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July 13, 2020

Jonathan Lamb, Senior Air Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Air Quality Division
3058 W. Grand Boulevard
Suite 2300
Detroit, MI 48202

RE: EQ Detroit, Inc. (DBA US Ecology – Detroit South) – Response to Violation Notice dated June 22, 2020 for Alleged Nuisance Odors on June 2, 2020

Dear Mr. Lamb:

Please accept this letter as US Ecology – Detroit South’s (USE-DS) response to the Violation Notice (VN) dated June 22, 2020, regarding odors allegedly caused by USE-DS’s operations in violation of PTI No. 269-04H; General Condition 6 and R336.1901(b) on June 2, 2020. The letter stated that inspections conducted by EGLE-AQD in response to a complaint reportedly found a moderate to strong (level 3 and 4), persistent burnt lime dust and chemical-type odor attributable to US Ecology’s operations, impacting areas downwind of the facility.

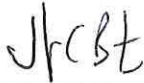
Actions Taken by USE-DS

USE-DS immediately evaluated the wastes present in the vaults at the time of the odor complaints and identified three non-hazardous waste approvals from Vault 702 whose waste description indicated a potential for odor contribution. While these three non-hazardous wastes had cleared their initial odor screening in the laboratory, the waste description identified herbicide and pesticide process rinsates. Based on review of product SDS, the potential for petroleum or musty odor was possible. Out of an abundance of caution and in response to the odor complaints and corresponding Violation Notice, these three waste approvals have been changed to ‘not acceptable for on site for treatment’. These wastes will only be acceptable for “transshipment to another facility”. These actions have already been taken and therefore considered to be closed.

As always, USE-DS appreciates EGLE's notifying the facility of potential issues and following-up with investigations. In order to enable USE-DS to respond most effectively to odor concerns, we ask that AQD field personnel make every effort to notify John C. Barta, General Manager, as soon as possible with all essential details when any odor complaint potentially relating to USE-DS is received. This will allow USE-DS to immediately investigate and potentially respond to the complaint and report the results.

If you have questions concerning this response, please feel free to contact me at (313) 347-1300.

Sincerely,



John C. Barta
General Manager

cc (via email):

Paul Max, City of Detroit, BSEED
Rich Conforti, EGLE
Todd Zynda, EGLE
Tracy Kecskemeti, EGLE
Greg Morrow, EGLE
Margie Ring, EGLE
Lonnie Lee, EGLE
Jim Day, EGLE

Jenine Camilleri, EGLE
Al Taylor, EGLE
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Andrew Bertapelle, EGLE
Alexandra Clark, EGLE
April Wendling, EGLE
Alex Whitlow, EGLE