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Air Quality Division
Detroit Office

VIA CERTIFIED MAIL

November 13, 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 October 17, 2017

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's response to the Violation Notice (VN) dated October 17, 2017 regarding odors allegedly emanating from DRP's operation on October 17, 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 October 17, 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, odor surveys (attached) were conducted by our Plant Manager and our Director of EHS on that date, as described below.

Slight trash odors (level 1) at Palmer and St. Aubin (~25' in extent).

Burning odors at St. Aubin and Medbury; and Chene and Medbury.

Detergent odor on St. Aubin, just south of Ferry.

The details of these odor surveys were sent via e-mail to you on Oct. 17, 2017 at 1:54 PM along with photos of the areas listed above.

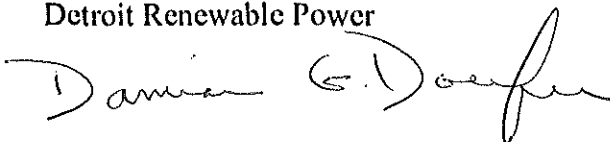
In summary, only slight trash odors were detected and those only in a small area. There were other significant odors (non-trash) in the area during this time.

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

A handwritten signature in blue ink that reads "Damian Doerfer". The signature is written in a cursive style with a large, stylized "D" and "D" at the beginning and end of the name.

Damian Doerfer, Director, EHS