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

M454564178

FACILITY: EQ Detroit, Inc. (dba US Ecology - Detroit South)		**SRN / ID:** M4545
LOCATION: 1923 FREDERICK, DETROIT		**DISTRICT:** Detroit
CITY: DETROIT		**COUNTY:** WAYNE
CONTACT: Tabetha Peebles , Environmental Compliance Manager		**ACTIVITY DATE:** 08/16/2022
STAFF: Jonathan Lamb	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Scheduled inspection, FY 2022		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION: August 16 and August 24, 2022
INSPECTED BY: Jonathan Lamb, EGLE-AQD
PERSONNEL PRESENT: Tabetha Peebles, EHS Manager; John Barta, General Manager; Andy Osip, Environmental Manager; Paul Haratyk, Operations Manager – Chem Fix; Jake Danko, Operations Manager – Chem Pre
FACILITY PHONE NUMBER: (313) 923-0080
FACILITY FAX NUMBER: (313) 923-3375
FACILITY WEBSITE: www.usecology.com

SAFETY REQUIREMENTS: Hard hat, steel-toed boots, and hi-visibility vest.

FACILITY BACKGROUND:
US Ecology - Detroit South is a waste processing facility specializing in the treatment, stabilization, and solidification of various types of industrial wastes, including both hazardous and non-hazardous liquids, solids, sludges, soils, and debris. The facility is licensed by EGLE's Materials Management Division (MMD) to transfer, store, and process hazardous and non-hazardous wastes through Part 111 and Part 115 licenses, respectively.

Republic Services acquired US Ecology, Inc. on May 1, 2022; however, this facility is continuing to operate as US Ecology – Detroit South at this time. This facility was previously owned and operated by EQ until the site was acquired by US Ecology, Inc. in June 2014. The facility is located in a mixed industrial/residential area of Detroit near the I-75/I-94 interchange, across from Detroit Renewable Power. The facility receives waste from 7 AM to 5 PM, Monday through Friday, and occasionally on weekends. Processing may occur 24 hours a day/7 days per week. There are currently around 85 employees at this site.

US Ecology, Inc. is a waste management company based in Boise, Idaho, which has facilities throughout North America. The company operates four waste treatment sites in southeast Michigan: Belleville, Romulus, and two in Detroit.

COMPLAINT/COMPLIANCE HISTORY:
The facility has a long history of odor issues dating back to 1995. In recent years, the facility has been a frequent source of odor complaints in the area; from 2015 through 2022, AQD cited the facility for violating Rule 901 a total of 28 times. US Ecology entered into a Consent Order with EGLE-MMD in September 2020 to address the ongoing odor issues. However, AQD has not resolved the outstanding violations of Rule 901 and the facility is considered to be in noncompliance with Rule 901.

PROCESS DESCRIPTION AND EQUIPMENT:
Wastes are received in both bulk and drums from tankers, trucks, or railcar. Each tanker is weighed on the truck scale, and every waste is sampled and analyzed ("fingerprint analysis") upon arrival to verify that the waste matches the waste profile detailed in the manifest before it can be accepted for treatment. Once approved, the waste material will be transferred to the appropriate process. Drums are unloaded at the ChemFix receiving dock while tankers are pumped directly to treatment or storage tanks. The facility receives around 10-12 railcar tankers per month.

There are two main waste treatment operations at the plant: ChemPre, where metal-bearing wastewater, oily wastes, and organic wastewaters are treated and processed; and ChemFix, where waste stabilization/solidification is performed.

ChemPre:
Chemical precipitation is performed on non-oily wastewater (both hazardous and non-hazardous) in the Main Building; this includes metal-bearing and organic wastewater, leachate, and contaminated groundwater. There are eight tanks located in the Main Building, ranging from 15,000 to 20,000 gallons, used to hold and treat liquid waste. The tanks are labeled T-201 through T-206, T-305, and T-306 and are loaded directly from tankers with incoming waste. For the chemical precipitation process, additives are put into the tanks and the contents are agitated using in-tank eductors, causing the solids to precipitate from the liquid. The precipitated solids create a sludge, which is pumped into either of two 17,000-gallon tanks (T-24 and T-25) for non-hazardous waste or to one 17,000-gallon tank (T-208) for hazardous waste. Organic wastewaters processed in these tanks have a low-VOC content and are vented within the Main Building; as such, Tanks T-201 through T-206, tanks T-305 and T-306, tanks T-24 and T-25, and tank T-208 appear to be exempt from permitting requirements per R.285(2)(m)(i). Note: Tanks 204, 205, and 208 were replaced with fiberglass tanks of equivalent capacities in 2020 (previous tanks were carbon steel).

Following chemical precipitation, the wastewater is then passed through one of two filter presses (designated for either hazardous or non-hazardous waste) to separate the liquid and solid waste. The hazardous solids are sent off-site for disposal; currently, the waste is sent to Stablex in Montreal, Quebec, in Canada) for further treatment and disposal, while the non-hazardous solids are treated in the ChemFix Building. The filtered liquid wastewater is stored in two 20,000-gallon tanks, designated as T-107 and T-108 (note: formerly known as T-1 and T-2), which are located outside the west side of the Main Building. The wastewater in these tanks is tested to determine if it needs further treatment; if not, it is then discharged to the city sewer system. The filter presses appear to be exempt from permit requirements under R.285(2)(m)(i) and tanks T-107 and T-108 appear to be exempt per R.284(2)(i).

There are also tanks used to store and treat light wastewaters, including leachate, which do not contain solids. Four of these tanks, designated as T-513, T-514, T-515, and T-516 (note: these tanks are formerly known as Tanks T-19, T-20, T-21, and T-22), are 78,000 gallons each and are the four big blue tanks located outside to the east of the oil processing building. These tanks are currently not in use but may be used again in the future. Two 78,000-gallon tanks, designated as T-109 and T-110 (note: formerly known as tanks T-3 and T-4) are also used as holding tanks for landfill leachate. These tanks are located outside to the west of the Main Building next to tanks T-107 and T-108. T-109, T-110, and T-513 through T-516 are not permitted. Based on previous discussions between AQD and the previous owners of the facility, AQD has accepted the facility's determination that these tanks are exempt from permitting requirements per R.285(2)(m)(i) because of the minimal concentration of VOCs in the waste steam and the fact that these tanks are used for storage and settling of solids rather than the treatment of VOCs in the waste stream.

The additives and reagents used in the chemical precipitation process are stored in various tanks inside the Main Building and are labeled as tanks A-1, C-1, and CST-1 through CST-5. The tanks range in size from 4,150 to 6,000 gallons each except for C-1, which is 14,000 gallons. These tanks are exempt from permitting requirements under R.284(2)(h) and R.284(2)(i).

Also inside the Main Building, there are two 8,000-gallon acid neutralization tanks (T-301 and T-302) and two 6,500-gallon acid storage tanks (T-303 and T-304) located in the "Acid Room". These tanks are considered part of the ChemFix process, not ChemPre. Wastes stored in these tanks are disposed of either in the waste stabilization process or sent off-site for deep well disposal. Tanks T-301 and T-302 are exempt from permitting requirements under R. 284(2)(i) and tanks T-303 and T-304 are exempt under R.284(2)(h).

The oil recovery process is used to reclaim fuel oil from oily wastewaters and waste oil. There are six primary treatment tanks (permitted as FGPRIMARYTANKS) located outside which are used for the treatment of non-hazardous oily wastewaters (three 150,000-gallon tanks and three 100,000-gallon tanks). The primary tanks

are designated T-101, T-102, T-103, T-104, T-105, and T-106 (note: these tanks are formerly known as T-13 through T-18) and are also referred to as the "6-Pack". Each tank is heated and holds a different type of oily wastewater, including rag oil, decanted water, and lighter oil.

There are four 15,000-gallon secondary treatment tanks (permitted as FGSECONDARYTANKS) located inside the Oil Treatment Room which are used to treat waste oil and synthetic coolants. The secondary tanks are designated as T-120 through T-123. Each tank is heated in colder months and equipped with an impeller (for agitation) and a temperature gauge, which can be checked from a central computer in the Oil Treatment Room. Sulfuric acid or polymer may be added to the secondary tanks to help break up the oil. The separation of oil during secondary treatment can take from three hours to three days.

There are seven 22,000-gallon non-permitted tanks used for storage only. Of the seven non-permitted tanks, five (T-111 through T-115) are used to store pre-treated oily wastes, while two (T-116 and T-117) are used to store treated outbound oil (product), including fuel-grade oil and rag oil. These tanks are exempt from permitting requirements per R.284(2)(d).

The facility has also determined that any tanks exceeding a capacity of 20,000 gallon are not subject to 40 CFR 60, Subpart Subpart Kb because the tanks either contain liquids with vapor pressures below the regulatory thresholds in 40 CFR 60.110b(a) and (b) and/or the tanks are considered process tanks, not storage vessels, as defined in 40 CFR 60.111b, either of which would exempt the tanks from NSPS Subpart Kb applicability.

Emissions from all tanks in FGPRIMARYTANKS and FGSECONDARYTANKS are controlled by a 5000-cfm scrubber; all other tanks are uncontrolled. The scrubber is equipped with a monitor which shows pH, flow rate, oxidation-reduction potential (ORP), and pressure drop. These operating parameters are monitored on a daily basis and manually recorded.

ChemFix:

Waste stabilization/solidification is performed in the ChemFix Building. The most common waste streams are metal-bearing and non-hazardous wastes. Inside the ChemFix Building, there are six below-ground open tanks (referred to as "vaults"), ranging in capacity from 150 to 460 cubic yards, in which wastes are processed. These vaults are designated as T-701, T-702, T-703, T-704, T-705, and T-706. Waste type determines the pre-treatment in each tank prior to solidification: acids and bases are neutralized, while characteristic wastes are treated to eliminate the hazardous characteristic. The treated wastes are then allowed to be disposed of as non-hazardous wastes. Listed wastes, however, are simply solidified and then disposed of as hazardous waste. Some non-hazardous sludge waste is also processed in a 144,500-gallon underground storage tank (T-901) located underneath the baghouse. This waste is screw-conveyed directly to the vaults inside the ChemFix Building for treatment. The facility has determined that Tank T-901 is not subject to 40 CFR 60, Subpart Subpart Kb because the tank either contains liquids with vapor pressures below the regulatory thresholds in 40 CFR 60.110b(a) and (b) and/or the tank is considered a process tank, not storage vessel, as defined in 40 CFR 60.111b, either of which would exempt the tank from NSPS Subpart Kb applicability.

During processing, compatible wastes are dumped into the vault, treated (if necessary), and then mixed with a solidification agent (fly ash, cement kiln dust, or hazardous waste dust) to solidify the material in the vault. There are five 5,500-cubic foot silos outside the south side of the ChemFix building used to store materials used for solidification. Four of the silos (permitted as EUSILO1 through EUSILO4) store cement kiln dust and lime, while the fifth (EUSILO5) holds hazardous waste dust, which is steel mill baghouse dust. Once the solidification agent is added, the contents of the vault are then mixed and allowed to cure overnight. The following morning, after the waste has cured, the waste is dug out using a front-end loader and loaded into a trailer. The stabilized waste is then tested to make sure it meets federal disposal requirements and then transported to landfill for disposal; currently, non-hazardous wastes are taken to Carleton Farms Landfill in Carleton, Michigan, while hazardous wastes are sent to US Ecology's Belleville site. Waste streams not treated at this site include biological, radioactive, and oxygen-generating wastes.

In 2020, The facility installed a PFAS wastewater treatment system to treat landfill leachate, non-hazardous wastewater, and firefighting foam. The system became fully operational in July 2021. The system uses a cartridge filter, carbon filter, and ion exchange to remove PFAS from the wastewater to allow the wastewater to be disposed of in the city sewer system. Emissions from the process are vented internally inside the building. Per the facility, this process is considered to be wastewater treatment equipment and exempt from permitting per R.285(2)(m).

Particulate emissions from the ChemFix building are controlled by two identical baghouses operating in parallel. The baghouses were installed in July 2006 and have a combined maximum flow rate of 180,000 scfm. Particulates from processing are captured by collection hoods located near the ceiling over the vaults which are ducted to the baghouses; a flexible plastic "curtain" hangs part way down from the ceiling around the perimeter of the vaults to facilitate collection. Each baghouse contains 1,144 bags and has its own stack exhausting to atmosphere. Any particulates collected by the baghouses are fed back into the ChemFix process as stabilizing agent, so no off-site disposal is required. The baghouses have a "puffer system" to prevent blockage in the baghouses.

The enclosed drum receiving and storage area is located adjacent to the ChemFix building. The drums are segregated according to waste type, such as acids, flammable liquids, non-hazardous, corrosives and toxics, oils, cyanide, caustics, and characteristic metals. Flammable liquids, corrosives, and toxics are not treated at this site, but are temporarily stored here before being shipped out for off-site treatment and disposal. Drum wastes which can be treated on-site are dumped into the vaults inside the ChemFix building.

Lab De-Pack/Transfer and Processing:
The Lab De-Pack Building, known as "Detroit Service Station", is located at the northeast corner of the property (near Ferry St. and St. Aubin St.) and is considered a separate entity from the Detroit South facility. This area is used for storage and de-packaging of small-quantity wastes and household hazardous waste drop-off. These wastes are consolidated and then either processed on-site through the Chem-Fix process or shipped off-site for disposal; currently, wastes not treated on-site are sent to Ross Environmental Services in Grafton, Ohio for incineration. Consolidation is performed by either grouping smaller containers together in their original containers to ship off site, or by transferring the contents of smaller containers into a larger container, such as a drum, prior to shipping off site.

Outside the Lab De-Pack Building is the Transfer and Processing Area, where drums and other containers are stored on a short-term basis. This area is permitted for 10-day storage through the facility's Part 111 license. The facility previously provided a demonstration which shows that the Lab De-Pack and Transfer and Processing areas are exempt from air permitting requirements per R.290(2)(a). Records are maintained to show that emissions are below R.290(2)(a) limits and all materials processed have screening levels above the threshold limits allowed in R.290(2)(a). The exemption demonstration shows VOC emissions to be less than 10 pounds per year.

APPLICABLE RULES/ PERMIT CONDITIONS:
Permit to Install No. 269-04H was issued on February 5, 2018. This permit kept the limits on VOCs and HAPs below major source thresholds which maintained the facility's synthetic minor status, allowing it to opt out of Title V permitting requirements. Records from August 2020 through July 2022 were reviewed to determine compliance during this inspection.

PTI No. 269-04H, Special Conditions:

EUTREATMENT – Enclosed waste stabilization/solidification operation which processes hazardous and nonhazardous off-site waste using chemical stabilization and controlled by two baghouses.

I. Emission Limits

Pollutant	Limit	Reported Emissions	Compliance Status

1. PM	0.002 gr/dscf	0.0005 gr/dscf[1]	IN COMPLIANCE
2. PM	4.3 pph	0.75 pph[1]	IN COMPLIANCE
3. VOC	25.0 pph	7.32 pph[2]	IN COMPLIANCE

[1] Based on the results of stack testing performed on November 8 and 9, 2006.

[2] Based on the results of stack testing performed on June 26, 2007.

II. Material Limits

1. IN COMPLIANCE. Facility does not process hazardous liquid waste with a VOC content greater than 500 ppmw, as received. Facility monitors and records the VOC content of all loads of hazardous liquid wastes received prior to processing to demonstrate compliance with this condition.

2. IN COMPLIANCE. Facility does not process nonhazardous liquid waste with a VOC content greater than 5.0% by weight, as received. Facility monitors and records the VOC content of all nonhazardous liquid wastes received prior to processing to demonstrate compliance with this condition.

3a. through x. IN COMPLIANCE. Facility does not process any waste streams in EUTREATMENT which contain any of the compounds listed in a. through x. of this condition in excess of 500 ppm. Facility monitors and records the concentrations of all components in every waste stream received and processed in EUTREATMENT to demonstrate compliance with this condition.

III. Process/Operational Restrictions

1. IN COMPLIANCE. Facility implements and maintains an approved fugitive dust plan. A wet sweeper is used on site daily, except during rain, snow, or freezing conditions. The company purchased a new wet vac sweeper earlier in 2022. Daily sweeping records were reviewed on site during the inspection. No issues with fugitive dust were observed while I was on site and fugitive dust issues have not been noted during AQD's frequent surveillance of the facility during the past two years.

2. IN COMPLIANCE. Facility keeps no more than one bay door to EUTREATMENT and the container storage door open during normal operation, including loading and unloading the vaults. EUTREATMENT is equipped with quick closing bay doors to minimize the time any bay door is open. During the inspection, I observed the container storage door and no more than one bay door open at a time during normal operation.

3. IN COMPLIANCE. Facility maintains negative pressure in EUTREATMENT during normal operation. Based on my visible observations, EUTREATMENT was under negative pressure at the time of inspection and the facility. In addition, I observed negative pressure testing performed on August 24, 2022, and August 18, 2021, which verified that EUTREATMENT was under negative static pressure with two bay doors open, which demonstrated compliance with this condition. The facility also performs daily visible observations each operating day to monitor that negative pressure is being maintained in EUTREATMENT.

IV. Design/Equipment Parameters

1. IN COMPLIANCE. The baghouse for EUTREATMENT is maintained and operated in a satisfactory manner. I checked the baghouse operating parameters during the inspection: the pressure drop was 0.3" for Baghouse 1 and 0.6" for Baghouse 2, and the flow rates for each baghouse was 58,094 scfm and 106,194 scfm, respectively, through the flow rates and pressure drop varied while I was viewing the display screen. Per the Malfunction Abatement Plan, normal operation for the baghouse has a pressure drop range of 3"-5", but the baghouse was going through a cleaning cycle while I was taking readings from the display screen, which likely accounted for the lower pressure drop. The baghouse appeared to be operating properly during this time and maintained negative pressure in the building. I did not observe any visual emissions coming from the baghouse stacks. Per the Preventative Maintenance Plan, the facility performs inspections of the baghouse weekly with daily checks for visible emissions. Records of all inspection and maintenance activities are maintained electronically; these records were reviewed on site during the inspection and did not indicate any operational issues of concern. The facility replaces all the bags in the baghouse every five years, or if any leaks are detected during inspections or visible emissions observed. The facility most recently replaced all the bags in both baghouses in March 2020. Baghouse flow rate is verified annually; most recent verification was performed on August 23, 2022.

V. Testing/Sampling
1. IN COMPLIANCE. Testing to demonstrate negative pressure in EUTREATMENT using smoke tubes is performed on an annual basis. The most recent tests were performed on August 24, 2022, and on August 18, 2021. Both tests were observed by AQD staff and verified that the building was under negative pressure during normal operating conditions. The testing was performed with the container storage door plus one bay door open, with a separate test performed for each open bay door scenario (there are four bay doors so there four tests performed). Negative pressure was verified in each scenario.

VI. Monitoring/Recordkeeping
1. IN COMPLIANCE. Facility records and maintains the following records in an acceptable manner;
a. VOC content of each waste stream received for treatment in EUTREATMENT;
b. Daily and cumulative monthly total records of the type (by waste code) and amount of waste processed in EUTREATMENT;
c. Calculations of VOC emission rates from EUTREATMENT for each month and 12-month rolling time period, using the method in Appendix A or an alternate method approved by the District Supervisor. After discussions between US Ecology and the AQD Detroit Office, AQD has accepted US Ecology's alternate methodology for calculating and reporting VOC emissions for the EUTREATMENT process. This alternate method may be reevaluated if it is later determined to be insufficient in accurately reporting VOC emissions.

VIII. Stack/Vent Restrictions
1 and 2. IN COMPLIANCE. According to facility documentation and visible observation, baghouse stacks SVTREAT1 and SVTREAT2 appear to meet permit specifications.

FGOILRECOVERY – Oil recovery process controlled by a packed bed scrubber. Associated Emission Unit IDs: EUOILRECOVERY, FGPRIMARYTANKS, and FGSECONDARYTANKS

II. Material Limits
1. IN COMPLIANCE. The highest 12-month rolling total of oily waste processed in FGPRIMARYTANKS during the compliance period was 13,508,204 gallons in the 12-month rolling time period ending in March 2022, which is below the permit limit of 73,000,000 gallons per 12-month rolling time period. 12-month rolling total in July 2022 was 13,003,702 gallons.
2. IN COMPLIANCE. Highest 12-month rolling total of oily waste processed in FGSECONDARYTANKS was 3,782,297 gallons in the 12-month rolling time period ending in March 2022, which is below the permit limit of 36,500,000 gallons per 12-month rolling time period. 12-month rolling total in July 2022 was 3,641,037 gallons.

III. Process/Operational Restrictions
1. IN COMPLIANCE. FGPRIMARYTANKS are kept below 190°F. Primary tanks are not heated. A review of the tank temperature logs showed no exceedances of the permit limit of 190°F during the compliance period. Tanks were not being heating at the time of inspection. The temperature of the tanks at the time of inspection ranged from 73°F to 84°F.
2. IN COMPLIANCE. FGSECONDARYTANKS are kept below 210°F. A review of the tank temperature logs showed no exceedances of the permit limit of 210°F during the compliance period. Tanks were not being heating at the time of inspection. The temperature of the tanks at the time of inspection ranged from 73°F to 84°F.

IV. Design/Equipment Parameters
1. IN COMPLIANCE. Tanks in FGOILRECOVERY are controlled by a scrubber. Based on a cursory review of daily operating records the scrubber appeared to be operating within the following operating parameters during the compliance period (scrubber parameters were also checked during the inspection):
a. pH maintained at 5.0 or higher (pH was 8.9 at the time of inspection)
b. ORP maintained at 350 mV or higher (ORP was 636 mV at the time of inspection)
c. Flow rate maintained between 100-135 gpm (flow rate was 122 gpm at time of inspection)
d. Pressure drop maintained between 4" and 6.5" wg (pressure drop was 5.6" wg at time of inspection)

V. Testing/Sampling
1. NOT EVALUATED. Odor testing has not been formally requested by AQD. However, US Ecology hired RWDI AIR, Inc. to perform an odor study in October 2018 and shared the results with AQD in April 2019.

VI. Monitoring/Recordkeeping
1. IN COMPLIANCE. Temperatures of the tanks in FGOILRECOVERY are monitored continuously and manually recorded periodically throughout the day.
2. IN COMPLIANCE. A device to monitor scrubbing liquid pH, ORP, flow rate, and pressure drop on a continuous basis is installed, calibrated, and maintained in a satisfactory manner. Monitors were most recently calibrated on April 28, 2022. Based on maintenance records, the ORP and pH probes were replaced on March 17, 2020, and the flow meter was replaced on March 29, 2019.
3a-d. IN COMPLIANCE. The following records are maintained in a format acceptable to AQD:
a. Daily records of oil/water waste processed in FGPRIMARYTANKS and FGSECONDARYTANKS.
b. Temperature of the tanks in FGOILRECOVERY is recorded at least once per day.
c. Date and amount of additions to the scrubber liquid.
d. Facility monitors and records the parameters listed in I-IV at least once per day when processing oil/water mixtures.

VIII. Stack/Vent Restrictions
1. IN COMPLIANCE. According to facility documentation and visual observation, scrubber stack SVSCRUBBER appears to meet permit specifications.

FGFACILITY – All process equipment at the facility, including equipment covered by other permits, grandfathered equipment, and exempt equipment. Associated Emission Unit IDs: EUTREATMENT, EUOILRECOVERY, EUSILO1, EUSILO2, EUSILO3, EUSILO4, EUSILO5, FGPRIMARY TANKS, and FGSECONDARYTANKS.

I. Emission Limits

Pollutant	Limit	Highest Reported Emissions	Compliance Status
1. VOC	89.9 tons per 12-month rolling time period	6.01 tons for 12-month rolling time period ending May 2022; 5.53 tons for 12-month rolling time period ending July 2022	IN COMPLIANCE
2. Individual HAP	Less than 9 tons per 12-month rolling time period	0.23 tons of "glycol ethers 2" for 12-month rolling time period ending July 2022	IN COMPLIANCE
3. Total HAPs	Less than 22.5 tons per 12-month rolling time period	1.87 tons for 12-month rolling time period ending June 2022; 1.84 tons for 12-month rolling time period ending July 2022	IN COMPLIANCE

III. Process/Operational Restrictions
1. IN COMPLIANCE. Malfunction Abatement Plan (MAP) was submitted to AQD and is maintained and implemented by the facility. Records of all preventative maintenance and repair activities are maintained electronically and were reviewed on site during the inspection. Monitors for the baghouse and scrubber are calibrated annually. All tanks which are in service are inspected every 2-5 years.

VI. Monitoring/Recordkeeping
1. IN COMPLIANCE. Monthly and 12-month rolling time period calculations of VOC, Aggregate HAP, and Individual HAP emissions from FGFACILITY are maintained, as required. Per AQD request, the facility has agreed to adjust the recordkeeping for the 12-month rolling calculations of individual HAPs in a format which makes it easier for AQD to evaluate; this should be completed by August 2023.

FINAL COMPLIANCE DETERMINATION

At the time of inspection, US Ecology - Detroit South was determined to be in substantial compliance with PTI No. 269-04H and applicable State and Federal air regulations, excluding the unresolved Rule 901 violations. AQD is currently evaluating whether the 2020 MMD Consent Order will be sufficient in addressing and resolving the outstanding violations.

NAME _____ DATE 1-27-23 SUPERVISOR JK