



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GRETHUR
DIRECTOR

August 17, 2016

Mr. Greg Reichard
Chief Executive Officer
Aevitas Specialty Services Corporation
663 Lycaste
Detroit, Michigan 48214

SRN: N7359, Wayne County

Dear Mr. Reichard:

VIOLATION NOTICE

On Friday, August 12, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the Aevitas Specialty Services Corporation (hereinafter Aevitas) facility located at 663 Lycaste Street, Detroit, Michigan. The purpose of this inspection was to determine Aevitas' 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 AQD's administrative rules; and the conditions of Permit to Install (PTI) No. 10-12.

As a result of the inspection, the DEQ-AQD has determined that the following regulatory requirements are not currently being met in relation to the processing tanks for oily liquid industrial waste and wet oil product, referenced in the PTI as FG-ProcessTanks. The permit special conditions (SC) noted below refer to SCs within FG-ProcessTanks:

| Rule/Permit Condition Violated | Comments |
|---------------------------------------|--|
| SC IV.1; R 336.1224, R 336.1910 | The scrubber system is not currently equipped with functional devices to continuously monitor the redox potential of the scrubber solution and the liquid flow rate of scrubber solution that is being circulated to the scrubber packing. |
| SC IV.3; R 336.1910 | Material is being transferred to processing tanks, which requires that the scrubber be maintained and operated in a satisfactory manner. The liquid flow rate and redox potential of the scrubber are not currently being adequately monitored in order to ensure that these scrubber operating parameters are being maintained in a satisfactory range. |
| SC IV.4; R 336.1910 | Material is being treated in the processing tanks, which requires that the scrubber be maintained and operated in a satisfactory manner. The liquid flow rate and redox potential of the scrubber are not currently being adequately monitored in order to ensure that these scrubber operating parameters are being maintained in a satisfactory range. |

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|--------------------------------|--|
| SC VI.3.b&c; R 336.1910 | The redox potential of the scrubber solution and the liquid flow rate of scrubber solution being circulated to the scrubber packing are not currently being monitored and recorded in a satisfactory manner. |
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During the inspection, the current operating status of the scrubber system used to control emissions from the processing tanks in FG-ProcessTanks was discussed. The scrubber system consists of a vertical scrubber and a horizontal scrubber that operate in series. At the time of the inspection, the horizontal scrubber was not operational due to a failure in the electronic control system for the scrubber unit. While the vertical scrubber is currently operational, a leak was recently discovered in the scrubber solution circulation system; I was told that scrubber solution is still being circulated to the nozzles, but that the liquid flow rate of the scrubber solution cannot currently be monitored on a continuous basis. The redox potential of the scrubber solution and the liquid flow rate of scrubber solution being circulated to the scrubber packing in the vertical scrubber are currently being monitored manually, but these parameters are not being monitored continuously, nor being monitored and recorded once each shift that the scrubber operates, as required in PTI No. 10-12.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 7, 2016 (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 violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Aevitas believes that 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 violation cited above and for the cooperation that was extended to me during my inspection of the Aevitas facility. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Stephen Weis
Senior Environmental Engineer
Air Quality Division
313-456-4688

Mr. Greg Reichard
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cc: Ms. LaReina Wheeler, City of Detroit, BSEED
cc via e-mail: 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