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JUN 26 2019

Air Quality Division
Detroit Office

June 21, 2019

Jonathan Lamb
Department of Environment, Great Lakes, and Energy
3058 West Grand Boulevard
Suite 2-300
Detroit, Michigan 48202

RE: Response to June 11, 2019 - Violation Notice
Petro – Chem Processing Group of Nortru, LLC

Dear Mr. Lamb:

This letter is in response to your June 11, 2019 Violation Notice specific to your August 28 and September 14, 2018 inspections. I have included the information in the following sections to correspond to the order of the three “violations” listed in your communication.

1. The smoke test to monitor/verify negative pressure is conducted the first operational day of the year of the EU-PUMPROOM. Even though the operations of the pump room have and continue to decline significantly (not operated in 2019). As appropriate, operations are and will be maintained according to the stipulated requirements in the PTI. The smoke test results are to be captured on the permanganate concentration(s) spread sheet maintained in the on-site notebook. If they have not been adequately documented, Stericycle will assure that future smoke test data will be appropriately documented. A stand-alone spread sheet for the smoke test recordings will be prepared and included/maintained in the permanganate concentration notebook. Attached is a copy of the smoke test method originally submitted to you on May 9, 2016.
2. The facility has and continues to collect average monthly benzene, formaldehyde, and chloroform concentrations of all waste inbound in the FG CONTNROFFLOAD. An example spread sheet was presented to you in May 2016 (attached) and for your review an updated version with the data presented in both megagrams and percent by weight are included. We corrected the spread sheet to read/report percent by weight directly and will continue to maintain as directed. We apologize for the inconvenience. These records are and will continue to be maintained in the on-site laboratory office.
3. The facility has and continues to collect total benzene quality from waste processed in FGFACILITY both monthly and 12-month rolling time period basis. Example spread sheets are attached for your review (both 2018 and 2019 to date). These records are and will continue to be maintained in the on-site laboratory office.



Thank you for your time and consideration regarding these matters. We appreciate the opportunity to work with the Department of Environment, Great Lakes, and Energy. Stericycle continues strives to work toward improvement in all aspects including safety, operations, and environmental compliance. Your comments assist in that effort. If there are any questions, please contact me at allen.jones@stericycle.com or 313-824-5832.

Sincerely,

STERICYCLE ENVIRONMENTAL SOLUTIONS

A handwritten signature in blue ink, appearing to read "Allen Jones", with a long horizontal flourish extending to the right.

Allen Jones
General Manager

enclosure

C: E. Burk, Stericycle