

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

N073143797

FACILITY: Nortru, LLC		SRN / ID: N0731
LOCATION: 421 LYCASTE, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Ed Burk , Manager, Environmental Heath & Safety		ACTIVITY DATE: 08/28/2018
STAFF: Jonathan Lamb	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Targeted inspection, FY 2018		
RESOLVED COMPLAINTS:		

**INSPECTION NOTES:**

An initial inspection was performed with U.S. EPA Region V on March 28, 2018, which included a facility walk-through and monitoring of the processing equipment for leaks using an infrared camera (FLIR) and TVA 220 FID analyzer, which was performed by Luke Hullinger and Scott Connolly of U.S. EPA. I performed follow-up inspections on August 28 and September 14, 2018, to review processing records, parametric monitoring records, and emission calculations.

DATE OF INSPECTION: March 28, 2018

INSPECTED BY: Luke Hullinger, U.S. EPA R5; Scott Connolly, U.S. EPA R5; Jonathan Lamb, MDEQ-AQD  
STERICYCLE PERSONNEL PRESENT: Ed Burk, EH&S Manager; Alan Jones, Location Manager; Dwayne Keith, Lab Technician

DATES OF INSPECTION: August 28 and September 14, 2018

INSPECTED BY: Jonathan Lamb, MDEQ-AQD  
STERICYCLE PERSONNEL PRESENT: Ed Burk, EH&S Manager; Dwayne Keith, Lab Technician

SAFETY EQUIPMENT REQUIRED: hard hat, steel-toed boots, safety glasses, safety vest

**FACILITY BACKGROUND:**

Stericycle Environmental Solutions, Inc. (Stericycle), formerly Nortru, Inc., is a waste processing and fuel blending facility located at 421 Lyncaste St. (operations) and 515 Lyncaste St. (offices) in Detroit, Michigan. The facility is RCRA Part 111 licensed to transfer, store, and process hazardous and non-hazardous wastes, including solvents, waste fuels, paints, and household hazardous wastes. Stericycle purchased this facility in May 2014.

**COMPLAINT/COMPLIANCE HISTORY:**

Based on its inspection on March 28, 2018, U.S. EPA issued a Finding of Violation (FOV) to Stericycle, Inc. on June 18, 2018, for violations of 40 CFR Part 63, Subpart DD, 40 CFR Part 61, Subpart FF, and Renewable Operating Permit No. MI-ROP-N0731-2009. These violations included: failure to properly operate the vapor balance system, pressure relief valves, and sampling ports; failure to correctly calibrate VOC monitoring equipment and meet the performance criteria of Method 21 while monitoring; and failure to maintain vapor tight seals on delivery vessels. A copy of this FOV can be found in the facility file.

Stericycle was found to be in noncompliance with several conditions during the last inspection of the facility performed on April 26 and September 19, 2016, resulting in the issuance of a Violation Notice on October 14, 2016. The violations included failure to maintain accurate records and failure to report deviations. The facility was issued a Violation Notice on October 22, 2015, for not submitting ROP semi-annual certification reports in a timely manner.

The facility is required to perform ambient air monitoring per its Part 111 license. The ambient monitoring results have shown recurring issues with spikes of various compounds, including xylene, toluene, and methylene chloride. AQD and OWRP staff met with the company most recently on January 22, 2016, to discuss these monitoring concerns. More recent monitoring reports have continued to show periodic exceedances.

**OUTSTANDING CONSENT ORDERS:**

There are no outstanding consent orders. Facility entered into Consent Agreement and Final Order (CAFO) Docket No. CAA-05-2002-0020 with USEPA on September 30, 2002 and operated under this CAFO until the CAFO was terminated by USEPA on June 24, 2009.

**PROCESS DESCRIPTION AND EQUIPMENT:**

Stericycle primarily performs fuel blending of solvent-based wastes, including paint solvents and solvent flush waste. The blended solvents are then sold to be used as fuel for cement kilns. The facility also performs waste consolidation for disposal off-site. Wastes are received from tankers or from drums/totes.

Drums are processed in the Container Management Building, which includes a drum segregation/storage area, a pump room for emptying drums (EU-PUMPROOM), and a lab pack area (EU-LABPACKAREA). The lab pack area is used to consolidate compatible small-quantity wastes, often from labs or retail, into larger quantities to ship off site for disposal. Contents of the drums unloaded in the pump room are stored in either of two 6,000-gallon waste storage tanks (EU-WASTETANK1 and EU-WASTETANK2). All of these operations are permitted under the flexible group FG-CONTNROFFLOAD and emissions are controlled by a permanganate scrubber. During the past two years, the facility reports minimal processing in the Container Management Building. Per Mr. Burk, the building is mainly used during very cold weather; processing records show almost all the processing in FG-CONTNROFFLOAD has occurred in January and February of 2017 and 2018.

The offloading of wastes from tankers is performed in the TS1 and TS2 Transfer Pads, permitted as the flexible group FG-TruckTransfer. Truck offloading is performed using vapor balance to control emissions.

Fuel blending (FG-BlendingTanks) is performed in the TS1 and TS2 Tank Farms. Wastes are pumped into the tank farms either directly from tankers or from EU-WASTETANK1 or EU-WASTETANK2. TS1 Tank Farm consists of fifteen 30,000-gallon vertical tanks (EU-TS1Tank 16 through EU-TS1Tank 30) and TS2 Tank Farm consists of six 30,000-gallon vertical tanks (EU-TS2Tank35 through EU-TS2Tank40). All tanks in the TS1 and TS2 Tank Farms are equipped with agitators for blending and are controlled with an interconnecting vapor balance system, which equalizes the vapor pressure throughout the tank farms.

The facility has a natural gas-fired boiler with a heat input of 12.6 MMBtu which is used for building and process heating; this boiler is exempt from permitting per R.282(b)(i). There are two other boilers on site that are currently not in use; I was unable to obtain the heat input rating from the boiler plate, but the boilers appear to be similar in size or smaller than the 12.6 MMBtu boiler, so they should also meet the R.282(b)(i) exemption.

#### **APPLICABLE RULES/ PERMIT CONDITIONS:**

Stericycle was considered a major source for hazardous air pollutants (HAPs), under Section 112 of the Clean Air Act, at the time the facility was required to submit the required notification per 40 CFR 63.697 (Subpart DD – Off-Site Waste and Recovery Operations NESHAP) because the facility had a potential to emit HAPs above major source thresholds and failed to obtain an opt-out permit prior to the notification deadline of October 19, 1999. Therefore, due to the USEPA's "once in, always in" policy, the facility was determined to be a major source and required to obtain a Renewable Operating Permit (ROP), which was issued on August 19, 2009. The U.S. EPA rescinded its "once in, always in" policy in 2018 and the facility has submitted a permit application to opt-out of Title V permitting requirements. This permit application is currently under review. At this time, Stericycle remains a Title V-subject source and is also subject to the following federal standards:

- 40 CFR Part 63, Subpart DD – National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations;
- 40 CFR Part 61, Subpart FF – National Emission Standards for Benzene Waste Operations;
- 40 CFR Part 63, Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline);
- 40 CFR Part 60, Subpart Kb – Standards of Performance for Volatile Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

The facility was issued ROP No. MI-ROP-N0731-2009 on August 19, 2009, which also incorporated the conditions of Consent Agreement and Final Order (CAFO) Docket No. CAA-05-2002-0020. However, after the issuance of ROP No. MI-ROP-N0731-2009, the CAFO was terminated and the facility has since been issued two PTIs (PTI Nos. 84-04B and 84-04C) which have superseded the conditions of MI-ROP-N0731-2009. These conditions will be incorporated into the ROP upon renewal, pending the facility's decision to receive a permit modification to opt out of Title V permitting requirements. The ROP renewal application was received by AQD on December 13, 2013. The active permits are listed below:

- ROP No. MI-ROP-N0731-2009;
- PTI No. 84-04C, issued February 11, 2011;
- PTI No. 84-04B, issued April 8, 2009;
- PTI No. 184-13, issued May 6, 2014.

For this inspection, records from January 2017 through July 2018 were reviewed in determining compliance with

the following permit conditions. Copies of these records can be found in the facility file:

ROP No. MI-ROP-N0731-2009, Special Conditions:

EU-MVRSCONDTANK and FG-RTO&Scrubber: The RTO, acid gas scrubber, and master vapor recovery system (MVRs) have been discontinued and EU-MVRSCONDTANK and FG-RTO&Scrubber are no longer in use. Therefore, these conditions were not evaluated during the inspection.

FG-TruckTransfer: The conditions of ROP No. MI-ROP-N0731-2009, FG-TruckTransfer have been superseded by PTI No. 84-04B, FG-TruckTransfer.

FG-TS1BlendingTanks and FG-TS2BlendingTanks: The conditions of ROP No. MI-ROP-N0731-2009, FG-TS1TransferTanks and FG-TS2TransferTanks have been superseded by PTI No. 84-04B, FG-BlendingTanks.

FG-ContnrOffload: The conditions for ROP No. MI-ROP-N0731-2009, FG-ContnrOffload have been superseded by PTI No. 84-04C, FG-CONTNROFFLOAD.

For ROP No. MI-ROP-N0731-2009, the facility is in compliance with the following conditions for FG-TruckTransfer, FG-TS1BlendingTanks, FG-TS2BlendingTanks, and FG-ContnrOffload:

## VII. Reporting

1, 2, and 3. IN COMPLIANCE. Semi-annual reports of monitoring and deviations are submitted by March 15 (for reporting period July 1 through December 31) and September 15 (for reporting period January 1 through June 30) each year, as required per GC 23 of Part A.

PTI No. 84-04C, Special Conditions:

FG-CONTNROFFLOAD: All equipment and operations associated with waste offloading from containers, up to the point that materials are transferred to FG-BLENDINGTANKS or FG-TRUCKTRANSFER. This includes the following emission units: EU-LABPACKAREA, EU-PUMPROOM, EU-WASTETANK1, and EU-WASTETANK2.

## II. MATERIAL LIMITS

1. IN COMPLIANCE. Facility did not exceed 30,000 containers processed per 12-month rolling time period in FG\_CONTNROFFLOAD. The highest 12-month rolling total number of containers processed during the compliance period was 646 containers for the 12-month rolling time period ending in July 2018.
2. NOT DETERMINED. Facility did not provide the proper calculations of average benzene content of offloaded material in FG-CONTNROFFLOAD on a percent weight basis to demonstrate compliance with this condition. This condition will be reevaluated when the revised calculations are submitted to AQD.
3. NOT DETERMINED. Facility did not provide the proper calculations of average formaldehyde content of offloaded material in FG-CONTNROFFLOAD to demonstrate compliance with this condition. This condition will be reevaluated when the revised calculations are submitted to AQD.
4. NOT DETERMINED. Facility did not provide the proper calculations of average chloroform content of offloaded material in FG-CONTNROFFLOAD to demonstrate compliance with this condition. This condition will be reevaluated when the revised calculations are submitted to AQD.

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 61, Subparts A and FF. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 61, Subpart FF in its FOV issued June 18, 2018: 40 CFR 61.355(h)(2), 40 CFR 61.355(h)(4)(ii), 40 CFR 61.343(a)(1), and 40 CFR 61.349(a)(2)(ii).
2. NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 63, Subparts A and DD. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 63, Subpart DD in its FOV issued June 18, 2018: 40 CFR 63.694(k)(3), 40 CFR 63.694(k)(5)(ii), and 40 CFR 63.691(c)(1).
3. IN COMPLIANCE. Facility appears to be in compliance with the applicable provisions of 40 CFR Part 63, Subparts A and EEEE. The average vapor pressure of the material stored in the tanks (~7.7 to 9.9 kilopascals) is below the range of Table 2 of Subpart EEEE of Part 63 - Emission Limits, which applies to tanks containing material with an average vapor pressure between 27.6 to 76.6 kilopascals.
4. IN COMPLIANCE. Facility has implemented and maintained a malfunction abatement plan (MAP) for FG-CONTNROFFLOAD.

5. IN COMPLIANCE. Facility has implemented and maintained a MAP for EU-PUMPROOM, including the conservation vents on EU-WASTETANK1 and EU-WASTETANK2, operation of the permanganate scrubber, spill minimization, and maintaining negative pressure in EU-PUMPROOM.

6. NA. There is no S.C. III.6 due to a typo in the permit.

7. NOT EVALUATED. EU-PUMPROOM was not in operation at the time of inspection and has been used sparingly the past two years. However, negative pressure was not verified using smoke tests in 2017 or 2018, in accordance with the procedures in Appendix A.

#### IV. DESIGN/EQUIPMENT PARAMETERS

1. NOT EVALUATED. EU-PUMPROOM was not in operation at the time of inspection. However, the facility did not perform negative pressure testing in 2017 or 2018.

2. IN COMPLIANCE. Facility maintains permanganate concentration at a minimum of 3 percent by weight when FG-CONTNROFFLOAD is in operation.

3. IN COMPLIANCE. Main header system and permanganate scrubber are installed, maintained, and operated in a satisfactory manner during container offloading in EU-PUMPROOM and material transfer to EU-WASTETANK1 or EU-WASTETANK2

4. IN COMPLIANCE. EU-WASTETANK1 and EU-WASTETANK2 are equipped with conservation vents.

#### V. TESTING/SAMPLING

1. NOT IN COMPLIANCE. Verification of negative static pressure in EU-PUMPROOM was not performed in 2017 or 2018 in accordance with the procedures in Appendix A.

#### VI. MONITORING/RECORDKEEPING

1. IN COMPLIANCE. The facility records the number of containers processed in FG-CONTNROFFLOAD on a monthly and 12-month rolling time period basis.

2. NOT IN COMPLIANCE. Facility failed to provide the average benzene, formaldehyde, and chloroform content of all offloaded waste on a percent by weight basis based on a composite off all materials offloaded during the calendar month to demonstrate compliance with the limits set in FG-CONTNROFFLOAD, SC I.1 through 3.

3. NOT IN COMPLIANCE. Facility failed to provide the average benzene, formaldehyde, and chloroform concentration of all offloaded waste on a monthly basis on a percent by weight basis based on a composite off all materials offloaded during the calendar month to demonstrate compliance with the limits set in FG-CONTNROFFLOAD, SC I.1 through 3.

4. IN COMPLIANCE. Facility monitors the permanganate concentration in the scrubber twice per day, at the start and end of each shift, on days when FG-CONTNROFFLOAD is in operation.

5. IN COMPLIANCE. Facility records the permanganate concentration in the scrubber twice per day, at the start of each shift, on days when FG-CONTNROFFLOAD is in operation. These records were provided during the inspection.

6. IN COMPLIANCE. Facility appears to be in compliance with the applicable provisions of 40 CFR Part 63, Subparts A and EEEE. Based on monthly analysis, the average vapor pressure of the material stored in the tanks (~7.7 to 9.9 kilopascals) is below the range of Table 2 of Subpart EEEE of Part 63 - Emission Limits, which applies to tanks containing material with an average vapor pressure between 27.6 to 76.6 kilopascals.

#### VIII. STACK/VENT RESTRICTIONS

1. IN COMPLIANCE. Scrubber stack (SV-CONTNRSCRUB) appears to meet the permit requirements of maximum diameter of 20 inches and minimum height of 33.2 feet above ground.

2 and 3. IN COMPLIANCE. Diffuser stacks 1 and 2 (SV-DIFFUSER1 and SV-DIFFUSER2) appear to meet the permit requirements of maximum diameter of 14 inches and minimum height of 16 feet above ground.

4. IN COMPLIANCE. SV-GROUNDSTACK appears to meet the permit requirements of maximum diameter of 32 inches and minimum height of 41 feet above ground.

#### PTI No. 84-04B, Special Conditions:

FG-ContnrOffload: The conditions of PTI No. 84-04B, FG-ContnrOffload have been superseded by the conditions of PTI No. 84-04C, FG-CONTNROFFLOAD.

FG-BlendingTanks: Waste fuel storage tanks. This includes EU-TS1Tank16 through EU-TS1Tank30 and EU-TS2Tank35 through EU-TS2Tank 40.

## II. MATERIAL LIMITS

1. IN COMPLIANCE. Prior to performing a cleanout of any tank in FG-BlendingTanks, the permittee shall ensure that no single component of the material stored inside the tanks exceeds 40% by weight of the material. During the compliance period, cleanouts of TS1 Tanks 17, 19, and 23 were performed on August 9 and 10, 2017. The most recent sample from the tanks prior to cleanout was obtained on August 4, 2017; analysis of this sample performed by University Labs showed a xylene content of approximately 39.8% by weight, which is in compliance with the 40% limit.

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. IN COMPLIANCE. Facility maintains records of tank dimensions and capacity, material type and quantity stored in each tank, vapor pressure of the content of each tank, and all maintenance and inspections performed on each tank to demonstrate compliance with the provisions of 40 CFR Part 60, Subparts A and Kb.  
2. NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 63, Subparts A and DD. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 63, Subpart DD in its FOV issued June 18, 2018: 40 CFR 63.694(k)(3), 40 CFR 63.694(k)(5)(ii), and 40 CFR 63.691(c)(1).

## IV. DESIGN/EQUIPMENT PARAMETERS

1. NOT IN COMPLIANCE. Each tank in FG-BlendingTanks is equipped with a conservation vents and vapor balance system; however, the U.S. EPA staff detected leaks from multiple tanks during their inspection on March 28, 2018, and again during their follow-up inspection on August 2, 2018.  
2. IN COMPLIANCE. Each tank in FG-BlendingTanks is equipped with alarms and pressure/vacuum relief valves for each tank and pumps with automatic cut-off systems. Alarms are set to go off if the content of any tank reaches a capacity of 28,000 gallons.

## VI. MONITORING/RECORDKEEPING

1. IN COMPLIANCE. Facility performs inspections and monitors operating information in accordance with the provisions of 40 CFR Part 60, Subparts A and Kb.  
2. IN COMPLIANCE. Vapor pressure of FG-BlendingTanks is monitored on a monthly basis. Since the vapor balance system equalizes pressure between all tanks in FG-BlendingTanks, the vapor pressure is approximately the same in all tanks in FG-BlendingTanks. These records were provided during the inspection. During the compliance period, the vapor pressure of the materials stored in FG-BlendingTanks ranged from 58 mmHg @ 25 C (~7.7 kilopascals) to 74 mmHg @ 25 C (~9.9 kilopascals).  
3. IN COMPLIANCE. Facility maintains records of inspections and monitoring information to demonstrate compliance with the provisions of 40 CFR Part 60, Subparts A and Kb. These records were provided during the inspection.  
4. IN COMPLIANCE. The dimensions and analysis of capacity of each tank in FG-BlendingTanks is maintained on site.  
5. IN COMPLIANCE. Vapor pressure of FG-BlendingTanks is recorded on a monthly basis. Since the vapor balance system equalizes pressure between all tanks in FG-BlendingTanks, the vapor pressure is approximately the same in all tanks in FG-BlendingTanks. These records were provided during the inspection. Vapor pressure ranged from 58 mmHg @ 25 C (May 2018) to 74 mmHg @ 25 C (Jan. 2017).  
6. IN COMPLIANCE. Facility maintains records of the date and identification of each tank cleaned out and performs an analysis of the contents of the blending tanks on a monthly basis. Cleanouts were performed on TS1 Tanks 17, 19, and 23 on August 9 and 10, 2017.

## IX. OTHER REQUIREMENTS

1. IN COMPLIANCE. Provisions of PTI No. 84-04B for FG-BlendingTanks became effective upon termination of CAFO Docket No. CAA-05-2002-0020 on June 24, 2009.

FG-TruckTransfer: Tanker truck load/unloading pads. This includes EU-TS1TransferPad and EU-TS2TransferPad.

## II. MATERIAL LIMITS

1. IN COMPLIANCE. Total number of truckloads through FG-TruckTransfer did not exceed the permit limit of 7,300 truckloads of material 12-month rolling time period. Highest 12-month rolling total was 3,021 truckloads

processed in the 12-month rolling time period ending July 2018.

### III. PROCESS/OPERATIONAL RESTRICTIONS

1. IN COMPLIANCE. A vapor balance system is installed, maintained, and operated for all organic liquid transfers involving FG-TruckTransfer.
2. IN COMPLIANCE. Facility appears to be in compliance with the applicable provisions of 40 CFR Part 63, Subparts A and EEEE. The average vapor pressure of the material stored in the tanks (~7.7 to 9.9 kilopascals) is below the range of Table 2 of Subpart EEEE of Part 63 - Emission Limits, which applies to tanks containing material with an average vapor pressure between 27.6 to 76.6 kilopascals.
3. IN COMPLIANCE. Facility implements and maintains a malfunction abatement plan (MAP) for the loading rack and vapor balance system which includes recordkeeping for maintenance activities and a procedure for corrective action in case of malfunction.

### IV. DESIGN/EQUIPMENT PARAMETERS

1. NOT IN COMPLIANCE. Facility failed to maintain and operate the vapor balance system in a satisfactory manner to prevent equipment leaks during vessel unloading. This was cited in the U.S. EPA's FOV issued on June 18, 2018.

### VI. MONITORING/RECORDKEEPING

1. IN COMPLIANCE. Facility maintains records of each truck transfer for FG-TruckTransfer on a monthly basis. Records were provided during the inspection.
2. IN COMPLIANCE. Facility provided required records when requested at the time of inspection.
3. IN COMPLIANCE. Facility maintains records of FG-TruckTransfer throughput of each specific product for each calendar month and 12-month rolling time period.

### IX. OTHER REQUIREMENTS

1. IN COMPLIANCE. Provisions of PTI No. 84-04B for FG-TruckTransfer became effective upon termination of CAFO Docket No. CAA-05-2002-0020 on June 24, 2009.

FGFACILITY: All process equipment source-wide, including equipment covered by other permits, grandfathered equipment, and exempt equipment. Associated Emission Unit IDs include EU-TS1Tank16 through EU-TS1Tank30, EU-TS2Tank35 through EU-TS2Tank40, EU-TS1TransferPad, EU-TS2TransferPad, EU-PUMPROOM, EU-LABPACKAREA, EU-WASTETANK1, and EU-WASTETANK2.

### II. MATERIAL LIMITS

1. NOT DETERMINED. Facility failed to provide accurate records demonstrating that the total benzene from facility waste processed in FGFACILITY does not exceed the permit limit of 10 megagrams of benzene per 12-month rolling time period. This condition will be reevaluated once the records are submitted to AQD.

### III. PROCESS/OPERATIONAL RESTRICTIONS

1. NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 61, Subparts A and FF. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 61, Subpart FF in its FOV issued June 18, 2018: 40 CFR 61.355(h)(2), 40 CFR 61.355(h)(4)(ii), 40 CFR 61.343(a)(1), and 40 CFR 61.349(a)(2)(ii).
2. NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 63, Subparts A and DD. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 63, Subpart DD in its FOV issued June 18, 2018: 40 CFR 63.694(k)(3), 40 CFR 63.694(k)(5)(ii), and 40 CFR 63.691(c)(1).

### VI. MONITORING/RECORDKEEPING

1. NOT IN COMPLIANCE. Facility failed to provide accurate records demonstrating the total benzene quantity from waste processed in FGFACILITY was monitored on a monthly and 12-month rolling time period basis.
2. NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 61, Subparts A and FF. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 61, Subpart FF in its FOV issued June 18, 2018: 40 CFR 61.355(h)(2), 40 CFR 61.355(h)(4)(ii), 40 CFR 61.343(a)(1), and 40 CFR

61.349(a)(2)(ii).

3. NOT IN COMPLIANCE. Facility failed to provide accurate records demonstrating the total benzene quantity from waste processed in FGFACILITY was monitored on a monthly and 12-month rolling time period basis.

4. IN COMPLIANCE. Facility maintains records in accordance with the provisions of 40 CFR Part 61, Subparts A and FF. These records were made available at the time of inspection.

## VII. REPORTING

1. NOT DETERMINED. To date, AQD has not received any annual reports from Stericycle required per 40 CFR Part 61, Subpart FF if the total annual benzene throughput of facility waste exceeds 1 megagram per 12-month rolling time period. However, the facility failed to provide accurate records of total benzene processed in FGFACILITY, so at this time it cannot be determined if the facility processed a total annual benzene quantity in waste exceeding 1 megagram per 12-month rolling time period to trigger the reporting requirement. This condition will be reevaluated once the accurate records are submitted to AQD.

## IX. OTHER REQUIREMENTS

1. IN COMPLIANCE. Provisions of PTI No. 84-04B for FGFACILITY became effective upon termination of CAFO Docket No. CAA-05-2002-0020 on June 24, 2009.

2. IN COMPLIANCE. On June 29, 2009, the facility submitted to AQD a copy of U.S. EPA's letter terminating CAFO Docket No. CAA-05-2002-0020, effective June 24, 2009.

### PTI No. 184-13, Special Conditions:

The emission units covered by PTI 184-13 are installed but have yet to be operated since issuance of the permit. Therefore, the conditions of PTI No. 184-13 were not evaluated during this inspection.

### FINAL COMPLIANCE DETERMINATION:

At the time of inspection, Stericycle was found to be in noncompliance with the conditions of ROP No. MI-ROP-N0731-2009, PTI No. 84-04C, and PTI No. 84-04B. Specifically, Stericycle is in noncompliance with the following conditions cited in the Finding of Violation Notice dated June 18, 2018 [Note: The FOV referenced the federal regulations and ROP No. MI-ROP-N0731-2009, not PTI Nos. 84-04B and 84-04C]:

- PTI No. 84-04C, FG-CONTNROFFLOAD, S.C. III.1: NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 61, Subparts A and FF. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 61, Subpart FF in its FOV issued June 18, 2018: 40 CFR 61.355(h)(2), 40 CFR 61.355(h)(4)(ii), 40 CFR 61.343(a)(1), and 40 CFR 61.349(a)(2)(ii).

- PTI No. 84-04C, FG-CONTNROFFLOAD, S.C. III.2: NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 63, Subparts A and DD. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 63, Subpart DD in its FOV issued June 18, 2018: 40 CFR 63.694(k)(3), 40 CFR 63.694(k)(5)(ii), and 40 CFR 63.691(c)(1).

- PTI No. 84-04B, FG-BlendingTanks, S.C. III.2: NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 63, Subparts A and DD. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 63, Subpart DD in its FOV issued June 18, 2018: 40 CFR 63.694(k)(3), 40 CFR 63.694(k)(5)(ii), and 40 CFR 63.691(c)(1).

- PTI No. 84-04B, FGFACILITY, S.C. III.1: NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 61, Subparts A and FF. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 61, Subpart FF in its FOV issued June 18, 2018: 40 CFR 61.355(h)(2), 40 CFR 61.355(h)(4)(ii), 40 CFR 61.343(a)(1), and 40 CFR 61.349(a)(2)(ii).

- PTI No. 84-04B, FGFACILITY, S.C. III.2: NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 63, Subparts A and DD. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 63, Subpart DD in its FOV issued June 18, 2018: 40 CFR 63.694(k)(3), 40 CFR 63.694(k)(5)(ii), and 40 CFR 63.691(c)(1).

-PTI No. 84-04B, FGFACILITY, S.C. VI.2: NOT IN COMPLIANCE. Facility was determined to be in noncompliance with 40 CFR Part 61, Subparts A and FF. Specifically, U.S. EPA cited noncompliance with the following conditions of 40 CFR Part 61, Subpart FF in its FOV issued June 18, 2018: 40 CFR 61.355(h)(2), 40

