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Air Quality Division
Detroit Office

VIA CERTIFIED MAIL

August 21, 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 31, 2018 for Alleged Odors on July 22, 2018

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power's (DRP) response to the Violation Notice (VN) dated July 31, 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 22, 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 22, 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, a routine daily odor survey was conducted by Mr. Rob Suida on July 22, beginning at 11:35 a.m, approximately one-half hour after the first MDEQ survey on that date concluded. During this survey, strong (Level 3) garbage odors were detected only on Ferry Street from Riopelle to Russell, i.e., at the southern fenceline of the DRP facility, which is not a point of compliance. Within a very short distance (Ferry and Rivard), the odors had diminished to Level

2, which generally does not constitute a violation. Although intermittent Level 2 odors were also detected along St. Antoine, it is not clear whether those odors were attributable to DRP's operation because such odors were not detected at I-75 Service Drive and Ferry and other locations between St. Antoine and DRP's facility. A copy of Mr. Suida's July 22, 2018 survey report is attached.

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 22 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 22, 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 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 Manager

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