



VIA CERTIFIED MAIL

September 8, 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 Notice dated August 18, 2017

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) dated August 18, 2017 regarding odors allegedly emanating from DRP's operation on August 12 and 13, 2017. Inspections conducted by MDEQ-AQD reportedly found a moderate to strong (level 3 to 4) garbage odor 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.

Since the beginning of the summer, DRP management and personnel have placed special emphasis on minimizing the potential for objectionable odors, including increased emphasis on general housekeeping and diligently implementing all odor management practices. These efforts have been boosted by the fact that DRPs boilers have experienced very smooth and consistent operation, which greatly helps DRP manage its fuel inventory.

In addition, the daily inspections for August 12 and 13 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. Moreover, odor surveys (attached) were conducted by our Plant Manager and our EHS Manager for those dates, as described below.

DRP's regular daily odor survey on August 12, 2017 (copy attached) conflicts with the AQD complaint investigation activity report. On August 12, Damian Doerfer observed level 2 odors at the facility boundary, but only Level 1 odors ("just barely detectable") off-site. It is noteworthy that in the AQD odor survey, out of 17 observations, at 13 locations no odor or very minor odor was detected and one of the locations (Ferry between Riopelle and St. Aubin) was in the public roadway adjacent to the facility and, therefore, not strictly speaking "off-site." Given the nature of DRP's operation and the reported wind speed (10 mph), it seems unlikely that if DRP was causing an odor on August 12 it would have been detected at so few locations. Therefore, it seems more likely that the odors observed by AQD were from private dumpsters or other sources of "garbage" odors not attributable to DRP.

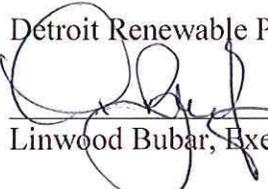
AQD's August 13 investigation reports lime/chemical odors attributed to US Ecology commingled with garbage type odors. The AQD report states that the garbage odors were observed in the vicinity of the Sweetest Heart of Mary Church, which was setting up for a festival. DRP's own survey, initiated at 9:29 a.m. and occurring largely concurrently with AQD's investigation, did not confirm AQD's reported observations and found only isolated low level (Level 1) odors that were caused by trash dumpsters and other local sources that are not attributable to DRP. In particular, AQD's activity report failed to mention a very large dumpster, full of trash, located on the grounds of the Sweetest Heart of Mary Church (photograph included in the attached). Based on all the available information, DRP concludes that the odors observed on August 13 were caused by overflowing private dumpsters and not DRP's operations.

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 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



Linwood Bubar, Executive V.P.

Attachments

Nathan Pentico

From: Robert Suida
Sent: Sunday, August 13, 2017 11:02 AM
To: Damian Doerfer
Subject: Odor Survey 08-13-2017 0930
Attachments: 40 yds west of church.jpg; 40 yds west of church-2.jpg; Flag 08-13-2017 0930.jpg; Full of trash on property.jpg; NE of church behind Plymouth Ed Center.jpg

Weather: 74°F, 53% humidity, average wind speed less than 1 mph out of the W/SW. Received call from Damian Doerfer at 9:25am referencing odors at Garfield and Russell near Sweetest Heart of Mary Church. Exited Ferry Street gate at 9:27 and traveled west toward Ferry. Turned Left (south) on Russell toward Garfield. Arrived at Garfield and Russell at 9:29am and exited my vehicle. I walked south to the corner of East Canfield and Russell and turned back north on Russell. As I was walking north on Russell I noticed open garbage containers west of Sweetest Heart of Mary (pictures attached). Level 1 odors were detected on the sidewalk east of the containers. I continued to walk north on Russell to East Forest Avenue. I turned back around and walked south toward Garfield. No odors detected. I then turned right (east) and walked down a brick alley between the church and the Plymouth Education Center (PEC). I continued east and then walked north through an open gate NE toward the football field. There were 3 open trash containers overflowing with trash and limbs (picture attached). Less than Level 1 odor detected. As I turned and walked SE toward the gate, I stopped and viewed a full roll off box of trash on church property (picture attached). I walked through the gate and then east down the alley toward Russell. I detected a less than level 1 trash odor in the alley approximately 20 yards from Garfield. I returned to my vehicle and then traveled north on Russell to Forest and turned right (east). I traveled east on Forest and did a u-turn at the end of the street and continued west toward Russell. No odors detected. I turned right (north) on Russell toward Warren. I turned right (east) on Warren and used the turn through the median to turn west toward Riopelle. No odors detected. I turned right (north) on Riopelle toward Ferry. At Ferry I turned right (east) toward St. Aubin. I continued east to St. Aubin and turned left (north) on St. Aubin. I traveled north on St. Aubin and turned around in the Ferrous driveway and headed south toward Ferry (no odors detected). Turned right (west) on Ferry toward Russell. Turned right (north) on Russell toward employee gate. Odor survey complete.

Thank you and regards,

Rob Suida

Plant Manager

C: 313-617-5448

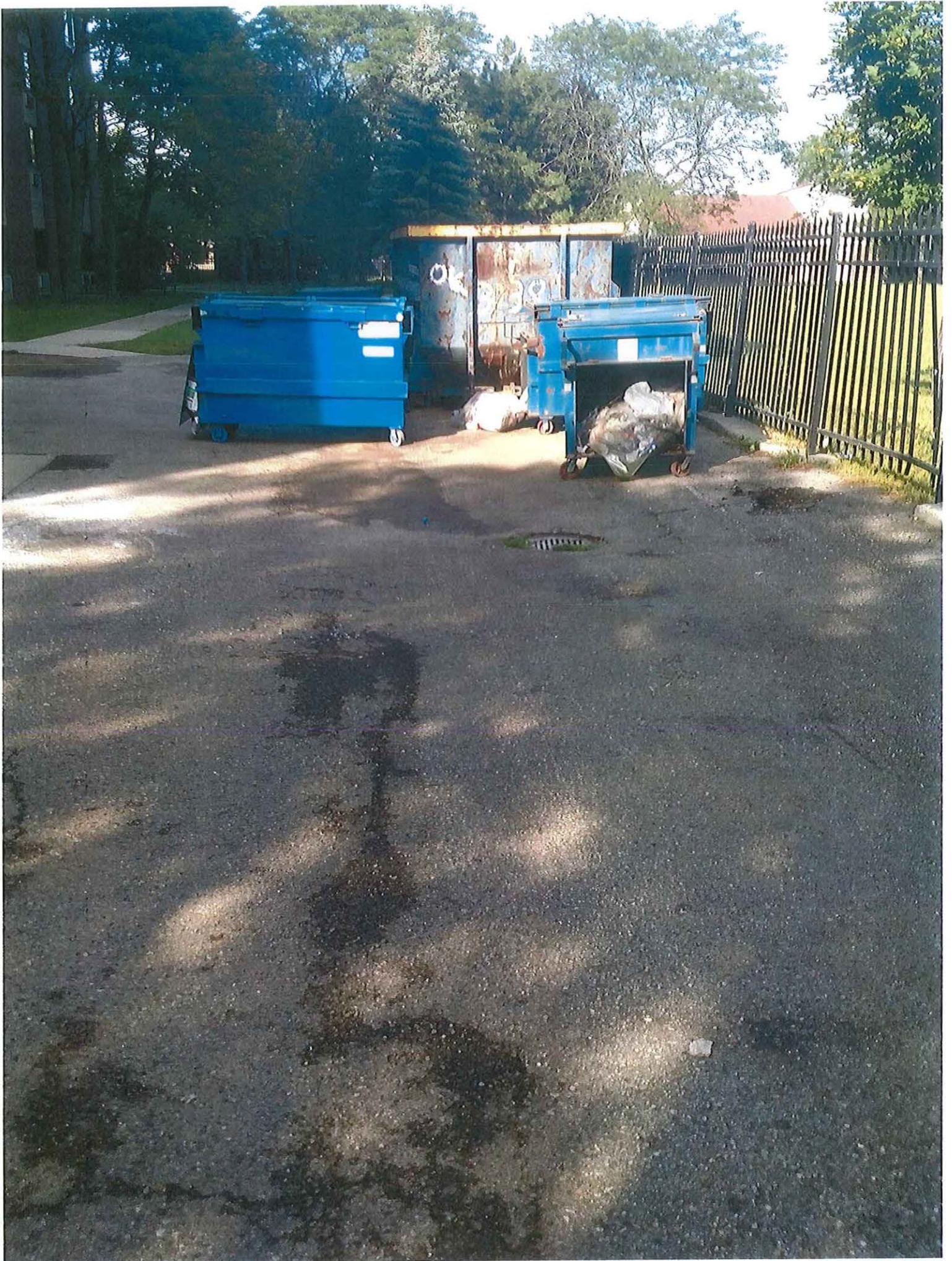
O: 313-972-4356

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