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May 16, 2017

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 Notice dated April 27, 2017.

Dear Mr. Lamb:

This letter is in response to the "Violation Notice" dated April 27, 2017 when the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) notified US Ecology- Detroit South (USED S) of the violation noted below. The following provides an additional detailed response to the alleged violations identified in that letter.

Date	Process Description	Rule/Permit Condition Violated	Comments
03/10/17	Chem-Fix	PTI No. 269-04E, Special Condition EUTREATMENT, III.3	Facility processed and unloaded material while the Chem-Fix building was not under negative pressure.

On March 8, 2017, southeast Michigan experienced wind speeds in excess of 60 miles per hour. As a result, extensive damage to the company's stabilization building occurred. Initial notification was provided to Rich Conforti with the Waste Management & Radiological Protection Division followed by a voicemail message to you regarding the building's condition. On March 9, 2017 an additional email update was also sent to you.

Due to concerns regarding the health and safety of contractors performing the necessary demolition and repairs, USED S worked closely with Rich Conforti on a plan of action to remove waste from the treatment vaults safely and in a timely manner to

minimize problems from additional winds and precipitation events. On March 10, 2017, waste was removed from Vaults 704, 706 and a portion of 701. The material was solid and did not produce any visible emissions. The remaining vaults containing waste were then tarped until the next round of loading out could be completed.

During the planning discussions on March 14, 2017 with both the Waste Management and Radiological Protection division (WMRP) and the Air Quality Division (AQD) to safely remove the remaining solid material from the vaults, you requested that USEDS needed to apply for a temporary Permit to Install. The PTI was approved and the remainder of the waste as well as treatment reagent was removed with the exception of the non-hazardous, primarily liquid Vault 702.

Included with this letter is a copy of the timeline of conversations and events that was provided to the MDEQ on March 22, 2017.

To summarize, the company continues to be diligent in its efforts to work closely with the agency divisions while the building repairs take place.

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

Sincerely,



Krystal K. Brown
Environmental Compliance Manager

Enclosures

cc: Raymond Landsberg, USE Detroit South (via email)
Andy Marshall, USE Boise (via email)
Dan Belisle, USE Romulus (via email)
Rich Conforti, MDEQ



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March 22, 2017

Mr. Jack Schinderle, Division Director
Waste Management & Radiological Protection Division
Michigan Department of Environmental Quality
525 W. Allegan
Lansing, MI 48909-7741

**RE: EQ Detroit, Inc. (DBA US Ecology) MID 980 991 566
Wind Damage to Chemical Fixation Building**

Dear Mr. Schinderle:

This letter is to provide a detailed report from what took place as a result of the extreme winds on Wednesday, March 8, 2017 until present as requested by the letter from your office dated March 14, 2017 addressed to Raymond Landsberg and in accordance with Condition II.L.7(b) of the company's license. For purposes of this letter, US Ecology Detroit South may be referenced as "USEDSD". Please refer to the following details:

Wednesday, March 8, 2017

- 8:30 am – 9:00 am – Normal loading out had been completed.
- 10:00 am - Extremely strong winds were forecasted and the decision was made to stop any processing within the Chem-Fix building. The last truck emptied into Vault 702 (non-hazardous) at approximately this time.
- Pieces began to break away from the roof and siding of the building.
- The building and areas of the property downwind were evacuated.
- 1:50 pm – The baghouse system was voluntarily shut down due to arcing on the main power line.
- Approximately 2:00 pm – notification of the damage and shut down was made to Rich Conforti with a follow up voicemail to Jon Lamb. No further operations were taking place within the Chem-Fix building.
- Provided update to Al Taylor and Jack Schinderle.
- Approximately 3:00 pm – Single phasing of the electrical effected the southern half of the facility (Chem-Fix, drum dock & T&P fed from different DTE feed).

Thursday, March 9, 2017

- 8:30 am – Contacted Rich Conforti with an update.
- 10:30 am – Spoke with Greg Marrow and explained the event and plans to move forward.
- 10:30 am – Jim Day arrived on site to conduct an inspection. An explanation of the company's plans to move out most of the material in the vaults was provided. Photos were taken and forwarded to Rich Conforti. At this time, all vaults remained covered.
- Began some early stage demolition to curtains and piping for safety.
- 12:45 pm – Contacted Rich Conforti with a status of the vaults, plans to load out approximately 40 yards of V- 701 (cleared lab), approximately 100 yards of V-704 and approximately 80 yards of V-706 (non-hazardous, damp solids) on March 11, 2017. Rich Conforti indicated he was waiting for Jim Day's assessment and would update Al Taylor and Jack Schinderle.
- 2:40 pm – An email update was sent to Jon Lamb.
- 3:10 pm – 4:30 pm – Email correspondences between Rich Conforti and Krystal Brown regarding covering of remaining vaults and V-703 not passing the lab, requiring additional treatment prior to disposal. A change in plans to move out V-704 and V-706 on Friday morning, March 10, 2017 was discussed. Higher winds were not expected until later that afternoon.
- 4:00 pm – 7:00 pm - Covered all vaults with tarps to prevent any dust concerns.

Friday, March 10, 2017

- Full power was restored at the site.
- 5:00- 7:00 am – V-704, V-706 and part of V-701 were successfully loaded out with no visible emissions. One load, approximately 40 yards, still remained in V-701.
- 7:30 am – Photos of the tarped vaults were forwarded to Rich Conforti, Jack Schinderle and Jim Day.

Saturday, March 11, 2017 and Sunday, March 12, 2017

- No additional correspondence with the state. No additional removal of material and no visible emissions.

Monday, March 13, 2017

- No changes to the vaults. Vaults remained tarped. There were no visible emissions.

Tuesday, March 14, 2017

- 7:30 am – Email sent to Rich Conforti indicating there were no changes to the vaults. Inquired about the need to leave V-702 (non-haz with liquids) for the duration of the repairs/replacements.
- 9:30 – 10:30 am – Additional email correspondences between Rich Conforti, Jim Day and Krystal Brown to discuss status and plans to move forward.
- Afternoon – phone discussions regarding V-705 (hazardous) and the need to remove the approximate 100 – 120 yards of this still.
- Approximately 2:00 pm – Spoke with Jon Lamb regarding the need to get a temporary PTI to complete loading out since material needed to be moved without negative pressure being maintained in the building.
- 3:00 pm – Spoke with Cindy Smith who provided the PTI application and instructions.
- Spoke with Andrew Drury regarding the application.
- 3:30 pm – Submitted application via email to Andrew Drury with original signed copy overnighted via UPS.
- 3:50 pm – Andrew Drury confirmed receipt of the email and emission calculations for V-705 were requested utilizing AP-42 Chapter 11.12.

Wednesday, March 15, 2017

- 8:00 am – Krystal Brown contacted GZA consultants to assist in a quick turnaround of the emissions calculations.
- Additional questions were discussed between Krystal Brown and Andrew Drury for clarification.
- 3:00 pm – Amy Robertson and Rich Conforti were contacted after it was discovered the power problems caused the company's ambient air station #1 to require a new power line. Amy instructed Krystal Brown to not sample at stations #2 or #3 on March 20, 2017 either until repairs were completed. Repairs should be completed by March 24, 2017 and sampling will occur on March 26, 2017.
- 3:30 pm – Final calculations were provided to Andrew Drury.
- 3:45 pm – PTI-269-04F was approved.

Thursday, March 16, 2017

- 8:00 am – 12:00 pm – Jon Lamb arrived on site to witness V-705 being loaded out.
- 12:00 – 3:30 pm – Krystal Brown participated in a Federal Rail Association inspection. During the inspection learned more material remained in V-705 due to no longer being compacted in the vault, requiring more space.
- 4:30 pm – Notified Jon Lamb, Rich Conforti, J. Korniski, W. McLemore there was still material remaining in V-705 and the

company was receiving additional boxes with plans to proceed loading out the remainder beginning at 6:30 pm.

Friday, March 17, 2017

- 6:45 am – Notification was sent that loading of V-705 was completed.
- 10:50 am – 11:30 am – Email correspondences between Rich Conforti, Jim Day and Krystal Brown were had to discuss the plan to load out the remaining of V-701 and all of V-703 (approximately 360 yards) on Saturday, March 18, 2017.

Saturday, March 18, 2017

- Approximately 10:00 am 2:00 pm Jim Day arrived on site to take photos and witness the remaining load outs of V-701 and V-703.

At no time since the Chemical Fixation building was shut down on March 8, 2017 did any processing/treatment occur in any of the vaults. As of Saturday, March 18, 2017, V-702 remains in place and will have a more permanent cover placed over it for the duration of the project. There has been no increase to the hazardous waste storage allowed under the company's Hazardous Waste Operating License. EQ Detroit, Inc. (DBA US Ecology) does not believe there was never a concern for release of hazardous waste or hazardous waste constituents which could have endangered public drinking water supplies, threaten human health or the environment or a spill that reached surface water or groundwater.

US Ecology will remain in contact regarding the progress of the repairs/replacement of the roof and siding, but anticipates the repairs/replacement to be completed sometime between the end of April 2017 and end of May 2017. As part of the company's action items, a minor modification for the addition of a corrosion resistant foam will be further discussed as part of the final construction details. USEDS also appreciates the support the agency has provided during this urgent matter. Should you have any further questions, please contact me at (313) 347-1328.

Sincerely,



Krystal K. Brown

Environmental Compliance Manager

cc: Rich Conforti, MDEQ
Jim Day, MDEQ
Jon Lamb, MDEQ
Raymond Landsberg, USE Detroit South
Dan Belisle, USE Romulus
Andy Marshall, USE Boise