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Air Quality Division  
Detroit Office

**PGP Corporation d/b/a/ Voss Clark, Voss Industries and Voss Taylor**

7925 Beech Daly Road  
Taylor, Michigan 48180  
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**Robert J. Squiers**  
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February 1, 2019

Mr. Todd Zynda, P.E.  
Michigan Department of Environmental Quality  
Air Quality Division  
Cadillac Place  
3058 West Grand Boulevard, Suite 2-300  
Detroit, Michigan 48202-6058

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

Dear Mr. Zynda:

Accompanying, please find PGP Corporation's response to the DEQ's Violation Notice dated January 15, 2019.

Very truly yours,



Robert J. Squiers  
General Counsel

Enclosures:

- Pickle Line Production Report
- Scrubber Makeup Water Flow Rate Spreadsheet

cc: Ms. Jenine Camilleri  
DEQ-AQ Enforcement Unit Supervisor

**PGP Corporation d/b/a Voss Industries – Voss Taylor**  
**7925 Beech Daly Road, Taylor, Michigan 48180**  
**SRN: B3472, Wayne County**  
**Response to DEQ VIOLATION NOTICE dated January 15, 2019**

**EUTENSIONLEV - Pressure drop records for the tension leveler baghouse were not recorded**

PGP acknowledges it failed to record manometer readings on a once per shift basis for the January 2018 through the October 19, 2018 inspection date. This oversight was brought to the attention of Operations Manager Steve Fischer. On October 30, 2018, Mr. Fischer initiated the addition of "Dust hog manometer reading" on the Pickle Line Production Report. (copy attached) The Pickle Line Production Report is required to be filled out by the shift leader for every production shift. Spot checks of Pickle Line Production Reports since October 30, 2018 confirm manometer readings have been recorded during scheduled production.

It should be noted that the baghouse fan motor has long been incorporated into the control logic for the entire pickle line. If the fan is not running, the pickle line will not run and a message will display on the pickle line operator's panel view.

Additionally, the baghouse manometer was alarmed two to three years ago. If the manometer reading climbs to the set point, the alarm will activate and trigger a response.

**FGSCRUBBERS – Scrubber flow rate data are missing on various dates/shifts**

PGP asserts it has fully met the conditions of PTI 133-17A. The operation, monitoring and maintenance of the scrubber system is the responsibility of PGP's Chemical Department. During pickle line production, the Chemical Department is staffed 24 hours per day. On every production shift, Chemists take and test samples, take readings and make records. During non-production days, Chemists take and test samples, take readings and make records once per day – typically during the 7:00 a.m. to 3:00 p.m. shift.

In accordance with the above, a spreadsheet is attached addressing each alleged violation and includes the following information:

- Date of alleged violation
- Day of week
- Production status
- Date and shift of testing closest to alleged violation date and time
- Results of testing closest to alleged violation date and time

Regardless of production schedules, PGP's scrubber system operates 24/7. Redundant fans allow the system to operate while inspection or maintenance is performed on the de-energized fan. The only time the entire scrubber system is shut down is during scheduled inspections or maintenance of the internals of the towers and/or demisters. Per the Malfunction Abatement Plan, Chemists allow for at least 48 hours of cooling of the pickle liquor to minimize fuming into the environment before shutting down the scrubber system.