



March 19, 2024

Iranna Konanahalli
EGLE, AQD, Warren District
27700 Donald Court
Warren, MI 48092

PTI No. 151-05B

RE: Violation notice dated February 29, 2024

Dear Iranna Konanahalli,

I'm writing in response to our recent air permit violation. The violations were noted during testing on December 14, 2023. This violation noted that some of our Non-Fugitive Enclosures (NFE) failed to meet the required maximum pressure differential (-.007 inches of water) to the adjacent areas during testing. There were some emissions units that were not tested as well due to being locked out and not in service at the time. There are three pieces of equipment that have issues meeting this requirement due to the design or nature of the machine.

1. Large Dip Drain coating booth – This machine has six very large openings in the enclosure that allow the parts and operator to enter and exit the booth. These openings are an integral part of the design and function of the machine.
2. Large Dip Drain oven – This machine has four large openings for parts to enter and exit the oven from the booth below. These are integral to the operation of the machine. In addition, hot air currents and blowers inside the oven make the pressure readings difficult to achieve consistently.
3. Chain on Edge 2 oven – This unit has similar problems to the oven described in item 2. While the openings are smaller, the heat and air currents inside the machine make reliable pressure readings difficult to obtain with any consistency.

These violations have been ongoing since the test due to the nature and design of the machines. While these three units fail the differential pressure reading, they always pass a visual air flow inspection using a smoke tube test with no issue. I am currently working with my environmental testing company, Impact Compliance, on a permit modification to remove the differential pressure testing requirement from these units. We believe that the smoke tube tests reliably demonstrate the capture ability of the units. This would put our permit requirements in line with our Industrial Highway facility (PTI 2-03M) that has similar units and ovens that do not have this requirement.

I will have a revision proposal submitted to change the test method from differential pressure to smoke tube similar to PTI 2-03M by April 12, 2024.

Sincerely,

Justin Engel
EHS Lead
Pioneer Metal Finishing – Warren
586-480-1704



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