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VIA CERTIFIED MAIL

November 2, 2018

Todd Zynda, Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard, Suite 2-300
Detroit, MI 48202-6058

RE: M4148 Detroit Renewable Power – Response to Violation Notice dated October 12, 2018

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power’s (DRP) response to the Violation Notice (VN) dated October 12, 2018 for an alleged violation based upon Michigan Department of Environmental Quality, Air Quality Division (AQD) observations during stack testing on October 2, 2018.

The following table summarizes the AQD alleged violations along with DRP’s response.

Process Description	Rule/Permit Condition	Summary of AQD Comments	DRP Response
FGMSWPROC-LINES	ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SC IX.1 Consent Judgment File No. 14-1184CE	The solid waste tipping floor, pit area, and processing equipment were not clean.	DRP follows the Odor Management Plan and applicable ROP and CJ requirements. The conditions described do not constitute a violation.

DRP follows the AQD approved June 2017 Odor Management Plan Material Throughput and Management and Housekeeping Practices and Procedures, which includes the following requirements relative to the areas AQD observed and cited in the VN. The Odor Management Plan addresses the activities to comply with ROP No. MI-ROP-4148-2011a, FGMSWPROC-LINES SC IX.1 and Consent Judgment File No. 14-1184CE paragraph 3.14.

2.1 Material Throughput and Management

- **Municipal Solid Waste (MSW)**

DRP's goal is to clear the tipping floors of MSW each week before the first MSW load of the following week is received (i.e. no later than Monday morning).

The observation occurred on Tuesday, October 2, 2018, which is after the weekly clearing of tipping floor on Monday, October 1, 2018. DRP did clear the tipping floor prior to Monday, October 1.

- **Refuse Derived Fuel (RDF)**

Activities in the RDF Building are coordinated consistent with the FIFO process of "first in/first out", where the RDF inventory is rotated to the power block on the basis of the "oldest" fuel is combusted first. Determining the RDF to be combusted first is the responsibility of the Power Block and Process Supervisors.

DRP maintains the FIFO process to minimize odors.

2.3 Housekeeping Practices and Procedures

- Removal of bulky waste once each weekday (Monday through Friday) or as needed; and
- Each day, cleaning activities are performed on the visible and accessible areas of the tipping floors; floors in the Processing Building; stairs, handrails, and around conveyor motors and couplings; and processing equipment (mobile equipment, conveyors, and shredders). Cleaning activities are performed in the RDF pit area at least five days per week and more often, if necessary.

According to the Odor Management Plan, daily cleaning is completed in the following areas or more frequently on an as needed basis. The following summarizes the activities performed during the week of September 30, 2018 as noted in the VN.

Primary Shredder Rooms: For each day and night shifts, the crew remove potential fire hazards using a bobcat. Each shift conducts daily preventative maintenance cleaning, which requires the operator to blow down the room from top to bottom including around the shredder.

Processing Pits: This area is cleaned daily based on the amount of spillage (frequency of previous operation). The spilled material is fed onto the operating line associated with each pit. In 2019, the facility plans to make repairs to conveyors associated with two of the three processing lines, which should reduce the amount of spillage into the pits.

Process MSW Alleyway: The alleyway is cleared periodically throughout the day for safe access to the picking station stairway. Bulky material is positioned in this area, which is pulled

Mr. Todd Zynda
November 2, 2018
Page 3 of 3

from the conveyors prior to processing and is removed each night. The daily buildup of bulky material is variable based on the composition of the MSW received.

Upper Tipping Floor: The upper tipping floor is operated from 0500-1600, Monday through Friday. The process night crew moves any material on the tipping floor to the MSW floor.

MSW Process Floor: For each day and night shifts, the crew runs the bobcat on the process floor to remove the loose material. In addition, a Billy Goat blower is used periodically to clean underneath conveyors. Employees also use air wands to blow out conveyor guards and tail sections.

The AQD observations were made during the day shift when active processing is occurring and buildup from after the night shift cleaning had already begun. Therefore, during your observation on October 2, 2018, raw material in these areas would be expected as part of normal operations and in compliance with the Odor Management Plan and the ROP No. MI-ROP-M4148- 2011a, FGMSWPROC-LINES, SC IX.1 and Consent Judgment File No. 14-1184CE requirements.

In response to the observed standing water in the tipping floor, pit area and secondary shredder location, the Detroit area received nearly 1.5 inches of rainfall on October 1 and 2 resulting in standing water temporarily in these areas. Water accumulated at the facility, either through storm water which runs onto process pits and floors or drips from waste collection vehicles, is collected and managed as process water. The process water discharges to the Great Lakes Water Authority in accordance with the permit with the Authority.

Consequently, DRP has followed the Odor Management Plan and the ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SC IX.1 and Consent Judgment File No. 14-1184CE requirements and does not constitute as a violation of these requirements.

If you have questions concerning this response, please feel free to contact Mark Fletcher at (313) 963-3394.

Sincerely,

Detroit Renewable Power



Robert Suida, Plant Manager

cc: Mark Fletcher, EHS Manager, DRP
Ms. Jenine Camilleri, Enforcement Unit Supervisor, MDEQ-AQD