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October 9, 2018

Jonathan Lamb, Senior Air Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division
3058 W. Grand Boulevard
Suite 2300
Detroit, MI 48202

RE: EQ Detroit, Inc. (DBA US Ecology – Detroit South) – Response to Violation Notice dated September 20, 2018 for Alleged Nuisance Odors on September 18, 2018

Dear Mr. Lamb:

This correspondence is US Ecology – Detroit South’s (USE-DS) response to the Violation Notice (VN) dated September 20, 2018 regarding odors allegedly from USE-DS’s operations and in violation of PTI No. 269-04E; General Condition 6 and R336.1901(b) on September 18, 2018. Inspections conducted by MDEQ-AQD in response to complaints reportedly found a moderately strong (level 3), persistent lime dust and chemical-type odors attributable to USE-DS’s operations, impacting areas downwind of the facility on September 18, 2018. USE-DS completed a review of the day in question and found that applicable equipment was functioning properly and no unusual odors were identified by personnel proximate to the site.

USE-DS received a total of three odor VNs prior to September of this year. Following the second violation of the year, which occurred on July 17, 2018, USE-DS requested a meeting with your office to discuss odors, including, how complaints are reviewed, the efforts that have been taken by USE-DS to reduce odors, what MDEQ’s expectations are regarding the subjective language in Rule 901, and what MDEQ would recommend for USE-DS in regard to dealing with the odor violations.

The requested meeting took place on August 2, 2018 (attendees included: Jon Lamb MDEQ, Todd Zynda MDEQ, Dan Belisle USE, Raymond Landsberg USE-DS, and Tabetha

Peebles USE-DS). The meeting concluded with AQD recommending USE-DS have an odor evaluation conducted. As suggested, USE-DS solicited the help of a contractor and met with RWDI Consulting Engineers out of Winsor, ON on August 13, 2018. There were several questions from RWDI on the odor survey approach which led to a request for a second meeting with MDEQ. The second meeting took place on August 31, 2018 (attendees included: Raymond Landsberg USE-DS, Tabetha Peebles USE-DS, Brad Bergeron RWDI, Jon Lamb MDEQ, and Todd Zynda MDEQ). Brad Bergeron presented information on conducting an odor survey to MDEQ.

In Mr. Bergeron's presentation he noted that the one drawback to conducting an odor survey is the lack of scientific/numerical limits, or guidelines available. MDEQ's odor threshold is very subjective where some areas, such as Ontario and other parts of the US, have a numerical limit associated with odors. MDEQ also commented on how they would like Michigan to have numerical limits for odor but know that is not something that will happen in the short-term.

Based on feedback from MDEQ in the August 31st meeting, Brad Bergeron of RWDI supplied a quote of approximately \$24,000 to complete an odor survey. The odor survey will take place in mid to late October of this year and consist of pulling samples straight from the stacks at the Chemfix building and the Chempre scrubber exhaust. The samples will be sent for a panel review to determine the odor levels. The odor levels will be used to create a dispersion model which will depict where the odors drift due to stack height and other criteria. Additionally, the odor levels will be compared with Ontario standards as a benchmark and recommendations will be made based on the evaluation.

The recommendations could range from increasing stack height to installing a scrubber. In addition to the odor survey, the current odor neutralizing system will be evaluated to determine its level of effectiveness. MDEQ stated in the meeting that they would not have an issue with USE-DS removing the system in the event it is not as effective as originally thought. The elimination of the odor neutralizing system would save money to use toward other odor reduction improvements.

USE-DS takes odor management very seriously and remains thorough in its efforts to prevent nuisance odors by scrutinizing waste profiles prior to approval, proactively monitoring for odors offsite, and continuing routine preventative maintenance on the baghouses and odor neutralizing system. The facility is also diligent in community outreach by encouraging citizens to call and even take tours of the facility in order to understand the company and its goals to be a good community partner.

USE-DS appreciates MDEQ's assistance in these efforts by notifying us of potential issues and following-up with investigations. In order to enable USE-DS to respond most

effectively to odor concerns, we ask that MDEQ continue to notify Raymond Landsberg, General Manager, and Tabetha Peebles, Environmental Compliance Manager, as soon as possible with all essential details when any odor complaint potentially relating to USE-DS is received. This will allow USE-DS to immediately investigate and potentially respond to the complaint and report the results back to MDEQ.

If you have questions concerning this response, please feel free to contact Tabetha Peebles at (313) 347-1328.

Sincerely,



Raymond Landsberg
General Manager

Enclosures

cc (via email):

Paul Max, City of Detroit, BSEED
Rich Conforti, MDEQ
Todd Zynda, MDEQ
Mary Ann Dolehanty, MDEQ
Craig Fitzner, MDEQ
Christopher Ethridge, MDEQ

Jenine Camilleri, MDEQ
Wilhemina McLemore, MDEQ
Jeff Korniski, MDEQ
Tracy Kecskemeti, MDEQ
Jeannette Noechel, MDEQ
Andrew Bertapelle, MDEQ