



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

July 6, 2016

Mr. Linwood Bubar, President
Detroit Renewable Power, LLC
5700 Russell St.
Detroit, MI 48211-2545

SRN: M4148, Wayne County

Dear Mr. Bubar:

VIOLATION NOTICE

On June 27, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated complaints regarding nuisance odors alleged to be the result of operations at Detroit Renewable Power, LLC, located at 5700 Russell Street, Detroit, Michigan. The purpose of the investigation was to determine Detroit Renewable Power's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; the conditions of Renewable Operating Permit (ROP) number; MI-ROP-M4148-2011a; Consent Judgment File No. 14-1184CE; and to investigate complaints of nuisance odors received on June 27, 2016.

Mr. Jon Lamb of the AQD performed the investigation from approximately 8:55 PM to 9:50 PM on June 27, 2016, and observed the following air pollution violation:

Process Description	Rule/Permit Condition Violated	Comments
Municipal Solid Waste Processing	R 336.1901(b) ROP No. MI-ROP-M4148-2011, (A)(G.C.12(b)) Consent Judgment File No. 14-1184CE, VI. Civil Fine and Stipulated Fines, Paragraph B.6.2(b)	Strong (Level 4) garbage odors observed emitting from the facility and impacting nearby neighborhoods.

During the investigation on June 27, 2016, Mr. Lamb detected strong garbage odors in residential areas downwind of the facility which were traced back to Detroit Renewable Power. In the AQD staff's professional judgment, the odors observed were of sufficient intensity and frequency so as to constitute a violation of Rule 901(b), Section A, General Condition 12(b) of ROP No. MI-ROP-M4148-2011a, and Section VI.B.6.2(b) of Consent Judgment File No. 14-1184CE.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 27, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing. Although AQD has been aware that DRP is in the process of installing the RDF odor control system, the company shall include a summary of the intermediate actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to minimize or prevent a reoccurrence.

If Detroit Renewable Power believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. Should you require any further information, please contact me.

Sincerely,



Joyce Zhu
Senior Environmental Engineer
Air Quality Division
313-456-4720

cc: Mr. Damian Doerfer, DRP
Ms. LaReina Wheeler, City of Detroit, BSEED
Mr. John Leone, AG
Ms. Lynn Fiedler, DEQ
Ms. Heidi Hollenbach, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeffrey Korniski, DEQ
Mr. Mike Kovalchick, DEQ
Mr. Jonathan Lamb, DEQ