



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

December 8, 2016

CERTIFIED MAIL- 7010 0290 0000 3734 2187
RETURN RECEIPT REQUESTED

Mr. Bob Lefere
Pioneer Foundry Company
606 Water Street
Jackson, Michigan 49203

SRN: B1661, Jackson County

Dear Mr. Bob Lefere:

VIOLATION NOTICE

On November 22 & 23, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Pioneer Foundry Company (Company) located at 606 Water Street, Jackson, Michigan. The purpose of this inspection was to determine the Company'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, Permits to Install (PTI) 207-98 and 75-75, and federal National Emission Standards for Hazardous Air Pollutants (NESHAP): Iron and Steel Foundry Area Sources 40 CFR Part 63, Subpart ZZZZZ.

During the inspection, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two electric induction furnaces that melt gray iron that is poured into a ladle. An inoculant is added to the ladle prior to the metal being poured.	Rule 201	An inoculant containing some chromium and other metals is currently being used. Some of the inoculant is emitted during the pouring of the metal into the ladle. These toxic materials were not previously described in the PTI application for 207-98 and represent a meaningful change in the emissions of air contaminants and require a PTI.

Gray Iron Foundry	40 CFR Part 63.10899 (c) NESHAP Subpart ZZZZZ	Required Semi-Annual reports have not been submitted for 2015 or 2016.
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During this inspection, it was noted that the Company had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised the Company on 11/23/2016 that this could be a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the E-coat line. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 2, 2017. 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.

If the Company 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 this Company. 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,

Mike Kovalchick
Environmental Engineer
Air Quality Division
517-780-5496

cc: Mr. Scott Miller, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ