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**VIA EMAIL and UPS**

December 30, 2022

Rich Conforti  
Environment, Great Lakes, and Energy  
Hazardous Waste Section  
Constitution Hall 525 W. Allegan St.  
P.O. Box 30241  
Lansing, MI 48909-7741

**RE: Environmental Monitoring Plan (including the Ambient Air Monitoring Program) - Addendum to Response to Notice of Deficiency for Renewal Application, Hazardous Waste Management Facility Operating License Renewal Application; EQ Detroit, Inc. or EQD (DBA US Ecology Detroit South; Detroit, Michigan); MID 980 991 566; Waste Data System Number 399367**

Dear Mr. Conforti,

EQ Detroit, Inc. (EQD) is providing Michigan Environment Great Lakes, and Energy (EGLE) with responses to Technical Notices of Deficiency (TNOD) dated June 30, 2022. The TNOD consisted of over five hundred and fifty comments from two technical memos from EGLE and one from United States Environmental Protection Agency's, Region 5 (USEPA) staff. EQD requested additional time to submit the updated Ambient Air Monitoring Program in connection with the comments on Section E – Environmental Monitoring. EQD hired RWDI Engineering and Trinity Consultants to review site emissions and ambient air monitoring in connection with updating the AAMP. Enclosed are responses to the questions and an updated Environmental Monitoring Plan.

The changes that were made were extensive and therefore a complete copy of the Environmental Monitoring Plan is being provided.

EQD looks forward to continuing to work with EGLE to ensure we can meet our common goal of safe and compliant waste management.

Please contact us if you have any additional questions.

Sincerely,



**John C. Barta**  
General Manger

Enclosures

cc (via email): Ronda Blayer, EGLE  
Elizabeth Brown, EGLE  
James Day, EGLE  
Chris Lambesis, U.S. EPA  
Jane K. Murphy, Jones Day (w/attachments)  
Tianna Kilgore, EGLE (w/attachments)  
Shaun Shields, EGLE  
Charles T. Wehland, Jones Day (w/attachments)

Dale Bridgford, EGLE  
Mary Carnagie, EGLE  
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December 30, 2022

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**Re: Response to State of Michigan Department of Environment, Great Lakes, and Energy (EGLE) – EQ Detroit, Inc. (US Ecology – Detroit South) Part 111 Technical Notice of Deficiency - Ambient Monitoring Questions - RWDI Reference No. 2206625**

Dear Ms. Peebles,

RWDI USA LLC (RWDI) was retained by EQ Detroit, Inc. (US Ecology – Detroit South) to prepare responses to the State of Michigan Department of Environment, Great Lakes and Energy (EGLE) “*Notice of Deficiency for Renewal Application, Hazardous Waste Management Facility Operating License Renewal Application; EQ Detroit, Inc., DBA US Ecology Detroit South, Detroit Michigan MID 980 991 566, Waste Data System Number 399367*”, dated June 3, 2022. RWDI’s responses are related to Section E – Environmental Monitoring. The following sections outline the comment received from EGLE and the responses for each comment:

### **Comment 15/16:**

USE-DS must re-evaluate the locations of the ambient air monitoring stations taking into consideration of local meteorological conditions and emission sources and propose and justify the locations of the ambient air monitoring locations. Presently, there is no ambient air monitor located in the southeast corner of the facility property. There are residential areas to the east and southeast of the property. Based on an initial review of local climatological data from the Detroit City Airport, historic hourly wind direction measurements from 1992 to October 2021 indicate a monitoring station in the southeast corner would be downwind of the facility an estimated 35% of the time. In this same timeframe, the northeast station was downwind of the facility an estimated 31% of hourly wind measurements. Based on this initial screening, a more thorough evaluation of the positioning of the ambient air monitoring stations is warranted, and (if revealed necessary) will require moving and re-installing the samplers.

### **Response 15/16:**

RWDI has completed a review of the monitoring site locations with respect to historical meteorological conditions. Data from 1995 to 2015 was reviewed from Detroit City Airport and from the on-site station from October 18, 2021, to October 18, 2022. We concur that the two (2) dominant downwind locations would be the northeast station and a proposed location to the southeast of the property based on meteorological data from both City of Detroit airport and the on-site location.



Based on the wind conditions, we would recommend relocating the station on the northwest corner to the southeast area of the property. The figure illustrating the current and proposed sampling locations as well as the historical meteorological data is provided in **Figure E-1**. For the proposed sampling location, we recommend relocating the northwest station to a southeast location that is downwind of the processing unit. The main emission points at the site are related to the two (2) baghouse exhausts and a scrubber exhaust located on the adjacent processing unit. **Figure E-2** outlines a figure showing the proposed southeast sampling location. **Figures E-3 to E-5** outline further details on the sampling locations.

### **Comment 17:**

USE-DS must add a co-located monitoring station to the monitoring network. This is necessary to more comprehensively assess data quality of collected samples. USE-DS must propose a location for the co-located sampler and update figures reflecting sampler locations in the application.

### **Response 17:**

The meteorological data from Detroit City Airport and the On-Site Station demonstrate that the winds are dominantly from the southwest to the northeast. Therefore, the northeast sampling location would be the most ideal for the co-located monitoring station. As such we are recommending that the northeast sampling location be altered to include a co-located VOC and particulate monitoring station. **Figure E-1** shows the sampling locations. Duplicate samples will be collected as described in the Section E-2c(vi) Quality Assurance Program.

### **Comment 18:**

The ambient air monitoring program (AAMP) must identify the following information to be submitted with monitoring program data:

- a. Ambient air monitoring data must include, at a minimum, the following items in an electronic report:
  - i. Analytical laboratory reports and associated quality assurance (QA), quality control (QC) information.
  - ii. Sampler flow data.
  - iii. Sample results.
  - iv. Chain of custody documentation.
  - v. Sampling narrative, which can include a certification statement and signature, as well as a narrative for any issues identified with monitoring data and actions to address issues, if needed.
  - vi. An evaluation of the monitoring data including any supporting figures and tables.



- b. The monthly submission of monitoring results must include an electronic format (such as electronic data deliverables, excel, etc.) for ease of maintaining monitoring databases. If the monitoring method is based on sample volume (ex: metals), the sample results must be reported based on the calculated sample concentration based on air volume sampled, instead of non-detect values being reported as "<DL." At minimum, the submission of monitoring results must include the following fields:
- i. Site ID.
  - ii. Monitoring Station ID.
  - iii. Sample Date.
  - iv. Parameter.
  - v. CAS Registry Number.
  - vi. Sample result.
  - vii. Reporting limit and detection limit.
  - viii. Data Qualifiers

***Response 18:***

The AAMP is attached as Section E and associated attachments includes the information required by 299.9611(2)(a) and specified reporting requirements.

**Comment 19/20:**

The SAP or method specific SOPs must describe what field documentation is collected as well as where field notes collected during sample collection will be stored if not submitted with the monitoring data submissions. For example, for leak testing or flow verification testing documentation, USE-DS may elect not to submit this information (unless it affects sample collection or results), but this information should be retained in the operating record.

***Response 19/20:***

Procedures required to execute the Sampling and Analysis Plan (SAP) are included in **Section E**.

**Comment 21:**

In the proposed AAMP, language states "If any parameter that is analyzed by the laboratory and determined to be non-detectable, the value of the method detection limit for that compound divided by 2 (MDL/2) shall be reported." This language is presently in the current AAMP; however, USE-DS does not report non-detect values in this method. Please revise language and monitoring data submissions to include reporting of non-detects at the detection limit. Data reported between the detection limit and quantitation limit should be reported and qualified.



***Response 21:***

The AAMP (**Section E-2c(iv)** and associated attachments) are updated to reflect non-detects at the detection limit.

**Comment 22:**

The SAP must describe sample handling, preservation, hold time requirements, and all other sampling and analysis steps. Examples include where sampling materials are acquired from, confirming sampling materials are of proper quality, what checks are done before installation, how a flow check is performed, etc. The SAP should include a copy of the contaminants of concern (COC) form for reference as an example. As previously described, the SAP must specify that a copy of the COC be provided with each monthly submission. Note that SOPs can be separate from the SAP, but they need to be referenced in it. The SAP must also address record retention, what happens to outdated SOPs, and how are SOPs revised and sent out to operators.

***Response 22:***

The COC information is located in Section **Section E-2c(vi)**.

**Comment 23:**

Please provide SOPs for all sample collection activities, such as metals, and volatile organic compounds (VOC). SOPs must describe calibration procedures and frequency, sampling procedures, equipment/flow checks procedures, and associated QA/QC requirements. Guidance on SOPs are available in the U.S. EPA's Guidance for the Preparation of Standard Operating Procedures EPA QA/G-6. SOPs may be referenced in the SAP, but USE-DS may modify the SOP and submit the modified SOP to EGLE. The SOPs must also identify the make and model of the flow sampling equipment. Where a specific method is cited, such as the U.S. EPA's method TO-17, a copy of the method with any additional details or modifications to the SOP must be included. For example, USE-DS' SOP for TO-17 must clearly outline the pump flow verification and calibration procedures, frequency, and acceptance criteria.



***Response 23:***

EQD internal SOPs are intended to be explanatory and flexible business tools that provide direction and guidance to EQD staff regarding the implementation of the AAMP, laws, rules, and license conditions applicable to the operation of EQD's facility. Procedures contained within a SOP may be discontinued, revised, or replaced by EQD to improve facility operations, to increase the safety of EQD staff, or for any other reason, so long as the procedures EQD employs results in compliance with the license, the approved AAMP, and other applicable regulatory requirements. For these reasons, EQD describes procedures in Section E.

***Comment 24:***

USE-DS must describe within the AAMP how ambient air monitoring data will be evaluated to detect a potential violation of 40CFR, Part 55, Outer Continental Shelf Air Regulations (Part 55), including any statistical calculations and ambient air action levels (concentration and duration). The AAMP must also identify and describe what procedures are enacted if monitoring data indicates a potential violation of Part 55.

***Response 24:***

We have assumed for purposes of this response that the reference to Part 55 is a reference to Part 55 of the Michigan Natural Resources and Environmental Protection Act.

The facility holds an air permit which is issued pursuant to and in accordance with Part 55 pursuant to EGLE's delegated authority to implement the Clean Air Act. So long as the facility obtains and complies with its air permit, then it is in compliance with Part 55 and the Clean Air Act.

The AAMP includes provisions pursuant to which the facility will monitor and demonstrate compliance with National Ambient Air Quality Standards (NAAQS) for TSP/PM-10. Note: If TSP results meet the PM-10 limits, EQD will comply since PM-10 is a subset of TSP. Steps will be taken to document and report the noncompliance. The facility's operations will be evaluated to determine if operations are the potential cause of exceedance. If facility operations are found to be the cause, then actions will be taken to remedy the source and these actions will be documented in the AAMP Quarterly Report.

***Comment 25:***

USE-DS must re-evaluate the frequency of sample collection of the AAMP. The frequency of sample collection must be justified based on an assessment of hazardous constituents managed by the facility, potential nearby community exposures, sources of emissions (including estimated emissions in a failure mode assessment), and local meteorological conditions.



### ***Response 25:***

We understand that EGLE position is to increase the sampling frequency from monthly to another suitable timeframe for discussion. Following the USEPA National Air Pollutants Surveillance (NAPS) Sampling schedule we are requesting that a 12-day sampling schedule be considered as adequate for the site. This would increase the sampling collection from 12 samples for VOCs, Particulate, and selected metals to approximately 30 samples per year. In addition, it would allow for double the number of samples to be collected per month. The sampling dates would adhere to the USEPA NAPS sampling schedule as posted on their website. At this point, US Ecology is requesting that the proposed increased frequency of collection is maintained for a 1-year period to understand any notable variations in the sample collection data. After a 1-year period, US Ecology would provide supporting information as to whether to continue with the increased frequency.

US Ecology installed a local meteorological station at the site in May 2021 at the location shown on Figure E-1. This is significant because it allows US Ecology to better understand the sample concentration measures considering concurrent weather conditions. The 30ft tower is equipped with wind speed, direction, temperature, relative humidity, barometric pressure, and a precipitation sensor. This data is collected continuously and is stored and logged on a data acquisition system.

Also, the realignment of the sampling locations will help to increase the quantity of sample collected from the facility in downwind conditions.

The increased sample collection, inclusion of local meteorological data, and realignment of the sampling location will assist to better evaluate the potential nearby community concerns of emissions from the various sources.

### **Comment 27:**

EGLE has identified concerns regarding the adequacy of the proposed TO-17 VOC monitoring method. Since USE-DS has used (and proposes to use) a version of method TO-17 similar to Wayne Disposal, Inc. (WDI), and there have been previously documented instances of moisture interference with VOC samples collected at USE-DS, EGLE believes the moisture interferences observed with samples collected at WDI are also present at samples collected at USE-DS. If USE-DS wishes to demonstrate that moisture interference with the TO-17 method is not a systemic issue at USE-DS, USE-DS may provide a response to this comment, including the previous three years of monitoring data laboratory reports and associated batch QC sample data. On February 4, 2021, EGLE received laboratory and QA documents for VOC ambient air samples collected from September 1, 2019, and August 31, 2020, at WDI. EGLE, MMD, and the Air Quality Division (AQD) reviewed the submitted laboratory results and associated QA/QC information. The monitoring data and associated QC information was compared to criteria and guidance contained in U.S. EPA Method TO-17, U.S. EPA's Quality Assurance Handbook for Air Pollution Measurement Systems, U.S. EPA Method TO-15, and University Laboratories' established QC limits for TO-17 analyses. Based on





the review of the submitted QC data and other laboratory documents, the MMD and AQD have identified over 80% of the samples collected between September 2019 and August 2020 as impacted by moisture in the sorbent tubes. During this same time, the relative percent difference (RPD) between collocated samples showed poor precision using the current TO-17 method. For VOC analytes, >50% of collocated samples exhibited RPDs greater than 30% and for many analytes, most collocated samples exceeded 50% RPD. Based on this information, it appears moisture interference contributes to a loss of accuracy and precision for VOC samples collected via TO-17. The MMD and AQD have determined that an alternative VOC sampling method is necessary to adequately measure ambient concentrations of VOCs at facility fence line monitoring positions.

- a. EGLE requests clarification and response to the following items:
  - i. Most laboratory reports included footnotes for moisture interference. However, in some laboratory reports, internal standard recovery was low and surrogate recovery was outside of QC limits, but no footnote indicating moisture interference was present. Additional clarification is needed if the laboratory uses information not presented in the QA/QC reports to identify analytical interference caused by moisture.
  - ii. Please provide an SOP for the TO-17 analysis or additional detail regarding the laboratory's current TO-17 analytical procedure, specifically the following steps:
    - a) What moisture management steps are implemented (for example, is a dry purge step used and is this step performed at elevated temperature?)
    - b) A description of how and when internal standards and surrogates are added during sample analysis (for example, are internal standards added after a dry purge step?).
    - c) Please confirm which internal standards are used to quantitate which target analytes.
  - iii. EGLE requests USE-DS submit an alternative VOC monitoring method for EGLE review utilizing U.S. EPA Method TO-15 or an equivalent method. U.S. EPA Method TO-15 is the recommended sampling method for many VOCs and has been demonstrated to be capable of meeting recommended data quality objectives for AAMPs. If USE-DS elects to use a modified version of TO-17 for VOC monitoring, USE-DS must submit a workplan for EGLE review which at minimum includes the following information:
    - d) A detailed description of sampling equipment, field sampling method, and analytical procedures. This description must identify any modifications from the current sampling and analytical method.
    - e) Target reporting limits for analytes.



f) A sampling plan to demonstrate, through field testing, a modified TO-17 method with results comparable to TO-15, and which is sufficiently robust to achieve  $\geq 75\%$  data completeness with valid samples not affected by moisture or other QC deficiencies ( $\geq 75\%$  data completeness is a recommended data quality objective per the U.S. EPA's QA handbook). The field tests must include concurrent sampling using TO-15, the current TO-17 method, and the modified TO-17 method. Please refer to U.S. EPA Method 301 and 40 CFR 53 subpart C for guidance on evaluating comparability between methods.

g) A description of any proposed statistical analysis performed as part of the above item.

h) A determination of the safe sampling volume and a description of the method to be used to determine the safe sampling volume.

i) Any sampling data collected using a modified TO-17 method collected prior to or outside of the scope of the workplan submitted to EGLE (such as data from preliminary tests used to select a sorbent packing material or operating a moisture trap).

### ***Response 27:***

US Ecology has determined that the sample volume suggested by USEPA Method TO-17 is too high and could be contributing to the moisture and data collection concerns at the site

Based on our review of the sampling flow rate and sample volume, we have determined that the sample volume should not exceed 7.2L of sample volume. The 7.2L maximum flow rate is consistent with the maximum sample volume recommended for a 3-hour sample. To achieve this, the system will require reconfiguration to include a mass flow controller and other various sampling needs to maintain a low sample flow rate of less than 5mL/min. EQD should complete a trial test at a single location to confirm this will be sufficient.

### ***Comment 28:***

If TO-17, or a modified TO-17 method is utilized, the SOP must state whether a particulate filter or ozone scrubber is part of the sampling equipment as well as their frequency for replacement.

### ***Response 28:***

The sampler will be designed as required by USEPA Method TO-17. The design requires the train to include, from front to back, an in-line particulate filter (optional), an ozone scrubber (optional), a sampling tube, a back-up tube if any is being used, and a flow controller/pump combination.



**Comment 29:**

If TO-17, or a modified TO-17 method is utilized, Section 13.1.2 of TO-17 recommends the safe sampling volumes of sorbent tubes should be retested annually or once every 20 uses, but two methods are outlined in section 10.8. The method SOP should specify which method is utilized to verify the safe sampling volume of the sorbent tubes, frequency, and where the information is retained. While it is not necessary for this information to be submitted with regular data submissions, records of this information may be relevant during in investigating data irregularities or other audit activities and records of this information must be maintained in the operating record.

**Response 29:**

This is included in Section E-2c(vi).

**Comment 30:**

In the SAP it states "The sampling for multi-metals will adhere to the requirements of 40 CFR Part 50, Appendix G for the determination of lead. All sections referenced by Part 50; Appendix G will likewise be followed." With the following statement "Quality control and assurance requirements specified in the method will be incorporated in the sampling protocol." It is unclear exactly what QA/QC requirements are being cited as Appendix G indirectly references 40 CFR Part 58 Appendix A and Appendix B. The referenced appendices have some differences in terms of their QA/QC requirements. EGLE requests USE-DS provide more detail as to which QA/QC requirements are being referenced.

**Response 30:**

Section E and associated attachments are updated to include field sampling, handling and analysis QA/QC techniques required to be completed by EQD.

**Comment 31:**

Target detection or reporting limits must be revised to reflect what the laboratory is capable of meeting on a practical basis for analyte detection or quantitation. For example, current monitoring reports suggest that the actual detection limit for toluene is lower than the 1 µg/m<sup>3</sup> detection limit listed in the table. Additionally, please add a detection limit for zinc in **Table E-1**.

**Response 31:**

**Table E-3** (formerly Table E-1) is updated to reflect the detection limits. As noted, Zinc is added to **Table E-3**. Table E-3 and E-4 is updated to reflect current reporting detection laboratory limits.



**Comment 32:**

USE-DS must provide justification for the analytes to be analyzed as part of the AAMP. This justification should consider possible emission scenarios (including failure mode assessment), types of wastes received, quantity of wastes received, and waste handling and treatment procedures. EGLE recommends this evaluation include monitoring for Arsenic, 1,1,2-trichloroethane, 1,1,2,2-tetrachloroethane, and 1,2-dichloroethane (both isomers) as these parameters are either presently monitored for at USE-DS and or are believed to be present in the wastes received at the facility and exhibit relatively low Secondary Risk Screening Levels or Initial Threshold Screening Levels developed by AQD.

**Response 32:**

An evaluation of the analytes was conducted utilizing the actual emission data from the facility. In the evaluation little to no relevance could be found for the analytes recommended by EGLE. Arsenic, 1,1,2-trichloroethane, 1,1,2,2-tetrachloroethane, and 1,2-dichloroethane (both isomers) could potentially be chemical components in waste that is received or shipped off site for treatment or disposal at facilities with the means to treat these chemicals. These are not typical chemical components in the Chemical Fixation process nor the wastewater treatment process and the emission are so insignificant that they would not be detectible through the ambient air monitoring program.

The facility holds an air permit which is issued pursuant to and in accordance with Part 55 pursuant to EGLE's delegated authority to implement the Clean Air Act. So long as the facility obtains and complies with its air permit, it is following Part 55 and the Clean Air Act. Therefore, because the analytes suggested by EGLE are not relevant, and there are no prominent actual VOC emissions from the facility, the facility would like to propose keeping the existing analytes are more commonly seen in waste and provides a good representation of halogenated and nonhalogenated VOCs received.

The AAMP monitor emissions will be evaluated to determine compliance with the National Ambient Air Quality Standards (NAAQS) for the analytes available. If noncompliance is identified, then the operations at the time of the noncompliance will be evaluated to determine if there is a potential correlation. If facility operations are found to be the cause, then actions will be taken to remedy the source, these actions will be implemented, documented, and reported in the Quarterly Report. It should be noted, ambient air monitoring collects air from the surrounding area and is not necessarily indicative of emissions from the facility operation.

**Comment 33:**

USE-DS must establish quantitative QC criteria for the AAMP to assist in evaluation of data and self-initiate corrective action. EGLE recommends establishing the following criteria:



- a) A rolling 3-month data completeness requirement of 75% for each monitoring station. EGLE requests a data completeness requirement whereas at least 75% of the samples in a 3-month period are sampled and there are no data quality issues which may impact the validity of the results (for instance, if TSP filters show pinholes upon evaluation in the lab, those samples would be biased low).
- b) A measure of precision between co-located samplers (unless otherwise specified in a referenced method). For instance, a relative percent difference limit of 30% could be established and used for evaluating field and laboratory precision and to initiate corrective measures if needed.

**Response 33:**

This Quality Control (QC) criteria is included in the AAMP. US Ecology will use the rolling 3-month requirement of 75% valid data. For the precision of data between the co-located samplers, 30% difference will be used to note any field or laboratory potential discrepancies.

**Comment 34:**

Ambient air monitoring data submissions must include sufficient laboratory and field information to review and perform data validation. Laboratory or field QC information and samples (such as noted holes in TSP filters, continuing calibration verification samples) must be available for both USE-DS and EGLE to review the validity of the submitted monitoring data and apply appropriate data qualifications. As referenced in item 16 above, EGLE requests this information was submitted as a report with monthly submissions. The AAMP should describe how USE-DS performs data validation and when data is qualified or rejected.

- A) Field documentation indicating any issues such as flow verification discrepancies which could impact sample results
- B) Laboratory narrative identifying any issues identified with analysis
- C) Data qualifications
- D) Batch laboratory QC samples such as method blanks, laboratory controls samples, and calibration samples.

**Response 34:**

An ambient air monitoring data quarterly report will be submitted as outlined in Section E-2c(v) Reporting.

Section E-2c(v) includes reporting information.



**Comment 35:**

EGLE requests an assessment of ambient air monitor siting locations. Several sources (Quality Assurance Handbook for Air Pollution Measurement Systems Volume 2, Technical Assistance Document for the National Air Toxics Trends Stations Program Revision 3) offer recommendations for monitor siting criteria to help ensure representative sample collection and prevent interferences between inlets/monitors and nearby obstructions. It is noted that due to the nature of perimeter monitoring, not all siting criteria may be able to be achieved. To this point, the facility should identify siting criteria that cannot be achieved due to site limitations and develop a management plan or maintenance schedule to maintain achievable siting criteria. For example, vegetation near the monitoring stations may need to be periodically monitored, and obstructions to the monitor (such as parked vehicles or equipment which are taller than the monitor) must be avoided during sample collection. Additionally, it is recommended that site observations are recorded if during sample collection, sample interferences such as construction, vegetation, or temporary obstructions can be noted. EGLE recommends USE-DS establish the following siting criteria to be maintained at the facility monitoring locations:

- a) Height from ground to inlet: 2-15m
- b) Horizontal and vertical distance from supporting structures to inlet: >1 meter.
- c) Distance to trees: >10 meters.
- d) Distance from obstructions: Twice the height the obstacle protrudes above the sampler.
- e) Collocated monitors must be within four meters of each other.
- f) TSP or high-volume samplers must be greater than two meters apart from all other sampling inlets.
- g) TSP or high-volume sampler outlets should be greater than two meters apart from all other sampling inlets.

**Response 35:**

The following table outlines the review of each of the current and the proposed station.

Criteria	Current Northeast Station	Current Southwest Station	Proposed Southeast Station
Height from ground to inlet: 2-15m	Yes	Yes	To be constructed to meet
Horizontal and vertical distance from supporting structures to inlet: >1 meter	Yes	Yes	To be constructed to meet
Distance to trees: >10 meters	Yes	Yes	To be constructed to meet



Criteria	Current Northeast Station	Current Southwest Station	Proposed Southeast Station
Distance from obstructions: Twice the height the obstacle protrudes above the sampler	See Figure E-3. Distance is 100ft and building is ~20ft. Criteria is met.	See Figure E-4. Distance is 105ft and building is 50ft. Criteria is met. Also, to ensure that 100ft radius is kept clear of trailer parking	See Figure E-5, Distance from structures is met. 100ft radius from station should be kept clear of trailer parking
Collocated monitors must be within four meters of each other.	Will be met if site selected for collocation of monitors	Not recommended for collocated monitors	Will be met if site selected for collocation of monitors
TSP or high-volume samplers must be greater than two meters apart from all other sampling inlets.	Can be achieved	Can be achieved	Can be achieved
TSP or high-volume sampler outlets should be greater than two meters apart from all other sampling inlets.	Criteria is met	Criteria is met	Will be met
Distance from Roadway with less than 10,000 vehicles per day is 10m or greater	Criteria is met	Criteria is met	Will be met
Surrounding Area	Grass and paved yard	Unpaved yard, dust suppression will be applied to unpaved area to control dust	Grass and unpaved yard, Unpaved yard, dust suppression will be applied to unpaved area to control dust

**Comment 36:**

Please provide laboratory QA/QC protocols, QC sample frequency, and criteria for laboratory analytical analyses performed as required in R299.9611(2)(a)(viii). For example, TO-17 does not explicitly establish surrogate recovery limits but may be relevant in evaluating sample analysis. A QA manual may be submitted as a response to this request if it contains all the requested information or alternatively may be incorporated into method specific SOPs.

**Response 36:**

See Appendix E-1 for the current version of US Ecology's third-party quality assurance manual.



## ENVIRONMENTAL MONITORING

### **Comment 39:**

SAP. Sampling and Analysis Plan for each environmental monitoring program a. Section E: Environmental Monitoring Program (AAMP) discussion is minimal here. Detailed information on the types of samplers, the methods for deploying and collecting the samplers, the collection procedures for the samplers (including procedures to prevent contamination of the samplers), and sampler transport and submittal to the analytical laboratory (including chain of custody procedures), along with all relevant forms, must be provided.

### **Response 39:**

Section E: Environmental Monitoring Program (AAMP) includes the following information:

- Type of samplers
- Methods used to deploy and collect samples
- Sample collection procedures
- Chain of custody procedures
- Field data collection

### **Comment 40:**

SAP. Data analysis, including statistical method used.

- a. Section E must be revised to include the standards that sample results will be compared to and any statistical or other treatment of the data used to make the comparisons to the standards.

### **Response 40:**

- See Section E-2c(v) for the data analysis information.

### **Comment 41:**

AAMP per Part 55 of Act 451.

- a. Tables E-1 and E-2 must be updated to indicate analytical method used for each monitored constituent. One monthly sample is not considered adequate: reference Section E, "Environmental Monitoring," for more details.





Tabetha Peebles  
US Ecology  
RWDI#22006625  
DECEMBER 30, 2022

### ***Response 41:***

Section E, Table E-1 references the analytical methods used for each monitored constituent.

We understand that EGLE position is to increase the sampling frequency from monthly to another suitable timeframe for discussion. Following the USEPA National Air Pollutants Surveillance (NAPS) Sampling schedule we are requesting that a 12-day sampling schedule be considered as adequate for the site. This would increase the sampling collection from 12 samples for VOCs, Particulate, and selected metals to approximately 30 samples per year. In addition, it would allow for double the quantity of samples to be collected per month. The sampling dates would adhere to the US EPA NAPS sampling schedule.

At this point, US Ecology is requesting that the proposed increased frequency of collection is maintained for a 1-year period in order to understand any notable variations in the sample collection data. After a 1-year period, US Ecology would provide supporting information as to whether to continue with the increased frequency.

## CLOSING

We trust this letter and attachments, as noted, provide the necessary information to complete the review of the ambient air quality monitoring plan for the Detroit South location of US Ecology. Should you have any further information, please reach out to US Ecology is us directly.

Yours truly,

**RWDI**

Brad Bergeron, d.E.T, A.Sc.T.  
Senior Project Manager

BCB  
Attach.