

Action Summary

US Ecology Detroit South (USE-DS) also known as EQ Detroit, Inc.

SUMMARY

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD), received a license renewal application (Application) for hazardous waste operations occurring at 1923 Frederick Street in Detroit, Michigan (Site). A license renewal process is required at least every ten years for hazardous waste operations. The renewal process gives EGLE an opportunity to update Site information, review operations, and improve the license. The license renewal process also gives EGLE an opportunity to clarify license requirements, enhancing the license and the protections it provides to the community. EGLE is currently reviewing the Application for the USE-DS Site. The Application was submitted on September 10, 2008, by Environmental Quality Company (EQ Detroit, Inc.), who was later acquired by US Ecology.



The Application does not propose any expansion of the Site footprint, or increases in the maximum capacities or types of hazardous waste which can be managed at the Site. EGLE determined the Application was administratively complete on September 14, 2012, and began the technical review of the Application. The technical review is performed to determine if the Site operations meet all the hazardous regulations that apply under Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and its administrative rules. EGLE issued a technical notice of deficiency on September 30, 2017, and USE-DS has submitted multiple revisions to the Application to address deficiencies and provide additional information. The latest Application revisions were submitted on September 25, 2020, and included a re-written Waste Analysis Plan.

If renewed, the new license would remain effective for ten years, and USE-DS would be required to submit another renewal application before the end of the ten-year period. EGLE's review will be based on the Application; results of Site inspections and audits; and community input that can be considered under the hazardous waste regulations. In order to re-issue the license, EGLE's review must conclude:

- A. That the Application is sufficiently detailed for EGLE to evaluate the Site and its potential for impact on human health and the environment.
- B. That the Site satisfies all the technical design, construction, and operating standards under the hazardous waste rules.

- C. That the Site does not present a hazard to human health or the environment, as determined by EGLE inspections and compliance with applicable environmental regulations, including but not limited to ambient air monitoring and effluent discharge monitoring requirements and limits.
- D. That the license includes all necessary conditions to ensure safe and proper waste storage and treatment. For example, this would include conditions for waste characterization, storage, treatment, training, emergency response planning, environmental monitoring, and recordkeeping.
- E. That USE-DS has obtained and maintains all required governmental authorizations and approvals required for the Site, and that any renewed license requires that those authorizations be maintained. For example, this would include fire marshal approval for building occupancy and fire suppression systems.
- F. That a public comment period and a formal public hearing are conducted, and that comments received are considered in making a final decision on the Application.

SITE DESCRIPTION

USE-DS is located at 1923 Frederick Street, Detroit, Michigan, near the intersection of freeways I-75 and I-94. The Site is zoned for heavy industrial use, and the surrounding areas are zoned for a mixture of industrial, commercial, and residential uses. The Site is entirely fenced. There are no lakes or streams in the vicinity, and the Site is located in the Detroit River drainage basin.

SITE HISTORY

Waste management activities have been occurring at the Site since 1984, prior to which the property was used for rendering and wire manufacturing. The Site has gone through several ownership changes. The Site was first licensed in 1990. US Liquids was licensed to store and treat hazardous waste in 2003. This license was transferred to EQ Detroit, Inc., in 2004. US Ecology subsequently acquired EQ Detroit, Inc., in 2014. Since 2014, the Site has remained under the operation and ownership control of US Ecology.

The current license was issued on December 13, 2003 (License), with an expiration date of December 12, 2008. A timely Application was submitted on September 10, 2008, which allows USE-DS to continue operating under the License until a final determination is made on the Application.

EXISTING SITE DESIGN AND OPERATION

The License is designed to prevent releases of any hazardous wastes to the soil or groundwater.

USE-DS stores and treats both characteristic (ignitable, toxic, corrosive, and/or reactive) and listed hazardous wastes, as well as non-hazardous wastes. Incompatible wastes are required to be separated within the licensed storage areas. USE-DS's existing storage and treatment units are currently operating with no evidence of a release of contaminants to soil or groundwater.

When USE-DS discontinues treating or storing hazardous waste in licensed areas, their License requires USE-DS to verify, with EGLE's review and approval, that no releases of contaminants have

occurred. If contaminants are found, the License requires USE-DS to perform corrective action to clean-up any detected release.

The USE-DS Site has two primary buildings Licensed for the treatment and storage of hazardous waste, and several other buildings and areas Licensed for hazardous waste storage.

Main Treatment Building

The Main Treatment Building accepts and processes hazardous and non-hazardous wastewater containing heavy metals, pressable sludges, acids, and oily wastes. Storage and treatment occur in licensed above-ground tanks made of steel, fiberglass, or polyethylene. The types of treatment performed in this building include chemical precipitation of metals, neutralization of corrosive wastes, and the separation of solids and liquids in sludges using a filter press. Corrosive wastes are stored and treated separately in dedicated portions of the building. Hazardous waste tanks are equipped with high level overflow alarms. The building also contains tanks with raw materials used in the treatment processes. The Main Treatment Building contains specific areas which are licensed for the storage of wastes in containers.

The building is designed so that in the event of an accidental spill from a hazardous waste tank or container, no waste would be released to soil or groundwater. This is accomplished using secondary containment, including sloped and curbed concrete floors with epoxy coatings or other chemical treatments to prevent corrosion or infiltration. The containment would direct any spill into dedicated collection floor drains and trenches. USE-DS has an on-site laboratory, located along the south side of the Main Treatment Building. Following on-site treatment in the Main Treatment Building, wastewaters are discharged to the Great Lakes Water Authority (GLWA) sewer system for further treatment.



Chemical Fixation Building

The Chemical Fixation Building accepts and processes hazardous and non-hazardous waste using treatment techniques such as stabilization. Stabilization reduces the ability of the waste to leak into water and allows the wastes to be safely disposed in licensed landfills. This is accomplished by mixing the waste with stabilizing agents which react similarly to cement. Treatment within the Chemical Fixation Building is performed within licensed in-ground, rectangular, steel vaults. These vaults are surrounded by a concrete containment structure that prevents waste from being released into the soil or groundwater in the event a steel vault was to fail. The Chemical Fixation Building also contains areas which are licensed for the storage of waste in containers. Incompatible wastes are stored in separate areas. The concrete floor of the building is sloped towards multiple collection sumps, so that even if waste was accidentally spilled from a container, it would be contained on-site and would not be released to the soil or groundwater.

Additional Key Waste Management Areas

- **Container Storage and Staging Areas:** The Container Storage and Staging Areas are located east of the Chemical Fixation Building and are Licensed for the storage of hazardous waste in containers. These areas are located within enclosed buildings designed with secondary containment, including curbed and sloped epoxy-coated concrete floors and isolated sumps, designed to prevent a release to soil or groundwater in the event of an accidental spill.
- **North Container Storage Pad:** The North Container Storage Pad is located north of the Chemical Fixation Building and Licensed for the storage of hazardous waste in containers. Containers are stored in an area designed with secondary containment, which includes a curbed and sloped chemically treated concrete floor and an isolated collection sump.
- **Lab DePack Area:** The Lab DePack Area is located in the northeast corner of the Site and Licensed for the storage and management of hazardous waste lab packs. This area is located within an enclosed building designed with secondary containment, which includes a sloped epoxy-coated concrete floor and an isolated collection sump.
- **Rail Area:** The Rail Area is located along the western border of the Site and is Licensed to receive and store shipments of hazardous waste by rail car. To prevent any releases to soil or groundwater in this area in the event of an accidental spill, the soil underneath the rail tracks was excavated and replaced with a PVC liner, which is covered by stone backfill and a collection system.
- **Transfer and Processing Area:** The Transfer and Processing Area is located by the northeast corner of the Site. This area is authorized for the short-term storage of hazardous waste (less than 10 days) and is regulated by EGLE as a separate transfer site, under the hazardous waste transportation rules.
- **Process Building and Used Oil Tanks:** The Process Building and Used Oil Tanks are located between the Main Treatment Building and the Chemical Fixation Building. This area is used for the management of non-hazardous wastes such as used oil and is regulated by EGLE separately under Michigan's liquid industrial by-products law.

All treatment and storage of hazardous waste occurring in tanks and container areas must be explicitly Licensed, with tanks and container storage areas being inspected by Site staff on regular schedules specified in the License.

ENVIRONMENTAL IMPACT

EGLE hazardous waste staff inspect USE-DS operations at least four times each year to ensure compliance with the License.

Groundwater Monitoring Program Waiver

USE-DS was granted a waiver from routine groundwater monitoring during the December 13, 2003, License review. This waiver was granted based upon existing geology and hydrogeological information on Site conditions, as well as the location, design, and operation of the Site.

Groundwater monitoring was waived because EGLE concluded Site conditions would not allow a

contaminant released at the Site to reach the uppermost aquifer. The waiver does not preclude EGLE from independently sampling groundwater at the Site.

Soil Monitoring Program Waiver

USE-DS was granted a waiver from routine soil monitoring during the December 13, 2003, License review. All areas of the Site where hazardous wastes are managed are paved and are designed with secondary containment. The waiver does not preclude EGLE from independently sampling soils at the Site.

Ambient Air Monitoring

USE-DS conducts ambient air monitoring at the Site for various contaminants in accordance with an approved ambient air monitoring program, included in the License. USE-DS submits the results from their air monitoring program to EGLE on a monthly basis, for review by EGLE's Materials Management Division and Air Quality Division staff. Additionally, USE-DS has a separate permit issued by EGLE's Air Quality Division, which restricts air emissions at the Site. USE-DS has also recently entered an [administrative consent order with EGLE](#) to reduce or eliminate odors coming from the facility to off-site areas.

Effluent Monitoring

USE-DS treats hazardous wastewaters on-site before discharging to the GLWA sewer system under a wastewater discharge permit issued by GLWA. USE-DS conducts effluent monitoring to ensure that it meets the standards contained in its wastewater discharge permit. GLWA also collects their own samples to audit USE-DS's wastewater discharges. EGLE has developed a scorecard to show USE-DS's wastewater compliance history, which is available at Michigan.gov/USEcologyDetroitSouth.

PUBLIC INVOLVEMENT

The purpose of public involvement is to ensure that the people interested in a proposed EGLE action are aware of the proposed action and have an opportunity to provide input on the EGLE decision under review before a final decision is made.

The public is encouraged to engage with EGLE throughout the application review process. To provide opportunity for input, EGLE is committed to hosting the following public meetings, to enhance communication:

- ***Administrative Completeness Public Information Meeting (date: December 10, 2020).*** This meeting is being held to give community members an opportunity to ask questions and learn about the Application and EGLE's review process.
- ***Technical Adequacy Public Information Meeting (date: to be announced).*** This meeting will be scheduled once EGLE determines that the Application meets all the design and operating standards under the hazardous waste regulations. This meeting will give community members further opportunity to ask questions and learn about the Application, EGLE's review process, and factors considered in the determination.
- ***Formal Public Hearing (date: to be announced).*** Prior to EGLE making a final decision on the Application, EGLE will host a public hearing to receive formal comments from the community. These comments will be considered along with all public comments submitted during a formal public comment period. EGLE will issue a formal written response to comments when a final decision on the Application is made.

EGLE is interested in hearing from you about what methods work best to keep you informed and what key details are important. EGGLE also wants to hear if additional accommodations are needed to participate in meetings.

STAYING CONNECTED

Staying Connected

EGLE has established a Site subscription list for receiving periodic updates from EGGLE related to Site specific activities and licensing. Please join us by going to Michigan.gov/EGLEConnect and subscribing to the US Ecology Detroit South Hazardous Waste Facility electronic mailing list.

Who to Contact

For questions or comments about the Application, to seek additional accommodations for meeting, or share input on what works best for keeping you informed, please contact Mx. Andrew Bertapelle at BertapelleA1@Michigan.gov or 517-290-3813. For questions or comments about facility hazardous waste operations oversight, please contact Mr. Jim Day at DayJ@michigan.gov or 586-494-5093.

Complaints

Through your observations and reporting of activities of concern, you play a valuable role in helping the EGGLE protect human health and the environment. To file a complaint or share details about improper waste handling or disposal, contact EGGLE through the [Pollution Emergency Alerting System \(PEAS\) Hotline](#) at 800-292-4706.

FINDING MORE INFORMATION

Web Resources

Finding information related to the Site, Application, and EGGLE's compliance oversight is simple. Just go to Michigan.gov/USEcologyDetroitSouth, and you will find these details.

Locations of Available Information

To review the administrative record for the License in-person in EGGLE's Lansing District office, please contact Ms. Vickie Terry at TerryV2@Michigan.gov or at 517-284-6546. To review the application in-person in EGGLE's Warren District office, please contact Ms. Jennifer Block at BlockJ4@Michigan.gov or at 586-753-3833.