



VIA CERTIFIED MAIL

July 13, 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 Notices dated June 18, 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 18, 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:** 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 18, 2017 the daily inspections found the municipal solid waste conveyors and the overhead doors operating properly. 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 property roadways were swept with the sweeper truck. In summary, all appropriate odor management practices were followed on the day noted.

In addition, an odor survey was conducted by our Plant Manager beginning at approximately 10:00 PM on June 18<sup>th</sup>. Level 1 odors (just barely detectable) were detected at Warren and Chene. No odors were detected at Forest and Grandy.

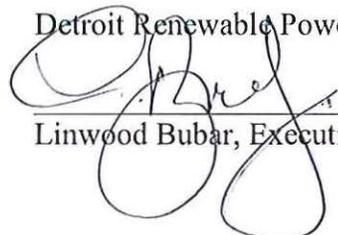
Overall, DRP reviewed records for the date of the alleged violation and did not find any issue of nonconformance. During the DRP surveys, only Level 1 waste-related odors were detected and those only in a limited area. Accordingly, DRP does not agree that nuisance odors from DRP's operation were of sufficient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

DRP appreciates the 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](mailto: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



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Linwood Bubar, Executive V.P.

