



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

November 1, 2021

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 October 18, 19, and 26, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), investigated complaints of nuisance odors alleged to be the result of operations at U.S. Ecology - Detroit South, located at 1923 Frederick, Detroit, Michigan. The purpose of these investigations 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.

Investigations were performed by Mr. Jonathan Lamb of the AQD on the following dates and times:

- October 18, 2021, from 10:10 AM to 10:55 AM
- October 19, 2021, from 11:30 PM to 12:15 AM
- October 26, 2021, from 7:50 PM to 8:40 PM

During each of these investigations, the following violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
EUTREATMENT	R 336.1901(b) PTI No. 269-04H; General Condition 6	Persistent and objectionable odors of moderate to strong intensity (Level 3 and 4), attributable to U.S. Ecology's operations, impacting residential areas downwind of the facility.

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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 performed on October 18, 19, and 26, 2021, AQD staff observed persistent and objectionable odors of moderate to strong intensity (Levels 3 and 4) impacting residential areas downwind of U.S. Ecology – Detroit South. In each of these investigations, AQD staff determined the source of the odors to be U.S. Ecology - Detroit South. In AQD staff’s professional judgment, during each investigation 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.

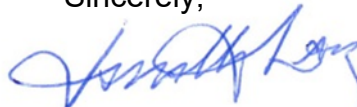
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 22, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 violations cited above. If you have any questions regarding the violations 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

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cc: Mr. Hosam Hassanien, City of Detroit BSEED
Ms. Crystal Rogers, City of Detroit BSEED
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Jenine Camilleri, EGLE
Ms. Mary Carnagie, EGLE
Mr. Greg Morrow, EGLE
Ms. Jennifer Hazelton, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE