



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

November 30, 2022

Justin Engel  
EHS Coordinator  
Pioneer Metal Finishing  
13251 Stephens Road  
Warren, MI 48089

SRN: N6388, Macomb County

Dear Justin Engel:

**VIOLATION NOTICE**

On September 15, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed emissions testing at Pioneer Metal Finishing – Stephens Road located at 13251 Stephens Road, Warren, Michigan. The purpose of the emissions testing was to verify volatile organic compound (VOC) capture and destruction efficiency of the regenerative thermal oxidizer (RTO) control. Staff had also visited the site on July 14, 2022, to conduct a scheduled inspection of Pioneer Metal – Stephens Road. The purpose of this inspection was to determine Pioneer Metal'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 151-05B.

During the inspection and emissions testing, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Regenerative Thermal Oxider (RTO)	PTI No. 151-05B, FG-RTO, Condition IV.3, Rule 910	Emissions testing results indicate a VOC destruction efficiency of 93%, which is below the minimum destruction efficiency of 95% specified in PTI 151-05B.
Large Dip Drain Line (EU-02) and Chain on Edge Line (EU-12)	PTI No. 151-05B, FG-RTO, Conditions III.5, IV.3, Rule 910	During emissions testing, the chain on edge (EU-12) oven, the large dip drain line, and the oven associated with the large dip drain line were found to not be meeting the maximum pressure differential of negative 0.007 inches of water.
Small Drip Drain Line (EU-03)	PTI No. 151-05B, EU-03, Condition IV.1	There are not any exhaust filters installed on the small drip drain line.
FG-RTO	PTI No. 151-05B, FG-RTO, Condition VI.4	The facility failed to provide records of 8-hour emissions calculations for methyl isobutyl ketone.

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During emissions testing on September 15, a volatile organic compound (VOC) destruction efficiency of the regenerative thermal oxidizer (RTO) of 93% was measured, which was below the required minimum 95% VOC destruction efficiency. In addition, the enclosures on the large drip drain line and associated oven were unable to meet the pressure difference maximum specified in PTI No. 151-05B, which is required for satisfactory operation of the RTO. The small drip drain line was also observed to be operating without exhaust filters installed.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law. This is also a violation of the conditions of PTI No. 151-05B.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 21, 2022 (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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Pioneer Metal 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 Metal. 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,



Kaitlyn Leffert  
Environmental Quality Analyst  
Air Quality Division  
586-249-6505

cc: Mary Ann Dolehanty, EGLE  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Joyce Zhu, EGLE  
Iranna Konanahalli, EGLE  
Andrew Riley, EGLE