



To: EGL, AQD, Warren District
27700 Donald Court
Warren, MI 48092

Re: Violation Notice N6388, Macomb County

I am writing in response to three violations that were noted during attempted emissions testing at Pioneer Metal Finishing at 13251 Stephens Road, Warren, Michigan. Our initial testing attempt was on December 21, 2021 which we had to abort due to failed testing equipment. The first and second violation were noted at that time. Our follow up testing was scheduled on January 20th, 2022. During setup and pre-testing, it was noted that our capture efficiency numbers were not sufficient. We tried various things to remedy the problem, but were not able to come up with an adequate short-term fix and so notified the state of the situation and cancelled the test.

We were notified of 3 violations which I am detailing here along with our proposed remedies:

1. The facility installed and commenced operation of a chain on edge coating line without a permit to install. There was some confusion on this as we were already in the process of applying for a new permit to install to cover all of our equipment for the entire plant. While we were going through the approval process there was an incident in the plant that destroyed our existing COE machines. The new one was brought in as part of the insurance work to replace what was lost. It was thought at the time that this would be covered by the lines already on the permit, but they had actually been removed already. We have already submitted an application to add this equipment to the permit and are waiting for approval.
2. Testing of VOC destruction efficiency and VOC capture efficiency was not completed within 180 days of permit issuance. This was an oversight on my part. It should have been completed before October but I lost track of it with some management changes we had going on at the time. This will be scheduled and completed as soon as the third violation is addressed which should be no later than July 31, 2022. We are already in the process of making the necessary changes. I will be pushing to have this completed much sooner, but must allow for the chance of material shortages, shipping delays, and testing availability.
3. The facility notified EGLE AQD staff that emissions were not being adequately captured and routed to the RTO while FGRTTO continued to operate. As a result, coating lines in FGRTTO were operated while the RTO was not operating in a satisfactory manner. We noticed during setup for the January test that we were not getting enough draw from the booths. We were not able to get it resolved in time for the test so we cancelled. We immediately began investigating the cause starting with the RTO. We were able to get technicians in to inspect the system the following Monday and everything checked out fine. Our investigation led us to the conclusion that the issue was the large open paint booths on the new COE line. We immediately covered the booth openings and noticed a marked improvement through the entire plant. We left the coverings on as a temporary fix, then ordered new doors for the booths. There



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are 3 booths. We already received the doors for the first booth and are installing and testing them right now. Once we have verified that the design is exactly what we want, we will order the doors for the other two booths. After the doors have been installed, we will get the duct system balanced so that we are able to achieve the required capture efficiency numbers on each line in the plant. Once the issue is resolved, we will reschedule the testing. We will also be starting weekly differential pressure testing on each of our lines to ensure that the fixes we put in place are adequate and remain effective.

I apologize for the violations that happened and appreciate the help I've gotten from Kaitlyn Leffert in getting them addressed. These issues will not happen again.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Engel". The signature is fluid and cursive, with a large loop at the end.

Justin Engel
EHS Coordinator
Pioneer Metal Finishing
586-480-1704