



VIA CERTIFIED MAIL

September 27, 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 September 6, 2017

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) dated September 6, 2017 regarding odors allegedly emanating from DRP's operation on August 27, 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 27 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 that date, as described below.

An extensive odor survey was conducted from 9:40 AM to 10:40 AM on Sunday, August 27th. These observations were made during a significant portion of the times listed in the MDEQ notice. Any objectionable odors detected were noted.

<u>Location</u>	<u>Odor Scale</u>	<u>Odor Characteristic</u>	<u>Comments</u>
Ferry & I-75	1	Trash	50' extent
Canfield & 2 nd	1	Sewer and Nat. Gas	25'
Woodward & Willis	3	Sewer	50'
Willis & 2 nd	2	Sewer	25'
Cass & Forest	2	Sewer	25'
Harper & Beaubien	1	Trash – very faint	25'
St. Antoine & Harper	2	Sewer and Nat. Gas	25'
Russell at DRP Gate	2	Trash	25'
Frederick and Russell	1	Chemical	25'

As you can see, although slight trash odors were detected adjacent to the plant boundary and at the plant gate (locations where odors cannot constitute a nuisance), the prevailing odors downwind from the plant were sewer and natural gas odors. The sewer and natural gas odors detected are quite different from trash odors and are not attributable to DRP's operations. Therefore DRP does not agree that a violation of Rule 901 due to DRP's operations occurred on August 27, 2017.

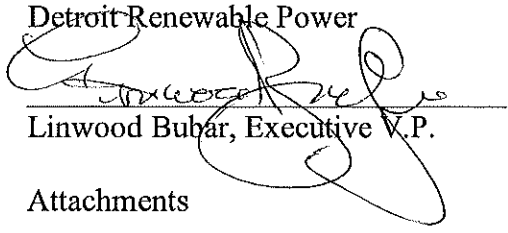
We also interviewed 2 people that were at Woodward and Warren. Both said they had been there a majority of the morning. Both said they did not detect any objectionable odors.

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