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Air Quality Division
Detroit Office

VIA CERTIFIED MAIL

July 18, 2017

Mr. 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 Notice dated June 27, 2017

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power’s response to the Violation Notice (VN) received on June 22, 2017 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 24 and June 25, 2017. 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 neighborhoods.

The following is in response to the violation notice: 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 June 24 and June 25, 2017, our regular daily inspections of the odor management system found the overhead doors closed and wet and dry odor spray systems to be working correctly at the tipping floor roof, the refuse derived fuel (RDF) area, 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 property roadways were swept with the sweeper truck. In summary, all appropriate odor management practices were followed on the day noted.

In addition, odor surveys were conducted by our plant supervisors on both days in question. On June 24, beginning at 18:30 hrs., no garbage odors were detected by our supervisor downwind of the plant. The supervisor's e-mail report is attached. On June 25, only level 1 and level 2 odors were detected and those only immediately adjacent to the plant. That supervisor's report is also attached.

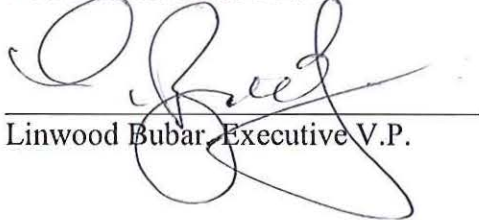
Overall, DRP reviewed records for the date of the alleged violation and did not find any issue of nonconformance. During the DRP surveys, only Level 1 or level 2 waste-related odors were detected and those only in a limited area. Accordingly, DRP does not agree that nuisance odors from DRP's operation were of sufficient intensity, frequency and duration to constitute a violation of Rule 901 on this occasion.

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 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 Damian Doerfer at (313) 269-2806.

Sincerely,

Detroit Renewable Power



Linwood Bubar, Executive V.P.

Damian Doerfer

From: Carl Harvey
Sent: Saturday, June 24, 2017 8:08 PM
To: Robert Suida; Damian Doerfer
Cc: Linwood Bubar
Subject: Response to odor Complaint

Received call from Rob Suida of odor complaint.

Left facility at 18:34 hrs. Proceeded east on Ferry st. to Chene st. Headed north on Chene st. to Palmer. Arrived at Chene and Palmer at 18:36 hrs. An odor survey was conducted a slight hint of burning wood was detected. No sent of anything else. Returned to vehicle and proceeded east on Palmer st. to Grandy headed south on Grandy to Warren Ave. Arrived at Grandy and Warren at 18:42 I proceeded to exit my vehicle there was no odor detected. Returned to vehicle and headed east on Warren Ave to return to facility at 18:46 hrs. Winds were blowing southbound at the time this odor survey was conduct.

Damian Doerfer

From: David Willman
Sent: Sunday, June 25, 2017 9:17 PM
To: Robert Suida; Damian Doerfer
Subject: ODOR COMPLAINT

Rob,

I came up Chene off of 94 and drove to Warren and traveled east to St Aubin took a right then left on Ferry got out of my car at each intersection and didn't smell anything except bonfire. I came down Ferry towards DRP and didn't start smelling it till I hit the side of the building which was normal smell. Traveled across 75 and turned back around and didn't smell anything out of the ordinary except just in the immediate area of DRP. There was a big party didn't appear to be a jazz festival but there was about 200 bikers and I stopped and talk to a couple right outside and asked them if there was any out of the ordinary odor and both said NO.

Regards,

David Willman
Facility Manager
Detroit Renewable Energy, LLC
C:3139952559
Email:dwillman@detroitrenewable.com

