



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

September 25, 2018

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

SRN: M4148, Wayne County

Dear Mr. Suida:

VIOLATION NOTICE

On September 24, 2018, 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 Air Pollution Control 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 during the late evening of September 23, 2018 and the morning of September 24, 2018.

On September 24, 2018, Mr. Todd Zynda of the AQD performed an investigation from approximately 8:20 AM to 9:10 AM. During the investigation, the following air pollution violation was observed:

| Process Description | Rule/Permit Condition Violated | Comments |
|----------------------------------|---|---|
| Municipal Solid Waste Processing | R 336.1901(b) ROP No. MI-ROP-M4148-2011a, (A)(G.C.12(b)) Consent Judgment File No. 14-1184CE, VI. Civil Fine and Stipulated Fines, Paragraph B.6.2(b) | Moderately strong (Level 3) garbage odors observed emitting from the facility and impacting nearby neighborhoods. |

During the investigation on September 24, 2018, moderately strong, consistent garbage odors were detected 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 to constitute a violation of Rule

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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.

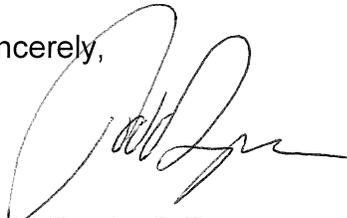
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 16, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the 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 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 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,



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

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