



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

September 9, 2019

Ms. Tabettha Peebles, Environmental Compliance Manager
U.S. Ecology Detroit South
1923 Frederick St.
Detroit, MI 48211

SRN: M4545, Wayne County

Dear Ms. Peebles:

VIOLATION NOTICE

On August 27 and 28, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), 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'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 269-04H.

During the investigations, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUTREATMENT	R 336.1901(b) PTI No. 269-04H; General Condition 6	Moderate to strong (Level 3 and 4), persistent 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 investigations of August 27 and 28, 2019, AQD staff detected moderate to strong, persistent lime dust and chemical-type odors in residential areas downwind of the facility which were traced back to U.S Ecology Detroit South. In the professional judgment of AQD staff, the odors observed were of sufficient intensity and duration so as to constitute a violation of R 336.1901(b) and General Condition 6 of PTI No. 269-04H.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 30, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates 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.

Please submit the written response to the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

cc: Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Jenine Camilleri, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jeff Korniski, EGLE
Mr. Todd Zynda, EGLE