

# Fact Sheet

## SUMMARY

The Michigan Department of Environment Great Lakes, and Energy (EGLE), Materials Management Division (MMD), has reissued a hazardous waste management facility renewal and expansion operating license (License) to US Ecology Michigan, Inc. (USE), formerly Dynecol, Inc., to continue existing operations, construct and operate two new buildings for storage and treatment, and repurpose an existing building at its facility located at 6520 Georgia Street in Detroit, Michigan (Facility). EGLE proposed this action pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and its administrative rules, Michigan Administrative Code Rule (R) 299.9101 *et seq.*

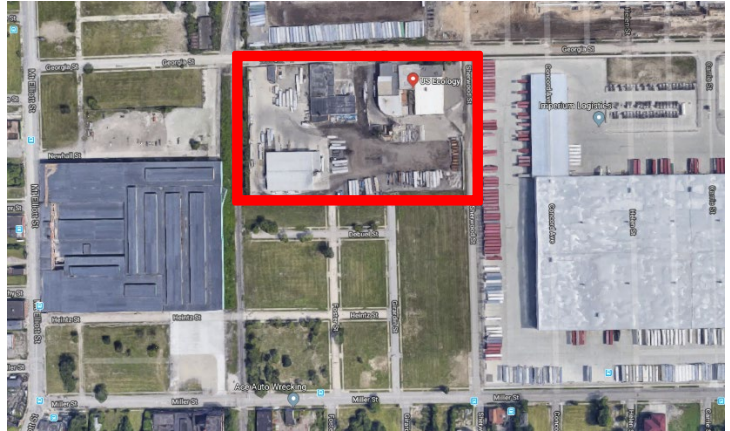
USE submitted a renewal license application (Application) on September 14, 2007, and a revised Application on March 4, 2013, which proposed to expand and enlarge the Facility to manage a greater amount of hazardous waste. The duration of the License is 10 years. Based on the review of the USE Application, site inspections, and Facility audits, EGLE determined that the License be issued based on the following determinations:

- A. The Application was sufficiently detailed for EGLE to evaluate the Facility and its impact on human health and the environment.
- B. The Facility satisfies all of the technical design, construction, and operating standards under Part 111 and its administrative rules, Michigan Administrative Code R 299.9101 *et seq.*
- C. The Facility does not, at this time, present a hazard to human health or the environment, based on a review of the Application; compliance inspections conducted by EGLE staff; ambient air monitoring; and effluent discharge monitoring conducted by USE in compliance with EGLE and the Great Lakes Water Authority, formerly the Detroit Water and Sewerage Department.
- D. In addition to the standard and general facility operating conditions contained in all operating licenses (which consists of proper acceptance and storage, labeling, employee training, emergency response planning, environmental monitoring, and recordkeeping), the License contains conditions specific to USE's existing storage and treatment operations to ensure proper oversight of both existing *and* proposed buildings, storage, and treatment methods.
- E. USE has obtained, or will be required to obtain, all other federal and state environmental authorizations required for the Facility prior to conducting operations in any newly-constructed hazardous waste management units, in accordance with site-specific conditions in the License; these include fire marshal approval for building occupancy and fire suppression systems, and inspections by EGLE staff to ensure appropriate containment has been constructed.
- F. Expansion conditions require construction to be in accordance with the approved engineering plans, submittal of progress reports during active construction, submittal of as-built plans after construction, certification of construction by a licensed professional engineer and inspection by EGLE that the newly constructed areas are capable of storing and treating hazardous waste, prior to operation.
- G. Comments received during the public comment periods were considered in making the final decision. Public comments received contributed to License modifications. Examples of modifications made to the License were: required vehicle traffic route; maximum vehicles per day; inclusion of City of Detroit in environmental monitoring notification.

## FACILITY DESCRIPTION

### Site Description

The facility is located on a 6.2-acre parcel zoned for “intensive industrial” use at 6520 Georgia Street, Detroit, Michigan, approximately one mile east of Hamtramck, Michigan, with industrial, commercial, and residential properties nearby. The site is entirely fenced and bordered by streets, vacant lots, or other industrial sites. There are no lakes or streams in the vicinity and the site is located in the Detroit River drainage basin. I-94 (Edsel Ford Freeway) and M-53 (Van Dyke) are major roads within one half mile of the site.



The USE site is outlined in red above.

### Prior Licensing

The current USE license was issued on March 16, 1998. That license expired on March 16, 2008. USE submitted a timely Application on September 14, 2007; therefore, has been allowed to continue operating under the conditions of the March 16, 1998, license until a final determination was made on the new Application. A major modification to the license was issued on July 30, 2004. This major modification allowed the Facility to: (1) accept additional waste codes in its container management facility, (2) discontinue groundwater monitoring, and (3) add additional wastewater treatment equipment. The major modification **did not** increase the volume of wastes that could be stored or treated at the Facility or extend the expiration date of the License.

### Existing Facility Design and Proposed Expansion

#### Container Management Facility:

The Container Management Facility (CMF) receives hazardous wastes in containers of various sizes, and in bulk, for transfer and storage. The CMF has eight separate storage bays with a storage capacity of up to 120 drums or 6,600 gallons each, assuming drums are stacked two high, for a total volume of 52,800 gallons. This volume is an increase of 11,800 gallons. Secondary containment and a fire suppression system are part of the building design.

#### Treatment Facility – Tank Storage and Treatment:

The Treatment Facility (TF) is designed to store up to 176,200 gallons of hazardous wastes. No additional tanks were added to the TF.

The increase of 153,200 gallons is the result of converting existing tanks from hazardous materials (chemicals) storage to hazardous waste storage. The overall storage capacity has not changed. The TF is designed to treat up to 144,000 gallons of hazardous wastes per day, the amount of treated waste has not been increased. The 300,000 gallons of treated effluent discharged to the Great Lakes Water Authority, formerly the Detroit Water and Sewage Department, in accordance with the requirements of USE’s Wastewater Discharge Permit has not been increased. Secondary containment and a fire suppression system are part of the building design.



Existing buildings outlined in orange; proposed buildings outlined in yellow.

**Proposed Stabilization Expansion (Building 4), Including Container Storage:**

Building 4 is located on the west side of USE's footprint. The proposed hazardous waste storage and treatment will be conducted in an enclosed 20,250 square foot building with three in-ground concrete stabilization/processing treatment tanks totaling approximately 90,000 gallons. All treatment of solid hazardous waste at the Facility will be performed in Building 4, and will be limited to 600 tons per day. Building 4 will also have a container staging area that will receive, transfer, and store hazardous and non-hazardous wastes in containers of various sizes up to 500 gallons in capacity. In addition, there is a bulk container staging area that will store hazardous wastes. The maximum number of drums containing waste material that may be stored in Building 4 is 1,120, for a total volume of 61,600 gallons of hazardous waste. Secondary containment and a fire suppression system are part of the building design.

**Proposed Bulking & Consolidation Building (Building 5A):**

The proposed Building 5A will be located adjoining east of Building 4 for the storage, bulking, and consolidation of wastes. The storing, bulking, and consolidation of wastes will be conducted in an enclosed, approximately 20,000 square foot building, with four recessed containment areas approximately 30 yards each. Containerized wastes to be bulked and consolidated will be subject to the same compatibility and waste evaluation as wastes that are handled in other parts of the Treatment Facility. The maximum number of drums containing waste material that will be allowed to be stored in this building is 4,160, for a total volume of no more than 228,800 gallons of hazardous wastes. Secondary containment and a fire suppression system are part of the building design.

**Proposed Storage Area - Building 5B:**

Containerized hazardous waste in roll-off boxes or trailers, if needed, will be stored in the Proposed Building 5B. The maximum volume of hazardous wastes allowed to be stored in containers in this area will be 121,184 gallons. The maximum number of 30-cubic yard containers, roll-off or trailer, of hazardous waste that may be stored in the Building 5B area will be 20 containers. The area will be utilized only for temporary storage in closed containers until they are shipped off-site to an appropriate disposal, recovery, or recycling facility; or transferred to and treated in USE's Treatment Facility. Secondary containment is part of the building area design.

*Facility-Specific License Conditions*

In addition to the standard conditions typical of all Licenses, the proposed License contains several facility-specific conditions related to the construction of the expansion of the Facility:

1. Conditions for Construction. Condition III.A. authorizes the construction of the new units for the expansion of the Facility, requires submittal of quarterly progress reports on construction activities, requires approval of any construction changes, requires the professional engineer or competent subordinate be on-site during construction activities, and defines the time frames for construction.
2. Conditions for Post Construction Documentation. Condition III.B. requires the submittal of any changes to disclosure information, certification of construction, as-built drawings, certification of capability, information on any deviations from the License, and proof of financial assurance for the new units.
3. Conditions for Operation. Condition III.C. requires USE to obtain written authorization from the MMD Director prior to managing waste in the expanded Facility.
4. Conditions for Notice Requirements. Condition III.D. requires USE to modify the notice on the property deed to identify the legal description of the land upon which the expanded Facility is located and submit verification of the execution, filing, and recording of the modified notice to EGLE.
5. Condition for Compliance Schedule. Condition VIII.A. requires USE to complete the facility upgrades, modifications, and conversions in accordance with a schedule, with deadlines of one to three years

from the effective date of the License for specified tasks. If USE does not complete a requirement by the specified deadline, then any replacement units or individual unit expansions associated with the requirement are no longer authorized, and an expansion modification application and operating license are required to regain the authorized process capacity for the replacement units and individual unit expansions, unless construction begins before the deadline, proceeds in a continuous manner, and is completed prior to submittal of the Application.

6. Condition for Reporting. Condition VIII.B. requires USE to notify the MMD Director of compliance or noncompliance with each facility upgrade, modification, or conversion requirement no later than 14 days following each Compliance Schedule deadline in Condition VIII.A of the License.

*Corrective Action*

Under Part 111, USE is required to perform corrective action and remediate the release of any contaminants from any waste management units (WMU) at the facility, regardless of when the contaminant may have been placed or released from the WMUs at the Facility. The draft License includes 11 WMUs and four Areas of Concern (AOCs) that are monitored under the draft License.

<b>WMU Number</b>	<b>WMU Name</b>	<b>Description</b>
1	Primary Treatment Area	Tanks 1, 2, 3, and 4
2	Secondary Treatment Building	Tanks 18,19, 20, and 21
3	Filter Press Control Room	Press A, B and C; Tank CV1; and CV2
4	Chemical Storage Area (Tank Farm Building)	Tanks 7, 10, 11, 12, 13, 16, 17, 27, 32, and 33
5	Dissolved Air Floatation Building	Tanks 34, 35, 36, 37, and 38
6	Effluent Storage Tanks	Tanks 30 and 31
7	CMF	Container and Bulk storage
8	Activated Carbon	Spent carbon from Treatment Plant and CMF
9	Building 4	Process vaults 1, 2, and 3; Container and Bulk storage
10	Proposed Building 5A	Container storage
11	Proposed Building 5B	Container/roll-off storage
<b>AOC Number</b>	<b>AOC Name</b>	<b>Description</b>
1	Maintenance Garage	Facility equipment repairs performed in this area.
2	Truck Unloading Containment Area	Location for trucks to unload to tanks in chemical storage area.
3	Fuel Storage Area	Fuel storage tanks
4	Former Underground Tank Farm	Located under the Tank Farm building and east of the CMF.

USE's existing WMUs are currently operating with no evidence of a release of any contaminants. When USE discontinues treating or storing hazardous waste in these units or areas, the draft License provides for USE to perform additional environmental monitoring to identify if there is or is not a need to perform corrective action to remediate any detected release(s).

## **ENVIRONMENTAL IMPACT**

### *Wastes Stored*

USE stores and treats both characteristic and listed hazardous wastes, as well as non-hazardous wastes. To ensure proper treatment and safe storage, limitations have been placed on the storage and treatment procedures for licensed wastes. Incompatible wastes are required to be segregated in the licensed storage units.

### *Groundwater Monitoring Program Waiver*

As of the July 30, 2004, major modification, the Facility was allowed to discontinue groundwater monitoring. During the July 15, 2015, through August 28, 2015, public comment period it was pointed out that all not all waste management at the facility was being performed under cover as required. As of June 19, 2017, the Facility met the groundwater monitoring exemption under R 299.9611(3)(b) of the Part 111 administrative rules. This waiver is based upon existing geology and hydrogeological information surrounding the facility. The groundwater monitoring requirement was waived as there was then and now, no potential for migration of liquid from the facility to the uppermost aquifer. The waiver does not preclude EGLE from independently sampling groundwater at the site.

### *Soil Monitoring Program Waiver*

The Facility received a waiver from the soil monitoring requirements of R 299.9611(2)(d) before issuance of the May 2, 1990, License that preceded the License that is currently in effect. All areas of the Facility where hazardous wastes are managed are paved with either concrete or blacktop and some specific areas (e.g., the storage bays in the CMF and the unloading pad in the treatment area) are coated with chemical-resistant materials. The waiver does not preclude EGLE from independently sampling soils at the site.

### *Ambient Air Monitoring*

USE conducts ambient air monitoring at the Facility for total suspended particulates, arsenic, lead, and chromium. in accordance with the ambient air monitoring program contained in Attachment 11 of the draft License.

### *Effluent Monitoring*

USE conducts effluent monitoring to ensure that it meets the standards contained in its effluent discharge permit from the Great Lakes Water Authority, formerly the Detroit Water and Sewage Department. The discharge permit allows USE to discharge storm water and treated process wastewaters to the city of Detroit's publicly owned treatment works for treatment prior to discharge to the Detroit River.

## **PUBLIC PARTICIPATION**

### *Public Comment Procedures*

The purpose of public participation is to ensure that the interested public has knowledge of the EGLE proposed actions and that it may have the opportunity to provide comment(s) related to those actions. In addition, the

process ensures that the EGLE has the opportunity to benefit from any information the public may have relevant to the proposed actions. A public hearing was held on August 18, 2015, from 7 p.m. to 9 p.m. at the Hamtramck Public Library, 2360 Caniff Street, Hamtramck, Michigan. The purpose of the hearing was to allow interested persons to submit oral or written comments regarding the draft License.

The public comment period began July 15, 2015, and ended August 28, 2015.  
The public comment period was extended from August 28, 2015, to October 12, 2015.

A second public meeting was scheduled for Thursday, March 28, 2019, from 6:00 p.m. to 9:30 p.m. at the Bridge Academy East, 9600 Buffalo Street, Hamtramck, Michigan 48212. The purpose of the meeting was to allow interested persons to submit oral or written comments regarding the draft License.

The second public comment period began February 22, 2019 and ended April 12, 2019.

Written comments submitted during the public comment period were considered by the project team, hazardous waste section manager, and the MMD Director in the formulation of the final decision. Responses to written comments and oral statements are included in the record supporting the final decision. The final decision is being communicated to USE, each person who submitted a written comment during the public comment period, persons providing formal oral statements at the public meeting on March 28, 2019, and all persons on the Facility mailing list.

#### *Locations of Available Information*

The administrative record for the License is on file at EGLE, MMD, Constitution Hall, 525 West Allegan Street, Lansing, Michigan (contact Mr. Richard A. Conforti at 517-284-6558).

Copies of the License, Fact Sheet, and the Responsive Summary are available for review at:

- EGLE, Detroit Field Office, Cadillac Place, 3058 West Grand Boulevard, Suite 2300, Detroit, Michigan (contact Ms. Wilhemina McLemore at 313-456-4685);
- EGLE, Warren District Office, 27700 Donald Court, Warren, Michigan (contact Ms. Jeanette Noechel at 586-494-5091).;
- Knapp Branch of the Detroit Public Library, 13330 Conant, Detroit, Michigan, (contact 313-481-1770)
- Online at <http://www.michigan.gov/usecologydetroitnorth>.

#### Contact Person

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