



VIA CERTIFIED MAIL

October 10, 2018

Todd Zynda, Environmental Engineer
 Michigan Department of Environmental Quality
 Air Quality Division
 3058 W. Grand Boulevard, Suite 2-300
 Detroit, MI 48202-6058

RE: M4148 Detroit Renewable Power – Response to Violation Notice dated September 19, 2018

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power’s (DRP) response to the Violation Notice (VN) dated September 19, 2018 for alleged violations based upon Michigan Department of Environmental Quality, Air Quality Division (AQD) May 14, 2018 inspection and review of inspection records provided to the AQD on June 8, 2018.

The following table summarizes the AQD alleged violations along with DRP’s response to each event. Explanation of the causes and corrective actions implemented, as applicable, is provided after the table.

Process Description	Rule/Permit Condition	Summary of AQD Comments	DRP Response
FGMSWPROC-LINES	ROP No. MI-ROP-M4148- 2011a, FGMPROC-LINES, SC IV.1, VI.3, and VI.13	Primary and secondary baghouses have multiple days with pressure drop readings outside the recommended operating range and the range established during the most recent stack test.	DRP concurs the records indicate that there were days with pressure drop readings outside the operating range cited in the September 19, 2018 notice.

Process Description	Rule/Permit Condition	Summary of AQD Comments	DRP Response
FGMSWPROC-LINES	ROP No. MI-ROP-M4148- 2011a, FGMPROC-LINES, SC IV.8 Odor Management Plan dated June 2017, Section 2.2g	The facility did not provide records of monthly roof exhaust filter inspections	DRP concurs that these records were not available for the months noted. Records beginning May to date are available.
FGMSWPROC-LINES	ROP No. MI-ROP-M4148- 2011a, FGMPROC-LINES, SC IV.3 Fugitive Dust Management Plan dated February 2011, Section 4.4.3 Odor Management Plan dated June 2017, Section 2.2a	Records provided from March 1, 2018 through May 10, 2018 indicate that the negative pressure is not maintained at Tip East 5.	DRP continues to evaluate options to address this issue, including engineering and odor studies to determine if an improvement is feasible or practicable. In addition, DRP will review the basis for this condition and evaluate potential permit modifications.
FGBOILERS011-013	ACO AQD No. 6-2017 Paragraph 9.B.1 and Paragraph 13	Records for the Startup/Shutdown Malfunction Abatement Plan were not maintained for various checklists on various dates.	DRP concurs that records have not been fully retained or organized. Since the original submittal of June 8, 2018, DRP has located additional records, which are enclosed.

The following summarizes the response of each of the items listed in the above table.

Primary and Secondary Baghouse Pressure Drop

DRP acknowledges that the primary and secondary baghouse pressure drop records indicate pressure drop readings were outside of the operating range cited in the September 19, 2018 notice. DRP proposes the following items as corrective actions:

- Implement a training program for process line operators on proper recordkeeping and records management

- Additional labeling to the checklist to highlight the recommended operating range and corrective action requirements when the reading is outside of the recommended range.
- Confirm that the form can clearly capture instances when process lines are down or not in operation to avoid discrepancies where the operator may have recorded “0” but the line was not in operation.
- Confirm the operational range of the baghouse and measurement range of the pressure gauges.

DRP will provide a copy of the modified checklist form for your review.

Roof Exhaust Filters

The requested monthly inspection records were not located at the time of the May 14, 2018 inspection or subsequent June 8, 2018 submittal. Subsequent to the submittal, DRP located the completed for May 2018 and has enclosed this record with this response. It is important to note that DRP has taken actions and, as a result, the inspections have been completed and records retained from May 2018 to date.

Negative Pressure at Solid Waste Receiving and Storage Rooms

As documented in correspondence since at least November 2011, DRP understands that the permit condition requires DRP to “minimize” odors from the MSW building by maintaining negative pressure rather than “eliminate” odors. In 1989, during permit discussions, DRP (then Michigan Waste Energy) understood the permit condition meant to maintain negative pressure in the MSW building to the extent practicable.

As discussed in more recent correspondence between DRP and AQD in 2017, DRP hired Derenzo and Associates in 2011 to conduct an evaluation of the potential effects of the odor control system and negative pressure in the building with respect to identification of potential odor sources. In the final report, completed in 2012, Derenzo and Associates determined that there was no effect on the frequency or intensity of odors from the operation of the MSW or RDF fans. Thereafter, in 2014, a Consent Judgment was entered between MDEQ and DRP to address odor issues, including several million dollars in capital improvements to address odors, but not including any additional measure to address the direction of airflow at Tip East 5.

DRP has continued to evaluate the air flow at Tip East 5, but it continues to appear to be infeasible to maintain inward air flow at Tip East 5 when the wind was blowing approximately west to east, which is the prevailing wind direction.

DRP continues to minimize odors by maintaining inward air flow at Tip East 5, as practicable, and will continue to research engineering options to improve performance of air flow at Tip East 5. In addition, DRP plans to review odor causes and review permit to install options to modify the permit to amend the condition and/or plan items to reflect the initial intent of the air permit to as practicable.

ACO AQD No. 6-2017, Exhibit A – Startup, Shutdown Malfunction Abatement Plan

DRP acknowledges that records were unavailable in the original submittal except as noted below. In addition, DRP has enclosed additional records which were located following the original submittal date. DRP continues to make improvements to recordkeeping and training to ensure that the required records are completed, retained and accurate. The additional enclosed records are summarized below.

RDF Boiler Startup, Appendix 1 – Turbine Operator Startup

Boiler 12: 3/12/18-3/13/18, 3/15/18, 3/21/18, and 4/2/18

Boiler 13: 3/7/18 and 4/30/18

RDF Boiler Startup, Appendix 2 – Grate Operator Walkdown

Boiler 11: 3/13/18 and 3/18/18

Boiler 12: 3/12/18-3/13/18, 3/15/18, 3/21/18, 4/2/18, and 4/26/18

Boiler 13: 3/7/18 and 4/30/18

RDF Boiler Startup, Appendix 3 – Ash Operator Walk Down/Baghouse Penthouse

Boiler 11: 3/13/18 and 3/18/18

Boiler 12: 3/12/18-3/13/18, 3/15/18, 3/21/18, and 4/2/18

Boiler 13: 3/7/18 and 4/30/18

RDF Boiler Startup, Appendix 4 – Slaker Operator Walk Down/8th Floor SDA Penthouse

Boiler 11: 3/13/18 and 3/18/18

Boiler 12: 3/12/18-3/13/18, 3/15/18, 3/21/18, and 4/2/18

Boiler 13: 3/7/18 and 4/30/18

RDF Boiler Startup, Appendix 5 – Auger Walk Down

Boiler 11: 3/13/18 and 3/18/18

Boiler 12: 3/12/18-3/13/18, 3/15/18, 3/21/18, and 4/2/18

Boiler 13: 3/7/18 and 4/30/18

RDF Boiler Startup, Appendix 6– Operator Walk Down List Doors

Boiler 12: 4/2/18

Appendix 8 – CEMS Checklist

The CEMS checklists are often completed the day prior to boiler startups so the date indicated on the checklist may be for the day prior to the actual startup.

Boiler 11: 3/13/18 and 3/18/18

Boiler 12: 3/12/18-3/13/18 and 3/21/18

Boiler 13: 3/7/18 and 4/30/18

SDA Maintenance Weekly Checks

Week ending 3/17/18

Michigan Waste Energy (Detroit Renewable Power) Control Room Log

Records enclosed from 2/27/18 through 4/30/18

Mr. Todd Zynda
September 10, 2018
Page 5 of 5

If you have questions concerning this response, please feel free to contact Mark Fletcher at (313) 963-3394.

Sincerely,

Detroit Renewable Power


Robert Suida, Plant Manager

cc: Mark Fletcher, EHS Manager

Enclosures

Roof Exhaust Filter May 2018 Monthly Inspection Record
Additional SSM Abatement Plan Appendix Checklist Records
SDA Maintenance Weekly Checks for Week Ending 5/17/18
Additional Control Room Logs for the Requested Period