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November 16, 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 October 27, 2020 for Alleged Nuisance Odors on October 15, 2020

Dear Mr. Lamb:

Please accept this letter as US Ecology – Detroit South’s (USE-DS) response to the Violation Notice (VN) dated October 27, 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 October 15, 2020. The letter stated that inspections conducted by EGLE-AQD in response to a complaint reportedly found moderate to strong (level 3 and 4) lime dust and chemical-type odors attributable to US Ecology’s operations, impacting areas downwind of the facility.

A call was received by USE-DS personnel from EGLE at 10:00 pm on October 15th, informing USE-DS that EGLE was investigating a complaint at Farnsworth and Elwood Streets. EGLE stated that lime chemical odor was detected. The field investigator decided odors were sufficiently intense to support a violation of Rule 901(b). The treatment of waste ceased at 9:00 pm, the operator left the site at 9:15 pm and drove around the area at 9:20 pm, but did not detect any odors. Additional odor evaluations took place earlier in the evening, around 7:30 pm.

Please note that USE-DS has been diligent in removing any potentially odorous materials from the waste treatment process, and any of the odors that may have been detected were the normal and customary odors indicative of complying with 40 CFR 268.42 - Treatment Standards Expressed as Specified Technologies for stabilization. The treatment standard, which is used by USE-DS, states “Stabilization with the following reagents (or waste reagents) or combinations of reagents: (1) Portland cement; or (2) lime/pozzolans (e.g., fly ash and cement kiln dust)—this does not preclude the addition of reagents (e.g., iron salts, silicates, and clays) designed to enhance the set/cure time and/or compressive strength, or to overall reduce the leachability of the metal or inorganic.”

Current Actions Taken by USE-DS

In response to this and previous odor violations, the following corrective actions have been implemented to date:

- Prior to acceptance of a waste stream on-site, the customer must provide USE-DS with details on the waste stream. The preapproval of waste streams is evaluated with more stringent criteria to identify potential odor issues before approving a customer's waste. Waste streams are not approved, at times, solely due to the potential odorous properties.
- Screening of samples for odors is a continuous process at the site. Once the waste stream arrives on-site, a sample is pulled for evaluation. If operations or laboratory personnel determine the sample of a waste stream may be too odorous, the waste stream will not be accepted on-site for treatment. Consequently, the waste will be rejected back to the customer or transshipped to another location.
- Once a waste stream is identified as odorous, these waste streams are no longer treated on site. The approvals for these wastes have been changed to 'not acceptable on-site for treatment' or 'transshipment to another facility.'
- As waste streams are identified as containing ammonia and amines, they are evaluated to determine if they should continue to be received on-site for treatment. This has, and continues to, reduce the volume of ammonia and amines waste streams received for treatment.
- Frequently the odor associated with the treatment process is from the reagents, such as lime, used to bind and dry the waste for landfill disposal. The volume of these reagents has been reduced when treating non-hazardous waste streams.
- The treatment process is a chemical reaction that can liberate odors from the process. In an effort to reduce odors, the drying time has been increased, which is essentially slowing the chemical reaction and consequentially reducing odors.
- Treatment of the waste streams occurs in batches. Another tactic taken to reduce odors is reducing the batch size. Ideally, this minimizes odors as well.
- In an effort to understand the treatment process and odor production from the process, the temperature of the vaults is being logged daily to determine if there is a correlation between odor complaints and higher temperature vault activity.
- The weather conditions are also considered. The wind direction is reviewed on a daily basis as part of operation's odor evaluation. The direction of the wind is an indicator of where odors may travel and the potential receptors downwind of the site. When the humidity is higher, it traps the odor and causes it to travel farther and linger longer. Also, high winds have been found to contribute to odor complaints off-site. Operations personnel use this information to make operational decisions to further reduce the potential to impact nearby receptors. Treatment is rescheduled as appropriate.
- Personnel conduct odor evaluations each day the facility is operating in the morning and in the evening. The evaluations are completed between 7:00 am to 9:00 am and again between 7:00 pm to 9:00 pm. If odor is detected, a scentometer is utilized to determine the level of odor detected.
- USE-DS has an on-site initiative to encourage personnel to "say something if they smell something." This initiative has led to earlier investigation of the potential for off-site odors and efforts to remedy the odors before they contribute to any off-site impact.

In order to enable USE-DS to respond most effectively to odor concerns, we ask that AQD field personnel make every effort to notify me 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 Barta

John C. Barta
General Manager

cc (via email):

Paul Max, City of Detroit, BSEED
Rich Conforti, EGLE
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