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October 21, 2015

CERTIFIED MAIL

Mr. Jonathan Lamb
Environmental Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202

SUBJECT: August 28, 2015 Inspection

Dear Mr. Lamb:

I am writing in response to the issues raised in your 10/2/2015 letter concerning your 8/28/2015 inspection of US Ecology Michigan, (USEM) Inc.:

1. Issue No. 1—Permit 302-07A; Special Conditions III.2. and III.3

MDEQ/AQD Statement:

Building was not under negative pressure during operation. More than two bay doors were open while processing.

USEM Response:

During inspection more than two doors were observed open affecting the ability of the ventilation system to maintain negative pressure within the building. Two unloading bay doors were open while inbound waste was unloading into the processing pits. During this time a third-party vendor opened door five without consulting USEM site personnel resulting in three doors open simultaneously. USEM has notified this vendor that this type of action affects the operating condition of the facility and is, in fact, a violation of the air permit currently issued to the facility. This vendor is required to check in with USEM facility personnel upon arrival at the facility and proceed at the direction of USEM personnel.

2. Issue No. 2— Permit 302-07A; Special Conditions III.4. and IV.1

MDEQ/AQD Statement:

Baghouses did not appear to be maintained and operating properly at time of inspection.

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USEM Response:

USEM believes the baghouses were functioning at their designed capacity and that the excessive number of open doors alone resulted in the loss of negative pressure during the time of inspection. Supporting this assertion, in the days after the inspection it was discovered the pressure gauge monitoring the negative pressure level of the building was reading incorrectly at the time of inspection. The gauge has two tubes, one on the inside of the building and one on the outside to determine the pressure difference between the two. Further inspection found that the outside tube had fallen in between the interior and exterior wall resulting in both tubes sensing internal pressure. Upon correct placement of the exterior tube the gauge immediately displayed a negative pressure reading as expected. Because of this observation USEM believes the baghouses were functioning properly at the time of inspection and the malfunctioning gauge combined with the open doors gave the appearance of improperly functioning baghouses. Pictures of this condition are attached for your review.

Thank you for your consideration. If you have any questions concerning this matter, please call me at (313) 344-5045.

Sincerely yours,



Terry Howes
Environmental Compliance Manager
US Ecology Michigan

cc: Mr. Scott Binder
Ms. Jeanette Noechel

Enclosures