



June 22, 2020

Mr. Steve Weis, Senior Environmental Engineer
EGLE - Air Quality Division
Cadillac Place
3058 West Grand Blvd. – Suite 2-300
Detroit, MI 48202-6058

Re: Violation Notice – June 1, 2020

Process Description	Rule/Permit Condition Violated	Comments
Liquid industrial waste processing operations.	Michigan Administrative Rule 901(b) PTI No. 10-12, General Conditions 6	Persistent objectional odors of a moderate intensity were detected downwind of the Aevitas facility.

Dear Steve,

This is the Aevitas Specialty Services, Corp. response to the EGLE, AQD violation notice for odor of May 4th, 2020. We believe that this odor occurrence was acute in nature and due to some operational issues with our odor control systems (OCS) that have since been corrected.

The following narrative explains and defines our internal evaluation of the OCS:

During the time period between the date of the violation, May 4th and submission of our response (June 22nd) our internal engineering and maintenance personnel have made an intensive effort to locate, evaluate, and correct vapor capture deficiencies in the OCS with the use of an anemometer to measure air flow at key locations in the system. Based upon these findings several system improvements have been made;

1. Hatchways in the in-line horizontal unit have been sealed with epoxy to mitigate cfm loss at the ventilated tanks.
2. Sample ports were created at keys points including post-primary blower, post-column, and at the exhaust point of each tank that is ventilated by the OCS.
3. Air flow rate data was collected at these tank locations under a variety of operating conditions by which the system performs – number of drying tank blowers operating, heat input, temperature of tank environment and associated process material, and the VFD set point for the primary blower.
4. A main damper located in the ductwork trunk serving the drying tanks has been more optimally positioned.
5. A section of impacted packing material has been removed from the OCS that had been obstructing airflow as it had fused/bonded together. The air flow throughout the OCS is now at a substantially improved level and therefore the possibility for fugitive emissions has been nearly eliminated. The displaced packing material will be replaced with new packing over the course of the next 30-60 days (July –August).
6. We are continuing to collect operational data and to make adjustments to the system. Future action items may include (as we gather more up-to-date information) removing the trunk damper, adding condensate drainage, adding new gaskets where appropriate, adding new dampers discrete to each tank, and possibly removing the horizontal unit altogether.

It is important to note that to our knowledge we have not have odor complaints since early May as these changes to the OCS have been made. Please let me know of any questions, comments, or additional concerns that you have have.

Sincerely,


Greg A. Reichard, CEO