



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GRETHER
DIRECTOR

August 3, 2016

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

SRN: M4545, Wayne County

Dear Ms. Brown:

VIOLATION NOTICE

On July 22, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated complaints of nuisance odors in the vicinity of U.S. Ecology Detroit South, located at 1923 Frederick, Detroit, Michigan. The purpose of the investigation was to determine U.S. Ecology Detroit South'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 July 22, 2016, regarding odors in the vicinity of U.S. Ecology Detroit South.

Mr. Todd Zynda of the AQD performed the complaint investigation from approximately 7:45 PM to 8:45 PM on July 22, 2016, and observed the following air pollution violation:

Process Description	Rule/Permit Condition Violated	Comments
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 U.S. Ecology Detroit South's operations and 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."

This rule (Rule 901(b)) is incorporated into U.S. Ecology Detroit South's PTI No. 269-04E as General Condition 6.

During the investigation of July 22, 2016, Mr. Zynda detected strong lime dust and chemical-type odors in residential and commercial areas downwind of the facility which

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were traced back to U.S Ecology Detroit South. In the AQD staff's professional judgment, the odors observed were of sufficient intensity and duration so as to constitute a violation of Rule 901(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 August 24, 2016 (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 July 22, 2016, including the generator of each waste stream, description of each waste stream, and amount of each waste stream processed.

If U.S. Ecology Detroit South 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

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Ms. Tracy Kecskemeti, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Ms. Jeannette Noechel, DEQ
Mr. Richard Conforti, DEQ
Mr. Todd Zynda, DEQ