



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



LIESL EICHLER CLARK
DIRECTOR

January 15, 2019

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

SRN: B3472, Wayne County

Dear Mr. Squiers:

VIOLATION NOTICE

On October 19, 2018, the Department of Environmental Quality (DEQ), 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.
FGSCRUBBERS	PTI 133-17A, FGSCRUBBERS, SC VI.2	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 requested for January 2018 through the date of inspection. According to email correspondence dated October 26, 2018, the facility states that records were not recorded for the requested time period. This is a violation of PTI 133-17A, EUTENSIONLEV, SC VI.1.

FGSCRUBBERS

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.”

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The facility provided scrubber flow rates for January 1, 2018 through October 25, 2018. A review of these records identified the following dates/shifts where the flowrate was not recorded: 1/21/18, 3/4/18, 4/11/18, 4/16/18, 4/22/18, 4/29/18, 5/4/18, 5/6/18, 5/12/18, 5/29/18, 7/20/18, 7/22/18, 9/17/18, 9/18/18, 9/23/18, and 10/14/18. Each instance where a record is missing is a violation of PTI 133-17A, FGSCRUBBERS, SC VI.2.

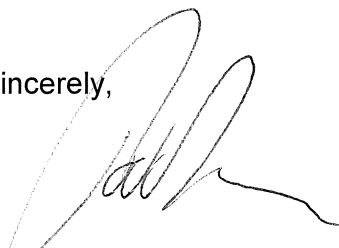
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 5, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of 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 the DEQ, 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 DEQ, 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 violations cited above and for the cooperation that was extended to me during my inspection of Voss. 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,



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

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