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 MAY 23 2019
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VIA CERTIFIED MAIL

May 13, 2019

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

RE: M4148 Detroit Renewable Power – Response to Violation Notice dated April 23, 2019

Dear Mr. Zynda:

This correspondence is Detroit Renewable Power’s (DRP) response to the Violation Notice (VN) dated April 23, 2019 for alleged violations based upon Michigan Department of Environment, Great Lakes, and Energy (EGLE) visits to DRP on March 12, April 8, and April 17, 2019 and review of facility records provided on March 22, 2019 following a request for these records by the Air Quality Division (AQD) of EGLE.

The following table summarizes the AQD alleged violations along with DRP’s response to each event. Explanation of the causes and corrective actions implemented, as applicable, is provided after the table.

Process Description	Rule/Permit Condition	Summary of AQD Comments	DRP Response
SOURCE-WIDE CONDITIONS – Plant Yard	ROP No. MI-ROP-M4148-2011a, SOURCE-WIDE CONDITIONS, SC IX.9 Fugitive Dust Management Plan dated February 2011, Section 4.1.2 Odor Management Plan dated June 2017, Section 2.3a	Excessive track out and debris observed in the facility yard and facility road on April 17, 2019.	Daily observations and cleaning, as necessary, is being completed by DRP personnel.

Process Description	Rule/Permit Condition	Summary of AQD Comments	DRP Response
SOURCE-WIDE CONDITIONS – Plant Yard	ROP No. MI-ROP-M4148-2011a, SOURCE-WIDE CONDITIONS, SC IX.10 Fugitive Dust Management Plan dated February 2011, Section 4.1.3	Garbage debris littering the fence line on March 12, 2019; April 8, 2019; and April 17, 2019.	Daily observations and debris removal, as necessary, is being completed by DRP personnel.
FGMSWPROC-LINES	ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SC IV.1 VI.3 and VI.13	Secondary baghouses have multiple days with pressure drop readings outside the recommended operating range and the range established during the most recent stack test.	The process lines have been idled since March 27, 2019. Maintenance and repairs for pulse air equipment was under review to correct the out-of-range operating pressure prior to idling.
FGMSWPROC-LINES	ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SC IV.3 Fugitive Dust Management Plan dated February 2011, Section 4.4.3 Odor Management Plan dated June 2017, Section 2.2a	Records provided from February 1, 2019 through March 8, 2019 indicate that the negative pressure is not maintained at Tip East 5.	Negative pressure through Tip East 5 is not feasible due to prevailing winds and the orientation of the building. With the reduced number of trucks each day since process and boiler idling, DRP personnel close MSW receiving doors, as practicable, during MSW receiving periods. Periodic velometer readings are still collected approximately every two hours.
FGMSWPROC-LINES	ROP No. MI-ROP-M4148-2011a, FGMSWPROC-LINES, SC IX.1 Odor Management Plan dated June 2017, Section 2.3c Consent Judgment File No. 14-1184CE	The solid waste tipping floor, pit area, and processing equipment were not clean on April 17, 2019.	Since MSW process line idling, the receiving and processing areas have been cleaned and no additional processing has been completed to generate additional debris.
MSW Building	Odor Management Plan dated June 2017, Section 2.4b Consent Judgment File No. 14-1184CE	The odor neutralizer system was not in use in the MSW Building on April 17, 2019.	The odor neutralizer system was restarted on April 22, 2019 and will be in operation on days when MSW management occurs.

Track Out and Debris - SOURCE-WIDE CONDITIONS, SC IX.9, Fugitive Dust Management Plan Section 4.1.2, and Odor Management Plan, Section 2.3a

Sweeping on days when MSW is received is conducted using both mechanical and manual means to mitigate fugitive dust and potential odors from the tracked material. DRP idled MSW processing and boiler operations on March 27, 2019. The amount of material received on a daily basis has greatly reduced and is also delivered to the facility by fewer trucks per day. As a direct result to the significant reduction in truck traffic, the potential sources of odors and fugitive dust resulting from track out is also significantly reduced. Plant management is conducting observations on days when MSW is received to note areas for improvement in sweeping and general housekeeping.

Yard Debris and Property Line Fence Litter- SOURCE-WIDE CONDITIONS, SC IX.10, and Fugitive Dust Management Plan, Section 4.1.3

Facility personnel have removed debris and litter along the fence line and yard, as needed, with daily observations of the area(s) as required in the Fugitive Dust Management Plan.

Secondary Baghouse Pressure Drop - FGMSWPROC-LINES, SC IV.1, VI.3 and VI.13

The MSW processing lines have not required operation since March 27, 2019; therefore, the baghouses operations and associated monitoring, recordkeeping and reporting are not required.

Negative Pressure at Solid Waste Receiving and Storage Rooms - FGMSWPROCLINES, SC IV.3, Fugitive Dust Management Plan, Section 4.4.3, and Odor Management Plan, Section 2.2a

Air flow through Tip East 5 is predominately dictated by the prevailing wind direction due to the physical orientation of the building. Since process and boiler idling in late March, the number of MSW trucks which are received at the plant has been reduced to approximately 12 trucks per day. Although the frequency is variable, DRP has modified operational methods for MSW receiving to reduce the amount of time each day when Tip East 5 is open. When possible, between truck deliveries, Tip East 5 (and other doors) are closed. Velometer readings at each door are still completed approximately every 2 hours. Those doors which are closed at the periodic reading times are noted as such.

Periodic Cleaning of Process Areas - FGMSWPROC-LINES, SC IX.1 Odor Management Plan, Section 2.3c, and Consent Judgment File No. 14-1184CE

Since boiler and MSW processing lines were idled March 27, 2019, DRP has refocused efforts to comprehensively remove debris from the processing and receiving areas. As of April 29, 2019, pits, conveyors, cat-walks, and floors have been cleaned:

- Conveyors 105, 113, 121, 129, 132, 138 and 139
- 140 packer room
- 240/340 packer room
- 500 conveyors area
- 200/300 pit
- 500 pit

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- 100 picking station platform
- 104 shredder room
- Bobcat process floor

Process lines have been idled; therefore additional debris will not be generated.

Standing water due to infiltration from heavy rains is managed as necessary to prevent stagnate water in these areas. The solid waste receiving floor is "zeroed" on a daily basis and cleaned as necessary.

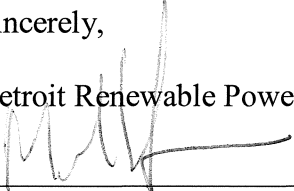
Operation of Odor Neutralizing System - Odor Management Plan, Section 2.4b and Consent Judgment File No. 14-1184CE

The odor neutralization system was restarted on April 22, 2019. The inactivity was an oversight due to changes in personnel following idling of the process and boiler operations. The system is in operation when receiving and holding MSW.

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

Sincerely,

Detroit Renewable Power



Mark Fletcher, EHS Manager

cc: Jenine Camilleri, Enforcement Unit Supervisor, AQD, DEQ