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Air Quality Division
Detroit Office

VIA CERTIFIED MAIL

August 10, 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 20, 2016 for Alleged Nuisance Odors on July 10, 2016

Dear Ms. Zhu:

This correspondence is Detroit Renewable Power's (DRP) response to the Violation Notice (VN) dated July 20, 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 July 10, 2016. 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 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 20, 2016: On July 10, 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 July 10, 2016.

Lastly, an odor survey was conducted by DRP's Executive VP of Operations on July 10, 2016 and his findings were as follows:

"Wind from the southeast (3-6 mph) heavy odor, following Russell from Warren to Piquette, the odor is an oily-fishy smell reported by the Shift Supervisor at/around 16:00, verified by myself at/around 17:00."

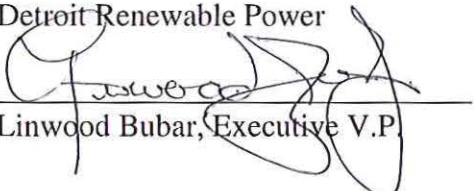
DRP reviewed records for the date of alleged violation and did not find any issues of nonconformance. During the DRP's survey, non-waste-related odors were detected several blocks from the facility, during the same period of time that the MDEQ's investigation was occurring. The odors were widely dispersed and inconclusive as attributable to DRP. 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 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 and Tabetha Peebles, Environmental Manager at 313.236.1181 and 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.

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

Sincerely,

Detroit Renewable Power



Linwood Bubar, Executive V.P.