice odors in an area a few blocks away where "a large group of people were attending a live music event" on the evening the complaints were made. Instead, this VN is based on the unsupported assumption that "a slight wind shift from a west wind to a west-southwest wind" may have occurred, and the further assumption that the hypothetical wind shift may have caused odors from DRP to reach the complainants' addresses. DRP respectfully contests the investigator's conclusion that odors from DRP violated Rule 901(b) on the evening in question.

Nevertheless, DRP takes seriously its commitment to operate the facility in a manner that minimizes the generation of off-site odors. DRP is committed to undertaking the actions described in the control plan to substantially reduce the generation of odors from the facility and will continue to investigate other practices to minimize the off-site generation of odors.

We trust that this letter provides a satisfactory response to the July VN as we continue to work with you and others at the state toward resolution. In the meantime, please contact me or Alan Greenberg if you have questions or comments.

Sincerely,

DETROIT RENEWABLE POWER

A handwritten signature in blue ink, appearing to read "S.A. White".

Steven A. White
CHAIRMAN AND CEO
DETROIT RENEWABLE ENERGY LLC

cc: Alan Greenberg
William Alexander