

Kaitlyn Leffert
Environmental Quality Analyst
EGLE, AQD, Warren District
27700 Donald Court
Warren, MI 48092

SRN: N6388, Macomb County

Dear Kaitlyn Leffert,

I'm writing this response to the violation notice received relating to the destructive efficiency testing observed at our 13251 Stephens Road facility on September 15, 2022.

1. Our VOC destructive efficiency tested at 93% which is below the required 95%. We have contacted our RTO service provider and gotten a quote for evaluating/servicing the RTO. We are planning to have this done in 1st quarter 2023 and are working on getting this scheduled with them. We are also trying to work with our environmental consultant to run another trial test. During the setup for our test in September we were getting a destructive efficiency of 98%. There were no changes the next day when we tested and registered the 93% so we are continuing to investigate that. We also found that one of the duct baffles leading to the RTO was very torn and deteriorated which could possibly contribute to the problem. We have the replacement part, but due to access and weather, we will not be able to install it until spring. We are implementing a temporary rubber seal around this baffle which will cover the air gap effectively. This will be done by January 1, 2023.

2. The chain-on-edge oven, large dip drain oven, and large dip drain coating booth did not meet the required .007 inches of water on a pressure differential reading. We would like to apply for a permit change removing the differential pressure requirement from these three pieces of equipment. The fans and turbulent air inside the ovens make getting a correct reading very difficult while the very open nature of the large dip drain coating booth makes reaching the required measurement impossible. None of these pieces of equipment involve spraying any coating so there is no atomization occurring. We have similar lines at our 24600 Industrial Highway facility. The dip drain lines and ovens are only subject to a smoke tube test to demonstrate correct air flow direction. The three lines involved in this violation pass this test easily.

3. There are no exhaust filters installed on the small dip drain line. This line never had a provision for a filter on the hood, but we will be adding it by the end of January, 2023. These will be kept in place and replaced as necessary.

4. The facility failed to provide records of 8-hour emissions calculations for Methyl Isobutyl Ketone. Our emissions calculations are currently recorded by shift which is ten hours. We will add a calculation to these records that shows the estimate for an 8-hour period. This will be done by the end of January, 2023.



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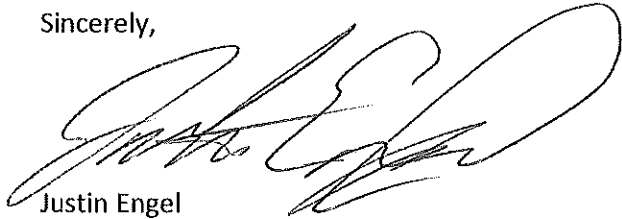
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We are continuing to operate the facility with all capture devices in place and the RTO operating with no faults or signs of trouble. We believe that the destruction efficiency is very close to the required 95% if not over but will continue our efforts listed in section 1 above until we can run the full destructive efficiency test and verify them for the records.

Thank you for your patience in this matter as it is our intention to fully comply with all required regulations and permits.

Sincerely,

A handwritten signature in black ink, appearing to read 'Justin Engel', written in a cursive style.

Justin Engel
EHS Lead
Pioneer Metal Finishing – Warren
586-480-1704