



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

February 29, 2024

Jay Cronin
Pioneer Metal Finishing
13251 Stephens Road
Warren, MI 48089-4377

SRN: N6388, Macomb County

Dear Jay Cronin:

VIOLATION NOTICE

On February 29, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a review of VOC Capture Efficiency (CE) tests (sampled on December 14, 2023, Impact Project No. 2300042) of Pioneer Metal Finishing ("Pioneer") located at 13251 Stephens Road, Warren, Michigan. The purpose of this CE test review was to determine Pioneer'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 Synthetic Minor Permit-to-Install (PTI) No. 151-05B dated May 25, 2022.

During the February 29, 2024, review of VOC Capture Efficiency (CE) tests, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGRTO ⁹	PTI No. 151-05B, III.5 ^β	Pioneer failed to maintain a maximum pressure differential of negative (-) 0.007 inches of water between each Non-Fugitive Enclosure (NFE) and the adjacent area through each natural draft opening (NDO) on a continuous basis. Some emission units (EUs) were not tested at all (EU-06, EU-10, etc.) ^μ
<p>⁹ Six (6) emissions units (EU-02, EU-04, EU-05, EU-06, EU-10, EU-12) for coating of metal parts. The purge and cleanup solvents are included. The particulate emissions are controlled by dry filters. The VOC emissions are controlled via Non-Fugitive Enclosure (NFE) associated with each emission unit and a communal regenerative thermal oxidizer (RTO).</p>		
<p>^β the permittee shall maintain a maximum pressure differential of negative (-) 0.007 inches of water between each Non-Fugitive Enclosure (NFE) and the adjacent area through each natural draft opening (NDO) on a continuous basis. An NDO defined as any opening that is not connected to a duct in which a fan or blower installed. (R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)</p>		
<p>^μ on an ongoing basis, Pioneer Metal has been having difficulty meeting the negative 0.007 inches of water pressure differential on the large dip drain coating line (EU-02). Negative pressure is maintained but is not consistently below the required -0.007 inches of water. However, the enclosure shows VOC capture via smoke test. During the July 07, 2023, FY 2023 inspection, we discussed a PTI revision for this and other items.</p>		

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During the July 2023 testing, VOC emissions via RTO stack was 0.83 pound of VOC per hour. The operating conditions noted were RTO retention time = 15 seconds; coating usage = 19.9 gallons; RTO Temperature (T) = **1,585 °F**. Therefore, henceforth until further DE testing, the RTO Temperature should be maintained at **> 1,585 °F > 1,500 °F** (PTI No. 151-05B, FG-RTO, IV.3: minimum temperature of 1,500°F). The required RTO operating temperature is now higher (1,585 °F) than what is stated in PTI No. 151-05B, FG-RTO (1,500°F).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 21, 2024 (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 Iranna Konanahalli at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or Konanahalli@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Pioneer 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. 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.

Jay Cronin
Pioneer Metal Finishing
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Sincerely,

A handwritten signature in black ink, appearing to read "Iranna Konanahalli". The signature is fluid and cursive, with a distinct loop at the end.

Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
586-596-7630

cc: Justin Engel, Pioneer
David Corey, Pioneer
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Andrew Riley, EGLE
Jeff Rathbun, EGLE