



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GRETHUR
DIRECTOR

August 8, 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 August 2, 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 269-04H.

I performed the investigation from approximately 7:05 AM to 8:00 AM on August 2, 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 and 4), persistent 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 August 2, 2018, I detected moderate to strong, persistent lime dust and chemical-type odors in residential areas downwind of the facility which were traced back to U.S Ecology Detroit (South). In my 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.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 29, 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.

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. Should you require any further information, please contact me.

Sincerely,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc: Ms. 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
Mr. Tracy Kecskemeti, DEQ
Ms. Jeannette Noechel, DEQ
Mr. Richard Conforti, DEQ
Mr. Andrew Bertapelle, DEQ
Mr. Todd Zynda, DEQ