

N 696T - RVN - 2017 1004
6169 ✓ MACES



Date 9/26/17

To whom it may concern,

This letter is in reference to the violation letter dated 9/18/17 for the MDEQ inspection conducted by Mike Kovalchick.

Violation 1. Two sulfuric tanks acid anodizing tanks not controlled by a wet scrubber.

Root Cause: The two tanks in question were an oversight and were not included in the original PTI (543-96) dated January 06, 1997.

Corrective Action: Pioneer has submitted an updated PTI including the Scrubber/tanks in question. Supporting evidence includes an updated drawing showing the emissions points.

Violation 2. 60 KW natural gas fired generator. The company has not demonstrated that they are in compliance with 40 CFR Part 63.

Root Cause: The generator was installed in 1998 and is below the HP threshold to be subject to the requirements. The requirements called out in the rule were overlooked.

Corrective Action: Pioneer has created an annual PM (000206) for an oil change, belt and hose inspection with a due date of 10/06/2017. The PM reoccurs annually as a preventative measure. Using the DEQ online tool it has been determined the generator is not subject to the rules.

Regards,

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