



STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY



GRETCHEN WHITMER
GOVERNOR

DETROIT DISTRICT OFFICE

LIESL EICHLER CLARK
DIRECTOR

June 11, 2019

Mr. Allen Jones, General Manager
Stericycle Environmental Solutions, Inc
421 Lycaste St.
Detroit, MI 48214

SRN: N0731, Wayne County

Dear Mr. Jones:

VIOLATION NOTICE

On August 28 and September 14, 2018, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Stericycle Environmental Solutions, Inc ("Stericycle") located at 421 and 515 Lycaste St., Detroit, Michigan. The purpose of this inspection was to determine Stericycle'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; the conditions of Renewable Operating Permit (ROP) number MI-ROP-N0731-2009 and the conditions of Permit to Install (PTI) Nos. 84-04C, 84-04B, and 184-13.

During the inspection, the following violations were observed:

Process Description	Rule/Permit Condition Violated	Comments
FG-CONTNROFFLOAD	ROP No. MI-ROP-N0731-2009, FGContrOffload, S.C. V.1; PTI No. 84-04C, FG-CONTNROFFLOAD, S.C. V.1.	Facility failed to perform annual testing to verify negative pressure in 2017 and 2018.
FG-CONTNROFFLOAD	ROP No. MI-ROP-N0731-2009, FGContrOffload, S.C. VI.2 and VI.3; PTI No. 84-04C, FG-CONTNROFFLOAD, S.C. V.2 and V.3.	Facility failed to provide the average monthly benzene, formaldehyde, and chloroform concentration of all offloaded wasted on a percent by weight basis.
FGFACILITY	PTI No. 84-04B, FGFACILITY, S.C. VI.1 and VI.3; 40 CFR 61.342(g); 40 CFR 61.355.	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.

During the inspection, Stericycle failed to provide the records listed in the table above in an accurate format acceptable to AQD for the time period beginning January 2017 through July 2018. As a result, at the time of inspection AQD was unable to determine Stericycle's compliance with the emission limits and material limits within ROP No. MI-ROP-N0731-2009, PTI Nos. 84-04C and 84-04B, and 40 CFR Part 61, Subpart FF.

In addition, Stericycle failed to perform testing to verify negative pressure in the container offload building in 2017 and 2018. Records provided by the facility indicated that material was processed in the building in 2017 and 2018.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 2, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates 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 Stericycle 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 and for the cooperation that was extended to me during my inspection of Stericycle. 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

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