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October 27, 2015

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 October 12, 2015**

Dear Mr. Lamb:

This letter is in response to the "Violation Notice" dated October 12, 2015. In the letter, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) notified US Ecology (DBA EQ Detroit), located at 1923 Frederick, Detroit, Michigan of the violation noted below based on an investigation performed by DTE on September 29, 2015. The following provides a response to the alleged violation listed in that letter.

Process Description	Rule/Permit Condition Violated	Comments
Chem-Fix	R 336.1901(b)  PTI No. 269-04E; General Condition 6	Very strong (Level 5) mercaptan odors, attributable to US Ecology's operations, impacting areas downwind of the facility.

At approximately 9:00 pm on September 29, 2015 General Manager, Raymond Landsberg was contacted by DTE due to a natural gas odor they were receiving calls for near Wayne State University. Shortly after, Raymond arrived onsite to investigate the odor and determine if any was from the US Ecology facility.

Upon investigation it was noted the winds were coming out of the Northeast and the temperature had dropped significantly from days prior. These conditions will often

result in the air from the facility's stack to drop which could result in nuisance odor. Never, at any time, was there an odor onsite at the US Ecology facility.

After the initial complaints, the treated material in Vault 703 was capped to mitigate any possible odors. US Ecology worked with DTE to borrow their misting system to provide an environmentally friendly, water-based deodorant used for neutralizing odors into our Chem-Fix building as an additional precaution. The air system was shut down and processing ceased for part of the day to ensure no odors were being emitted. The air system was slowly brought back up and processing resumed late afternoon with no further complaints.

Raymond contacted the Air Quality division early Wednesday morning and later spoke with Rich Conforti to provide information on what was being done at the site. The Department indicated a Notice of Violation would be issued to US Ecology (DBA EQ Detroit) for the nuisance odor.

Upon being made aware of possible odors, US Ecology began a full investigation into what material could be responsible. The Company pulled the report of all the containers and bulk loads that went into the vault and reviewed the associated waste profiles. Our investigation of the waste profiles that went into the batch did not show that anything particularly stands out or any mention of a mercaptan, US Ecology has remained diligent in an attempt to locate the source of the odor, but has been unable to locate a specific source.

Concurrently, all of the retains from the waste containers and bulk loads processed were pulled and the laboratory re-evaluated them. None of the retains had the mercaptan (additive used in natural gas to help detect leaks) odor that was detected.

US Ecology takes this matter very serious. A team of people are assigned daily to proactively drive around the surrounding community observing for odors. We have also now purchased a misting system similar to the one that DTE loaned us.

Per your request, we are including the list of what was processed, generator and approximate quantity based on container size.

Should you have any additional questions, please contact me at (313) 347-1328.

Sincerely,



Krystal K. Brown  
EHS Manager

Enclosure

cc: Raymond Landsberg, USEDS  
Jim Conn, USE Chicago  
Andy Marshall, USE Boise  
Scott Binder, USEDN