



VIA CERTIFIED MAIL

September 22, 2016

Todd Zynda, 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 September 8, 2016

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) received on September 8, 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 September 4, 2016. Inspections conducted by MDEQ-AQD in response to complaints reportedly found a moderate to strong (level 3 to 4) garbage odor observed emitting from the facility and impacting nearby neighbors.

The following is in response to the violation notice: 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.

On September 4, 2016 the daily inspections found the municipal solid waste conveyors and the overhead doors operating properly. 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. In summary, all appropriate odor management practices were followed on September 4, 2016.

In addition, an odor survey was conducted by DRP Operations Management on September 4, 2016 and their findings were as follows:

"Eric Miller received a phone call at 11:35am from Damian Doerfer stating that the MDEQ had contacted him about an odor complaint in the area of the GoLightly School (Ferry and St. Antoine). Winds were from the NW at 1.2mph (gusts to 3.1mph).

Eric Miller and I (Rob Suida) started an odor survey at the corner of Russell and Ferry at 11:50am. No odors were present and we turned E on to Ferry Street and drove toward St. Antoine. No odors were detected at the I-75 service drive and Ferry street and we continued West on Ferry to St. Antoine.

We stopped at the corner of Ferry and St. Antoine and did not detect any odors. As we proceeded west on Ferry we noticed a trash dumpster with the lid open (Photograph 2, page 4) in an apartment complex directly across St. Antoine from GoLightly School. We did not detect any odor in the area.

We continued West on Ferry and turned right (north) on Brush and proceeded to Palmer. We turned right (east) on Palmer and proceeded to the Chrysler Service Drive. No odors were detected. We turned right (south) on the Service Drive to Ferry Street. No odors were detected.

We turned right (west) on Ferry and drove to St. Antoine and turned right (north) and stopped in front of GoLightly school. We did not detect any odors.

We proceeded to Palmer and turned left (west) and drove to John R. We were at the stop sign at the corner of John R and Palmer and no odors were detected. Before we moved, an offensive odor (level 4) appeared. I got out and stood on the corner and as a car drove over a manhole (Photograph 5, page 4) on John R the odor reappeared. I walked out to the manhole and an odor (level 2) could be detected at the manhole. The level of the odor would increase to a level 4 as cars drove over the manhole and would dissipate when there weren't any cars driving on John R.

We then turned right (south) on John R and went to Ferry and turned left (east) and drove to Beaubien and turned right (south). No odors were detected. As we drove south on Beaubien we noticed garbage cans in the alley (Photograph 1, page 4) east of Beaubien between Ferry and Kirby. When we turned in to the alley there was a trash dumpster with the lid open (Photograph 4, page 4). No odors were detected. We drove down the alley to St. Antoine and turned right (south) and proceeded to Kirby. We turned right (west) on Kirby and proceeded to Beaubien. No odors were detected.

We turned right (south) on Beaubien and noticed trash and open containers (Photograph 5, page 4) in an alley east of Beaubien between Kirby and Frederick. A level 1 odor was detected in this area. We proceeded down the alley to Kirby and turned right (east) to St. Antoine and turned left (north) toward Ferry.

We turned right (east) on Ferry and drove to the Plant. No odors were detected on Ferry or at the corner of Russell and Ferry. Odor survey complete."

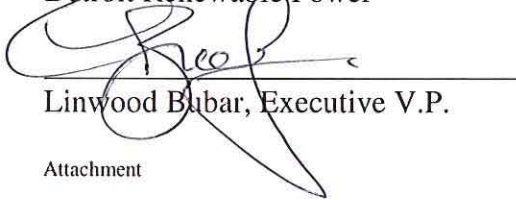
Overall, DRP reviewed records for the date of alleged violation and did not find any issue of nonconformance. During the DRP surveys, waste-related odors were detected from several dumpsters and a foul odor from an off-site storm sewer drain during the same period of time that the MDEQ's investigation was occurring. Accordingly, DRP does not agree that nuisance odors from DRP's operation were of sufficient intensity, frequency and duration to constitute a violation of Rule 901 on these occasions.

DRP appreciates MDEQ's assistance in its ongoing efforts to minimize odor impact. 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 Tabettha 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.

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

Sincerely,

Detroit Renewable Power



Linwood Bubar, Executive V.P.

Attachment

Photograph 1



Photograph 2



Photograph 3



Photograph 4



Photograph 5

