

# RT Holdings of Ohio, LLC

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Air Quality Division  
Detroit Office

**VIA CERTIFIED MAIL AND EMAIL**

September 14, 2015

Mr. Stephen Weis  
Senior Environmental Engineer  
Michigan Department of Environmental Quality  
Air Quality Division – Detroit District Office  
Cadillac Place  
3058 W. Grand Blvd., Suite 2-300  
Detroit, MI 48202

RE: Recycling and Treatment Technologies of Detroit (RTTD) Facility  
Permit to Install (PTI) No. 181-13  
Violation Notice Dated August 24, 2015

Dear Mr. Weis:

This letter is in response to the above-noted Violation Notice, dated August 24, 2015, which was sent to RT Holdings of Ohio, LLC (“RT Holdings”) regarding the compliance status of the Recycling and Treatment Technologies of Detroit (“RTTD”) facility with the Permit to Install (PTI) No. 181-13 conditions.

The August 24, 2015 Violation Notice indicated that the RTTD facility has been in violation of the following permit conditions: EU-STORAGE Special Conditions VI.1, VI.2, and VI.3; and EU-RPP Special Conditions V.1, VI.1, VI.2, VI. 3 and VI.4 for the following period of time: April, 2014 through August, 2015. For ease of review, we have reproduced the above-noted individual specific permit conditions in italics, followed by our completed corrective actions.

- A. EU-STORAGE – Finished oil product storage tanks, Special Conditions VI.1, VI.2, and VI. 3 state the following:

*VI. MONITORING/RECORDKEEPING*

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.*

RT Holdings has developed a tracking spreadsheet and has utilized it to complete and record the required calculations (see Attachment A). The spreadsheet will continue to be updated prior to the 15<sup>th</sup> day of each calendar month going forward, pursuant to the PTI requirements.

- 2. The permittee shall keep, in a satisfactory manner, records of the monthly and 12-month rolling time period, as determined at the end of each calendar month, amount, in gallons, of oil product transferred into and out of EU-STORAGE and make them available to the Department upon request.*

The tracking spreadsheet referenced above (i.e., Attachment A) includes records of the monthly and 12-month rolling time period for the amount of oil product transferred into and out of EU-STORAGE. The spreadsheet has been completed to-date for each month since the PTI took effect, and will be completed by the 15<sup>th</sup> day of each month going forward.

- 3. The permittee shall keep, in a satisfactory manner, records of the monthly and 12-month rolling time period, as determined at the end of each calendar month, emissions of VOC and benzene from EU-STORAGE and make them available to the Department upon request.*

The aforementioned tracking spreadsheet also includes the calculations as required by Special Condition VI.3 above.

- B. EU-RPP – Recycled petroleum product processing, Special Conditions V.1, VI.1, VI.2, VI. 3, and VI.4 state the following:*

#### *V. TESTING/SAMPLING*

- 1. Within 180 days after the date of this permit, the permittee shall verify benzene and isopropylbenzene concentration in the recycled petroleum product produced in EU-RPP by testing at owner's expense, in accordance with Department requirements.*

RT Holdings has completed the required testing and is awaiting results from the analytical laboratory, which will be forwarded to you following our receipt and review of the data. We expect to receive the analytical data this week.

#### *VI. MONITORING/RECORDKEEPING*

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.*

As discussed previously, RT Holdings has developed a tracking spreadsheet to complete and record the required calculations (see Attachment A). The spreadsheet has been completed to-date for each month since the PTI took effect, and will be completed by the 15<sup>th</sup> day of each month going forward.

2. *The permittee shall keep, in a satisfactory manner, all activated carbon breakthrough test results for EU-RPP on file at the facility and make them available to the Department upon request.*

RT Holdings has developed a form to record the results of the activated carbon breakthrough tests (see Attachment B). Going forward, the forms will be scanned after each required weekly test to provide an electronic backup to the paper copies. The form includes a written procedure for measurement of the influent concentration going into the first of two carbon canisters, as well as a measurement of the effluent concentration from each of the two canisters (i.e., a total of three sampling ports). The form also includes instructions for comparing the influent and effluent measurements to determine if breakthrough is occurring, and for replacing the carbon canisters, if breakthrough has occurred.

3. *The permittee shall keep, in a satisfactory manner, records of the monthly and 12-month rolling time period, as determined at the end of each calendar month, amount, in gallons, of recycled petroleum product produced in EU-RPP and make them available to the Department upon request.*

The tracking spreadsheet referenced above (i.e., Attachment A) includes records of the monthly and 12-month rolling time period for the amount of recycled petroleum product produced in EU-RPP. The spreadsheet has been completed to-date for each month since the PTI took effect, and will be completed by the 15<sup>th</sup> day of each month going forward.

4. *The permittee shall keep, in a satisfactory manner, records of the monthly and 12-month rolling time period, as determined at the end of each calendar month, emissions of VOC, benzene, and isopropylbenzene from EU-RPP and make them available to the Department upon request.*

The aforementioned tracking spreadsheet also includes the calculations as required by Special Condition VI.4 above.

In summary, review of the attached recordkeeping spreadsheet indicates that the RTTD facility has not been operating in violation of any permit limitation to-date, but has been satisfying the recordkeeping requirements stated in EU-STORAGE Special Conditions VI.1, VI.2, and VI.3; and EU-RPP Special Conditions V.1, VI.1, VI.2, VI. 3 and VI.4, since the PTI took effect in April 2014. As discussed, RT Holdings has implemented a system to comply with the aforementioned permit requirements and will continue to do so going forward.

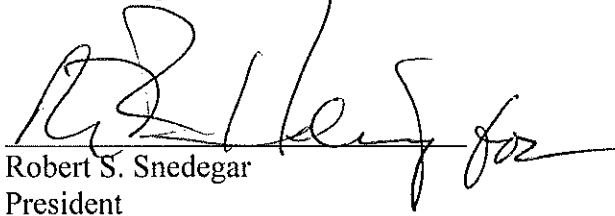
It was also mentioned in the August 24, 2015 Violation Notice that some of the tanks being utilized for the storage of non-hazardous oil product were not those tanks included in the description for EU-OIL. Specifically, EU-OIL references Tanks 12 and 13 (20,000 gallon capacity each), and Tanks 60, and 61 (365,000 gallon capacity each). RT Holdings has been utilizing Tanks 43, 44, 45, 46, and 47 (30,000 gallon capacity each) instead of Tanks 60 and 61, which are out of service. RT Holdings is working with the Michigan Department of Environmental Quality ("MDEQ")-Air Quality Division ("AQD") to modify the description of EU-STORAGE in the PTI to include Tanks 43, 45, 45, 46, and 47 instead of Tanks 60 and 61. This modification would not result in a material change in the air emissions associated with the activities covered by EU-STORAGE.

Additionally, it was noted that the processes covered by the permitted emission units EU-OIL and EU-WWTMT-POLISH have not been operated since the PTI took effect in April 2014. RT Holdings is aware of the additional recordkeeping, testing, and operational requirements specified for emission units EU-OIL and EU-WWTMT-POLISH, and will comply with the requirements of the PTI when these emission units become operational in the future.

Please feel free to contact us at 614- 443-1014 or Integrated Environmental, Inc. at 248-477-5021 should you require anything further.

Very truly yours,

**RT Holdings of Ohio, LLC**



Robert S. Snedegar  
President

cc.: Rick P. Harding, Ph.D., Integrated Environmental, Inc.  
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