



VIA CERTIFIED MAIL

October 17, 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 26, 2017**

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) dated September 26, 2017 regarding odors allegedly emanating from DRP's operation on September 25, 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 September 25, 2017 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, an odor survey (attached) was conducted by our Safety Specialist for that date, as described below.

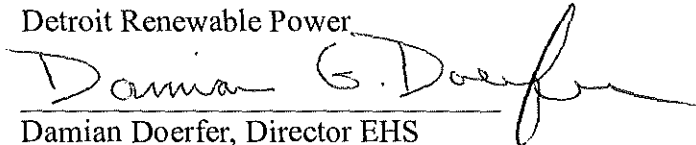
An extensive odor survey was conducted at approximately 11:40 AM on September 25<sup>th</sup>. No objectionable odors were detected. Therefore DRP does not agree that a violation of Rule 901 due to DRP's operations occurred on September 25, 2017.

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](mailto: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

A handwritten signature in black ink that reads "Damian G. Doerfer". The signature is written in a cursive style with a long, sweeping tail on the letter "f".

Damian Doerfer, Director EHS

Attachments

**Odor Management - Weekly Odor Survey**

Recordkeeping for the Odor Management Plan required by the Consent Judgement dated October 21, 2014.

Instructions:

1. Conduct a weekly odor survey upwind and downwind of the facility (April through October).
2. Document all of the required information below.
3. If odors are observed, initiate necessary actions to determine the cause and correct issue.
4. Contact your Supervisor if odors are observed.
5. Submit completed forms to Environmental Manager.

Complete this section each week

Date	Time	Odor observed from DRP at a grade 3 or more? Y/N	Observer Name	Observer Signature
9-25-17	1140	N	Nathan Pentico	

Weather Conditions

Temperature	Humidity	Wind Speed	Wind Direction	Sky Conditions
83°F	68°F	2 mph	from SSE	Partly Sunny

Location (attach map if needed)	Odor Scale*	Odor Characteristic**	Comments (including the spatial extent of the odor and the potential sources)
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			No odors noted entire route (AP)

If odor is observed this section must be completed

1. Review the Odor Management Plan if odor from DRP is observed at a grade 3 or higher, are updates needed?	
2. Were corrective actions taken if the souce was found?	
3. What were the corrective actions?	
4. Complete a report based on the findings and submit to MDEQ.	

<p>*Odor Scale:</p> <ul style="list-style-type: none"> <li>0 - Non-detect</li> <li>1 - Just barely detectable</li> <li>2 - Distinct and definite odor</li> <li>3 - Distinct and definite objectionable odor</li> <li>4 - Odor strong enough to cause a person to attempt to avoid it completely</li> <li>5 - Odor so strong as to be overpowering and intolerable for any length of time</li> </ul>	<p>**Odor Characteristic Examples:</p> <ul style="list-style-type: none"> <li>Paint-like</li> <li>Musty, moldy</li> <li>Burnt, smoky</li> <li>Tar-like, asphalt</li> <li>Cut grass</li> <li>Citrus fruit</li> </ul>
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Grand Blvd



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Chene St

Brush St

Russell St



Wayne State University

Dequindre St

