



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

July 31, 2017

Mr. Linwood Bubar, President
Detroit Renewable Power, LLC
5700 Russell St.
Detroit, MI 48211-2545

SRN: M4148, Wayne County

Dear Mr. Bubar:

SECOND VIOLATION NOTICE

On April 20, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Detroit Renewable Power (DRP) located at 5700 Russell, Detroit, Michigan. The purpose of the April 20, 2017 inspection was to determine DRP's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and MI-ROP-M4148-2011a.

On June 9, 2017, the AQD sent the company a Violation Notice citing violations discovered as a result of the inspection and requested your written response by June 30, 2017. A copy of that letter is enclosed for your reference. DRP's response dated June 30, 2017 was received July 5, 2017. The response provided regarding negative pressure of the municipal solid waste receiving, processing and storage rooms is not sufficient.

Below is the violation regarding negative pressure.

Process Description	Rule/Permit Condition Violated	Comments
FGMSWPROC-LINES	ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SC IV.3 Fugitive Dust Management Plan, Section 4.4.3 Odor Management Plant, Section 2.2g	Records provided from October 3, 2016 through April 18, 2017 indicate that the negative pressure is not maintained at Tip East 5.

Below is DRP's response from the letter dated June 30, 2017.

"DRP Response: All equipment was operating as designed and the required records were all maintained. There have been no reported visible emissions in the last year."

While records are maintained, it is clear from the records provided that negative pressure is not maintained.

As previously stated in the Violation notice dated, June 9, 2017, FGMSWPROC-LINES, SC IV.3, requires that a negative pressure is maintained in the solid waste receiving, processing, and storage rooms. The Fugitive Management Plan dated February 2011, Section 4.4.3 states that a hand held velometer will be used to "ensure inward flow is maintained". The Odor Management Plan dated December 2015, Section 2.2g states that the MSW building is maintained under negative pressure.

Records provided from October 3, 2016 through April 18, 2017 indicate that negative pressure is not maintained at Tip East 5 (the upper tipping floor entrance door). Velocity readings indicate a measurement for wind speed going out of tipping floor door "Tip East 5" for nearly all the readings provided from October 3, 2016 through April 18, 2017. This is a violation of FGMSWPROC-LINES, SC IV.3, Fugitive Dust Management Plan, Section 4.4.3, and Odor Management Plant, Section 2.2g.

Please be advised that failure to respond in writing and identifying actions the company will take or has taken to resolve the cited violation may result in escalated enforcement action by the AQD. Please provide the information on how the above violation will be resolved by August 14, 2017, which corresponds to 14 days from the date of this letter.

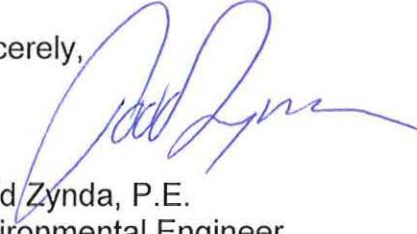
As part of your response, please provide velometer readings from April 18, 2017 through July 26, 2017.

Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

Mr. Linwood Bubar
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If you have any questions regarding the violation or the action necessary to bring DRP into compliance, please contact me at the number listed below.

Sincerely,



Todd Zynda, P.E.
Environmental Engineer
Air Quality Division
313-456-2761

cc: Mr. Damian Doerfer, DRP
Ms. LaReina Wheeler, City of Detroit, BSEED
cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ