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VIA EMAIL

August 13, 2021

Jonathan Lamb, Senior Air Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Air Quality Division
3058 W. Grand Boulevard
Suite 2-300
Detroit, MI 48202

RE: EQ Detroit, Inc. (DBA US Ecology – Detroit South) – Response to Violation Notice dated July 28, 2021

Dear Mr. Lamb:

Please accept this letter as US Ecology – Detroit South's (USE-DS) response to the Violation Notice (VN) dated July 28, 2021, regarding findings following the inspection you conducted on August 21, 2020. The inspection identified several days in 2018, 2019, and 2020 in which USE-DS did not document the ORP and pH readings on the daily inspection forms filled out by operations for the scrubber as required by PTI No. 269-04H, FGOILRECOVERY, Special Conditions VI.2a, b, and c; and VI.3d.

History

USE-DS proposed the installation of the scrubber to EGLE in 2006 to control odors from the oil recovery processing tanks. A permit was obtained from EGLE, and the installation of the scrubber took place in 2007.

Response/Actions by USE-DS

The VN identifies a wide range of dates from October 15, 2018 through March 27, 2019, and January 28, 2020 through March 18, 2020. However, the oil recovery process that vents through the scrubber is a batch process that only happens intermittently. The scrubber is only required to be operating (and readings to be taken) when the oil recovery process is operational. The oil recovery process is considered online when the steam generator is operating. USE-DS conservatively fills out the Oil Recovery Operating Log on all days when personnel are on site and accepting waste, and not just on the days the oil recovery process is online (steam generator is

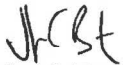
operating). USE-DS did a thorough evaluation of the daily operating records for the dates noted in the Violation Notice and only identified two days that the ORP reading was not documented when the oil recovery process was operational.

Date	pH	ORP	Reason
2/8/2020	8		Treatment took place in tank 106. The ORP sensor was not operating properly. An order was placed on 2/25/2020 for new pH and ORP sensors.
2/15/2020	8		Treatment took place in tank 106. The ORP sensor was not operating properly. An order was placed on 2/25/2020 for new pH and ORP sensors.

Therefore, in response to the missing documentation, personnel have been refreshed on the need to ensure all sections of the form are filled out. Also, for ease of records review in the future, a check box will be added to note if treatment is taking place (steam generator operating). Additionally, if the ORP and/or pH probe is out of service and a reading is not available, the operators will manually pull a sample from the scrubber and take the required reading with an external probe.

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):

Jenine Camilleri, EGLE
Mary Carnagie, EGLE
Mary Ann Dolehanty, EGLE
Christopher Ethridge, EGLE
Hosam Hassanien, City of Detroit BSEED
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Greg Morrow, EGLE
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