



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

January 25, 2022

VIA E-MAIL

Mr. Justin Engle  
EHS Coordinator  
Pioneer Metal Finishing  
13251 Stephens Road  
Warren, MI 48089

SRN: N6388, Macomb County

Dear Mr. Engel:

**VIOLATION NOTICE**

On December 21, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed an attempted emissions test at Pioneer Metal located at 13251 Stephens Road, Warren, Michigan. The purpose of this inspection was to verify volatile organic compound (VOC) destruction and capture efficiency, as required by Permit to Install (PTI) number 151-05A.

During and following the observation of the attempted stack test, staff observed and were made aware of the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
Chain on Edge Coating Line	R 336.1201	The facility installed and commenced operation of a chain on edge coating line without a permit to install.
FGRTO	PTI No. 151-05A, FGRTO, Special Condition V.2 and V.3	Testing of VOC destruction efficiency and VOC capture efficiency was not completed within 180 days of permit issuance.
FGRTO	PTI No. 151-05A, FGRTO, Special Condition IV.3; R 336.1910	The facility notified EGLE AQD staff that emissions were not being adequately captured and routed to the RTO while FGRTO continued to operate. As a result, coating lines in FGRTO were operated while the RTO was not operating in a satisfactory manner.

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During the visit to the facility for the first attempt of the emissions test, it was noted that Pioneer Metal had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised Pioneer Metal on January 18, 2022, that 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 chain on edge coating line process equipment. An application form is available by request, or at the following website: [www.michigan.gov/air](http://www.michigan.gov/air) (in the shaded box on the upper right-hand side of the page).

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.

On January 19, 2022, the AQD staff were notified of operation of the coating lines at the facility while the regenerative thermal oxidizer (RTO) was not demonstrating adequate emissions capture.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 15, 2022 (which coincides with 21 calendar days from the date of this letter). 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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Pioneer Metal 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Pioneer Metal. 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,

A handwritten signature in black ink that reads "Kaitlyn Leffert". The signature is written in a cursive, flowing style.

Kaitlyn Leffert  
Environmental Quality Analyst  
Air Quality Division  
586-249-6505

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