



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

October 12, 2015

Ms. Krystal Brown, QEHS Manager
U.S. Ecology
1923 Frederick St.
Detroit, MI 48211

SRN: M4545, Wayne County

Dear Ms. Brown:

VIOLATION NOTICE

On September 29 and 30, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received complaints of nuisance odors alleged to be the result of operations at U.S. Ecology Detroit (South), located at 1923 Frederick, Detroit, Michigan. AQD staff followed up on these complaints on September 30 and October 1, 2015, to determine U.S. Ecology's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; the conditions of Permit to Install (PTI) number 269-04E and to investigate complaints which were received on September 29 and 30, 2015, regarding odors attributed to U.S. Ecology's operations.

During the evening of September 29, 2015, I detected very strong mercaptan odors downwind of the facility while driving on the Lodge Freeway near the New Center/Midtown areas. An investigation by DTE, in response to several hundred complaints received that night and early morning reporting natural gas leaks, determined that the mercaptan odors were caused by operations performed at U.S. Ecology, which was later confirmed by representatives of U.S. Ecology. As a result, U.S. Ecology is being cited for the following violation:

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 U.S. Ecology's operations, impacting areas downwind of the facility.

R 336.1901(b) states, in part:

"A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health and property, or the unreasonable interference with the comfortable enjoyment of life and property."

Ms. Krystal Brown

Page 2

October 12, 2015

In my professional judgment, the odors observed were of sufficient intensity and frequency so as to constitute a violation of R 336.1901(b) and General Condition 6 of PTI No. 269-04E.

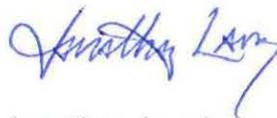
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 2, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

In addition, please include a list of all waste streams which were processed in the Chem-Fix building on September 29, 2015, including the generator of each waste stream, description of each waste stream, and amount of each waste stream processed.

If U.S. Ecology believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. Should you require any further information, please contact me.

Sincerely,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc: Ms. LaReina Wheeler, City of Detroit, BSEED
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Tracy Kecskemeti, DEQ
Ms. Jeannette Noechel, DEQ
Mr. Richard Conforti, DEQ