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October 13, 2016

Jonathan Lamb
Senior Air Quality Analyst
Air Quality Division
Department of Environmental Quality
Cadillac Place
3058 West Grand Boulevard
Suite 2-300
Detroit, Michigan 48202-6058

RE: SRN 4545 Violation Notices dated September 23, 2016 and October 4, 2016

Dear Mr. Lamb:

This letter is in response to the "Violation Notice" dated September 23, 2016 and "Violation Notice" dated October 4, 2016. In the letter, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) notified US Ecology-Detroit South (USEDSD) of the violations noted below. The following provides a response to the alleged violations listed in that letter.

Date	Process Description	Rule/Permit Condition Violated	Comments
9-20-16	Chem-Fix	R 336.1901(b); PTI No. 269-04E, General Condition 6	Moderately strong (Level 3) lime dust and chemical-type odors, attributable to US Ecology's operations and impacting areas downwind of the facility.
9-23-16	Chem-Fix	R 336.1901(b); PTI No. 269-04E, General Condition 6	Moderate to Strong (Level 3 and 4) lime dust and chemical-type odors, attributable to US Ecology's operations, impacting areas downwind of the facility.

At the time of the alleged violations stated above, Mr. Todd Zynda contacted Raymond Landsberg with the complaint. Mr. Landsberg immediately contacted Operations to investigate. During the time of the company's investigations it was noted that on September 20, 2016, a large volume of rag oil from an onsite

wastewater treatment tank cleanout was being dried up. This requires more dust than normal. In addition, US Ecology's typical dust supplier was down. The subsequent dust the company had to purchase can sometimes produce stronger exothermic reactions which in turn can create a fair amount of steam that can mistakenly viewed as solids. This was most likely the cause for the observation.

The batch reports for both days do not identify any wastestreams that would be concerning. Per the agency's request, the batch reports for both days are provided.

The lime odor detected is from the routine solidification of our materials in our Chem-Fix operation. As a result of these violations, however, USEDS has implemented several important changes to minimize the chances of future issues arising from our normal operation.

First, we have created new procedures and provided employee training that includes slowing the treatment process down in the event a stronger exothermic reaction occurs. Additionally, we have added personnel requirements for the testing and inspections of air duct penetrations during times such as these. Lastly, we have worked with our high-speed door vendor to reprogram our doors so the delay time for closing the door has been reduced to further prevent any emissions leaving the building.

US Ecology Detroit South takes these matters very seriously. The company is in the process of testing out new technologies that will further mitigate any potential odor from being detected offsite. Once a course of action has been decided upon, further correspondence will be sent to the agency highlighting our proposed improvements to the air handling system. Additionally, the company will continue to be diligent in its efforts to prevent nuisance odors by thoroughly reviewing waste profiles before approval, using a deodorizer in our stacks if an odor is detected, continuing routine preventative maintenance on the baghouse and proactively monitoring for odors offsite from the facility.

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

Sincerely,



Krystal K. Brown
EHS Manager

Enclosures

cc: Raymond Landsberg, USE Detroit South
Jim Conn, USE Chicago (via email)
Andy Marshall, USE Boise (via email)