



VIA CERTIFIED MAIL

July 6, 2016

Joyce Zhu, Senior Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard
Suite 2300
Detroit, MI 48202

RE: Detroit Renewable Power – Response to Violation Notices dated June 15, 2016 and June 22, 2016 – Alleged Nuisance Odors on June 12, 2016 and June 21, 2016

Dear Ms. Zhu:

This correspondence is Detroit Renewable Power's (DRP) response to the Violation Notices (VN) dated June 15, 2016 and June 22, 2016 regarding odors allegedly emanating from DRP's operation in violation of ROP No. MI-ROP-M4148-2011a, A. General Conditions, 12(b) and R336.1901(b) on June 12, 2016 and June 21, 2016, respectively. Inspections conducted by MDEQ-AQD in response to complaints reportedly found a strong (level 4) garbage odor observed emitting from the facility and impacting nearby neighbors.

DRP takes odor management very seriously and remains diligent in operating its facility according to the Consent Judgment (CJ) issued on October 20, 2014. As you know, the CJ requires DRP to have an Odor Management Plan (OMP) which requires review and recordkeeping of odor abatement activities on a daily, weekly, and monthly basis. These practices are intended to ensure conformance with the OMP to mitigate odors from the facility.

The following is in response to the violation notice dated June 15, 2016: On June 12, 2016 the daily inspections found the municipal solid waste conveyors were operating properly; the doors were closed at the alleyway, the tipping floors, and the MSW receiving areas; and the tipping floor was clean. Daily inspections also found the odor spray system to be working correctly at the tipping floor roof, the refuse derived fuel (RDF) area, the alleyway door, the north alley door, the south alley door, the municipal solid waste (MSW) pile, the east tipping floor, the west tipping floor, and the stack systems. In addition, the MSW roof fans were working properly and the area was swept with the sweeper truck. It is also important to note on June 9, 2016 the wet system odor filters were changed, dry (odor control) system barrel was changed, and spray nozzles on the wet (odor control) system were replaced. In summary, all appropriate odor management practices were followed on June 12, 2016. Lastly, an odor survey was conducted

by a DRP supervisor on June 12, 2016 at 9:00am and the observer did not identify any odors from the facility in the surrounding area. The facility was not receiving waste on June 12, 2016.

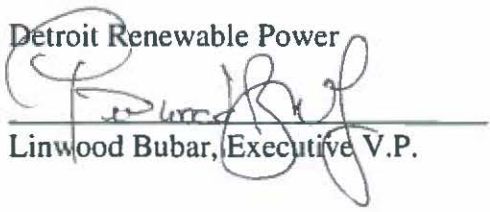
The following is in response to the violation notice dated June 22, 2016: On June 21, 2016 the daily inspections found the municipal solid waste conveyors were operating properly; the doors were closed at the alleyway, the tipping floors, and the MSW receiving areas. Daily inspections also found the odor spray system to be working correctly at the tipping floor roof, the RDF area, the alleyway door, the north alley door, the south alley door, the MSW pile, the east tipping floor, the west tipping floor, and the stack systems. In addition, the MSW roof fans were working properly and the area was swept with the sweeper truck. As above, all appropriate odor management practices were followed on June 21, 2016. It is also important to note on June 20, 2016 the wet system odor filters were changed. Lastly, a second review of the doors and (odor control) sprayer was done following the complaint and an odor survey was completed in the area. The observer found a slight odor near E. Warren and Dubois on June 21, 2016 at 7:50pm, but did not detect any odors near Farnsworth, Grady, or E. Palmer. The observer also spoke to two individuals in the area working on a movie and they did not detect any odors.

DRP reviewed records for the dates of alleged violations and did not find any issues of nonconformance. DRP appreciates MDEQ's assistance in these efforts. In order to enable DRP to respond most effectively to odor concerns, we ask that MDEQ notify Damian Doerfer, Director of EHS at 313.269.2806 and ddoerfer@detroitrenewable.com and Tabetha Peebles, Environmental Manager at 313.236.1181 and tpeebles@detroitrenewable.com as soon as possible with all essential details when any odor complaint potentially relating to DRP is received. This will allow DRP to immediately investigate and potentially respond to the complaint and report the results back to MDEQ. Also, please provide us with any field notes or reports concerning the June 12 and 21 investigations to aid in our review of these concerns. For example, it would be helpful to know what time of day odors were allegedly observed on June 12, 2016.

If you have questions concerning this response, please feel free to contact Tabetha Peebles at (313) 972-4336.

Sincerely,

Detroit Renewable Power



Linwood Bubar, Executive V.P.