



1923 Frederick Street, Detroit, MI 48211
P 313.347.1300 F 313.923.0217



December 14, 2016

Jonathan Lamb
Senior Air Quality Analyst
Air Quality Division
Department of Environmental Quality
Cadillac Place
3058 West Grand Boulevard
Suite 2-300
Detroit, Michigan 48202-6058

RE: SRN 4545 Violation Notice dated November 23, 2016.

Dear Mr. Lamb:

This letter is in response to the "Violation Notice" dated November 23, 2016. In the letter, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) notified US Ecology- Detroit South (USEDs) of the violation noted below. The following provides a response to the alleged violations listed in that letter.

Date	Process Description	Rule/Permit Condition Violated	Comments
11-21-16	Chem-Fix	R 336.1901(b); PTI No. 269-04E, General Condition 6	Moderately strong (Level 3) lime dust and chemical-type odors, attributable to US Ecology's operations and impacting areas downwind of the facility.

During the post-incident review, US Ecology was unable to identify any waste streams that would have created an abnormal odor issue. As per the agency's request, the batch reports for November 21, 2016 are provided on disk. The lime odor detected is from the routine solidification of our materials in our Chem-Fix operation.

As a result of recent violations, however, USEDs has implemented several important changes to minimize the chances of future issues arising from our normal operation. To summarize:

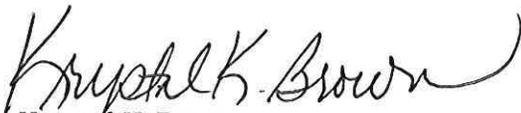
- USE continues to be diligent in its efforts to prevent nuisance odors by thoroughly reviewing waste profiles before approval.
- USE will continue routine preventative maintenance on the baghouse.
- USE will continue proactively monitoring for odors offsite of the facility.
- USE will continue to slow down any exothermic treatment processes.
- USE has completed the reprogramming of the high-speed doors in order to minimize the delay in the closing of the doors.

In addition to the aforementioned newly established procedures and changes, the company has been working with an outside vendor and consultant to develop and implement an odor neutralization system. We have ordered the unit and are in the process of receiving the components of the system as well as securing the needed skilled trades. Additionally, some PLC programming will need to occur as this system will work in conjunction with the baghouse in order to optimize the application of the neutralant.

At this juncture we anticipate the system to be up and running in the next 60-90 days depending on the weather and any unforeseen computer integration issues. We are eager to start using the system and will notify the MDEQ when the system is up and running. In total the system will cost US Ecology over \$50,000 to install and then in excess of \$10,000 annually in chemical costs and upkeep. We feel that the expenditure of this capital further reinforces US Ecology's commitment to mitigating any odors and remaining in full compliance with all applicable rules and regulations.

Should you have any additional questions, please contact me at (313)347-1328.

Sincerely,



Krystal K. Brown
EHS Manager

Enclosures

cc: Raymond Landsberg, USE Detroit South (via email)
Jim Conn, USE Chicago (via email)
Andy Marshall, USE Boise (via email)
Paul Haratyk, USE Detroit South (via email)
Dan Belisle, USE Romulus (via email)