



STATE OF MICHIGAN  
 DEPARTMENT OF  
 ENVIRONMENT, GREAT LAKES, AND ENERGY  
 DETROIT DISTRICT OFFICE



GRETCHEN WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

January 17, 2020

Mr. Rob Squiers, General Counsel  
 Voss Industries  
 7925 Beech Daly  
 Taylor, Michigan 48180

SRN: B3472, Wayne County

Dear Mr. Squiers:

**VIOLATION NOTICE**

On November 26, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of PGP Corporation d/b/a Voss Industries – Voss Taylor (Voss) located at 7925 Beech Daly Road, Taylor, Michigan. The purpose of this inspection was to determine Voss’s 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 133-17A.

As a result of the inspection and review of inspection records the below violations were identified.

Process Description	Rule/Permit Condition Violated	Comments
EUTENSIONLEV	PTI 133-17A, EUTENSIONLEV, Special Condition (SC) VI.1	Pressure drop records for the tension leveler baghouse were not recorded for various dates/shifts.
FGSCRUBBERS	PTI 133-17A, FGSCRUBBERS, SCs III.1, 2, and 3;  R 336.1910;  R336.1911(2)(c)	Measured scrubber flow rates are less than the minimum flow rates established during stack testing on June 1, 2017 for various dates. Corrective action not implemented and documented per MAP.
FGSCRUBBERS	PTI 133-17A, FGSCRUBBERS, SC VI.2;  R336.1911	Scrubber flow rate data are missing on various dates/shifts.

### EUTENSIONLEV

PTI 133-17A, EUTENSIONLEV, SC VI.1 requires that the facility “monitor and record in a satisfactory manner, the pressure drop across the baghouse for EUTENSIONLEV on a once per operating shift basis.” Records were provided for January 2019 through November 30, 2019. The following days and shifts did not have pressure drop measurements: 1/17/19, 7:30 AM; 1/30/19, 7:30 AM; 3/18/19, 3:30 PM; 4/8/19, 7:30 AM; 4/26/19, 7:30 AM; 5/3/19, 3:30 PM; 7/18/19, 3:30 PM; 7/19/19, 7:30 AM; 7/20/19, 7:30 AM; 7/23/19, 7:30 AM; 9/27/19, 7:30 AM; and 11/26/19, 3:30 PM. The above listed dates and shifts are in violation of PTI 133-17A, EUTENSIONLEV, SC VI.1.

### FGSCRUBBERS

PTI 133-17A, FGSCRUBBERS, SC III.1 requires that the facility “not operate FGSCRUBBERS unless a malfunction abatement plant (MAP) as described in Rule 911(2) for the scrubber pollution control system is implemented and maintained.” FGSCRUBBERS, SC III.2 requires that the “scrubber control system consisting of the packed-bed wet scrubber, a plate scrubber, and a demister pad operating in series is installed, maintained and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining the scrubber pollution control equipment in accordance with an approved MAP.” FGSCRUBBERS, SC III.3, requires that the facility “use fresh water for the scrubber pollution control system make-up water and maintain the makeup water flow rate and the minimum recirculation water flow rate at or above the minimum rates specified in the MAP.” The minimum flow rates within the MAP are based upon stack testing performed June 1, 2017 and are as follows: Heil scrubber tower (first tower) minimum makeup water flow rate of 9.1 gpm; Raven scrubber tower (second tower) minimum makeup water flow rate of 2.8 gpm.

The facility provided scrubber flow rates for January 1, 2019 through November 30, 2019. The following days were identified where the flow rate at the Heil scrubber was less than the minimum flow rate established during stack testing and included in the MAP.

5/19/19, 11:30 PM – 1 gpm  
6/13/19, 7:30 AM – 9 gpm

The following days were identified where the flow rate at the Raven scrubber was less than the minimum flow rate established during stack testing and included in the MAP.

1/24/19, 7:30 AM, 3:30 PM, 11:30 PM – 2.5 gpm  
1/27/19, 11:30 PM – 2.5 gpm  
11/5/19, 3:30 PM – 2.6 gpm

Voss has not provided any documentation of corrective action taken during periods of out of range scrubber operations as required by the MAP. The out of range scrubber operations and lack of documented corrective actions is a violation of PTI 133-17A, FGSCRUBBERS, SCs III. 1, 2, and 3. The out of range scrubber operations is also a violation of R 336.1910, which requires that an air cleaning device be installed, maintained, and operated in a satisfactory manner. In addition, not documenting the corrective actions taken during the out of range flow rates is a violation of R 336.1911(2)(c).

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PTI 133-17A, FGSCRUBBERS, SC VI.2 requires that the facility "monitor the scrubber makeup water flow rate and recirculation water flow rate on a continuous basis and record the scrubber makeup water flow rate at least once per shift while the scrubber is operating."

The facility provided scrubber flow rates for January 1, 2019 through November 30, 2019. A review of these records identified the following dates/shifts where the flowrate was not recorded: 4/2/19, 11:30 PM; 6/7/19, 3:30 PM; and 10/3/19, 7:30 AM. Each instance where a record is missing is a violation of PTI 133-17A, FGSCRUBBERS, SC VI.2. In addition, the missing flow rate records is also a violation of R 336.1911 as the records were not maintained per the MAP.

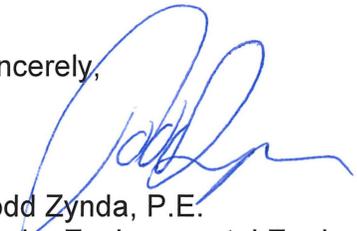
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 7, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Voss believes 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 Voss. 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,



Todd Zynda, P.E.  
Senior Environmental Engineer  
Air Quality Division  
313-456-2761

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Jeff Korniski, EGLE