

M4008
mnvlsDEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

M400867230

FACILITY: US ECOLOGY MICHIGAN, Inc. (Detroit North)		SRN / ID: M4008
LOCATION: 6520 GEORGIA ST, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Dan Belisle , Environmental Compliance Manager		ACTIVITY DATE: 04/26/2023
STAFF: Jonathan Lamb	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site inspection, 2023		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION: April 26, 2023

INSPECTED BY: Jonathan Lamb, EGLE-AQD

PERSONNEL PRESENT: Dan Belisle - Environmental Compliance Manager; Jake Danko - Operations Supervisor; Paul Haratyk - Operations Manager - Chem Fix (US Ecology - Detroit South)

FACILITY PHONE NUMBER: (313) 571-7141

FACILITY FAX NUMBER: (313) 571-7190

CONTACT EMAIL: Dan.Belisle@usecology.com

FACILITY WEBSITE: www.usecology.com

FACILITY BACKGROUND:

US Ecology - Detroit North is a hazardous and non-hazardous waste storage and treatment facility. Republic Services acquired US Ecology, Inc. on May 1, 2022; however, this facility is continuing to operate at US Ecology - Detroit North. The facility was previously owned by PVS Chemicals and operated as Dynecol until being purchased by US Ecology, Inc. in June 2012.

The Detroit North facility performs treatment of liquid industrial waste through wastewater treatment/filtration and solidification. The treatment plant operates two shifts, 4:00 AM through 12:00 AM, Monday through Friday, with occasional weekend work. There are currently 12 employees working on site.

COMPLAINT/COMPLIANCE HISTORY:

The facility does not have a history of complaints. AQD has not received any complaints relating to operations at US Ecology – Detroit North in the past five years.

The facility was determined to be in substantial compliance during the most recent inspection performed on August 16, 2022. There are currently no outstanding violations or Consent Orders.

ADDITIONAL REGULATORY INFORMATION:

US Ecology – Detroit North is permitted under Part 111 – Hazardous Waste Management Facility and Part 115 – Solid Waste Management. The facility is considered to be a controversial source and faced considerable public and legislative scrutiny during the renewal of its Part 111 license, which was issued in January 2020.

PROCESS/EQUIPMENT DESCRIPTION:

US Ecology – Detroit North uses two separate processes to treat waste: wastewater treatment (Building 2) and waste stabilization/solidification (Building 4).

Treatment Plant (Building 2):

The Treatment Plant is currently permitted under Part 111, allowing for the treatment of hazardous waste. US Ecology – Detroit North accepts both non-hazardous and hazardous wastes, including listed and characteristic wastes. These wastes include acids, bases, leachate, contaminated ground water, and metal-bearing waste; oily wastes are not processed at this facility. These wastes come from various sources, including steel industries (including platers, metal finishers, and picklers), auto manufacturing, utilities, and chemical processing. The wastes generally have a very low volatile organic compound (VOC) content.

Most of the waste (approximately 98%) is received in bulk from tankers, with the remainder received in drums or totes. The facility receives 4-12 tankers per day, with each tanker containing approximately 6,000 gallons of waste each. The quantity of wastes received in drums or totes has continued to decrease in recent years. Received wastes go through a fingerprint analysis before being accepted for treatment. Bulk wastes are transferred from the tankers to either one of four 20,000-gallon primary treatment tanks (Tanks 1 through 4), or to bulk storage tanks for later processing. Note: Mr. Belisle stated that Tanks 1 and 2 were replaced with equivalent tanks in 2021. The facility did not submit a permit modification for this activity; however, AQD believes these tanks would likely be exempt from permitting per Rule 285(2)(m)(i) if they were not permitted under Wayne County Permit Nos. C-10626 through C-10632.

Note: The facility ceased bulking and transferring drum wastes in the Container Management Facility (CMF) in 2022 due to the lack of service contractors for the carbon adsorption unit and the low volume of non-bulk wastes received. However, since the equipment is still permitted, a description of the process and equipment will be included in this report. Non-bulk wastes that can be treated on-site are capable of being pumped from drums to tankers in the “bulking area” of the Container Management Facility (CMF), which is also used for drum storage. In recent years, this process was operated infrequently (once every few months) and was only used for recovered petroleum products (generally, water and gasoline mixes). The bulking area consists of a drum unloading hood, vapor recovery exhaust, and drum wash station. Emissions from the CMF are vented first through a regenerative carbon adsorber to remove VOCs, then through caustic Scrubber-2 (Duall Model FW 303; 5000 CFM; 30 gal/min; SP = 5), before being exhausted through a 70' stack. The carbon adsorber is equipped with a flame ionization detector (FID) to monitor breakthrough in the carbon bed and a control system to automatically switch the process emissions to a standby carbon bed prior to breakthrough.

A small natural gas-fired boiler (Iron Fireman Whirlpower Space Conditioner; Model 2803; 70 horsepower output) is used to steam-strip the carbon beds after saturation for reuse. Liquid waste collected from the carbon bed during steam stripping is collected and sent off site either for disposal or to be used in fuel blending. The boiler is exempt per R.282(2)(b)(i) because it has a heat input capacity below 50 MMBtu/hr. [Calculation using AP-42 conversion factor: $(70 \text{ BHP})(50 \times 10^3 \text{ Btu/hr}) = 3.5 \text{ MMBu/hr}$ input capacity.] Since the facility is not using the bulking process, this boiler is currently idled.

While in primary treatment, the waste undergoes neutralization to bring the pH to a range of 4-5. The waste is then moved to one of four 20,000-gallon secondary treatment tanks (Tanks 18 through 21), where the pH is raised to 9-10, causing the solids to coagulate. During secondary treatment, the

waste goes through precipitation, flocculation, detoxification, sedimentation, and clarification. The primary and secondary treatment tanks are cleaned after each batch of waste is treated.

After undergoing secondary treatment, the waste is sent through one of two filter presses which separate the solids from the liquid waste. The filtered liquid waste is pumped from the filter press to one of two 30,000-gallon "Pre-Tertiary Treatment" effluent tanks (Tanks 34 and 35), where it is held until it can undergo tertiary treatment in the Dissolved Air Floatation (DAF) unit. The DAF unit was installed in 2004 to allow the liquid waste to meet the more stringent municipal wastewater discharge requirements. The DAF unit uses flocculants (alum, sodium hydroxide) to further remove dissolved metals from the wastewater. The treated water is then pumped to one of two 30,000-gallon tanks (Tanks 37 and 38), where the solids and liquids separate. The solids float to the top and are scraped off the surface and sent to a solids holding tank before being sent back through the filter press again. The liquid waste is then sent to one of two 15,000-gallon post-treatment effluent holding tanks (Tanks 30 and 31), where it is tested and, if meeting the regulatory limits, is discharged to the City of Detroit sanitary sewer system in accordance with US Ecology's Wastewater Discharge Permit. Liquid waste not meeting discharge limits is sent back through the entire process, starting at primary treatment. The DAF Unit has been determined by AQD to be exempt from permitting requirements under Rule 285(2)(m). Note: Tanks 30 and 31 were each replaced with equivalent tanks within the past year.

After the wastewater is sent through the filter press, the solid waste (sludge) is manually scraped off filter plates into a roll-off box, where it is tested using the Toxicity Characteristic Leaching Procedure (TCLP) and shipped off for land disposal. Waste that passes the TCLP test is disposed of as non-hazardous solid waste. If the waste does not pass TCLP and the waste is determined to be categorized as a characteristic hazardous waste, the waste is put through the process again, starting with primary treatment, until the waste no longer meets the definition of characteristic hazardous waste and can be disposed of as non-hazardous waste. Listed hazardous wastes, however, are always disposed of as hazardous waste, so no additional treatment is performed. About 90% of the treated solid waste is disposed of as non-hazardous waste at Carleton Farms Landfill; the remaining 10% is considered listed hazardous waste and is sent to US Ecology's hazardous waste landfill (Michigan Disposal) in Belleville. The facility disposes of three or four roll-off boxes per day, on average. Non-bulk wastes that cannot be treated on-site (including organics) are stored in drums in segregated areas in accordance with the facility's Part 111 license and then shipped out at a later date to another facility for processing.

The following is an inventory of the tanks used in the wastewater treatment process:

- Tank 1: 20,000-gallon primary treatment tank; permitted under Wayne County Permit Nos. C-10626 through C-10632
- Tank 2: 20,000-gallon primary treatment tank; permitted under Wayne County Permit Nos. C-10626 through C-10632
- Tank 3: 20,000-gallon primary treatment tank; permitted under Wayne County Permit Nos. C-10626 through C-10632
- Tank 4: 20,000-gallon primary treatment tank; permitted under Wayne County Permit Nos. C-10626 through C-10632
- Tank 7: 10,000-gallon hazardous wastewater storage tank (currently out of service); covered by Wayne County Permit Nos. C-10626 through C-10632
- Tank 9: 27,600-gallon alkaline reagent storage tank; exempt per R.284(2)(h)

- Tank 10: 10,000-gallon hazardous wastewater storage tank (currently out of service); covered by Wayne County Permit Nos. C-10626 through C-10632
- Tank 12: 25,800-gallon non-hazardous wastewater storage tank; permitted under Wayne County Permit Nos. C-10626 through C-10632
- Tank 13: 25,800-gallon non-hazardous waste storage tank; permitted under Wayne County Permit Nos. C-10626 through C-10632
- Tank 14: 14,000-gallon lime slurry storage tank; exempt per R.284(2)(i)
- Tank 15: 27,000-gallon alkaline reagent storage tank; exempt per R.284(2)(h)
- Tank 16: 25,800-gallon sodium hydroxide storage tank; exempt per R.284(2)(h)
- Tank 17: 25,800-gallon ferric chloride storage tank; exempt per R.284(2)(i)
- Tank 18: 20,000-gallon secondary treatment tank; permitted under Wayne County Permit Nos. C-10626 through C-10632
- Tank 19: 20,000-gallon secondary treatment tank; permitted under Wayne County Permit Nos. C-10626 through C-10632
- Tank 20: 20,000-gallon secondary treatment tank; permitted under Wayne County Permit Nos. C-10626 through C-10632
- Tank 21: 20,000-gallon secondary treatment tank; permitted under Wayne County Permit Nos. C-10626 through C-10632
- Tank 23: 6,000-gallon lime slurry storage tank; exempt per R.284(2)(i)
- Tank 24: 6,000-gallon sodium hydroxide storage tank; exempt per R.284(2)(h)
- Tank 27: 10,000-gallon hazardous wastewater storage tank; exempt per R.285(2)(m)(i)
- Tank 28: 1,900-gallon vacuum process vessel (currently out of service); permitted under Wayne County Permit Nos. C-10626 through C-10632
- Tank 30: 15,000-gallon effluent holding tank; exempt per R.285(2)(m)(i)
- Tank 31: 15,000-gallon effluent holding tank; exempt per R.285(2)(m)(i)
- Tank 32: 5,500-gallon aluminum sulfate storage tank; exempt per R.284(2)(i)
- Tank 33: 5,500-gallon sodium hydroxide storage tank (currently out of service); exempt per R.284(2)(h)
- Tank 34: 30,000-gallon pre-tertiary treatment effluent tank; exempt per R.285(2)(m)(i)
- Tank 35: 30,000-gallon pre-tertiary treatment effluent tank; exempt per R.285(2)(m)(i)
- Tank 37: 30,000-gallon post-tertiary treatment effluent tank; exempt per R.285(2)(m)(i)
- Tank 38: 30,000-gallon post-tertiary treatment effluent tank; exempt per R.285(2)(m)(i)

Emissions from the primary and secondary treatment tanks, alkaline storage tanks, non-hazardous storage tanks, and hazardous waste storage tanks are vented through caustic Scrubber-1 (Heil Model 734-XL; 5000 CFM) to remove HCl. Scrubber-1 operates continuously and exhausts through a 70' stack. Two dry lime silos (Silos 1 and 2) are outside the treatment building and are controlled by 1000-cfm fabric filter dust collectors; however, the facility has discontinued use of these silos and is using a pre-mixed lime slurry instead.

There is one 12,000-gallon and two 1,000-gallon diesel tanks used to fuel vehicles on site; these tanks are exempt per Rule 284(2)(g)(ii).

Waste Stabilization (Building 4/EUSTABILIZE):

Building 4 is currently permitted under Part 115 – Solid Waste Management through EGLE – Materials Management Division. Building 4 is permitted through AQD to perform waste solidification but for the past few years the building has been used as a waste diversion center for the

storage of household hazardous waste and lab de-pack materials, as allowed in its Part 115 license. Building 4 is not currently being used for waste solidification.

Building 4 contains three 30,000 gallon "pits" (30'x 29'x 12' deep) in which stabilization and solidification of non-hazardous liquid wastes is performed. Wastes include clean-out water from neutralization tanks, water slurries, oil and paint sludge, and industrial wastes. These wastes generally have a low VOC content. No oxidizers or flammables are processed due to risk of fire and explosion.

When the building is used for waste solidification, a normal production day begins with the load out of the stabilized waste from the previous day. The stabilized waste is loaded into trucks and hauled to Carleton Farms Landfill for disposal. Once a pit is cleared, untreated wastes are dumped into the pit either straight from the trucks or from drums while a solidification agent (a mix of fly ash and cement kiln dust) is mixed in via a screw conveyor/tube system. The fly ash/cement kiln dust mix is stored in a 100-ton silo outside of Building 4. After mixing with the solidification agent, the waste is then cured in the pit at least overnight or until it is ready for disposal.

The pits are enclosed by a plastic curtain to keep the dust contained within the pit area. Around the top edges of the pits are intake vents which collect the particulate emissions and send them to two 40,000 cfm baghouses. The building is maintained under negative pressure.

APPLICABLE RULES/PERMIT CONDITIONS:

Wayne County Permit Nos. C-10626 through C-10632, issued on January 8, 1997, covers operations within the wastewater treatment process. This permit consolidated and amended conditions for 19 emission units within the wastewater treatment process which had previously been permitted and also added conditions for Primary Treatment Tanks 1 through 4, Hazardous Waste Storage Tanks 7 and 10, and Scrubber-1. This permit also set limits on hazardous air pollutant (HAP) emissions below major source thresholds, allowing the facility to opt out of Title V permitting requirements.

PTI No. 302-07A, issued on March 17, 2014, covers the waste stabilization process (EUSTABILIZE). This permit was a modification of PTI No. 302-07, allowing the facility to process hazardous waste in the waste stabilization process and changing the limits on hours of operation to limit material processing. However, the facility is only permitted to process solid waste by MMD under Part 115, so the facility is not permitted through MMD to process hazardous waste in EUSTABILIZE.

In determining compliance for this inspection, process and emission records from August 2022 through March 2023 were reviewed.

Permit Nos. C-10626 through C-10632, Special Conditions:

17. IN COMPLIANCE. Per Todd Zynda, EGLE-MMD, US Ecology - Detroit North is currently in substantial compliance with its Part 111 permit.

18. IN COMPLIANCE. The facility is in compliance with the hazardous waste treatment limits of 144,000 gallons. The highest daily total amount of hazardous waste processed during the compliance period was 68,181 gallons on July 6, 2021. The facility is in compliance with its annual limit of 44,928,000 total gallons of hazardous waste treated each year during the compliance period:

2022: 4,326,966 gallons hazardous waste

2023 (through March): 989,781 gallons hazardous waste

19. IN COMPLIANCE. Facility does not accept wastes not approved in its Hazardous Waste Facility Operating License (Part 111).
20. IN COMPLIANCE. Facility only processes wastes approved by its Hazardous Waste Facility Operating License in the primary treatment tanks (Part 111).
21. IN COMPLIANCE. Facility only stores and bulks wastes approved in its Hazardous Waste Facility Operating License (Part 111).
22. IN COMPLIANCE. Facility only stores wastes approved in its Hazardous Waste Facility Operating License (Part 111).
23. IN COMPLIANCE. Facility follows procedures for dealing with ignitable, reactive, and incompatible wastes in accordance with its Hazardous Waste Facility Operating License (Part 111).
24. IN COMPLIANCE. Compatibility testing is performed prior to bulking wastes to determine there are no adverse reactions.
25. IN COMPLIANCE. Cyanide wastes are segregated from acid wastes in the CMF Building and bays are labeled, as required.
26. IN COMPLIANCE. Facility does not bulk wastes with a reactive cyanide content greater than 250 ppm.
27. IN COMPLIANCE. Facility does not accept F006 and F019 waste codes with a reactive cyanide content greater than 20 ppm in the primary or secondary treatment tanks.
28. IN COMPLIANCE. Facility does not treat organic materials with TCLP concentrations greater than 30 ppm (volatiles) or 30,000 ppm (semi-volatiles).
29. NOT EVALUATED. Scrubber-3 is installed but has not been used because the facility does not process organic materials with TCLP concentrations greater than 30 ppm (volatiles) or 30,000 ppm (semi-volatiles).
30. IN COMPLIANCE. Primary Treatment Tanks 1 through 4 are vented through Scrubber-1. Scrubber-1 appeared to be operating properly at the time of inspection.
31. IN COMPLIANCE. All emissions from the drum wash station are vented through both the carbon adsorber and Scrubber-2.
32. IN COMPLIANCE. All emissions from the drum wash station are vented through the carbon adsorber and Scrubber-2.
33. IN COMPLIANCE. Exhaust gases from the carbon adsorber are discharged through Scrubber-2.
34. IN COMPLIANCE. Vapor Recovery Exhaust and Drum Unloading Hood are vented through the carbon adsorber/Scrubber-2 system.
35. IN COMPLIANCE. Bungs are replaced on drums immediately after emptying.
36. IN COMPLIANCE. Tanks No. 7, 10, 12, 13, 16, 17, 18, 19, 20, and 21 are exhausted through Scrubber-1.
37. IN COMPLIANCE. Scrubber-1 appears to be installed and operating properly. During the inspection, the pH of Scrubber-1 was at 10.7.
38. IN COMPLIANCE. Scrubber-2 is installed; however, during the compliance period, the facility only performed bulking and transfer operations on organic wastes. No inorganic wastes were bulked or transferred, so Scrubber-2 was not required to be in operation. Note: exhaust gases from the carbon adsorber still exhaust through Scrubber-2 even when not in use.
39. NOT EVALUATED. The lime silos were not used during the compliance period. The silos were last used in 2019. Facility currently uses a pre-mixed lime slurry rather than dry lime during processing.
40. NOT EVALUATED. The lime silos were not used during the compliance period. The facility uses a lime slurry which is delivered pre-mixed, so the dry lime silos not being used.
41. IN COMPLIANCE. Total VOC emissions from Scrubber-2 are below the permitted limits of 12.60 pounds per hour and 18.5 tons per year. During the compliance period, the facility only

performed bulking and transfer operations on organic wastes. No inorganic wastes were bulked or transferred, so Scrubber-2 was not required to be in operation. VOC emissions from the wastewater treatment process are minimal. The facility reported the following total annual VOC emissions from the wastewater treatment process, which includes both Scrubber-1 and Scrubber-2:

2022: 0.249 tons VOC

2023 (through March): 0.0019 tons VOC

42. IN COMPLIANCE. VOC emissions from the wastewater treatment process are minimal. During the compliance period, the facility reported the following total annual VOC emissions from the wastewater treatment process, which includes both Scrubber-1 and Scrubber-2:

2022: 0.249 tons VOC

2023 (through March): 0.0019 tons VOC

43. IN COMPLIANCE. Hydrochloric acid emission rate from Scrubber-1 is below permitted limits of 0.016 gram per second and 0.12 pounds per hour. Results of HCl emissions testing performed on July 9, 2002, show HCl emission rates were below the detection limits of < 0.0002 grams per second and < 0.0018 pounds per hour.

44. IN COMPLIANCE. Sulfuric Acid emission rate from Scrubber-1 is below the permitted limits of 0.149 grams per second and 1.18 pounds per hour. Results of sulfuric acid testing performed on July 11, 2002, show sulfuric acid emission rates below the detection limits of < 0.0000003 grams per second and < 0.000002 pounds per hour.

45. IN COMPLIANCE. Hydrogen Cyanide emission rate from Scrubber-1 is below the permitted limits of 0.02 grams per second and 0.18 pounds per hour. Results of hydrogen cyanide emissions testing performed on July 10, 2002, show hydrogen cyanide emission rates below the detection limits of < 0.0001 grams per second and < 0.0005 pounds per hour.

46. IN COMPLIANCE. HAP emissions are well below the permit limits of 25 tons per year aggregate HAPs and 10 tons per year for any individual HAP. Testing performed on July 10, 2002, showed a total HAP emission rate of 0.02 lb/hour. During the compliance period, the facility reported the following total annual HAP emissions from the wastewater treatment process:

2022: 0.2603 tons HAP

2023 (through March): 0.0023 tons HAP

47. NOT EVALUATED. The fabric filter dust collectors on the silos were not in use during the compliance period.

48. IN COMPLIANCE. No visible emissions were observed from Primary Treatment Tanks 1, 2, 3, and 4, Scrubber-1, or Scrubber-2/carbon adsorber system during the inspection. Visible emission readings are part of the daily inspection performed by plant operators.

49. IN COMPLIANCE. No visible emissions were observed from Secondary Treatment Tanks 18, 19, 20, and 21 during the inspection. Visible emission readings are part of the daily inspection performed by plant operators.

50. NOT APPLICABLE. Act 451, Part 55, Administrative Rule 373 has been rescinded. However, the facility continues to implement and maintain a fugitive dust plan to control fugitive dust emissions.

51. IN COMPLIANCE. Facility uses a dry sweeper daily on paved areas of the facility, unless it rains or snows; unpaved areas are sprayed with water or calcium chloride, as necessary. No issues with fugitive dust from the lot were observed during the inspection.

52. IN COMPLIANCE. Scrubber-1 pH was 10.7 at time of inspection, in compliance with the permit minimum of 10.0.

53. IN COMPLIANCE. Scrubber-1 is inspected daily and appears to be operated according to manufacturer's specifications, though I was unable to verify the packing bed depth. Daily scrubber inspection and maintenance logs were reviewed during the inspection.

54. NOT EVALUATED. Scrubber-3 is installed but has yet to be put into use.
55. IN COMPLIANCE. Carbon adsorber is operated according to manufacturer's specifications. Breakthrough is monitored by an automatic FID.
56. IN COMPLIANCE. Lime silos were not in use during the compliance period, but the filter meets specifications.
57. NOT EVALUATED. Scrubber-3 is installed but has yet to be put into use.
58. IN COMPLIANCE. Scrubber-2 was not used during the compliance period, but has a gas flow rate of 5,000 ACFM, as required.
59. IN COMPLIANCE. Fabric filter collectors were not in use during the compliance period but have a design rating of 1,000 ACFM, as required.
60. IN COMPLIANCE. Scrubber-2 stack appears to meet permit specifications.
61. IN COMPLIANCE. Scrubber-1 stack appears to meet permit specifications.
62. IN COMPLIANCE. Records of wastes processed are maintained, as required.
63. NOT EVALUATED. AQD has not requested odor testing at this facility.
64. IN COMPLIANCE. Testing for VOC, HCL, sulfuric acid, and hydrogen cyanide, and HAP emission rates was performed on July 10-12, 2002, by Derenzo and Associates, Inc. Results showed all emission rates in compliance with permit limits.
65. IN COMPLIANCE. Facility has not been a source of odor complaints, so there has not been a need to propose a Plan of Action for odor abatement.

PTI No. 302-07A; Special Conditions:

Note: EUSTABILIZE was not operated during the compliance period so most of the conditions of PTI No. 302-07A were not evaluated during the compliance period.

EUSTABILIZE: Liquid waste stabilization process consisting of three 30,000-gallon processing pits in a building controlled by two dust collectors.

I. Emission Limits:

Pollutant	Limit	Actual	Compliance Status
1. PM	0.002 gr/dscf	0.0014 gr/dscf ¹	IN COMPLIANCE
2. PM	0.69 pph	0.15 pph ¹	IN COMPLIANCE
3. VOC	14.6 tons per 12-month rolling time period	EUSTABILIZE not in operation during compliance period, so there were no emissions.	IN COMPLIANCE
4. Naptha	3.5 pph	Not evaluated*	NOT EVALUATED*
¹ Results based on testing performed on June 25, 2008, by Derenzo and Associates, Inc. *Testing to determine naptha emission rate has not been requested by AQD. However, materials with waste code D001, which would include naptha, do not appear to be commonly processed in Building 4.			

II. Material Limits:

1. NOT EVALUATED. EUSTABILIZE was not in operation during the compliance period.
2. NOT EVALUATED. The facility does not have an approved Part 111 license for Building 4, so the facility has not yet treated hazardous waste in EUSTABILIZE.
3. NOT EVALUATED. EUSTABILIZE was not in operation during the compliance period.

4. NOT EVALUATED. EUSTABILIZE was not in operation during the compliance period.
5. NOT EVALUATED. EUSTABILIZE was not in operation during the compliance period.
6. NOT EVALUATED. EUSTABILIZE was not in operation during the compliance period.
7. NOT EVALUATED. Hazardous wastes are not currently being treated in EUSTABILIZE. Facility does not have an approved Part 111 license to treat hazardous waste in EUSTABILIZE.

III. Process/Operational Restrictions:

1. IN COMPLIANCE. Facility implements and maintains an approved fugitive dust plan. Facility uses a dry sweeper daily on paved areas of the facility, unless it rains or snows; unpaved areas are sprayed with water or calcium chloride, as necessary.
- 2 and 3. NOT EVALUATED. EUSTABILIZE has not be used under normal operation, as defined in Appendix B, during the compliance period.
4. IN COMPLIANCE. Facility maintains an approved preventative maintenance plan and malfunction abatement plan for the baghouses for EUSTABILIZE.

IV. Design/Equipment Parameters:

1. NOT EVALUATED. EUSTABILIZE was not in operation during the compliance period.

V. Testing/Sampling:

1. NOT EVALUATED. EUSTABILIZE was not in operation during the compliance period, so the facility did not perform a negative pressure test in 2022. Note: Following the inspection on April 26, 2023, the facility informed AQD of plans to operate EUSTABILIZE later in the year. The facility performed a negative pressure test using smoke tubes on June 14, 2023, under operating scenarios with both one door and two bay doors opened at a time. The testing was observed by AQD staff and was determined to have failed to demonstrate that EUSTABILIZE could operate under negative pressure in either operation scenario. The facility made some adjustments to the baghouse and retested on August 8, 2023, under the operating scenario with only one bay door opened at a time. Testing was observed by AQD staff and this time was determined to have passed under that operating scenario for all six bay doors. Since PTI No. 302-07A allowed the facility to operate with two bay doors open during normal operation, the facility was required to obtain a permit modification to allow only one bay door open during normal operation; PTI No. 302-07B was issued on August 24, 2023.

VI. Monitoring/Recordkeeping

- 1 through 8. NOT EVALUATED. EUSTABILIZE was not in operation during the compliance period.

VIII. Stack/Vent Restrictions:

- 1 and 2. IN COMPLIANCE. Baghouse stacks appear to meet permit specifications.

FINAL COMPLIANCE DETERMINATION:

At the time of inspection, US Ecology - Detroit North was determined to be in substantial compliance Wayne County Permit Nos. C-10626 through C-10632 (including the amended conditions for previously issued permits for the wastewater treatment process), PTI No. 302-07A, and other applicable State and federal air regulations.

NAME 

DATE 10-6-23

SUPERVISOR 