



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

October 12, 2018

Mr. Robert Suida, Plant Manager
Detroit Renewable Power
5700 Russell St.
Detroit, MI 48211-2545

SRN: M4148, Wayne County

Dear Mr. Suida:

VIOLATION NOTICE

On October 2, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), observed stack testing of waste process line 200 (EUMSWPROC-LINE2) at Detroit Renewable Power (DRP) located at 5700 Russell, Detroit, Michigan. As part of the stack test observation, the AQD evaluated DRP'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 Air Pollution Control Rules; MI-ROP-M4148-2011a; and Consent Judgment File No. 14-1184CE.

During observation of the stack test, the following violation was identified.

Process Description	Rule/Permit Condition Violated	Comments
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.

During the October 2, 2018 stack test observation, the AQD recorded pressure drop readings at both the primary shredder and secondary shredder baghouses. To access the pressure drop gages on both the primary and secondary baghouses requires walking through and/or observation of the tipping floor, pit area, and waste processing area. During the stack test observation, neither the tipping floor, pit area, or process equipment appeared to be cleaned. The tipping floor and pit area were observed to have standing water and excessive garbage buildup. The primary shredder area contained excessive garbage buildup on catwalks, stairways, and throughout the primary shredder area. Similarly, during observation of the secondary shredder pressure drop gage it was observed that excessive fine particle refuse derived fuel (RDF) or "RDF fluff", and garbage were on the waste processing floors, stairways, and catwalks. At the secondary shredder pressure drop gage, there was standing water mixed with RDF, creating a wet garbage sludge. During observations it was apparent that daily cleaning is not taking place in a sufficient manner, such that odors from these

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areas are minimized. This is a violation of MI-ROP-M4148-2011a, FGMSWPROC-LINES, Special Condition (SC) IX.1 and Consent Judgment File No. 14-1184CE, Paragraph 3.14. FGMSWPROC-LINES, SC IX.1 and Consent Judgment File No. 14-1184CE, Paragraph 3.14 includes the same language as follows.

“Permittee/Defendants shall clean the solid waste receiving tipping floor, pit area, and processing equipment on a daily basis, or more often if required, such that odor from these sources is minimized.”

On September 30, 2018 and October 1, 2018, the AQD documented moderate to strong, consistent garbage odors in the residential areas downwind of DRP as documented in Violation Notice dated October 4, 2018. This further supports sufficient daily cleaning is not being performed as required.

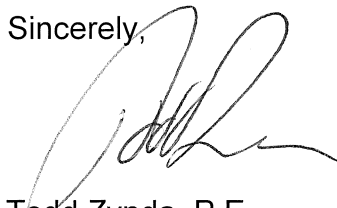
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 2, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If DRP 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 violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Todd Zynda, P.E.
Senior Environmental Engineer
Air Quality Division
313-456-2761

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cc: Mr. Mark Fletcher, DRP
Mr. Paul Max, City of Detroit BSEED
Mr. John Leone, AG
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Jon Lamb, DEQ