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Air Quality Division
Detroit Office

PGP Corporation d/b/a/ Voss Clark, Voss Industries and Voss Taylor
Registered to TS 16949:2002 and ISO 9001:2000 – ANSI/ISO/ASQ Q9001-2000
SRI Quality System Registrars

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Robert J. Squiers
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April 17, 2017

Mr. Todd Zynda, P.E.
Michigan Department of Environmental Quality
Air Quality Division
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202

Re: **PGP Corporation d/b/a Voss Taylor and Voss Industries**
7925 Beech Daly Road, Taylor, Michigan 48180
SRN: B3472, Wayne County

Dear Mr. Zynda:

Accompanying, please find Respondent's (PGP Corporation, d/b/a Voss Taylor and Voss Industries) response to the DEQ's Violation Notice dated April 4, 2017. By way of preface, we acknowledge and appreciate the promptly scheduled meeting with you and your supervisor, Mr. Jeffrey Kornisky, last Monday, April 10, to review and discuss the Violation Notice. We found the meeting informative and constructive. We look forward to working with you and your colleagues to resolve this matter amicably and swiftly.

Very truly yours,


Robert J. Squiers
General Counsel

Attachments

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Response to DEQ VIOLATION NOTICE dated April 4, 2017

Fresh Acid Tanks #1 and #2 were installed without obtaining a Permit to Install in violation of R 336.1201(1).

- Respondent's Fresh Acid Tanks #1 and #2 were installed in 1997. Respondent was unable to locate any records indicating the DEQ was notified of the installation. Respondent will commence the Permit to Install process. Permit to Install information from the DEQ's website and other materials provided to Respondent by Mr. Zynda are being reviewed. Respondent has registered to attend the DEQ's Permit to Install and Potential to Emit workshops in Ann Arbor on May 2, 2017. Respondent estimates it will be in compliance on or before July 15, 2017.

The Hydrochloric Acid (HCl) Steel Pickling Line capacity was increased without obtaining a Permit to Install in violation of R 336.1201(1)

- Respondent's Hydrochloric Acid Pickle Line capacity has increased in increments since its construction in the 1960's. Respondent was unable to locate any records indicating the DEQ was notified of significant capacity increases. Respondent will commence the Permit to Install process. Permit to Install information from the DEQ's website and other materials provided to Respondent by Mr. Zynda are being reviewed. Respondent has registered to attend the DEQ's Permit to Install and Potential to Emit workshops in Ann Arbor on May 2, 2017. Respondent estimates it will be in compliance on or before July 15, 2017.

Stationary Source (source with the potential to emit HCL in excess of 10 tons per year) is operating without having a obtained a Renewable Operating Permit (ROP) in violation of R 336.1201(1)

- Respondent failed to take action to obtain a Renewable Operating Permit (ROP) in 1997 when the EPA published documentation that a ROP was required. Respondent will commence the Permit to Install process. Permit to Install information from the DEQ's website and other materials provided to Respondent by Mr. Zynda are being reviewed. Respondent has registered to attend the DEQ's Permit to Install and Potential to Emit workshops in Ann Arbor on May 2, 2017. Respondent estimates it will be in compliance on or before July 15, 2017.

Respondent has failed to demonstrate its Hydrochloric Acid Steel Pickling Line has demonstrated compliance with 40 CFR Part 63, Subpart CCC - National Emissions Standards for Hazardous Air Pollutants for Steel Pickling-HCl Process Facilities and Hydrochloric Acid Regeneration Plants

- Respondent failed to take action to demonstrate compliance in 1999 when the EPA published documentation that would categorize Respondent's operation as a "major source of HAPs" triggering certain requirements. Respondent has solicited a quote for scrubber performance testing from Mr. Randal Tysar, Senior Environmental Engineer, BT Environmental Services (BTEC) (4949 Fernlee Avenue, Royal Oak, Michigan 48073

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(phone (248) 548-8070)). That quote was shared with Mr. Zynda on April 5, 2017 prompting e-mail correspondence among Mr. Tysar, Mr. Zynda and Mr. Squiers to ensure compliance and coordination. Respondent is reviewing its scrubber system operation, maintenance and reporting plans against the regulation and will correct any shortcomings. Respondent estimates it will be in compliance on or before July 15, 2017.

Respondent has failed to demonstrate its Boilers have demonstrated compliance with 40 CFR Part 63, Subpart DDDD - National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters

- Respondent failed to take action to demonstrate compliance in 1999 when the EPA published documentation that would categorize Respondent's operation as a "major source of HAPs" triggering certain requirements. Respondent has requested from Mr. Nick Carver (Expert Mechanical Services, 542 Biddle Avenue, Wyandotte, Michigan 48192 (phone (734) 282-2250)), its longtime boiler inspection and repair supplier, for any records Expert Mechanical may have to demonstrate Respondent's compliance with the regulations. Respondent has also requested a quote from Mr. Carver for Expert Mechanical to perform a tune up and energy assessment on each boiler preceded by correcting any maintenance items it may discover. Respondent is reviewing its boiler operation, maintenance and reporting plans against the regulation and will correct any shortcomings. Respondent estimates it will be in compliance on or before July 15, 2017.

Respondent failed to keep the cover on its cold cleaner closed or have cold cleaner operational procedures posted in violation of R 336.1707(3)(a) and R 336.1707(4)

- Respondent has closed the cover on the cold cleaner and posted a Temporary Work Instruction (TWI) setting forth the operational procedures of the cold cleaner. All affected personnel are required to acknowledge familiarity with the TWI. The TWI will be converted to a Work Instruction within Respondent's Quality System. Records of distribution will be maintained. Respondent believes it has abated the violation and is in compliance with the requirements.