N7358
MANILA

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N735947950

FACILITY: Aevitas Specialty Services Corp		**SRN / ID:** N7359
LOCATION: 663 LYCASTE, DETROIT		**DISTRICT:** Detroit
CITY: DETROIT		**COUNTY:** WAYNE
CONTACT: Greg Reichard , Chief Executive Officer		**ACTIVITY DATE:** 10/11/2018
STAFF: Stephen Weis	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Compliance inspection of the Aevitas Specialty Services facility in Detroit. The Aevitas facility is scheduled for inspection in FY 2019.		
RESOLVED COMPLAINTS:		

Location:
Aevitas Specialty Services Corporation
(SRN N7359)
663 Lycaste
Detroit

Date of Activity:
Thursday, October 11, 2018

Personnel Present:

Steve Weis, DEQ/EGLE-AQD Detroit Office
Greg Reichard, Chief Executive Officer, Aevitas
Rob Slater, Aevitas
Constantinos (Kosta) Loukeris, Environmental Engineer, EPA Region 5 Office

Purpose of Activity

A self-initiated inspection of the Aevitas Specialty Services Corporation facility (hereinafter "Aevitas") was conducted on Thursday, October 11, 2018. The Aevitas facility is on my list of sources targeted for an inspection during FY 2019. The purpose of this inspection was to determine compliance of operations at the Aevitas facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), with applicable Federal standards, and with the terms and conditions of Permit to Install No. 10-12. This particular inspection was scheduled for this date to correspond with an unannounced site visit that was scheduled by the US EPA Region 5 Office of Air and Radiation staff.

Facility Site Description

The Aevitas facility is located in Detroit's Connor Creek Industrial neighborhood, which is located between Interstate 94 and the Detroit River, and is bounded by St. Jean Street and Connor Avenue/Clairpoint Street. The facility occupies the area at the southwest corner of Lycaste and Edlie Streets, which is located south of Jefferson, and east of St. Jean. The area in the immediate vicinity of Aevitas (between Edlie and Freud Streets, and between Lycaste and St. Jean Streets) consists of a variety of commercial and industrial properties, including Stericycle (formerly PSC Nortru) and ALCO Products. Fiat-Chrysler's Jefferson North Assembly Plant is located on the north side of Jefferson, just over ¼ mile north of Aevitas.

There are residential areas to the south and west of the Aevitas facility, and the area to the east of Clairpoint St. (approximately 0.4 miles from Aevitas) consists almost entirely of residential properties. The closest residences to Aevitas are located about ¼ from the facility. In addition, there is a U.S. Customs and Border Protection Border Patrol Station (hereinafter "BP Station") located along East Jefferson having a fence line about 100 yards to the north-northeast of Aevitas; Detroit Fire Department Engine House No. 32, located about 300 yards to the north; and the U.S. Citizenship and Immigration Services Detroit Field Office, located at the northeast corner of East Jefferson and St. Jean about 400 yards to the northwest of Aevitas.

On June 7, 2011, Aevitas Inc., a Canadian company that specializes in industrial waste management, purchased

General Oil Company. General Oil was in the business of used oil and oily wastewater recycling; they operated an oil product blending facility in Livonia, and a used oil and oily wastewater treatment facility at 12600 Beech-Daly Road in Redford Township. Aevitas purchased the property at 663 Lycaste in 2012. The property and facility had previously been operated as Energis Detroit, LLC, a used oil processor, and previous entities owning/operating the property/facility included OmniChem, Apex Casting, and PSC-Nortru, Inc. Aevitas ceased operating the Redford location on September 10, 2012, and all of the business related to used oil and oily wastewater recycling that was taking place at the Redford site was moved to the Lycaste facility from that point onward. I was told during a site visit in 2016 that the oil product blending operation from the Livonia location (35796 Veronica St.) had been moved to the Lycaste facility, and that the Livonia facility was to be permanently shut down.

Facility Operations

As mentioned in the previous section of this report, Aevitas owns and operates a used oil and oily wastewater treatment and oil product blending facility on Lycaste Street. The facility consists of a building structure that has a front portion off of Lycaste that contains the facility's office area, and a larger rear portion that houses an on-site laboratory, and various tanks that are part of the treatment and blending operations; several material treatment and storage tanks located outside and on the north and west sides of the building structure; a tanker truck loading and offloading are to the north of the treatment and storage tanks; and an equipment storage area in the southern portion of the property.

The materials that are processed or stored at the facility arrive via tanker truck, with a small percentage of material delivered in drums or totes. According to the permit application that was submitted for PTI No.10-12, the industrial liquid waste that is accepted and treated by Aevitas at this facility is classified in one of three categories – straight oil, which contains over 90% oil (and less than 10% water); oily waste, which contains between 10 and 90% oil (the rest, between 11 and 89%, would be water and sludge); and oily water, which contains less than 10% oil, with the remainder consisting of water and sludge.

When straight oil arrives at the Aevitas facility, it is unloaded from the tanker/drum/tote in which it was transported to the facility into one of six vertical fixed roof storage tanks identified in PTI No. 10-12 as the FG3 flexible group. This flexible group consists of Tanks 31 through 36, which are identified in the permit as EU-Tank31 through EU-Tank36 and that make up Tank Farm 3. Tanks 31, 32, 35 and 36 have a working capacity of 19,500 gallons, while Tanks 33 and 34 have a working capacity of 6,000 gallons. These six tanks are located outside of and adjacent to the building on the west side, and they vent to the scrubber system. Oil is heated in these tanks to 210°F to separate the oil and water in the incoming material from each other. After this heat treatment, the oil product is transferred to one of six petroleum product storage tanks with a storage capacity of 19,500 gallons. These tanks, identified as tanks 41 through 46, are located outside of the building on its west side, to the south of Tank Farm 3.

Oily waste and oily water are treated using essentially the same procedure in the same process equipment; the main difference would be the amount of treatment (and treatment chemicals) that would be needed to separate the water and sludge from the oil. In this treatment process, the oily waste/water is unloaded from the tanker/drum/tote into one of six storage tanks identified in the permit as FG1; these vertical fixed roof tanks are identified in the permit as EU-Tank11 through EU-Tank16, and that make up Tank Farm 1. Oily waste is heated to 160°F, and then transferred to one of the two exterior tanks in the FG2 flexible group, both of which vent to the scrubber system and make up Tank Farm 2. Within these two tanks, identified as Tanks 21 and 22 and having a working capacity of 16,000 gallons, the oily waste is heated to between 150° and 200°F, its pH is adjusted via the addition of sulfuric acid and sodium hydroxide, and, if necessary, polymers are added, all to further separate the oil, water and sludge in the waste material. The oil that is separated is transferred to one of the FG3 tanks (Tanks 31 through 36, Tank Farm 3), and processed as straight oil, as described in the last paragraph. The sludge is also transferred to one of the FG3 tanks, where it is dried by heating the material to between 180° and 200°F. The sludge is shipped offsite for sale as a fuel.

The water phase that is produced as a result of the treatment process (i.e. during the oil/sludge/water phase separation) is treated by Aevitas in on-site wastewater treatment tanks. The water is adjusted for pH and further treated with precipitating and flocculating agents to remove solids. The water is discharged to the POTW (Publically Owned Treatment Works, which is essentially the sewer pipe that directs the water to the Great Lakes Water Authority Water Resource Recovery Facility), and the discharge is subject to permitted effluent discharge limits. The solids generated by the wastewater treatment process are removed via a filter press, and they are sent offsite for disposal.

The heated treatment tanks are heated via heating coils, which are heated by steam produced by a boiler identified as EU-Boiler. The boiler has a heat input rating of 5 MMBTU/hour, and it is exempt from AQD permitting requirements per the provisions of Michigan Administrative Rule 282(2)(b)(i). Accordingly, while the boiler is identified in the Emission Unit Summary Table of the PTI, its operation is not further addressed in the permit.

A facility site map is attached to this report that shows the location of the tanks within the boundaries of the facility.

I was told during the site visit that the facility currently operates one expanded day shift from 6am-6pm Mondays through Fridays, with an occasional half day on Saturdays.

Inspection Narrative

Kosta Loukeris of US EPA's Region 5 had chosen this date for an unannounced inspection of the Aevitas facility. The Aevitas facility was chosen by EPA staff for inspection due to some complaints to various Federal agencies earlier in 2018 relating to odors alleged to be coming from the Aevitas facility, and questioning what pollutants are being emitted to the ambient air from the facility. Communications were sent to the US EPA and the US Department of Health and Human Services - National Institute for Occupational Safety and Health (NIOSH) through which staff at the BP Station expressed their concerns about the emissions from the Aevitas facility, and through which inquiries were made as to the possibility of having air monitoring equipment installed at the BP Station or having measurements taken in the area to evaluate the air quality in the area of the BP Station.

Staff from US EPA's Region 5 Air Monitoring and Analysis Section scheduled ambient air monitoring in the area around the Aevitas facility, utilizing their mobile air monitoring equipment, for the week of October 1. Kosta scheduled his site visit for the following week, choosing October 11 as the date of his inspection. I was informed of the US EPA site visit shortly before the scheduled date and invited along.

I arrived at the facility at 9:35am. I met Kosta in the parking area on the east side of Lycaste, across from the Aevitas facility. Kosta and I announced ourselves at the main entrance to the facility's offices, and we were met by Greg Reichard. Greg took us to the facility's conference room, and we were joined by Rob Slater of Aevitas.

Kosta introduced himself, and he described the purpose of his visit. He told Greg and Rob that he wanted to discuss the operations at the facility, review records, and to perform some monitoring of aspects of the operation at the facility using a FLIR GF320 infrared camera that he had brought along for the visit. The FLIR camera is an optical gas imaging camera that is able to detect fugitive VOC and hydrocarbon emissions; Kosta planned to use it to monitor emissions from storage and treatment tanks, and the loading area of the facility.

We discussed current operations at the facility, and Greg provided Kosta with some background about the operations at the site. Greg described that the Aevitas facility is a centralized treatment facility that treats non-hazardous wastewaters (industrial oils and wastewaters) from offsite customers. Aevitas also has a trucking fleet to pick up and transport material to the facility for treatment. There are currently 20 staff employed at the facility, and current operations are 5-6 days per week, day shift only. Greg said that the Aevitas facility currently has 450,000 gallons of storage tank space, with all of the tanks being above-ground storage tanks. The heated tanks are vented to the facility's scrubber air pollution control device. The throughput of material that is accepted and treated at the facility is tracked on a load and weekly basis. Greg told us that the facility currently receives 40-50 shipments of material per week, produces 20,000-40,000 gallons of oil product per week, and produces 60,000-70,000 gallons of wastewater per day. He further provided that 4-5 loads of secondary fuel (which consists of oil, water and dirt/solids) is sent to cement kilns each week.

Greg described that the facility has a wastewater discharge permit with the Great Lakes Water Authority (GLWA) that requires the facility to perform weekly monitoring of their effluent, and monthly monitoring by GLWA. He described that facility's on-site laboratory which is used to analyze the incoming materials for flashpoint, halogen content, PCB concentration, and the composition and physical properties of the material. Greg said that the lab waste is of a quantity that classifies the facility as a conditionally exempt small-quantity generator (CESQG) of hazardous waste, as defined in 40 CFR Part 261 (Federal RCRA regulations) and Part 111 of Michigan Public Act 451 (Natural Resources and Environmental Protection Act)

We then walked through the facility. Our first stop was the lab. One of the lab technicians showed us the sample receiving bench, and he described how the samples of material to be treated at Aevitas are analyzed for oil

content, water, solids, pH, halogens (using a halogen flame test), metals, odor, and oil properties (for custom blended products).

We then walked out into the treatment area of the building. We first looked at the facility's water treatment process, through which the wastewater produced by the treatment operations at the facility is processed. Water treatment begins in Tanks 51-56, in which sequential batch separation takes place; this involves gravity settling and pH adjustment. We were told that a small amount of incoming wastewater that meets certain criteria can be directed to Tanks 51-56. After processing in Tanks 51-56, wastewater receives final treatment/polishing in Tanks D1 and D2. There are two storage tanks in this area that contain caustic that is used for pH adjustment. None of these tanks are heated, they are located inside of the building, and they are not vented to the scrubber.

We next visited the receiving pit and pumping station, which is located in the building along the northwest corner. The majority of the incoming waste is pumped from the tanker trucks in the offload area to the receiving pit, from where it can be pumped to treatment and storage tanks around the facility. We were told that the pit/pumping station is cleaned once per year. Just past the receiving pit at the west end of the building are two filter presses, which are used to filter oil. We were told that one of them has never been used, and that the one that is in use is not used every day.

At the southwest corner of the building are the oil blending tanks in which finished oil product is blended. The facility blends gear oils, lubricants and hydraulic oils. The boiler is located in the southern portion of the building. It is used to provide live steam to the waste processing tanks in which material is heated. We were told that the boiler came with the building. The boiler plate affixed to the unit provided that the boiler is a Superior Boiler Works Mohawk unit, serial number 10531, built in 1988 with a maximum rated heat input capacity of 6.3 MMBTU/hour. The boilers are inspected annually by the City of Detroit, and internally by Aevitas.

The facility's effluent discharge to the POTW is located next to the boiler. Greg described that the effluent is subject to CWT (centralized wastewater treatment) regulations, and is monitored for metals (zinc, copper, nickel), FOG (fats, oils, greases), BOD (biological oxygen demand), dissolved solids and phosphate.

We walked outside at the south end of the facility property. The outside area currently serves as a staging area for Aevitas' trailers, and for drums. Some of the storage and treatment tanks from the former Redford facility are stored in this area. We were told that Aevitas is talking to metal scrappers about removing these tanks from the site. Along the south wall of the building are some additional tanks. We were told that the tank identified as Tank No. 6 has never been used. Tanks 10 and 14-17 were brought to the site from the former Livonia facility, and they are used to store materials that are used as part of the oil blending process – virgin mineral oil, and paraffin oil (which is used for viscosity).

As we walked along the west end of the building, Kosta and I were told that the paved roadway that runs along the west property line is the finished product lane, which trucks that have picked up finished oil product use to leave the facility. We walked past the outdoor tanks that are located on the west side of the building. The first group that we walked past (the southern tanks) are the product storage tanks in Tank Farm 4. We then walked by tanks that were identified as Tank Farm 3, which contains the drying tanks. The past tanks along the west side of the building are those in Tank Farm 2, which includes storage and processing tanks. The scrubber, which is located at the northwest corner of the building and outdoor tank area, was pointed out. We then walked to the north side of the building, which is the receiving pad (i.e. the loading area). There are some outdoor tanks located between the truck offload area and the building; these are identified as Tank Farm 1, and they are used to hold incoming waste if there is no available room in the treatment tanks.

We returned to the conference room. We briefly discussed the records that the company keeps to track the operations at the facility. Kosta also inquired if the boiler's burner and/or tubes have been replaced. Kosta requested records of the amount of material accepted to be processed at the facility, boiler maintenance and repair records, and records of the scrubber flow for August of 2017. In correspondence dated October 17, 2018, Aevitas provided Kosta and I with scrubber flow records for August 2017, 12 months of rolling volume records of inbound oil and water, five years of maintenance and repair records for the boiler, and a facility layout. Copies of this information are attached to this report, and the original information is filed in the Aevitas facility file. Kosta grabbed the FLIR camera, and our group headed back out into the facility for Kosta to perform monitoring using the FLIR camera.

The first place that was monitored was the wastewater treatment tanks inside of the building (Tanks 51-56). We walked on the catwalk near the top of the tanks. There are observation ports affixed to the tanks that are viewed and accessible via the catwalk. We walked along all of the tanks, and the FLIR camera showed some VOC emissions coming from Tank 54, for which the port door was open. These tanks vent inside of the building. Kosta

showed Greg and Rob the display screen of the FLIR as he was sampling, pointing out the VOCs that were visible emitting from Tank 54. Greg and Rob committed to having facility staff keep the doors associated with the observation ports closed.

We then went outside, and we climbed the stairs and ladders to survey from the walkway at the tops of the treatment and drying tanks in Tank Farms 2 and 3. Kosta analyzed the tops of the tanks, and the piping, relief valves and connections associated with these tanks. No VOC emissions were detected by the FLIR camera while we were surveying Kosta analyzed the scrubber with the FLIR; there were no VOC emissions detected from the connections and piping associated with the scrubber, and Kosta reported that the FLIR showed "slight VOC emissions" coming from the scrubber.

Kosta then used the FLIR to analyze the receiving pad/truck offload area. There were a couple of tanker trucks transferring (or preparing to transfer) material at the time. Kosta aimed the camera at the at the tanker trucks, at their top hatches, at the connecting hoses, and at the hose connection to the building. The FLIR did not show any fugitive emissions associated with the offloading operations.

After the FLIR monitoring, we went back to the conference room and summarized the site visit. We discussed the operation of the scrubber, specifically the requirement to maintain a minimum scrubber liquid flow rate. The permit requirements in the FG-Process Tanks Flexible Group table in PTI 10-12 require and address the use of a packed bed scrubber to control emissions to the ambient air from the processing tanks at the Aevitas facility that are included in this Flexible Group. Special Condition III.1.c in FG-Process Tanks requires that the scrubber solution be recirculated to the packing at a rate not less than 125 gallons per minute. I have issued a Violation Notice to Aevitas in the past for not adequately and accurately monitoring the scrubber liquid flow rate. Greg told us that Aevitas is working on upgrading the scrubber, including the pump and scrubber feed pipe and the flow meter. Kosta and I were told that we would receive correspondence regarding the proposed improvements. In correspondence dated November 28, 2018, Kosta and I received a document with the subject line "Corrective Action – Scrubber Media Flow Rate" that provided a Process Improvement Plan to address the scrubber media flow rate, and included a process flow diagram of the upgrades that are to be made to the scrubber. On May 30, 2019, Aevitas staff sent electronic correspondence that updated me as to the completion of the Process Improvement Plan for the scrubber. This will be described in further detail in the next section of this report.

Kosta and I left the facility at 12:05pm. We surveyed a few locations around the facility for odors. At 12:50pm, Kosta and I visited the BP Station. The person that I have spoken with at the site, Jeff Paplawsky, was not on-site at the time of our visit. We spoke with one of the staff at the site, Matt Dunaway, and asked him about the odors that staff at the BP Station have been noticing. He told us that the BP Station has been operating at the location since 2015. Matt said that the odor is not constant – a few weeks could go by without what he described as a sulfurous, natural gas odor, then the odor is back for a while. Matt said that the odor is noticeable outside of their building, and sometimes inside portions of the building, as well. Kosta and I left our contact information, and we left the BP Station shortly after 1:00pm.

Permits/Regulations/Orders/Other

Permits

The Aevitas facility was issued DEQ-AQD Permit to Install (PTI) No.10-12 on April 3, 2012. This permit addresses the various process and storage tanks associated with the oil and oily wastewater treatment process. The permit includes an Emission Unit Summary Table that lists all of the pieces of process equipment that were included in the permit application and considered during the permit review process. Some of this equipment is only listed in the Emission Unit Summary Table, with no corresponding permit requirements; this is presumably due to this equipment meeting the criteria of one of the Part 2 Permit to Install exemptions, and in the case of tanks used to store oil, oily waste and wastewater, due to the low vapor pressure of the materials in these tanks. This equipment includes:

- Six fixed-roof storage tanks, each having a storage capacity of 19,500 gallons, that receive oily liquid industrial waste. These tanks, which make up FG1, are identified as EU-Tank11, EU-Tank12, EU-Tank13, EU-Tank14, EU-Tank15 and EU-Tank16. The location of these tanks is designated as Tank Farm No. 1.

- Six fixed-roof petroleum product storage tanks, each having a storage capacity of 19,500 gallons. These tanks, identified as EU-Tank41 through EU-Tank46, are used to store the recycled oil product. The location of these tanks is designated as Tank Farm No. 4.

- Eight fixed-roof storage tanks located inside of the building that are used to store and process the

wastewater generated during the treatment processes. These tanks, designated as EU-Tank51 through EU-Tank56 and EU-TankD1 and EU-TankD2, each have a working capacity of 11,000 gallons.

- Two fixed-roof storage tanks located inside of the building that are used to store sodium hydroxide, which is used in the oily waste/oily water treatment process. These tanks, identified as EU-TankC1 and EU-TankC2, each have a working capacity of 11,000 gallons.
- One fixed-roof tank that is used to store acid (sulfonic and sulfuric), which is used in the oily waste/oily water treatment process. This tank, identified as EU-TankA1, has a working capacity of 3,500 gallons.
- EU-Boiler, a natural gas-fired boiler with a heat input rating of 6.3 MMBTU/hour that is used to produce steam to heat the heating coils associated with the heated treatment tanks.

There is a flexible group, FGFACILITY that applies to all process equipment at the entire facility, including equipment that is exempt and/or grandfathered from permitting requirements.

The October 11 site visit was initiated by US EPA Regional staff. During the site visit, we discussed facility operations, and EPA staff (Kosta) and I discussed and made inquiries relating to Aevitas' compliance status with the requirements of the PTI. The information that was requested of and sent to us by Aevitas further addresses the compliance status of the facility. The following provides a description of Aevitas' compliance with the Special Conditions put forth by PTI No. 10-12; the conditions are grouped under two Flexible Groups, FG-Process Tanks, and FGFACILITY:

FG-Process Tanks

Condition II.1 and 2 (Material Limits) – These conditions limit the amount of material that can be received for treatment at the facility with an oil content greater than 10% (SC II.1), and greater than 90% (SC II.2). Aevitas provided Kosta and I with monthly throughput records for the time period from October 2017 through September 2018. This information shows that during this 12 month rolling time period, 2,091,625 gallons of material was accepted with an oil content greater than 10% (versus the permit limit in SC II.1 of 20,000,000 gallons per year), and 606,510 gallons of material was accepted for treatment at Aevitas with an oil content greater than 90% (versus the permit limit in SC II.2 of 4,000,000 gallons per year). Aevitas is in compliance with this requirement. A copy of the records that Aevitas sent are attached to this report for reference.

Condition II.3 (Material Limits) – Aevitas is assumed to be in compliance with this condition, which limits the number of batches that can be treated on a daily and monthly basis that contain an organic halide concentration of 100 ppmw or greater. During my previous site visit in August of 2017, I was told by Greg Reichard that Aevitas does not deal with much waste with a halide content this high; the types of oily material that they get from their customers doesn't contain this high of a halide content. During the discussion with myself and Kosta, Greg reiterated this status. As part of my August 2017 site visit, I received throughput records for the 12-month rolling time period from August 2016 through July 2017. These records included a column that showed how many loads received by Aevitas were "halide positive", which is based on a lower threshold than the 100 ppmw referenced in SC II.3. These records indicated that 4 loads were "halide positive" in the 12-month rolling time period from August 2016 through July 2017, which is well below the permit limits of 30 such batches per calendar day and 100 per calendar month.

Condition III.1 (Process/Operational Restrictions) – Aevitas is in compliance with this condition. Aevitas has submitted a Malfunction Abatement Plan (MAP), as required by the permit, for the scrubber system and the processing operations that vent to the scrubber. Based on the completion of the Corrective Action that addresses the scrubber flow rate monitor, I sent a reply to the May 30, 2019 e-mail message from Aevitas advising them to update the MAP if the installation of the new flow meter and its associated equipment has necessitated a new flow rate trigger point for corrective action in the MAP.

Condition IV.1 (Design/Equipment Parameters) – This condition requires that the scrubber be equipped with devices to continuously monitor the redox potential of the scrubber solution, and the liquid flow rate of scrubber solution being circulated to the scrubber packing. Based on the completion of the Corrective Action, the scrubber flow rate is being monitored continuously. Aevitas has also installed a redox/ORP monitor on the scrubber. The facility appears to be in compliance with the requirements of this condition.

Condition IV.2 (Design/Equipment Parameters) – The temperature of the tank contents for the heated tanks is being monitored via a temperature measuring device and recorded by facility staff.

Condition IV.3 (Design/Equipment Parameters) – According to Aevitas, the scrubber is maintained and operated in a satisfactory manner when material is being transferred to processing tanks. Aevitas is taking necessary steps to ensure that the scrubber flow rate, pH and redox potential are being maintained within acceptable ranges when the scrubber is operating.

Condition IV.4 (Design/Equipment Parameters) – The scrubber is maintained and operated in a satisfactory manner when material is being treated in the processing tanks. Aevitas is taking necessary steps to ensure that the scrubber flow rate, pH and redox potential are being maintained within acceptable ranges.

Condition VI.1 (Monitoring/Recordkeeping) – This condition puts forth the recordkeeping requirements related to the material limits in SC II.1 and 2. These records are kept in a company database. I was provided with a printout that summarizes the type (by oil content) and amount of material accepted at the facility from October 2017 through September 2018. Aevitas is in compliance with this requirement. A copy of the printout that I received is attached to this report for reference.

Condition VI.2 (Monitoring/Recordkeeping) – Aevitas is in compliance with this condition, which puts forth the recordkeeping requirements related to the material limits in SC II.3. I did not request records associated with this condition during this site visit. Based on conversations with facility staff, the facility is accepting similar amounts of this material as they were at the time of my last site visit in 2017.

Condition VI.3 (Monitoring/Recordkeeping) – Aevitas is currently monitoring and recording the pH, redox potential and flow rate of the scrubber solution at least once per shift.

Condition VI.4 (Monitoring/Recordkeeping) – Aevitas is in compliance with this condition, which requires that the maximum temperature of the contents of each tank be monitored and recorded, on a batch basis. This information is recorded on an internal document referred to as a Shift Report that show this information being kept.

Condition VI.5 (Monitoring/Recordkeeping) – Aevitas is in compliance with this condition. Per paragraphs a. and b., the identification of each waste generator and the amount of material received for treatment for each generator is being maintained. I was told during past site visits that this information is kept in a database, and that the information is part of the facility's billing system.

Condition VI.6 (Monitoring/Recordkeeping) – Aevitas is in compliance with this condition, which requires information to be monitored and recorded for each batch treated at the facility. The Shift Reports include information that shows - a. the amount of material processed in the batch, b. the tank in which processing occurs, c. the amount and type of chemicals used during the processing of the batch and d. the time period over which processing occurs.

Conditions VIII.1 – This special condition puts forth the parameters (minimum height above ground, maximum exhaust diameter) for the scrubber stack. The dimensions in the permit condition were provided during the permit review. I did not verify these dimensions with the facility; I am assuming that they are compliant with the dimensions in the permit conditions

FGFACILITY

Condition I.1 (Emission Limits) – This condition addresses visible emissions from traffic areas at the Aevitas facility. During this site visit, the facility's fugitive dust plan was not discussed. I did not observe any visible emissions or track out on the facility property or the adjacent streets (Edlie and Lycaste). Most of the facility's road surfaces are paved.

Condition II.1 (Material Limits) and VI.1 (Monitoring/Recordkeeping) – Condition II.1 limits the maximum organic halide concentration in used oil received for treatment to 1,000 ppm by weight. I was told during my last two visits to the facility (in 2016 and 2017) that none of the loads that Aevitas accepts for treatment at this facility have organic halide concentrations anywhere near 1,000 ppm by weight. Aevitas is in compliancewith this condition. Aevitas monitors and records the total organic halides concentration of each shipment received for treatment at the facility, as required in condition VI.1.

Condition II.2 (Material Limits) – Aevitas is in compliance with this condition, which prevents the facility from accepting material regulated as a hazardous waste and limits the PCB content of incoming materials to less than 50 parts per million, by weight (ppmw). I was told during my last two site visits that Aevitas does not accept material that is regulated as a hazardous waste per state or Federal laws and regulations. Also, all loads

accepted at the facility are analyzed for PCB content; any load having a PCB content greater than 2 ppmw is not accepted at the facility.

Condition III.1 (Process/Operational Restrictions) – Aevitas is in compliance with this condition. Aevitas has submitted an Odor Management Plan (OMP), as required by the permit, for all process operations at the facility. The OMP is maintained on file at the facility, and there is a copy kept in the facility file for the Aevitas facility in the AQD-Detroit Office.

Condition III.2 (Process/Operational Restrictions) – Aevitas is in compliance with this condition. Aevitas has submitted a Fugitive Dust Control Plan. During a discussion about the dust plan during my 20-17 site visit, Aevitas staff told me that there is not as much vehicle traffic on unpaved areas as anticipated when the permit and the dust plan were written. I was also told that the facility utilizes steam to clean the grates in the loading and offloading areas of any accumulated dirt and oil residue to prevent track out.

Odor Complaints

Since the time of the October 11, 2018 site visit, three odor complaints that alleged Aevitas as the source of the odors were received by DEQ(EGLE)-AQD. A Violation Notice was issued to Aevitas as a result of my investigation of a complaint that was received on December 10, 2018. Aevitas sent a response to the Violation Notice via correspondence that was dated January 16, 2019, a copy of which is attached to this report. Aevitas identified a procedural issue related to staffing as the most likely cause of the odor.

Only one complaint has been received thus far in 2019. On April 22. The investigation of this complaint did not reveal a Rule 901 issue. In the time since, Aevitas has completed the Corrective Action work on the scrubber, resulting in a regulated, monitored flow of scrubber solution to the scrubber.

Compliance Determination

Based upon the results of the October 11, 2018 site visit and subsequent review of facility records and correspondence, the Aevitas Specialty Services facility in Detroit is in substantial compliance with the terms and conditions of Permit to Install No. 10-12.

Attachments to this report: A copy of the Response for Inspection Conducted document dated October 17, 2018 that provides the information that was requested during the site visit; a copy of the November 28, 2018 e-mail message and scrubber process flow diagram that addressed the proposed Corrective Action regarding the scrubber flow rate; a copy of Aevitas' response to the Violation Notice that was issued as a result of the December 10, 2018 odor complaint; a copy of the May 30, 2019 correspondence notifying of the completion of the Corrective Action plan for the scrubber.

NAME Steve Wells DATE 7/11/19 SUPERVISOR JK