



# THE ENVIRONMENTAL QUALITY COMPANY

EQ DETROIT • 1923 FREDERICK STREET • DETROIT, MICHIGAN 48211 • tel 800-495-6059 • fax 313-923-3375

May 12, 2014



Mr. Jonathan Lamb  
Senior Environmental Quality Analyst  
Air Quality Division  
Cadillac Place  
3058 West Grand Boulevard, Suite 2-300  
Detroit, MI 48202

**RE: M4545, Wayne County, AQD Violation Notice Dated April 14, 2014**

Dear Mr. Lamb:

This letter is in response to the "Violation Notice" dated April 14, 2014. In the letter, the Michigan Department of Natural Resources and Environment (MDNRE), Air Quality Division (AQD) notified EQ Detroit, Inc. (EQD) of the violations noted below. Based on an email conversation on April 28, 2014, you granted EQD an extension to the May 5, 2014 deadline for responding to the NOV to that of May 12, 2014. The following provides a response to each of the alleged violations listed in that letter.

Process Description	Rule/Permit Condition Violated	Comments
Chem-Fix	PTI No. 269-04D; EUTREATMENT, SC III.3	Failure to maintain negative pressure in Chem-Fix building, allowing particulate emissions to escape building.
Chem-Fix	Act 451, Rule 301	Particulate emissions greater than 20%; highest 6-minute opacity was 63%.

**Cause and duration of the violation:**

At approximately 10:30 am on April 11, 2014 there was active steam generated from Vault 706 due to the dumping of a concentrated sulfuric acid load into water in order to neutralize the acid strength. This Vault is located close to the southwest door where the violation was noted. When this type of reaction occurs, it may take up to an hour for the steam to dissipate. We believe this was the case when you performed your opacity reading. Any steam from the acid reaction was completely dissipated by 11:30 am.



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## **Corrective Actions & Preventative Measures:**

An internal investigation of the incident was conducted. During this incident, the air system was temporarily overwhelmed by the steam created from the neutralization reaction. As a result all doors should remain closed during a reaction. Training will occur to ensure all personnel are aware of permitted requirements.

To minimize future strong exothermic reactions during the unloading of acid waste streams more frequent mixing within the waste tank will occur.

Coincidentally, just prior to the incident, routine clean out of the duct work from the baghouse had been scheduled for Saturday, May 3, 2014. In addition to our other efforts, we believe this will increase air flow which will increase the negative air pressure within the building. Additional maintenance has also been scheduled for early summer to replace baghouse bags and cages to further increase the efficiency of the baghouse.

The cost of high-speed doors throughout Chem-Fix is also being investigated. This would minimize the amount of time doors are open thereby increasing air flow and maintaining the appropriate negative air pressure.

## **Observation on April 17, 2014 by Todd Zynda:**

During the unloading process, it was noted by our operators that two doors were open during the time of Mr. Zynda's observation. The winds were observed to be very strong that day. The actions taken above will reduce the likelihood of future occurrences. In addition, during times of stronger winds, extra attention will be paid to wind direction and open doors.

If you have any further questions please contact me at (313) 347-1328 or by email at [krystal.brown@eqonline.com](mailto:krystal.brown@eqonline.com).

Sincerely,

Krystal K. Brown  
QEHS Manager, EQD

CC: Scott Maris, EQ  
Scott Binder, EQD  
EQD File