aevitas
AEVITAS SPECIALTY SERVICES CORP.

HAND DELIVERED

September 21, 2016

Mr. Stephen Weis, Senior Environmental Engineer
State of Michigan
Department of Environmental Quality, Air Division
Cadillac Place
3058 West Grand Blvd., Suite 2-300
Detroit, MI 48202-6058

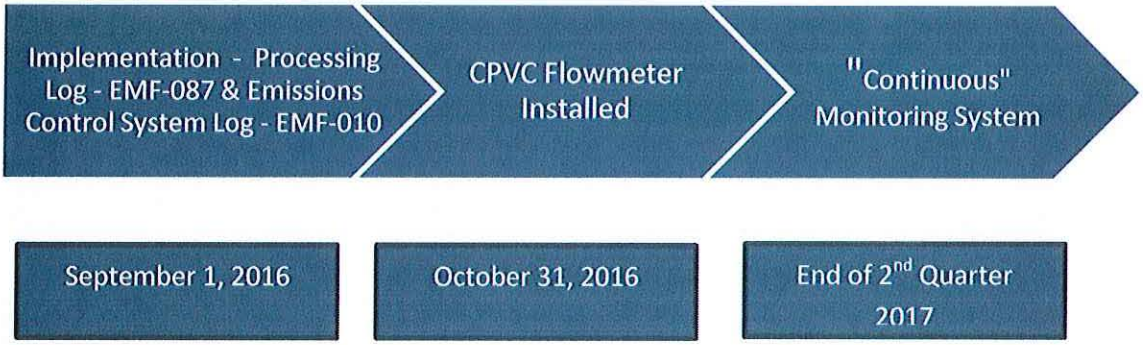
Dear Mr. Weis,

We are submitting our written response for the Violation Notice, dated August 17, 2016.

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.
Response	*In the interim we have implemented the Emissions Control System Log –EMF-010 to document the data. (Please see attached log)*
SCIV.3; R 336.1910	Materials 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.
Response	*In the interim we have implemented a Processing Log –EMF-087 (see attached) and Emissions Control System Log –EMF-010 (see attached) to document the data.*
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.
Response	*Same as SCIV.3*

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.
Response	*The redox potential of the scrubber solution is being monitored and documented 2X per shift via probe and Data Logs.* *We're in the process of getting quotes on the CPVC Flowrate meter. We expect to have this installed by the end of October. In the short term we are gauging the flowrate manually.* *Aevitas is evaluating a more suitable "continuous" monitoring system and plans to install by the end of 2nd Quarter 2017.*

Timeline – 2016 - 2017



With these improvements, we feel this will enhance our operations. The focus of these improvements is to improve overall plan production efficiency, minimize the potential for odor emissions and energy conservation.

Please feel free to contact me if you have any further questions or concerns.

Best Regards
Aevitas Specialty

Greg Reichard, CEO

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Emissions Control System Log

Date	Shift	Time	Initials	pH (>9.0) HS	pH (>9.0) VS	Redox (>30mV) HS	Redox (>30mV) VS	Flow Rate (>125)GPM HS	Flow Rate (>125)GPM VS
9-1	AM	9:00	[illegible]		10		485		IN Repair
9-1	PM	1600	TSS		11		437		IN REPAIR
9-2	AM	9:03	[illegible]		11		467		11
9-6	AM	9:00	DS		10		451		11
9-6	PM	16:00	DS		11		443		11
9-7	AM	10:00	[illegible]		11.8		225		11
9-7	AM	1700	DS		11		318		11
9-8	AM	9:15	[illegible]		9		124		11
9-8	PM	1700	DS		10		443		11
9-9	AM	9:45	[illegible]		11.9		384		11
9-9	PM	330	[illegible]		10.4		183		11
9-12	AM	9:15	[illegible]		12.		348		11
9-12	PM	4:30	[illegible]		10		284		11
9-13	AM	9:00	[illegible]		11.		222		11
9-13	PM	2:30	[illegible]		10		209		11
9-14	AM	9:00	[illegible]		11		485		11
9:14	PM	3:45	[illegible]		11		465		11
9:16	AM	9:10	[illegible]		10		245		11
9:19	AM	9:20	[illegible]		12		143		11
9-19	PM	3:45	[illegible]		10		125		11
9-20	A	9:05	[illegible]		11		285		11

		Process Material				Chemicals	
Date	Time	Tank #	Amount	Materials	Temperature	Name	Amount
9/1	0700	22	13,000 GALS.	☒ Rag ☐ Water ☐ Sludge	155°	ACID WEB	35 GALS. 1 GAL.
9/1	1000	22	13,000 GALS.	☒ Rag ☐ Water ☐ Sludge	155°	KOH ACID	100 GALS. 10 GALS.
9/2	0800	21	12,000 GALS.	☐ Rag ☒ Water ☐ Sludge	140°	KOH ACID WEB	50 GALS. 45 GALS. 1 GAL.
9/6	1600	21	14,000 GALS	☐ Rag ☐ Water ☒ Sludge	155°	KOH ACID	50 GALS 15 GALS
9/6	1700	22	14000 GALS	☐ Rag ☒ Water ☐ Sludge	150	KOH ACID	150 GALS 50 GALS
9/7	1700	22	14000 GALS	☒ Rag ☒ Water ☐ Sludge	165°	KOH ACID	400 GALS 185 GALS
9/7	1700	21	13,000 GALS	☐ Rag ☐ Water ☒ Sludge	170°	KOH ACID WEB	75 GALS 35 GALS 2 GALS
9/8	1000	21	13,000 GALS	☐ Rag ☐ Water ☒ Sludge	175°	KOH	350 GALS