



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 7, 2019

Mr. David Lewis, Terminal Facility Manager  
PVS Transportation, Inc.  
11001 Harper Ave.  
Detroit, MI 48213

SRN: B3427, Wayne County

Dear Mr. Lewis:

**VIOLATION NOTICE**

On August 29, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of PVS Transportation, Inc., located at 11001 Harper Ave., Detroit, Michigan. The purpose of this inspection was to determine PVS Transportation'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 Wayne County Installation Permit No. C-10424.

During the inspection, the following violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
Hydrochloric Acid Scrubber	Wayne County Installation Permit No. C-10424, Special Condition 20	Scrubber flow rate was not maintained above 30 gpm

At the time of inspection, AQD staff noted that the hydrochloric acid scrubber had not been operated at a minimum flow rate of 30 gallons per minute (gpm) since July 5, 2019, as required per Wayne County Installation Permit No. C-10424, Special Condition 20.

In addition, AQD is requesting per R 336.1911 that PVS Transportation develop, implement, and maintain a Malfunction Abatement Plan for the hydrochloric acid scrubber. The plan should include, at a minimum, an inspection and maintenance schedule, corrective actions to be taken in case of malfunction, and associated recordkeeping of inspection and maintenance activities to demonstrate that the Malfunction Abatement Plan is followed. The plan shall be submitted to the AQD Detroit District Supervisor for approval.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 28, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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violation 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. Please include a copy of the Malfunction Abatement Plan with the written response.

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 the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If PVS Transportation believes the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirement 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 PVS Transportation. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jonathan Lamb  
Senior Environmental Quality Analyst  
Air Quality Division  
313-456-4683

cc: Mr. Paul Max, City of Detroit BSEED  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Wilhemina McLemore, EGLE  
Mr. Jeff Korniski, EGLE