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 MAR 15 2023
 Air Quality Division
 Detroit Office

March 14, 2023

VIA E-Mail

Mr. Stephen Weis
 Department of Environment, Great Lakes, and Energy
 Air Quality Division-Detroit District
 3058 West Grand Boulevard, Suite 2-300
 Detroit, Michigan 48202

SUBJECT: Violation Notice
 Valicor Environmental Services - Dearborn MI
 February 14, 2023 Visit by EGLE Air Quality Division
 Determination of Compliance

Dear Mr. Weis,

This letter is our response to your violation notice, dated February 21, 2023, for the compliance inspection that occurred on February 14, 2023.

Valicor Environmental Services LLC (VALICOR) has responded to each of the following violations observed in the February 14, 2023 compliance visit item-by-item, and has provided a written response as to the date the violations occurred; an explanation of the cause 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 are to take place; and what steps are being taken to prevent a reoccurrence.

Process Description	Rule/Permit Condition Violated	Comments
EUSTABILIZE- a non-hazardous liquid and solid waste stabilization operation that includes processing chambers located inside of a building.	PTI No. 305-04A, Special Condition (SC) 1.3	SC 1.3 requires that the permittee keep the doors and windows of the processing building closed while processing waste material. Processing took place while some of the bay doors on the stabilization were either open or not fully closed due to damage or other issues related to the doors.

In the days before the February 14th visit, the VALICOR facility was experiencing periodic and seemingly random issues with the actuators on the overhead doors of the solidification processing facility not fully opening or closing. VALICOR engaged Quality Overhead Door (QOD) to



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In the days before the February 14th visit, the VALICOR facility was experiencing periodic and seemingly random issues with the actuators on the overhead doors of the solidification processing facility not fully opening or closing. VALICOR engaged Quality Overhead Door (QOD) to

troubleshoot the actuator issues on multiple occasions since February 7, 2023 but they had not yet identified the root cause(s). QOD was onsite February 14th to reset the travel limits and replace damaged door slats. As you observed on your visit at our facility on Wednesday February 15th, all doors were functional and in the closed position during normal operation. On Tuesday, February 28, 2023, QOD replaced the bearings and drive chains of one door, but that didn't correct the travel problem as anticipated. From February 15th through March 2, 2023, QOD has been onsite daily to address door issues. VALICOR has not operated the solidification facility without the doors being in the closed position since February 14, 2023.

On March 3, 2023, QOD identified worn drums and spring tensioners as the root cause of the periodic door travel issues. Replacement drums and springs options for all doors will be quoted and ordered upon review. The installation will begin immediately upon arrival (anticipated within 2-4 weeks). In the interim, the VALICOR maintenance technician and/or QOD have and will continue to ensure the bay doors are fully closed when processing material.

Process Description	Rule/Permit Condition Violated	Comments
EUSTABILIZE	PTI No. 305-04A, SC 1.6	<p>SC 1.6 requires the permittee to maintain negative pressure in the EUSTABILIZE building during normal operations.</p> <p>EUSTABILIZE operated with some of the building's bay doors either open or not fully closed, such that the negative pressure was not maintained.</p>

As explained in the previous response, the VALICOR facility has identified the root cause of the door travel issues and has developed a plan to correct the deficiencies. In the interim, VALICOR personnel can make adjustments to ensure the bay doors are fully closed when processing material.

Process Description	Rule/Permit Condition Violated	Comments
EUSTABILIZE	PTI No. 305-04A, SC 1.7; R 336.910	<p>SC 1.7 puts forth that the permittee shall not operate EUSTABILIZE unless the wet scrubber is installed, maintained and operated in a satisfactory manner.</p> <p>EUSTABILIZE was operated at times when one or both of the two scrubbers associated with EUSTABILIZE were not operational.</p>

Although VALICOR typically operate both scrubbers simultaneously to optimize visibility, the design enables maintenance downtime of one scrubber while maintaining compliance with negative pressure. Periodically, VALICOR has performed maintenance on one or the other scrubber blower, but we have not experienced interruption of both blowers prior to February 14th. The South Scrubber Blower tripped off-line on Friday, February 10th and was being evaluated for repair. Before repair of the South Blower could be accomplished, the North Scrubber Blower experienced a bearing failure on the morning of February 14th, just prior to the site visit. The cause of the North Blower interruption was determined to be metal fatigue at a bearing mount, and was repaired the evening of February 14, 2023. The South Blower impeller fan was identified as being broken, and was consequently repaired on February 15th.

VALICOR's Corporate Maintenance Manager was at the Dearborn MI facility on Thursday and Friday February 16-17, 2023 to assess the blowers and has recommended both scrubber blowers be replaced to improve uptime reliability. After investigating several options VALICOR placed an order to purchase two new "in-kind" blowers on March 10, 2023. Delivery of the replacement blowers will occur in 6-8 weeks, and installation will occur immediately thereafter. In the interim, both blowers are being monitored closely to ensure reliable operation.

Process Description	Rule/Permit Condition Violated	Comments
EUSTABILIZE	PTI No. 305-04A, SC 1.9	<p>SC 1.9 requires that the permittee verify the negative static pressure in the waste treatment building associated with EUSTABILIZE. SC 1.9 puts forth guidelines for the testing negative static pressure testing procedure and requires that the testing be performed at least once every year.</p> <p>Testing to verify the negative static pressure in the waste treatment building has not been conducted within the last year.</p>

Prior to the February 14th visit, VALICOR had solicited bids and was in the process of scheduling the current year's test with Technical Service Professional (TSP). The test was to coincide with the ongoing pit liner replacements, because TSP would be on-site to inspect the concrete basins already. The negative static pressure test in the waste treatment building associated with EUSTABILIZE is currently scheduled for the week of March 27-31st, 2023. Once this initial test is done, VALICOR will add this negative pressure testing to our Computerized Maintenance Management System (CMMS) to occur on an annual basis.

Process Description	Rule/Permit Condition Violated	Comments
EUSTABILIZE	Consent Order AQD Order No. 35-2005, paragraph 2.29	<p>Paragraph 2.29 puts forth that the facility shall fully comply with the terms and conditions of Permit to Install No. 305-04A. Paragraph 2.16 puts forth that PTI no. 305-04A is an enforceable part of AQD Order No. 35-2005. EGLE-AQD has cited violations of SC's 1.3, 1.6, 1.7 and 1.9 of PTI No. 305-04A.</p>

VALICOR was unaware that EnviroSolids and CESI were subjected to an active Consent Order until February 21, 2023 . This matter was not disclosed by the seller (EnviroSolids) during the diligence process, nor has it ever been brought up during our numerous conversations with EGLE since purchasing the facility in September of 2021. Furthermore, Consent Orders (CO) are typically assigned through a formal transfer process between the regulating entity and assignee.

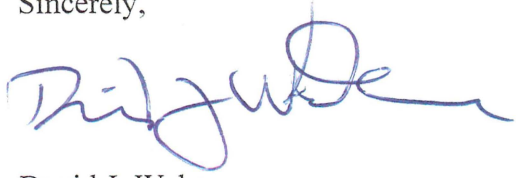
While we are not disputing the requirements of the CO, VALICOR has been put in a situation to where it is being held responsible for the terms and conditions of a CO without benefit of knowing about its existence and lack of a formal transfer process. Now that VALICOR has been made aware of this CO, we will follow the conditions of it specific to Paragraph 2.29.

Process Description	Rule/Permit Condition Violated	Comments
EUSTABILIZE	Consent Order AQD Order No. 35-2005, paragraph 5.2	Paragraph 5.2 requires that any violation(s) of the terms and conditions of the Consent Order be verbally reported to EGLE District Supervisors no later than the close of the next business day following the detection of the violation(s); and followed up with a written report within five days following the detection of the violation(s). The written report is to include a detailed description of the violation(s), the precise causes of the violation(s), and a schedule of implementation of any proposed corrective action(s). EGLE-AQD did not receive notification of the violations cited in this correspondence.

As explained in the previous response, VALICOR was unaware that EnviroSolids and CESI were subjected to an active Consent Order until February 21, 2023 . This matter was not disclosed by the seller (EnviroSolids) during the diligence process, nor has it ever been brought up during our numerous conversations with EGLE since purchasing the facility in September of 2021. Furthermore, Consent Orders (CO) are typically assigned through a formal transfer process between the regulating entity and assignee. While we are not disputing the requirements of the CO, VALICOR has been put in a situation to where it is being held responsible for the terms and conditions of a CO without benefit of knowing about its existence and lack of a formal transfer process. Now that VALICOR is aware of this CO, we will follow the conditions specific to Paragraph 5.2.

If you have any additional questions, please feel free to contact me directly at 513-200-5373, or at my email which is dweber@valicor.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "David J. Weber". The signature is fluid and cursive, with a large initial "D" and "W".

David J. Weber
Valicor Environmental Services, LLC
Regional Compliance Manager
Northeast Regional District

Cc: Jeanine Camilleri, Enforcement Unit Supervisor (EGLE-Lansing Michigan)