

## MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

#### Public Information Meeting:

US Ecology Detroit South, also known as EQ Detroit, Inc. Hazardous Waste License Renewal Application

## Welcome

Meeting will Begin Soon!

## Host

Jim Ostrowski
Environmental Support Division
Training and Outreach Manager
Lansing Headquarters



## Housekeeping



All lines are muted during the meeting.



You can submit your questions using the "Q/A" box at the bottom of your screen.



Click the "hand" icon at the bottom of your screen.



We are recording this meeting.



## Moderator

Tracy Kecskemeti
Materials Management Division
Warren District Office Manager
Warren District



#### Presenter

Andrew Bertapelle
Materials Management Division
Environmental Engineer
Lansing Headquarters



## **Panelists**

Al Taylor

Materials Management Division

Hazardous Waste Section Manager

Lansing Headquarters

Rich Conforti

Materials Management Division

Management & Tracking Unit

Supervisor

Lansing Headquarters



## **Panelists**

Nicole Sanabria

Materials Management Division

Geologist

Lansing Headquarters

Ricardo Jaimes

Materials Management Division
Environmental Quality Analyst
Lansing Headquarters



## **Panelists**

Jim Day
Materials Management Division
Hazardous Waste Inspector
Warren District Office

Jonathan Lamb
Air Quality Division
Air Quality Inspector
Detroit District Office



## Agenda

#### 6:00 PM – 6:30 PM: Informational Session

- EGLE Licensing Process
- USE-DS Application Review
  - Overview Site Operations
  - Environmental Inspections and Monitoring

6:30 PM – 7:30 PM: Informal Question & Answer



## Hazardous Waste Operating Licenses

What is a hazardous waste operating license?

When are these licenses required?

What is the purpose of these licenses?



## EGLE Licensing Process

Company submits Application

EGLE reviews Application

EGLE informs the public of Application and its review process

EGLE makes initial decision on Application

EGLE seek public input on initial decision

EGLE makes final decision on Application



#### EGLE Review Process

#### Renewal Application Submitted

- Must re-apply before license expires
- US Ecology Detroit South submitted application on September 10, 2008

#### Administrative Completeness Review

- To confirm all the requirements of the application are included
- Completeness Determination made by EGLE on September 14, 2012

#### Administrative Completeness Public Information Meeting

Give the community an opportunity to ask questions and learn about
 US Ecology Detroit South's site operations and their renewal application





#### Site Location

1923 Frederick Street, Detroit, Michigan

Near I-75 and I-94 intersection

Zoned for heavy industrial use

Surrounding areas are a mixture of residential, commercial, and industrial zoning



#### Site History

Variety of site uses throughout the 1900s

Waste Management activities began in the 1980s

Previously licensed for hazardous waste activities in 1990 and 2003

2004 – Environmental Quality Company (EQ) purchased from US Liquids

2014 – US Ecology acquired EQ

## Existing Site Operations

#### Stores and treats hazardous and non-hazardous waste

- Characteristic (ignitable, toxic, corrosive, and/or reactive) & Listed
- Incompatible wastes are separated within licensed storage areas

#### Hazardous Waste Storage

- Containers
- Tanks

#### Hazardous Waste Treatment

- Tanks
- Methods of treatment





# Existing Site Operations



## Existing Site Design and Operation – Main Treatment Building (1)

#### Treatment and Storage

 Above-ground tanks made of steel, fiberglass, or polyethylene

#### Storage

Containers

Treatment processes include chemical precipitation, neutralization, and solid-liquid separation

Secondary containment includes treated concrete floors, which are curbed and sloped to dedicated floor drains and trenches





## Existing Site Design and Operation – Chemical Fixation Building (2)

#### Treatment and Storage

 Rectangular steel tanks constructed within a concrete vault

#### Storage

Containers

#### **Emission** controls

- Under vacuum, air doesn't escape
- Baghouse filter to capture particulates





## Existing Site Design and Operation – Chemical Fixation Building (2)





## Container Storage and Staging Areas (3)

#### Storage

Containers

Used for the storage and staging of hazardous wastes to be treated

Completely enclosed within buildings, directly east of the Chemical Fixation Building

Secondary containment includes epoxy-coated concrete floors, which are curbed and sloped towards isolated collection sumps





## North Container Drum Pad (4)

#### Storage:

Containers

Secondary containment includes chemically treated concrete floor, which is curbed and sloped toward an isolated collection sump





## Lab DePack Area (5)

#### Storage:

Containers

Used for the storage and handling of hazardous waste lab packs (small containers of wastes which are placed together inside a larger container)

Completely enclosed within a building, near the northeast corner of the site

Secondary containment includes an epoxy-coated concrete floor, which is sloped to an isolated collection sump





## Rail Area (6)

#### Storage:

Containers

Used to receive and store shipments of hazardous waste by rail car

Secondary containment was created by excavating soils and replacing with a PVC liner and covering with stone backfill. This provides a collection system in the case of any potential spills





## Additional Waste Management Areas

#### Process Building and Used Oil Tanks (7)

- Area used for the management of non-hazardous wastes such as used oil
- Regulated by EGLE separately under Michigan's liquid industrial by-products rules

#### Transfer and Processing Area (8)

- Authorized for short-term storage of hazardous waste (up to 10 days)
- Regulated by EGLE separately as a transfer site, under the hazardous waste transportation rules





# Existing Site Operations

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Preparedness & Prevention



## Site Inspections

#### **EGLE** Inspections

- EGLE staff inspect the facility's hazardous waste operations at least four times each year
- This is in addition to inspection requirements for other EGLE programs (e.g. non-hazardous waste, air quality)

#### Self-Inspection

- US Ecology staff must conduct extensive inspections of the site operations
- Frequencies and requirements are specified in the license



## Environmental Monitoring

#### Ambient Air Monitoring Program

- 3 monitoring stations
- Monitoring required for various metals, organics, and particulate matter
- Site submits monthly reports detailing sampling results

#### Note:

USE-DS has a separate air permit issued by EGLE's Air Quality Division, which limits air emissions from the site









## Environmental Monitoring

#### Groundwater & Soil Monitoring Waivers

- Granted as part of December 12, 2003 license issuance
- Routine groundwater waiver issued based on site geology and hydrogeological conditions
- Routine soil monitoring waiver issued because all licensed areas where hazardous wastes are managed are paved and are designed with secondary containment

These waivers will be re-examined as part of EGLE's review process, along with the need for any other additional monitoring requirements





## **Environmental Monitoring**

#### Wastewater Discharge Monitoring

- Wastewater discharge permitted and overseen by the Great Lakes Water Authority (GLWA)
- Site required to perform routine sampling and analysis of treated wastewater effluent
- GLWA also samples and analyzes wastewater discharges to audit

EGLE has developed a scorecard showing the site's recent monitoring compliance history, which is available at Michigan.gov/USEcologyDetroitSouth





## Next Steps

Continue Technical Review

Technical Adequacy Public Informational Meeting

 Provide community with further opportunity to ask questions and learn about the application, EGLE's review process, and factors considered in the determination



## How Do We Assess Compliance?

Routine inspections

Review required submittals

Review environmental

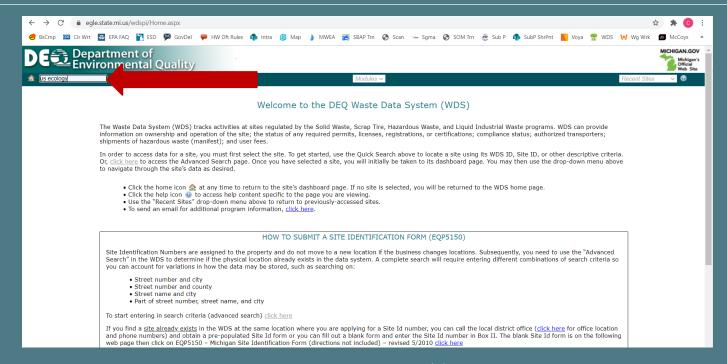
monitoring data

Respond to complaints

To file a complaint or share details about improper waste handling or disposal, contact EGLE through the <u>Pollution Emergency Alerting System (PEAS) Hotline</u> at 800-292-4706



## How Do We Assess Compliance?



For more information, go to <a href="https://www.egle.state.mi.us/wdspi">https://www.egle.state.mi.us/wdspi</a>

Search for US Ecology and hit enter



#### How Do We Address Violations?

Progressive enforcement strategy

Informal - Used for minor or quickly corrected violations

 Compliance Communications, Violation Notices - requires corrective action, no penalty

Formal – Used for significant violations or violations that require a longer-term corrective action

Administrative Consent Orders – enforceable schedule for corrective action, includes a monetary penalty



## Recent EGLE MMD compliance actions

September 2020 – entered Administrative Consent Order – addresses nuisance odors, requires odor management plan, includes stipulated penalties for future violations

May 2019 – Violation Notice – failure to submit ambient air monitoring data as required; resolved

May 2019 – Violation Notice – discolored air emission; resolved



## Staying Connected

#### Facility Mailing List

- Email: Subscribe online through <u>Michigan.gov/EGLEConnect</u>
- USPS Mail: Contact Ms. Vickie Terry at <u>TerryV2@Michigan.gov</u> or 517-284-6546

Questions: Mx. Andrew Bertapelle at BertapelleA1@Michigan.gov or 517-290-3813



#### Resources

#### Want to see the application?

- Michigan.gov/USEcologyDetroitSouth
- In Person\*:
  - Lansing Contact Ms. Vickie Terry at <u>TerryV2@Michigan.gov</u> or 517-284-6546
  - Warren District Office Contact Ms. Jennifer Block at <u>BlockJ4@Michigan.gov</u> or 586-753-3833

\*Note: Due to current restrictions related to COVID, in-person visits have been temporarily suspended

#### General Questions?

 Please contact Mx. Andrew Bertapelle at <u>BertapelleA1@Michigan.gov</u> or 517-290-3813



## US Ecology's Detroit South Webpage

For information on the site as presented by US Ecology:

www.usecology.com/location/us-ecology-detroit-south





## Poll Questions



#### Questions?

#### Panel

Andrew Bertapelle – Licensing Engineer

Al Taylor – Hazardous Waste Section Manager

Jim Ferritto – Waste Characterization Specialist

Jaimes Ricardo – Environmental Quality Analyst

Nicole Sanabria – Geologist

Jim Day – Hazardous Waste Inspector

Jonathan Lamb – Air Quality Inspector

December 10, 2020





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