



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GRETHER  
DIRECTOR

June 20, 2018

Ms. Tabettha Peebles  
Environmental Compliance Manager  
U.S. Ecology Detroit South  
1923 Frederick St.  
Detroit, MI 48211

SRN: M4545, Wayne County

Dear Ms. Peebles:

**VIOLATION NOTICE**

On June 8, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated complaints of nuisance odors in the vicinity of U.S. Ecology Detroit (South), located at 1923 Frederick, Detroit, Michigan. The purpose of the investigation was to determine U.S. Ecology'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 administrative rules; and the conditions of Permit to Install (PTI) number 269-04H.

Mr. Todd Zynda of the AQD performed the investigation from approximately 8:30 PM to 9:30 PM on June 8, 2018, and observed the following air pollution violation:

Process Description	Rule/Permit Condition Violated	Comments
Chem-Fix	R 336.1901(b)  PTI No. 269-04H; General Condition 6	Moderate to strong (Level 3 to 4) lime dust and chemical-type odors, attributable to U.S. Ecology's operations, impacting areas downwind of the facility.

R 336.1901(b) states, in part:

"A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health and property, or the unreasonable interference with the comfortable enjoyment of life and property."

During the investigation of June 8, 2018, Mr. Zynda detected moderate to strong lime dust and chemical-type odors in residential and commercial areas downwind of the facility which were traced back to U.S. Ecology Detroit (South). In Mr. Zynda's professional judgment, the odors observed were of sufficient intensity and frequency so as to constitute a violation of R 336.1901(b) and General Condition 6 of PTI No. 269-04H.

Ms. Tabetha Peebles

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 11, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 DEQ, 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 DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Please include a list of all waste streams which were processed in the Chem-Fix building on June 8, 2018, including the generator of each waste stream, description of each waste stream, and amount of each waste stream processed.

If U.S. Ecology 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 violation cited above. If you have any questions regarding the violation 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, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ  
Ms. Tracy Kecskemeti, DEQ  
Ms. Jeannette Noechel, DEQ  
Mr. Richard Conforti, DEQ  
Mr. Todd Zynda, DEQ