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**VIA CERTIFIED MAIL**

August 6, 2018

Todd Zynda, Senior 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 July 18, 2018 for Alleged Odors on July 14, 15 and 16, 2018**

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's (DRP) response to the Violation Notice (VN) dated July 18, 2018 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 July 14, 15 and 16, 2018. According to the VN, inspections conducted by MDEQ-AQD in response to complaints reportedly found moderate to strong, consistent garbage odors in residential areas downwind of DRP's facility.

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 July 14, 15 and 16, 2018 the daily inspections found the municipal solid waste conveyors were operating properly; the doors were closed at the alleyway, the tipping floors, and the MSW receiving areas except as noted below; and the tipping floor was clean. DRP has recently become aware of improvements that can be made to the odor spray system and the MSW roof fans, which we are pursuing and we anticipate will further reduce odor emissions.

In addition, routine daily odor surveys were conducted by Mr. Rob Suida on July 14 and 15, 2018 and a supplemental survey was conducted on July 15 after MDEQ contacted DRE to notify us of some concerns. The July 14 survey occurred during the morning (10:14 a.m. to 11:07 a.m.), several hours before Mr. Zynda's investigation at 2:15 pm to 3:30 pm. A copy of Mr. Suida's July 14, 2018 report is attached. Despite a very thorough survey, Mr. Suida did not encounter any trash type odors that exceeded Level 1 during this investigation. On July 15 a routine survey was conducted by Mr. Suida from 9:15 to 10:10 am, which partially overlapped

with Mr. Lamb's survey from 9:55 to 11:45. In addition, Mr. Suida performed a supplemental survey on July 15 beginning at 11:44 a.m. after being notified by MDEQ. Copies of Mr. Suida's July 15 reports are attached. Notably, Mr. Suida did not find objectionable odors during either survey, with the strongest odor being a Level 2 right at the corner of Russell and Ferry (i.e., at the facility fence). DRP did confirm that an overhead door near the 129 conveyor was jammed open and in need of repair. Repairs were completed on July 15. As noted in Mr. Suida's second report on July 15, the East and West tipping floor doors were each opened, at separate times, for brief periods to allow routine cleaning activities. However, Mr. Suida's odor surveys demonstrate that these conditions did not result in objectionable odors leaving the premises.

DRE did not conduct its own odor survey on July 16, 2018.

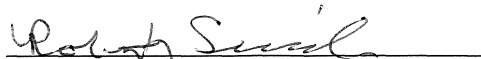
Although DRP has requested that MDEQ provide copies of any odor surveys it conducts of DRP, both informally and through a formal Freedom of Information Act request, MDEQ has not provided any such report for July 14, 15 or 16 and has not otherwise substantiated the allegations in the VN. Accordingly, based on the information available to DRP at this time as discussed in this letter, DRP cannot agree that nuisance odors attributable to DRP's operation of sufficient intensity, frequency and duration to constitute a violation of Rule 901 occurred on July 14, 15 or 16, 2018.

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 Mark Fletcher, Director of EHS at 313.963.0749 and [mfletcher@detroitrenewable.com](mailto:mfletcher@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. Also, please provide us with any field notes or reports concerning the July 14, 15 and 16 investigations to aid in our review of these concerns.

If you have questions concerning this response, please feel free to contact Mark Fletcher at the phone number above.

Sincerely,

Detroit Renewable Power



Rob Suida, Plant Manger

Cc: Paul Max, City of Detroit, BSEED  
John Leone, MDAG  
Mary Ann Dolehanty, MDEQ  
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