



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



DAN WYANT
DIRECTOR

October 2, 2015

Mr. Terry Howes, Environmental Compliance Manager
US Ecology Detroit-North
6520 Georgia St.
Detroit, MI 48211

SRN: M4008, Wayne County

Dear Mr. Howes:

VIOLATION NOTICE

On August 28, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of US Ecology Detroit-North located at 6520 Georgia St., 48211, Michigan. The purpose of this inspection was to determine US Ecology Detroit – North’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 administrative rules and the conditions of Permit to Install (PTI) number 302-07A and Wayne County Permit numbers C-10626 through C-10632.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUSTABILIZE	302-07A; Special Conditions III.2. and III.3	Building was not under negative pressure during operation. More than two bay doors were open while processing
EUSTABILIZE	302-07A; Special Conditions III.4. and IV.1 R. 336.1910	Baghouses did not appear to be maintained and operating properly at time of inspection.

On August 28, 2015, the AQD staff observed operation of EUSTABILIZE while the baghouses did not appear to be operating properly. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

The EUSTABILIZE building also did not appear to be under negative pressure at the time of inspection, based on the building’s pressure gauge and visual observations. In addition, the permit allows no more than one bay door to the EUSTABILIZE building to be open during normal operation, except during unloading, at which time up to two bay

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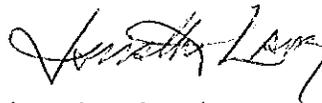
doors may be open. During the inspection, three bay doors were observed to be open during processing.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 23, 2015 (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.

If US Ecology Detroit-North 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 and for the cooperation that was extended to me during my inspection of US Ecology Detroit-North. 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,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc: Ms. LaReina Wheeler, City of Detroit, Department of Environmental Affairs

cc/via e-mail: Ms. Lynn Fielder, DEQ

Ms. Mary Ann Dolehanty, DEQ

Ms. Teresa Seidel, DEQ

Mr. Thomas Hess, DEQ

Ms. Wilhemina McLemore, DEQ

Mr. Jeff Korniski, DEQ

Ms. Tracy Kecskemeti, DEQ

Ms. Jeanette Noechel, DEQ

Mr. Rich Conforti, DEQ