



RICK SNYDER  
 GOVERNOR

DAN WYANT  
 DIRECTOR

September 23, 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 September 20, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated a complaint 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'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 the complaint received on September 20, 2016, regarding odors in the vicinity of U.S. Ecology Detroit South.

Mr. Todd Zynda of the AQD performed the complaint investigation from approximately 9:30 PM to 10:30 PM on September 20, 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	Moderately strong (Level 3) lime dust and chemical-type 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."

During the investigation of September 20, 2016, Mr. Zynda detected moderately strong, persistent lime dust and chemical-type odors in residential and commercial areas downwind of the facility which were traced back to U.S Ecology Detroit South. In the AQD staff's professional judgment, the odors observed were of sufficient intensity and

Ms. Krystal Brown  
Page 2  
September 23, 2016

duration so as to constitute a violation of Rule 901(b) and General Condition 6 of PTI No. 269-04E.

Additionally, during the investigation, opacity was observed from the Chem-Fix Building, for approximately 20 minutes (9:45 PM to 10:05 PM). Due to the dark night time conditions, Method 9 visible emission readings were not performed. Photos of the opacity were provided to Mr. Raymond Landsberg on September 21, 2016.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 14, 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 your response, please include a list of all waste streams which were processed in the Chem-Fix building on September 20, 2016, including the generator of each waste stream, description of each waste stream, and amount of each waste stream processed.

In addition, the AQD requests that U.S. Ecology perform an investigation into the cause of the visible emissions that occurred the evening of September 20, 2016. Please provide the results of the investigation and corrective actions conducted to prevent reoccurrence of such situations.

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

Ms. Krystal Brown  
Page 3  
September 23, 2016

cc: Ms. LaReina Wheeler, City of Detroit, BSEED

cc via email: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Tracy Kecskemeti, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ  
Ms. Jeannette Noechel, DEQ  
Mr. Richard Conforti, DEQ  
Mr. Todd Zynda, DEQ