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Air Quality Division
Detroit Office

VIA CERTIFIED MAIL

October 19, 2018

Todd Zynda, 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 Notice dated October 4, 2018 for Alleged Odors on September 30 and October 1, 2018

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's (DRP) response to the Violation Notice (VN) dated October 4, 2018 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 30 and October 1, 2018. According to the VN, inspections conducted by MDEQ-AQD in response to complaints reportedly found moderate to strong, consistent garbage odors in residential areas downwind of DRP's facility.

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 30 and October 1, 2018 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 except as noted below; and the tipping floor was clean. DRP has recently become aware of improvements that can be made to the odor spray system and the MSW roof fans, which we are pursuing and we anticipate will further reduce odor emissions.

In addition, an odor survey was conducted by Mr. Carl Harvey in the morning of September 30 beginning at approximately 11:00 a.m. Mr. Harvey and Mr. Mike Davis conducted an additional

survey in the afternoon of September 30 beginning at 3:30 pm (approximately the same time that Mr. Zynda of MDEQ concluded his investigation). After confirming that all doors at the facility were closed and sprayer systems were operating, Mr. Harvey surveyed the downwind area, stopping several times to check for odors and speaking to several residents and business owners. None of the individuals Mr. Harvey spoke with reported noticing any odors and Mr. Harvey did not detect any odors in the morning of September 30. In the afternoon survey on September 30, only mild "Level 2" odors were detected. A copy of Mr. Harvey's September 30, 2018 survey report is attached. DRP did not conduct an independent odor survey on October 1.

Although DRP has requested that MDEQ provide copies of any odor surveys it relies upon as a basis for issuing a VN, MDEQ has not provided any such report for September 30 or October 1, 2018 and has not otherwise substantiated the allegations in the VN. Accordingly, based on the information available to DRP at this time as discussed in this letter, DRP cannot agree that nuisance odors attributable to DRP's operation of sufficient intensity, frequency and duration to constitute a violation of Rule 901 occurred on September 30 or October 1, 2018.

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 Mark Fletcher, Director of EHS at 313.963.0749 and mfletcher@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 September 30 and October 1 investigation to aid in our review of these concerns.

If you have questions concerning this response, please feel free to contact Mark Fletcher at the phone number above.

Sincerely,

Detroit Renewable Power


Rob Suida, Plant Manager

Cc: Paul Max, City of Detroit, BSEED
John Leone, MDAG
Mary Ann Dolehanty, MDEQ
Craig Fitzner, MDEQ
Christopher Ethridge, MDEQ
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