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N5747 IK

E-file: N5747_RVN - P. # 219/40917

September 17, 2014



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Mr. Iranna Konanahalli
Senior Environmental Engineer
STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Quality Division
Southeast Michigan District Office
27700 Donald Ct.
Warren, MI 48092-2793

Aug 27, 2014, VN Response

Subject: Pioneer Metal Finishing Industrial Hwy (SRN N5747)
Reply to Notice of Violation dated August 27, 2014

Dear Mr. Iranna Konanahalli:

Pioneer Metal Finishing (Pioneer Metal) has prepared this correspondence to reply to the Notice of Violation (NOV) issued by the Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) on August 27, 2014 for the Pioneer Metal Industrial Hwy facility located in Warren, Macomb County (State Registration No. N5747).

The NOV specifies that Pioneer Metal failed to:

1. Complete volatile organic compound (VOC) and hazardous air pollutant (HAP) calculations by the 15th day of the month for the preceding month for the coating line emission group (FG-LINES).
2. Complete HAP emission calculations by the 15th day of the month for the preceding month for the facility (emission group FG-FACILITY).
3. Maintain a properly operating water flow gauge on a wet scrubber associated with a parts washing line (Line 2 of FG-PARTSWASHLINES).

FG-LINES VOC and HAP Recordkeeping

Material use data and VOC/HAP emission calculations for FG-LINES were current through May 23, 2014 at the time of the MDEQ AQD inspection on August 20, 2014. Administrative staff that had been reviewing the daily production sheets and entering material use data (coating and solvent) into the emissions recordkeeping database left the company in May 2014.

Reviewing and entering material use data for each day for each coating line is a significant and time-consuming task that cannot be easily transferred to another employee. Pioneer Metal has recently hired additional administrative staff and assigned this job function to an employee. This employee is currently working on entering a backlog of data into the emissions recordkeeping database, which is expected to take several more weeks.

Entering the backlog of material use data is expected to be complete by October 3, 2014. At that time Pioneer Metal will provide an update to the MDEQ AQD (a written correspondence or electronic mail message) verifying the completion of this activity.

The facility has operated normally since May 2014 and experienced normal production volumes and material use rates. The calculated VOC and HAP emission rates are expected to be consistent with previous months and well below permitted emission levels.

FG-FACILITY HAP Recordkeeping

Similar to the information provided above, once the backlog of material use data are entered into the emission recordkeeping database, HAP emission calculations (monthly and 12-month total) for FG-FACILITY will be complete. Pioneer Metal will provide the MDEQ AQD with an update of these efforts by October 3, 2014.

FG-PARTSWASHLINES Flow Meter

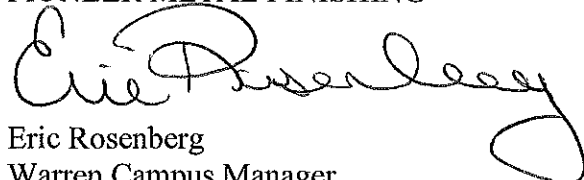
During the site inspection on August 20, 2014, MDEQ AQD staff observed that the water flow gauge on the wet scrubber for Parts Wash Line 2 was 'not operating properly'. The flow meter sight glass is darkened and difficult to read. However, Pioneer Metal verified that the flow meter itself and all associated water flow alarms are operational. Therefore, the water flow supply to the wet scrubber and the audible alarm on the water flow supply are (and have been) operating properly.

A new flow meter has been ordered and is expected to be installed and operational by September 19, 2014. At that time Pioneer Metal will provide an update to the MDEQ AQD (a written correspondence or electronic mail message) verifying the completion of this activity.

We appreciate your review and consideration of the NOV corrective actions presented in this correspondence. Please contact us at (586) 480-1720 if you require additional information.

Sincerely,

PIONEER METAL FINISHING



Eric Rosenberg
Warren Campus Manager