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**VIA CERTIFIED MAIL**

July 27, 2016

Joyce Zhu, 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 July 6, 2016 for Alleged Nuisance Odors on June 27, 2016**

Dear Ms. Zhu:

This correspondence is Detroit Renewable Power's (DRP) response to the Violation Notice (VN) dated July 6, 2016 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 27, 2016. Inspections conducted by MDEQ-AQD in response to complaints reportedly found a strong (level 4) garbage odor observed emitting from the facility and impacting nearby neighbors.

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.

The following is in response to the violation notice dated July 6, 2016: On June 27, 2016 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; 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 27, 2016.

Lastly, an odor survey was conducted by a DRP Supervisor and also by a DRP Manager on June 27, 2016. The DRP Manager stated the following in his report on June 27, 2016:

*"I received a phone call from Damian Doerfer at 9:18pm and Damian stated that he had received a call from the MDEQ referencing an odor complaint. I called Wes Kendrick the Power Block Supervisor to have him call the Process Supervisor to perform an odor survey in the areas around the Plant, specifically on St. Aubin from Warren to Superior.*

*Carl Harvey called me at approximately 9:30pm when he was on Ferry Street heading east to St. Aubin to start his odor survey and I informed him to continue his survey and that I would be in the area soon to conduct an odor survey as well.*

*I was at Russell and Ferry at 9:45pm and proceeded east on Ferry to St. Aubin. At the railroad tracks that cross Ferry at the SE corner of the Plant I could smell what appeared to be a trash odor (MSW)(2 on a 1-5 scale). As I crossed the railroad tracks the smell was not present. I turned right on St. Aubin and as I crossed Kirby there was an odor but it was not trash (RDF or MSW) (2 on a 1-5 scale). It appeared to be more of a chemical odor and had a fishy scent. This odor was present at St. Aubin and Frederick, and at St. Aubin and Farnsworth.*

*When I stopped at St. Aubin and Warren I did not detect any odor. As I proceeded south on St. Aubin there was an odor other than trash (MSW or RDF) (2 on a 1-5 scale) at St. Aubin and Hancock and at St. Aubin and Garfield. Between St. Albertus and East Canfield there was an odor that appeared to be trash (3 on a 1-5 scale) but it was only near the property on the east side of St. Aubin before Canfield.*

*From Willis to Superior driving south on St. Aubin there was an odor of fresh cut grass (3 on a 1-5 scale). As I crossed Superior there weren't any odors. I turned east on Mack and went to Chene Street and turned north to Ferry and did not smell any odors. I went west on Ferry to St. Aubin and then turned south again. The same odors that were present the first time were present the second time.*

*I turned west on to Warren and then north on Riopelle. At 10:05pm I approached Ferry on Riopelle and here was a trash (MSW) odor, (2 on a 1-5 scale). I completed my odor survey at this time."*

The DRP Supervisor reported:

*"Assured all sprayers functional, turned off MSW floor roof fans. Left facility at 21:40. Winds south proceeded to Warren and St Aubin 21:45 Chemical type smell in area with a rating of 4. Returned to the facility at 21:55, at that time winds were blowing westward."*

DRP reviewed records for the date of alleged violation and did not find any issues of nonconformance. During the DRP manager's and supervisor's surveys, non-waste-related odors were detected at several locations, including chemical odors, cut grass odors and burning/barbeque odors, during the same period of time that the MDEQ's investigation was occurring. Although potentially waste-related odors were also detected, they were widely dispersed and were not of greater intensity than the other odors detected in the vicinity. Accordingly, DRP does not agree that nuisance odors attributable to DRP's operation of sufficient intensity, frequency and duration to constitute a violation of Rule 901 were occurring on this occasion.

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 Damian Doerfer, Director of EHS at 313.269.2806 and [ddoerfer@detroitrenewable.com](mailto:ddoerfer@detroitrenewable.com) and Tabetha Peebles, Environmental Manager at 313.236.1181 and [tpeebles@detroitrenewable.com](mailto:tpeebles@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 June 27 investigation to aid in our review of these concerns.

If you have questions concerning this response, please feel free to contact Tabetha Peebles at (313) 972-4336.

Sincerely,

Detroit Renewable Power



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Linwood Bubar, Executive V.P.