



August 18, 2015

Ms. Joyce Zhu  
Senior Environmental Engineer  
Michigan Department of Environmental Quality  
Air Quality Division  
Southeast Michigan District Office  
27700 Donald Court  
Warren, MI 48092-2793

**RE: RESPONSE OF DETROIT RENEWABLE POWER TO VIOLATION NOTICE  
DATED AUGUST 4, 2015 ISSUED BY THE AIR QUALITY DIVISION**

Dear Ms. Zhu:

Detroit Renewable Power (“DRP”) submits this response to the August 4, 2015 Violation Notice (“VN”) issued by the Air Quality Division (“AQD”) of the Michigan Department of Environmental Quality. The VN alleges that DRP violated Rule 901(b) of Michigan’s Air Pollution Control Rules, MAC R 336.1901(b), and General Condition (A)(G.C.12(b)) of DRP’s Renewable Operating Permit due to odor observations made by AQD staff on July 27, 2015. DRP acknowledges the issuance of the VN but DRP neither admits to nor denies the accuracy of information or conclusions in the VN or the associated inspection report. Instead, and in the spirit of continuing to attempt to resolve odor issues raised by MDEQ, DRP provides the following;

DRP review of its daily operation on July 27 did not reveal any unusual conditions at the facility that could have caused off-site odors on July 27. MSW and RDF inventories were at or below normal levels and all equipment was in typical operating mode. The Odor Management Plan (OMP) was in place and operational. The OMP describes additional procedures that DRP has implemented to manage odors during the period of construction, including among other things revised inventory management procedures that enable DRP to divert waste receipts when necessary to avoid excessive inventories. We note from the inspection report that other facilities also experienced off-site odors on July 27, so perhaps the weather may have played a role.

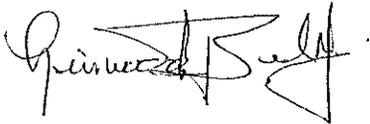
As agreed to and directed by the consent judgment, DRP is installing an air collection and management system to improve odor control at the facility pursuant to the specific schedule for design, construction, and operation. To date, the project has met all milestones. Once construction is completed, the air collection and management system will provide additional assurance that odors from the DRP facility have been minimized.

Joyce Zhu  
August 15, 2015  
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We trust that this letter provides a satisfactory response to the August 4 VN, but please contact me if you have questions or comments. We have appreciated AQD's willingness in the past to discuss DRP's efforts to mitigate odors from the facility. We would be more than willing to meet with you or other AQD personnel again to discuss this response or progress under the consent judgment if you feel a meeting would be helpful.

Yours truly,

**DETROIT RENEWABLE POWER**

A handwritten signature in black ink, appearing to read "Linwood Bubar". The signature is stylized and cursive.

Linwood Bubar  
**PRESIDENT**

cc: Alan Greenberg