



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

August 24, 2015

Mr. Robert Snedegar, President
RT Holdings of Ohio, LLC
809 Marion Road
Columbus, OH 43207

SRN: B4354, Wayne County

Dear Mr. Snedegar:

VIOLATION NOTICE

On Monday, July 27, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the Recycling and Treatment Technologies of Detroit (RTTD) facility, located at 530 Rouge Street in Detroit, Michigan. The purpose this inspection was to determine the compliance of the operations at the RTTD facility 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; and the terms and conditions of DEQ-AQD Permit to Install (PTI) No. 181-13.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-STORAGE - Finished oil product storage tanks.	PTI No. 181-13, Special Conditions VI.1, VI.2 and VI.3.	Records required by the PTI are not being kept.
EU-RPP – Recycled petroleum product processing.	PTI No. 181-13, Special Conditions V.1, VI.1, VI.2, VI.3 and VI.4.	Testing required by the PTI has not been performed, and records required by the permit are not being kept.

During the inspection, it was explained to me that several of the processes and operations addressed by PTI No. 181-13 are not currently in operation, and have not been in operation since the PTI was issued. Specifically,

- RTTD has not treated any oily waste or oily wastewater using the processes and process equipment as described in Emission Unit EU-Oil since the PTI was issued.
- Since no oily waste or oily wastewater has been treated, there has been no wastewater generated that would be treated using the on-site wastewater treatment equipment. The processes and process equipment, as described in the EU-WWTMT_POLISH, have not been used since the PTI was issued.

The other Emission Units addressed in the PTI, EU-STORAGE and EU-RPP, have been in operation since the PTI was issued. The PTI puts forth specific terms and conditions relating to the operation of all of the processes that fall under an Emission Unit designation at the RTTP facility, including those associated with EU-STORAGE and EU-RPP. These requirements include the monitoring and recording of certain operating parameters, as well as records of activity associated with these emission units. During my inspection, I discovered that some of the permit requirements for these Emission Units are not currently being met. These deficiencies are described in the following sections that are specific to the two Emission Units.

EU-STORAGE

The PTI requires that certain records be maintained in order to demonstrate compliance with other permit special conditions. In the EU-STORAGE Emission Unit table, Special Condition VI.2 requires that RTTD keep records, on a monthly and 12 month rolling time period basis, of the amount of oil product, in gallons, transferred into and out of the storage tanks. This permit Special Condition is necessary in order to demonstrate compliance with Special Condition II.1, which limits the storage tanks in EU-STORAGE to having no more than 29,200,000 gallons of oil product transferred into and out of the storage tanks per year; this annual limit is based on a 12 month rolling time period as determined at the end of each calendar month.

Similarly, Special Condition VI.3 requires that RTTD keep records, on a monthly and 12 month rolling time period basis, of the calculations of VOC and benzene emissions associated with the use of the storage tanks. The records required to be kept by this Special Condition are the basis for demonstrating compliance with Special Conditions I.1 and I.2, which limit the activities associated with EU-STORAGE to emitting 955 lbs. of VOC and 1 lb. of benzene to the ambient air per year.

During my inspection, I was provided with a facility-wide record of materials that were accepted at RTTD, as well as shipped from RTTD. However, the records were not specific to the storage tanks represented by EU-STORAGE, and the information relating to material received and shipped was not tabulated in a monthly and 12 month rolling total format. Also, there are no records of emission estimates for VOCs and benzene.

EU-RPP

As is the case with EU-STORAGE, the PTI also requires that certain records be maintained in relation to the operation of the processes and equipment associated with EU-RPP in order to demonstrate compliance with other permit special conditions. Special Condition VI.3 requires that RTTD keep records, on a monthly and 12 month rolling time period basis, of the amount of recycled petroleum product produced in EU-RPP. This permit Special Condition is necessary in order to demonstrate compliance with Special Condition II.1, which limits the amount of recycled petroleum product that can be produced by EU-RPP to 610,000 gallons per year; this annual limit is based on a

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12 month rolling time period as determined at the end of each calendar month. The same facility-wide record that I was provided with to review the throughputs associated with EU-STORAGE contains records of all of the outbound shipments of recycled petroleum product, but the information is not tabulated in a monthly or 12 month rolling time period format.

In addition, Special Condition IV.4 requires that RTTD keep records, on a monthly and 12 month rolling time period basis, of the calculations of VOC, benzene and isopropylbenzene emissions associated with EU-RPP. The records required to be kept by this Special Condition are the basis for demonstrating compliance with Special Conditions I.1, I.2 and I.3, which limit the activities associated with EU-RPP to 4.3 tons per year of VOC, 143 lbs. of benzene per year, and 38 lbs. of isopropylbenzene per year, respectively. These records are not currently being kept by RTTD.

The PTI contains other requirements specific to the EU-RPP Emission Unit under the "Testing/Sampling" heading. Special Condition V.1 requires that, within 180 days of issuance of PTI 181-13, RTTD was to verify the concentration of benzene and isopropylbenzene in the recycled petroleum product by having a sample of the material tested. During my inspection, I was told that staff at the RTTD facility was not aware of such a test being conducted; it was mentioned that the test may have taken place, but that they are unaware of it. In addition, Special Condition V.2 requires that the first canister on the dual-stage activated carbon system that is used to control emissions from EU-RPP be checked for breakthrough once each week. This permit condition also specifies the actions to be taken by RTTD if breakthrough is detected. I was shown that records of the breakthrough checks are currently being kept on a paper log sheet, but the sheets were damaged by a water leak in the main building. There are currently no back-ups to the paper log sheet. In order to adequately demonstrate compliance with Special Condition V.2, RTTD should develop and maintain a record that includes the influent concentration to the carbon system that serves as the baseline for determining whether or not there is breakthrough, as well as records of the readings from the hand held analyzer that is used to check for breakthrough.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 14, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates that 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.

If RTTD 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of RTTD. 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,



Stephen Weis
Senior Environmental Engineer
(313) 456-4688
weiss@michigan.gov

cc: Mr. Don Kaniowski, RTTD
Mr. Rick Harding, Integrated Environmental, Inc.
Ms. LaReina Wheeler, City of Detroit BSEED
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Barb Rosenbaum, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ