



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

July 28, 2021

Ms. Tabettha Peebles, Environmental Compliance Manager
U.S. Ecology Detroit South
1923 Frederick St.
Detroit, MI 48211

SRN: M4545, Wayne County

Dear Ms. Peebles:

VIOLATION NOTICE

On August 21, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) performed an inspection at U.S. Ecology - Detroit South, located at 1923 Frederick, Detroit, Michigan. The purpose of the inspection was to determine U.S. Ecology's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 269-04H.

As a result of the inspection, AQD staff observed the following violations:

Process Description	Rule/Permit Condition Violated	Comments
FGOILRECOVERY	PTI No. 269-04H, FGOILRECOVERY, Special Conditions VI.2a, b, and c.	Scrubber ORP and pH meters were not properly operated and maintained from January 28 through March 18, 2020; scrubber flow meter not properly maintained and operated from October 15, 2018, through March 27, 2019.
FGOILRECOVERY	PTI No. 269-04H, FGOILRECOVERY, Special Condition VI.3d.	Scrubber ORP and pH not monitored and recorded from January 28 through March 18, 2020; scrubber flow meter not monitored and recorded from October 15, 2018, through March 27, 2019.

PTI No. 269-04H, EUOILRECOVERY, Special Condition VI.2 states the following:

The permittee shall install, calibrate, maintain, and operate, in a satisfactory manner, devices to monitor the following packed bed scrubber operating parameters on a continuous basis:

- a) Scrubbing liquid pH
- b) Oxidation/reduction potential (ORP) of the scrubbing liquid
- c) Scrubbing liquid flow rate
- d) Pressure drop across the packed bed scrubber

PTI No. 269-04H, EUOILRECOVERY, Special Condition VI.3d states the following:

The permittee shall keep, in a satisfactory manner, the following records. The permittee shall keep all records on file and make them available to the Department upon request:

- d) The following monitored parameters for the packed bed scrubber shall be recorded at least once per day and shall be measured at a time when FGOILRECOVERY is actively processing oil/water mixtures:
 - I. Scrubbing liquid pH.
 - II. Oxidation/reduction potential (ORP) of the scrubbing liquid.
 - III. Scrubbing liquid flow rate.
 - IV. Pressure drop across the packed bed scrubber.

Records reviewed during the inspection on August 21, 2020, indicated that the ORP and pH meters of the scrubber were not in proper operation from January 28 through March 18, 2020, and the flow meter was not in proper operation from October 15, 2018, through March 27, 2019. Therefore, the facility was unable to monitor the operating parameters on a continuous basis and unable to record the readings on a daily basis.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 18, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

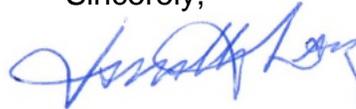
Please submit the written response to the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Ms. Tabettha Peebles
U.S. Ecology Detroit South
Page 3
July 28, 2021

If U.S. Ecology believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc: Mr. Hosam Hassanien, City of Detroit BSEED
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Jenine Camilleri, EGLE
Ms. Mary Carnagie, EGLE
Mr. Greg Morrow, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE