



January 11<sup>th</sup>, 2016

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



Dear Mr. Lamb:

Subject: Violation Notice, Odor Complaint – December 19<sup>th</sup>, 2015  
SRN: B9080, Wayne County

In response to the Violation Notice sent from your office on December 22<sup>nd</sup>, 2015 (Received 12-23-2015).

Please see attached Solidification Waste Processing log, which displays two waste streams, which were processed on December 19<sup>th</sup>, 2015. We have also included the waste profiles, which describe the waste materials and how they are generated.

Based on our review, we believe the odor being emitted off site was due to the sheer volume of the oily sludge waste approval #7162 which was processed that day. The generator was performing an annual cleanout of their industrial waste oil recovery system and tanks. This particular cleanout generated a much higher volume than previous years. Based on the discovery, we have taken the following corrective actions:

- The generator "Usher Oil Co." has been informed that we will no longer permit more than 50 tons of approval #7162 per day and no more than 3 days per week (150 tons per week maximum).
- We have also made adjustments to our scrubber systems so we can move more air through them during processing of this type of waste.
- We have also contracted to have all roof and sidewall panels replaced that are leaking or in disrepair (this work has started but will take a few weeks to complete). The work can only be performed when we are not processing materials (which slows down the process).

If you would have any questions or concerns please do not hesitate to call me @ 313.850.6672.

Best Regards

Brent Damman, General Manager