



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

June 26, 2023

VIA E-MAIL

Ken Siuda, Corporate Compliance Manager
Prefix Corporation
3500 Joslyn Road
Auburn Hills, MI 48326

SRN: P0328, Oakland County

Dear Ken Siuda:

VIOLATION NOTICE

On May 9, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Prefix Corporation located at 3500 Joslyn Road, Auburn Hills, Michigan. The purpose of this inspection was to determine Prefix Corporation'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) numbers 128-16B and 40-12.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coating Booth #4	PTI No. 40-12, SC I.1	Monthly VOC emission limit of 2,000 lb. VOC/booth/month was exceeded in this booth. 2,271 lbs. were reported as emitted from Booth #4 during September 2022.
Purge and clean-up operations	PTI No. 40-12, SC VI.3	Usage of GRO1501 purge solvent and VOC laden wipes was reported inaccurately. Prefix used the total amount of GRO1501 solvent and VOC laden wipes purchased each month as the monthly usage. This is not an acceptable method of accounting for usage. Prefix must account for the actual amount of GRO1501 solvent and VOC laden wipes used in each coating line.

Ken Siuda
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 17, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 Prefix Corporation 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 violation cited above and for the cooperation that was extended to me during my inspection of Prefix Corporation. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Bognar
Senior Environmental Engineer
Air Quality Division
586-854-1517

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE