



10/24/19

EGLE, AQD, Detroit District
3058 West Grand Boulevard
Suite 2-300
Detroit, MI. 48202

PVS CHEMICALS
11001 HARPER AVE
DETROIT, MI 48213

Dear Sir or Madam,

On August 29th 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. The hydrochloric acid scrubber had not been operated at a minimum flow rate of 30 gallons per minute (gpm) since July 5th, 2019, as required per Wayne County Installation Permit No. C-10424, Special Condition 20.

In response to the violation noted, PVS Transportation is providing the following information.

Explanation:

The motor on the pump failed resulting in reduced flow rate. A new motor and pump were installed in place of the failed piece of equipment on July 5th. Consistent performance above 30 gallons per minute was not achieved until August 31st due to system blockage.

Corrective Action:

The new motor and pump have been added to the preventive maintenance plan. Additionally a new flow meter and packing have been installed. New sight glasses have been added to facilitate inspections.

In addition as requested per requirement 336.1911 please find attached the malfunction abatement plan.

Sincerely,

David Lewis

Terminal and Facility Manager

Attachment:

Purpose:

This standard has been developed to establish expectations and subsequent guidance and specific requirements for preventive maintenance of the scrubber system.

Applicability:

This Standard applies to Transportation business unit only.

This Standard recognizes that organizations, components and facilities are located in a variety of agency jurisdictions and is therefore correspondingly broad and general in nature. As a result, organizations and components must identify and incorporate legal and regulatory requirements of the appropriate jurisdictions into operation and component level standards and processes. For example, component and/or operations are to incorporate the requirements of the Occupational Safety and Health Administration (OSHA) for any operation subject to the jurisdiction of OSHA.

Implementation:

Business Units shall revise any existing standards to be consistent with this standard or establish a plan to meet the minimum requirements of this standard within 6 months of this standard's approval date. Implementation shall be completed within 12 months of this standard's approval date.

Newly acquired or created organizations shall have one year from date of acquisition or creation to implement this standard.

Definitions:

Business Unit: Operating entities within PVS Chemicals pertaining to PVS Transportation

Roles and Responsibilities:

- **Railyard Operations** - Visual inspection, HCl concentration, Flow Meter, and change scrubber water
- **Terminal Maintenance** - Repairs to the scrubber system
- **Terminal Manager** - Ensuring the preventative maintenance procedures are being conducted.

References:

- Monthly Terminal Inspection (TRAN-DET-OPS- FRM-0172)
- Scrubber Testing (TRAN-DET-OPS-FRM-0117)
- Scrubber Water Procedure (TRAN-DET-OPS-PRC-0294)

Requirements:

Daily Scrubber Inspections are tracked on the scrubber testing data sheet located on the network here G:\PVS23\PVS Transportation Report Index\2019 Folder\Terminal\Scrubber Testing.

All monthly and annual scrubber maintenance inspections are documented and recorded in TMT maintenance software.

1) Daily

- Check Scrubber Water twice daily (AM/PM)
 - Percent of HCl present in the scrubber water is below 6%
 - Change scrubber water if greater than 5.5% concentration
- Indication if water has been changed
- Confirm flow rate is above 30 GPM
- Changing of scrubber water
- Visual Inspections
 - a) Overall condition of the scrubber
 - b) Signs of any corrosion
 - c) Wiring in good condition
 - d) Check for leaks and unusual noise or vibrations

2) Monthly

- Greasing bearing on the fan motor

- Visual inspection of the pump, flow rate, fittings, drain strainer, alarm, sight glasses, nuts, bolts, valves, gaskets
 - Visual inspection through packing access port
- 3) Annually
- Check the packing and replace if necessary
 - Greasing the fan on the scrubber system
 - Check spray nozzle

Scrubber Malfunction Abatement Plan

When a failure of the scrubber systems occur, the following steps will be taken:

- 1) Immediately shut down any processes that use the scrubber including but not limited to:
 - Railcar Unloading
 - Tank Trailer Venting
- 2) Shut down scrubber
- 3) Identify failure – open repair order in TMT Maintenance software outlining issue
- 4) Correct issue as required – close out repair order with details of the repair
- 5) Perform monthly maintenance inspection to confirm all other systems are operable
- 6) Put scrubber back into service

Revision History:

This document was originally issued on at DATE revision 0. It has been revised as follows:

Date	Description of Changes	Revision #
		01
10/18/2019	Original Document Issue	00