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Air Quality Division  
Detroit Office

**VIA CERTIFIED MAIL**

July 20, 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 June 29, 2018 for Alleged Odors on June 25, 2018**

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's (DRP) response to the Violation Notice (VN) dated June 29, 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 June 25, 2018. According to the VN, an inspection 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 June 25, 2018 the daily inspections found the municipal solid waste conveyors were operating properly; the doors were closed at the alleyway, the alleged time of the odor complaint was during receiving hours therefore the tipping floor doors, and the MSW receiving area doors were open ; and the tipping floor was clean. 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 June 25, 2018.

In addition, a routine daily odor survey was conducted by Mr. Rob Suida on June 25, 2018. This survey occurred from 9:42 a.m. until 10:18 a.m. and included a thorough examination of ambient air conditions in the area downwind from DRP. This inspection concluded only 12 minutes before the first of two MDEQ inspections began on June 25. Mr. Suida did not observe any odors stronger than Level 2 and those were only found in the immediate vicinity of DRP.

Although DRP has requested that MDEQ provide copies of any odor surveys it conducts of DRP, both informally and through a formal Freedom of Information Act request, MDEQ has not provided any such report for June 25 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 June 25, 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](mailto: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 May 18, 2018 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

  
Robert J. 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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