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

Robert J. Squiers
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February 4, 2020

Mr. Todd Zynda, P.E.
Department of Environment, Great Lakes, and Energy
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 EGLE AQD's Violation Notice dated January 17, 2020.

Very truly yours,



Robert J. Squiers
General Counsel

Enclosures:

- Response Memo
- EUTENSIONLEV Violation Response Spreadsheet
- FGSCRUBBERS Violation Response Spreadsheet
- Chemical Daily Logs

**cc: Ms. Jenine Camilleri
EGLE-AQD 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 17, 2020

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

PGP acknowledges 12 instances of failing to record magnahelic gauge readings on a once per shift basis for the 612 shifts worked between January 1, 2019, through November 30, 2019. This is a failure rate of 0.02%.

The baghouse fan motor is incorporated into the control logic for the pickle line. If the fan is not running, the pickle line will not run. A message will display on the pickle line operator's panel view (i.e., dashboard). Additionally, the baghouse magnahelic gauge is alarmed. If the reading climbs to the set point, the alarm will activate and trigger a response.

The accompanying spreadsheet "EUTENSIONLEV Violation Response" addresses each of the 12 failures. Readings taken during the shifts before and after the shifts with missed readings were within range. Lastly, the same supervisor was responsible for 10 of the 12 failures. He has been counseled as to the importance of ensuring the readings are taken.

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

PGP acknowledges a single instance of a minor out of range condition. On November 5, 2019, at 3:30 p.m., the duty chemist recorded a makeup water reading on the Raven tower of 2.6 gpm, which is 0.2 gpm lower than the ≥ 2.8 gpm range. It should be noted that this low reading was on one of two scrubber towers. The other scrubber tower (Heil) makeup water reading taken at the same time was 12 gpm, well above the ≥ 9.1 gpm range. The scrubber HCl concentrations tested at the same time were well below range at 0.3% (Raven range $< 1\%$) and 1.0% (Heil range $< 2\%$). Lastly, readings taken before and after this low reading were within range. It is highly unlikely emissions exceeded permit limits, even for a brief time.

Concerning the three January 24 items, PGP believes it should be granted one day grace for the implementation of a modified MAP following approval by AQD. The MAP was approved on January 23 with the last email exchange with the AQD's Mr. Zynda occurring at about 1:00 p.m. The MAP was published the next day, January 24, and affected personnel were briefed on the changes. Also on January 24, the new ranges were implemented and were met by 11:00. The new ranges continued to be met thereafter.

PGP asserts that the remaining violations were the result of errors when chemists transferred data from paper logs into the database. These errors were discovered when researching each of the alleged violations. We apologize for the extra work created by the erroneous data and can only offer that we were surprised, as well. Copies of the Chemical Daily Logs for each instance of alleged FGSCRUBBER violation accompanies this response. The originals are available for inspection at the plant. Please note that our Midnight/First shift starts at 11:00 p.m. and is given the following day's date. That is why the Chemical Daily Log states, "Date at Midnight."

PGP Corporation d/b/a Voss Taylor
SRN: B3472, Wayne County
EUTENSIONLEV Violation Response

Alleged Violation Date	Time	Day of Week	Supervisor	Explanation for Lack of Baghouse Magnahelic Gauge Record
1/17/2019	7:30 a.m.	Thursday	Driscoll	Pickle line gearbox failed last hour of previous shift. Repaired and back up 6th hour of this shift. Supervisor busy managing repairs.
1/30/2019	7:30 a.m.	Wednesday	Driscoll	Multiple mechanical problems first four hours of shift. Supervisor busy managing repairs.
3/18/2019	3:30 p.m.	Monday	Goodman	First shift of production following three day downtime. Supervisor busy managing startup problems.
4/8/2019	7:30 a.m.	Monday	Driscoll	No explanation.
4/26/2019	7:30 a.m.	Friday	Driscoll	Pickle line down intermittently from previous afternoon due to brittle product repeatedly breaking during processing. Product was finally cleared out of line shift after this one. Supervisor busy managing problems.
5/3/2019	3:30 p.m.	Friday	Driscoll and German	Off-going day and oncoming midnight supervisors each worked 4 hours of this shift. Day supervisor forgot to take the reading. Midnight supervisor did not take the reading because it is supposed to be taken 30 minutes into the shift.
7/18/2019	3:30 p.m.	Thursday	Goodman	Mechanical breakdown on prior shift caused problems continuing into this shift resulting in slow production. Supervisor busy managing problems.
7/19/2019	7:30 a.m.	Friday	Driscoll	Mechanical issues resulting in down time and slow production during this shift. Supervisor busy managing problems.
7/20/2019	7:30 a.m.	Saturday	Driscoll	No explanation.
7/23/2019	7:30 a.m.	Tuesday	Driscoll	No explanation.
9/27/2019	7:30 a.m.	Friday	Driscoll	No explanation.
11/26/2019	3:30 p.m.	Tuesday	Driscoll	No explanation.

**PGP Corporation d/b/a Voss Taylor
SRN: B3472, Wayne County
FGSCRUBBERS Violation Response**

Alleged Violation Date	Day of Week	Time	Explanation for Low Heil Scrubber Make Up Water Flow Rates (Range is ≥ 9.1 gpm)
5/19/2019	Sunday	11:30 p.m.	This appears to be an entry error that occurred when entering the reading from the Chemical Daily Log into the database. The Chemical Daily Log indicates the reading was 12, which is in range.
6/13/2019	Thursday	7:30 a.m.	This appears to be an entry error that occurred when entering the reading from the Chemical Daily Log into the database. The Chemical Daily Log indicates the reading was 10, which is in range.

Alleged Violation Date	Day of Week	Time	Explanation for Low Raven Scrubber Make Up Water Flow Rates (Range is ≥ 2.8 gpm)
1/24/2019	Thursday	All Shifts	This was the first day following the finalization of MAP flow rates established on January 23 between the company and the AQD. The finalized MAP was circulated to the affected personnel on January 24 and fully implemented by 11:00 p.m. that evening.
1/27/2019	Sunday	11:30 p.m.	There was no production from Friday, January 25 at 11:00 p.m. until Monday, January 28 at 7:00 a.m. During non-production days, readings are taken once per day (per the MAP). The January 26 and 27 readings were taken during the 7:00 a.m. to 3:00 p.m. shift.
11/5/2019	Tuesday	3:30 p.m.	No explanation. The reading for the preceding and following shifts were both 3, which are in range.

Alleged Violation Date	Day of Week	Time	Explanation for Missing or No Raven Scrubber Make Up Water Flow Rates (Range is ≥ 2.8 gpm)
4/2/2019	Tuesday	11:30 p.m.	This appears to be an entry error that occurred when entering the reading from the Chemical Daily Log into the database. The Chemical Daily Log indicates the reading for the Raven scrubber tower was 3, which is in range.
6/7/2019	Friday	3:30 p.m.	This appears to be an entry error that occurred when entering the reading from the Chemical Daily Log into the database. The Chemical Daily Log indicates the reading for the Raven scrubber tower was 3, which is in range.
10/3/2019	Thursday	7:30 a.m.	This appears to be an entry error that occurred when entering the reading from the Chemical Daily Log into the database. The Chemical Daily Log indicates the reading for the Raven scrubber tower was 3, which is in range.