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Air Quality Division  
Detroit Office

**VIA CERTIFIED MAIL**

November 2, 2016

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 October 12, 2016**

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) received on October 12, 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 October 9, 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.

**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 October 9, 2016 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 area was swept with the sweeper truck. In summary, all appropriate odor management practices were followed on the days noted.

In addition, the following odor survey took place by Jason Jacobsen:

*"I received a phone call from Rob [Rob Suida, Facility Manager] at 2230 saying he was notified of an odor complaint in the area of Henry St and I75. This area is approximately 3 miles from the plant. I left the plant at 2250 and the temperature was 45°F and there was no wind. I left the plant from the Ferry St exit going west to Russell St and there were no noticeable odors. I then proceeded to Warren Ave through Russell and no noticeable odors in this area. I went south on the Chrysler Service Drive from Warren traveling slowly but did not detect any odors. I continued on the Chrysler Service drive across Woodward Ave to Cass Ave. I arrived at Cass and Henry St at 2303 and did not detect any odors. I traversed the area as best I could, but there is a lot of construction and blocked off streets in this area. I surveyed the area by the Cass Tech high school and nearby Cass Park, but did not notice any unpleasant odors. I returned to the plant from Cass Ave to Warren Ave with no odors noticeable."*

Overall, DRP reviewed records for the date of alleged violations and did not find any issue of nonconformance. During the DRP surveys, waste-related odors were not detected. 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 these occasions.

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.

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

Sincerely,

Detroit Renewable Power

*Linwood Bubar*

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Linwood Bubar, Executive V.P.