



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 17, 2020

Mr. Justin Engel
EHS Coordinator
Pioneer Metal Finishing
24600 Industrial Highway
Warren, Michigan 48089

SRN: N5747, Macomb County

Dear Mr. Engel:

VIOLATION NOTICE

On January 31, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Pioneer Metal Finishing located at 24600 Industrial Highway, Warren, Michigan. The purpose of this inspection was to determine Pioneer Metal Finishing'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 2-03M.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-LINES	PTI No. 2-03M, FGLINES Condition VI.5	During my inspection, I noticed that the company had not calibrated the temperature monitor on the Regenerative Thermal Oxidizer (RTO) for more than a year. Records of the dates and results of the calibration of the temperature monitor were also not being maintained.

During this inspection, Pioneer Metal Finishing was unable to produce records of the dates and results of the calibration of the temperature monitor on the Regenerative Thermal Oxidizer (RTO) control device. In addition, tags on the RTO temperature monitor indicated that the last calibration took place over a year ago.

This is a violation of the recordkeeping requirement specified in Special Condition VI.5 of PTI number 2-03M.

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The conditions of PTI Number 2-03M require Pioneer Metal to calibrate the temperature monitoring device at least once per year and keep records of the dates and results of the temperature monitoring device calibration. These records shall be maintained on file and made available to the Department on request. PTI No. 2-03M also requires that the temperature monitor be calibrated annually.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 7, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the 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 submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Pioneer Metal Finishing 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 violation cited above and for the cooperation that was extended to me during my inspection of Pioneer Metal Finishing, Industrial Highway. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kaitlyn Leffert
Environmental Quality Analyst
Air Quality Division
586-753-3797

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE