

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

N638826930

FACILITY: PIONEER METAL FINISHING - STEPHENS ROAD		SRN / ID: N6388
LOCATION: 13251 STEPHENS ROAD, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Dave Corey ,		ACTIVITY DATE: 09/17/2014
STAFF: Joyce Zhu	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled annual inspection		
RESOLVED COMPLAINTS:		

On 8/1, I conducted an annual air quality inspection at Pioneer Metal Finishing, formerly known as Automated Deburring, located at 13251 Stephens, Warren. Arriving at the facility around 11:20 AM, I met with Mr. Dave Corey from the facility. I explained the purpose of inspection; afterwards, he took me for inspection. Upon entering the lobby area where was under remodeling, I smelled a strong solvent odor. The lobby was under remodeling due to a fire occurred on 6/20/2014.

### Inspection

The majority of the work in the plant is metal part coating. There are three Chain on Edge (COE) lines, two dip drain lines, & three spray paint booths with filter control. The VOC emissions from the COE lines, one of the dip drain lines & the spray booths are controlled by a catalytic oxidizer. Prior to coating, they measure paint viscosity & will add thinner if needed. Also, there are four alkaline wash lines on site. Each wash line consists of a wash tank followed by a rinse tank. They operate two shifts: 7 AM – 3:30 PM & 3:30 PM – 11 PM.

### Permit # 169-07

This permit covers the three Chain on Edge lines, two dip drain lines, & three spray paint booths with filter control, & a batch oven. HVLP applicators are used in COE lines (#2 & #3); & the electro static nozzles are used in the rest of the coating processes. They replace the booth filters as needed. They clean the spray nozzles by purging with MEK or other solvents. Waste solvents are stored in a waste drum which will be picked up by Knight Resources. During the inspection, they only operated two of the three spray booths & two of the chain-on-edge lines (COE # 2 & #3). I observed some overspray inside the booths as well as the area of the COE lines. The small spray booth which they didn't operate had missing filters. The filters in the other small spray booth appeared to be warped. I told Dave that they needed to replace the filters. Also, near the COE Line #2 & #3 area, they left the paint containers open. In the paint storage area, all paints & solvents were stored on the shelves of the northeast corner of the facility. All containers were closed. I didn't see any spill in the storage area; however, I smelled strong solvent odor near the area. I saw some corrosive appearance on the duck work of the catalytic incinerator. On one side of the incinerator, the vegetation was taller than me. I couldn't access any temperature readings of the incinerator. I asked for the temperature records of the inlet to the catalyst bed of the oxidizer; I was told they didn't have the records.

### Permit #151-05

This permit is an opt-out permit which sets the facility wide enforceable limits for HAP as well as HAPs.

During the inspection, Dave told me that he didn't have any record for me because the

person who was responsible for records was not available. I told him I would email him the contents of required records & have him sent the records to me later. I emailed him to request the following records:

1. MSDS of the cleaning agent used in the part washer lines
2. For the month of July

- Material usage containing HAP(s) in gallons
- The corresponding HAP contents in the above materials
- Emission calculation of HAP & aggregate HAPs in tons/month as well as tons/(12-month rolling time period)
- Purchase order of all coatings, reducers, purge/clean up solvents
- VOC contents (lb./gal) of each material and its usage rate
- VOC emission (lb/month & lb./[12-month rolling time period])

In the email I asked to send the records by 8/8/14. On 9/9, I left a message regarding to the records on the Facility's phone line (586-480-1720) since I didn't received any records. I emailed Dave again on 9/9 to demand the records. I asked to send the records by 9/12; however, I haven't heard from him.

In conclusion, below is several non-compliance issues identified after the inspection:

1. Catalytic oxidizer was not well maintained (Permit #168-07 General Condition No. 15 & Special condition No. 1. B.)
2. Dry filters were not properly operated (Permit #168-07 Special Condition IV. 2)
3. No temperature records were provided for inlet to the bed of the catalytic oxidizer. (Permit #168-07 Special Condition VI. 4)
4. No records provided as required by Permit #168-07, Special Condition III.
5. No records provided as required by Permit #151-05, Special Condition 1.3 & 1.4.

As a result, a Notice of Violation (NV) will be issued to the facility.

NAME Joyce DATE 9/17/2014 SUPERVISOR CTE