



GRETCHEN WHITMER
GOVERNOR

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

EGLE
DANIEL EICHINGER
ACTING DIRECTOR

February 10, 2023

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

SRN: M4545, Wayne County

Dear Tabetha Peebles:

VIOLATION NOTICE

On February 8, 2023, 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 this 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.

The investigation was performed by Jonathan Lamb of the AQD from approximately 9:20 AM to 11:05 AM on February 8, 2023. During the investigation, 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.

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 performed on February 8, 2023, 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. AQD staff determined the

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source of the odors to be U.S. Ecology – Detroit South. In AQD staffs professional judgment, 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 March 3, 2023 (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 cause 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 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 a violation 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
313-348-2527

cc: Hosam Hassanian, City of Detroit BSEED
Crystal Rogers, City of Detroit BSEED
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Jeff Korniski, EGLE
Mary Carnagie, EGLE
Greg Morrow, EGLE
Jennifer Hazelton, EGLE
Todd Zynda, EGLE