

SECTION A

**OPERATING LICENSE APPLICATION
AND
GENERAL FACILITY INFORMATION
MI ACT 451 R 299.9504 AND R 299.9508
AND
40 CFR 270.13**

OPERATING LICENSE APPLICATION AND GENERAL FACILITY INFORMATION

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SECTION A
OPERATING LICENSE APPLICATION
AND
GENERAL FACILITY INFORMATION

MI Act 451 R 299.9504 and R 299.9508

And

40 CFR 270.13

This section contains EQ Detroit, Inc. (EQD) Application for Hazardous Waste Treatment, Storage and Disposal Facility Operating License, Part A Hazardous Waste Permit and General Facility Information.

The information submitted in this application is in accordance with the requirements of Michigan Act 451 R 299.9504(1) and R 299.9508(1) and (3), which incorporates 40 CFR 270.13 by reference.

A-1 Introduction

R 299.9504(1) and 40 CFR 270.13(a), (c), (g) and (m)

EQD is located at 1923 Frederick Street, Detroit, Wayne County, Michigan. EQD has operated as a Treatment, Storage, and Disposal Facility under Act 451, Part 111 as amended since 2003.

The original lot was reportedly purchased by Leonard Reliable Storage from James Witherell Farm in 1908. The Detroit Foundry Supply occupied the site from 1911 to 1914, and the Whitney Hollinger Company inhabited the site from 1914 to 1925. The Detroit Cleveland Warehouse and Realty Company and Michigan Trust Company were reportedly owners from 1925 to 1929.

Phoenix Wire Works held the property for the longest period from 1927 to 1966. Then the Detroit Rendering Company conducted operations from 1966 to 1982. The Darling Company conducted rendering operations at the site from 1982 to 1984. City Management Corporation (CMC) owned and operated the EQD Detroit facility from 1984 through 1998. USA Waste purchased the facility in January of 1998 and shortly after, it was acquired by US Liquids (USL) in May of 1998. EQ Detroit took over the facility February 2, 2004 and was purchased by US Ecology in 2014 but continues to operate as EQ Detroit, Inc.

This document has been prepared to address U.S. Environmental Protection Agency (USEPA) Administrated Permit Programs, in particular the Hazardous Waste Permit Program requirements for Resource Conservation and Recovery Act (RCRA) Part B Permit Application. EQD has compiled the following information for conformance with permit content requirements established in the Code of Federal Regulations Title 40, Part 270, Section 14 (40 CFR 270.14) and in State of Michigan Regulations promulgated in Act 451 of the Public Acts of 1994, Part 5.

In addition, this document has been prepared to document compliance with 40 CFR 264 and MI Act 451 Regulations for hazardous waste treatment and/or storage activities at EQD.

Table C-4 outlines the characteristic and listed hazardous waste codes as defined by the USEPA and MDEQ that are accepted at the EQD facility.

The USEPA Part A Permit Application was originally filed in September 1990, and subsequently revised October 1991, August, 1996, September 1999 and May 2002 and transferred to EQD in March 2004. EQD submitted a renewal application in 2008.

A-2 Facility Information

R 299.9504(1)(b) and 40 CFR 270.13(b), (d), and (e)

The physical address of the facility is EQ Detroit, Inc., 1923 Frederick Street, Detroit, MI 48211. EQD is located in an area of Detroit which is zoned heavy-industrial and is bordered on the south by Farnsworth Street, to the east by St. Aubin Street, to the north by Ferry Street and to the west by the Grand Trunk & Western Railroad. The subject site is located near the intersection of Michigan Interstates 75 and 94 as shown on **Sheet A-0**. The nearest residential homes are located within 0.25 miles to the east.

Compliance with MI Act 451 location standards is discussed in **subsection A-3** (Act 451 Location Standards).

EQD's geographic location is 42°22'027 north latitude and 083°02'053 west longitude. **Sheet A-0** provides a site location map.

EQD's U.S. EPA ID Number is MID 988 991 566. Ownership and operating personnel information is as follows:

Facility Name:	EQ Detroit, Inc. (EQD)
Facility Contact Person	Raymond Landsberg, General Manager
Facility Phone Number	313 347 1300
Facility Location	1923 Frederick Street Detroit, MI 49211
Facility Mailing Address	EQ Detroit, Inc. 1923 Frederick Street Detroit, MI 49211
Owner and Operator Information:	
Operator:	EQ Detroit, Inc. 1923 Frederick Street Detroit, MI 49211
Owner:	EQ Detroit, Inc. 1923 Frederick Street Detroit, MI 49211

A-3 Act 451 Facility Location Standards

R 299.9504(16), R 299.9603(1), (3), and (5)

As specified in R 299.9603 of the Michigan hazardous waste regulations, EQD is required to comply with the following location standards for active portions of the facility:

1. Active portions of the facility may not be located in any of the following areas:
 - a. Within 61 meters of a fault which had its displacement in Holocene time;
 - b. In a floodway designated by the MDEQ under Michigan Act 245;
 - c. In a coastal high-risk area designated under the Shorelands Act;

- d. Over a sole-source aquifer or the recharge zone of a sole-source aquifer, unless the director grants an exemption to this provision based upon a demonstration by the applicant that the treatment, storage or disposal facility will be located, designed, constructed and operated in a manner that will prevent contamination of the aquifer;
 - e. Within the isolation distance from public water supplies specified in Act 399; and
 - f. In a wetland.
2. An isolation distance of 60 meters shall be maintained between the active portion of the facility and adjacent commercial, residential or recreational property lines.

EQD meets the standards outlined above. No residential or recreational properties are located within 60 meters of active portions of the facility. Activities at EQD are not expected to adversely impact adjacent properties based on the preventative measures that have been taken, as described in the following sections of this document.

A-4 Environmental Permits

(MI Act 451 R 299.9508(1)(f) and 40 CFR 270.13(k))

The following list describes which permits or construction approvals were received or applied for under the reference regulations:

	Permit	Issuance Date	Expiration Date
1.	EPA RCRA Hazardous Waste Management Permit (Resource Conservation Recovery Act)	12/12/2003	12/12/2008
2.	MI Part 111 Operating License (MI 1994 PA 451, 1980)	12/12/2003	12/12/2008
3.	MI Part 115 Operating License	09/18/2014	09/18/2019
4.	MDEQ Air Quality Division Permit to Install	03/27/2017	No Expiration
5.	Great Lakes Water Authority (GLWA) Wastewater Discharge Permit No. 9223-91964-IU	12/30/2015	03/01/2019

A copy of the EQD facility MI Part 115 Operating License Permit, the Part A RCRA Operating License, the MDEQ Air Quality Division Permit to Install, and the GLWA Permit are found in **Appendix A-3**.

A-5 Certification by Executive Officer

R 299.9508(3) and 40 CFR 270.11(d)

Any person signing a document under Paragraph (a) or (b) of Section 270.11 shall make the following certification (see **Appendix A-9**).

I, certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system design to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Appendix A- 1: Hazardous Waste Permit Part A Application

R 299.9504(1)(b)

And

40 CFR 270.13

Appendix A- 2: Hazardous Waste Permit Part B Application

R 299.9504(1)

And

40 CFR 270.14

Appendix A- 3: Notification of Hazardous Waste Activity

Appendix A- 4: List of All Necessary Environmental Permits

R 299.9508(1)(f)

And

40 CFR 270.13(k)

Appendix A- 5: Formal Determination of Compliance with Local Zoning

Appendix A- 6: Proof of Financial Capability

R 299.9508(1)(e)

See **Section I** "Coverage by State Financial Mechanism"

Appendix A-7: "Proof of Payment"
\$500.00 Application Fee

R 299.9508(1)(H)

Appendix A- 8: Closure Post-Closure Cost Estimate

R 299.9508(1)(c)

See **Section I** for “Closure Cost Estimate” and “Post-Closure Cost Estimate”

**Appendix A- 9: Operating License Application “Signed and
Certified”**

R 299.9508

And

40 CFR 270.11(a), (b), and (d)

**Appendix A- 10: Administrative Completeness Checklist and
Location of Information
FOR
HAZARDOUS WASTE MANAGEMENT FACILITY OPERATING LICENSE
APPLICATION**

Appendix A- 11: Nature of the Business

R 299.9504(1)(b)

And

40 CFR 270.13

Section XII of MDEQ EQP5111

Appendix A- 12: Certificate of Capability to Dispose

R 299.9508(1)(d)

Appendix A-13: Permits or Construction Approvals

This information is provided in Appendix A-4: Necessary Environmental Permits

Appendix A-14: Description of Hazardous Debris Categories and Contaminant Categories

R 299.9504(1)(b)

And

40 CFR 270.13

Hazardous Debris must be treated prior to Land Disposal, unless the debris is no longer contaminated with hazardous waste, or the debris is treated to the specific treatment standards specified in 40 CFR 268.5 using technologies identified in Table I of 268.45. Treated hazardous Debris will be managed as specified in 268.45(c). Contaminant categories in debris may include those contaminants identified in Table UTS of 40 CFR

This information is found in Section C: Waste Analysis Plan of this Application

Appendix A-15: Facility Photographs

**Table A-1: Processes and Design Capacity to Treat, Store or Dispose
of Hazardous Waste**

R 299.9504(1)(b)

And

40 CFR 270.13(i)

Section XIII of MDEQ EQP5111

Also See Engineering Drawings

**Table A-2: Hazardous Waste Types and Quantities
TO BE
TREATED, STORED OR DISPOSED AT THE FACILITY ANNUALLY AND
PROCESSES USED FOR EACH**

R 299.9504(1)(b)

And

40 CFR 270.13(j)

See Part XIV "Description of Hazardous Waste Types" of MDEQ EQP5111
"Environmental Permits"