



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT  
DIRECTOR

August 27, 2014

Mr. Eric Rosenberg  
Plant Manager  
Pioneer Metal Finishing  
24600 Industrial Highway  
Warren, Michigan 48089-4346

SRN: N5747, Macomb (50) County

Dear Mr. Rosenberg:

**VIOLATION NOTICE**

On August 20, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Pioneer Metal Finishing ("Pioneer") located at 24600 Industrial Highway, Warren, Michigan. The purpose of this inspection was to determine Pioneer'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 administrative rules; the conditions of Permit to Install (PTI) number 2-03L; the conditions of Renewable Operating Permit (ROP) number MI-ROP-N5747-2011a; and Consent Order AQD number 19-2010 dated August 17, 2010.

During the August 20, 2014, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-LINES VOC & HAPs	PTI No. 2-03L, Special Condition (SC) No. FG-LINES, VI.1  ROP No. MI- ROP-N5747- 2011a, SC No. FG-LINES, VI.1  Consent Order No. 19-2010, Para Nos. 9A, 9B, 12, 17	Pioneer failed to complete the required calculations by the 15 <sup>th</sup> day of each calendar month for data corresponding to preceding month and to prepare a corresponding MS Excel spreadsheet (or equivalent) report. The calculations are performed only up to May 2014.
FG-FACILITY	PTI No. 2-03L, SC No. FG-	Pioneer failed to complete the required calculations by the 15 <sup>th</sup> day of each calendar

HAPs	FACILITY, VI.1  ROP No. MI-ROP-N5747-2011a, SC No. FG-FACILITY, VI.1  Consent Order No. 19-2010, Para Nos. 9A, 9B, 12, 17	month for data corresponding to preceding month and to prepare a corresponding MS Excel spreadsheet (or equivalent) report. The calculations are performed only up to May 2014.
FG- PARTSWASHLINES  Particulates and acids	PTI No. 2-03L, SC No. FG-PARTSWASH LINES, IV.2  ROP No. MI-ROP-N5747-2011a, SC No. FG-PARTSWASH LINES, IV.2  Consent Order No. 19-2010, Para Nos. 9A, 9B, 12, 17	Water flow gauge (rotameter/variable area meter) is not operating properly.

During this inspection, Pioneer Metal Finishing was unable to produce the emission records and the required calculations. The calculations are performed only up to May 2014. The calculations are required to be completed by the 15<sup>th</sup> day of each calendar month for data corresponding to preceding month.

This is a violation of the recordkeeping and emission limitations specified in Special Condition number FG-LINES, VI.1 of PTI number 2-03L.

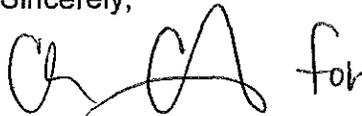
The cited Special Condition numbers FG-LINES, VI.1 and FG-PARTSWASHLINES, IV.2 of PTI number 2-03L and MI-ROP-N5747-2011a are also enforceable as paragraphs 9A, 9B, 12 and 17 of Consent Order, AQD number 19-2010.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 17, 2014 (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.

If Pioneer 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 Pioneer. 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,

A handwritten signature in black ink, appearing to read 'Iranna Konanahalli for'. The signature is stylized and cursive.

Iranna Konanahalli  
Senior Environmental Engineer  
Air Quality Division  
586-753-3741 or [konanahalli@michigan.gov](mailto:konanahalli@michigan.gov)

ISK/DAC

cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Jenine Camilleri, DEQ  
Mr. Chris Ethridge, DEQ