



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 28, 2022

VIA EMAIL AND U.S. MAIL

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

SRN: P0328, Oakland County

Dear Ken Siuda:

VIOLATION NOTICE

On June 8, 2022, 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 Nos. 128-16B and 40-12.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Automated coating line with two coating booths. Line is currently in construction.	Rule 201	Began installation of new automated coating system without obtaining a permit to install or permit to install waiver. The structure, coating delivery systems, conveyor belt, HVAC, humidifying system, drying section, and cooling system are partially or fully constructed.

During this inspection, it was noted that Prefix Corporation had installed unpermitted equipment at this facility. This is a violation of Rule 201 of the administrative rules promulgated under Act 451. A program for compliance may include a completed PTI application for the automated coating line. An application form is available by request,

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or at the following website: www.michigan.gov/air. 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 violation and submit a written response to this Violation Notice by July 19, 2022 (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 or email listed below.

Sincerely,



Adam Bognar
Environmental Engineer
Air Quality Division
586-854-1517; BognarA1@michigan.gov

cc: Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Joyce Zhu, EGLE