



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

October 15, 2015

Mr. Pete Onyskiw, Environmental Manager
PVS Technologies, Inc.
10900 Harper Ave.
Detroit, MI 48213

SRN: B2371, Wayne County

Dear Mr. Onyskiw:

VIOLATION NOTICE

On August 26, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of PVS Technologies, Inc. located at 10825 Harper Ave., Detroit, Michigan. The purpose of this inspection was to determine PVS Technologies' compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules, and the conditions of Wayne County Permit numbers C-9040 through C-9055 and C-10082 through C-10084.

During the inspection, AQD staff observed the following violations:

Process Description	Rule/Permit Condition Violated	Comments
Ferric Chloride Production	Wayne County Permit nos. C-9040 through C-9055 and C-10082 through C-10084; Special Condition 21	Facility exceeded the permit limit of 52,600 tons of ferric chloride produced per year. Facility produced 53,403 tons in 2013 and 54,858 tons in 2014.
Ferric Chloride Production	Wayne County Permit nos. C-9040 through C-9055 and C-10082 through C-10084; Special Conditions 30, 34, and 35	Scrubbers not operating in accordance with permit specifications.

During the inspection on August 26, 2015, it was noted that the scrubbers were not operating within the parameters specified by the permit. Specifically, the single-stage scrubber was not equipped with a flow meter, as required by Special Condition 30; the two-stage scrubber was not using sodium hydroxide, as specified in Special Condition 34; and both scrubbers are rated higher than the maximum gas flow rate of 800 acfm, as allowed in Special Condition 35.

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In addition, a review of production records showed a total of 53,403 tons and 54,858 tons of ferric chloride produced in 2013 and 2014, respectively. These totals exceed the permit limit of 52,600 tons of ferric chloride per year, per Special Condition 21.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 5, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If PVS Technologies believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of PVS Technologies. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc: Ms. LaReina Wheeler, City of Detroit, Department of Environmental Affairs

cc/via email: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Ms. Teresa Seidel, DEQ

Mr. Thomas Hess, DEQ

Ms. Wilhemina McLemore, DEQ

Mr. Jeff Korniski, DEQ

Ms. Catherine Asselin, DEQ