

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY LANSING



C. HEIDI GRETHER DIRECTOR

November 7, 2018

UPS NEXT DAY DELIVERY

ENFORCEMENT NOTICE

In the matter of:

PPI Aerospace 23514 Groesbeck Highway Warren, Michigan 48089

SRN: N6857; Macomb County

ATTENTION: Mr. Paul Clark, Vice President

This letter is to advise you of the commencement of escalated enforcement action against PPI Aerospace (Company). This letter follows the May 23, June 12, June 19, and July 25, 2018 Violation Notices issued by the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) which detailed violations of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994, PA 451, as amended (NREPA), MCL 324.5501 *et seq.*, and the following state and federal air quality violations:

- Failing to comply with conditions in Permit to Install (PTI) No. 294-00D and PTI No. 120-02;
- Failing to comply with the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, Title 40 of the Code of Federal Regulations, Part 63, Subpart T;
- Failing to obtain a permit prior to installing the hydrogen chloride tank on the C line that is vented to a scrubber and the copper strip solution evaporation process in violation of Mich Admin Code, R 336.1201 (Rule 201);
- Failing to submit the Michigan Air Emissions Reporting System forms in violation of Mich Admin Code, R 336.202 (Rule 2).

The AQD is providing the Company with an opportunity to formally resolve these violations through the entry of a legally enforceable agreement that will include a compliance program and payment of an appropriate monetary penalty pursuant to Section 5528 of Part 55 of NREPA, MCL 324.5528.

Be advised that failure to respond to this Enforcement Notice in a timely manner and adequately resolve or address the cited violations may result in further enforcement proceedings, including but not limited to, referral of the matter to the Michigan Department of Attorney General (MDAG) for commencement of civil litigation.

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This Enforcement Notice does not preclude or limit the MDEQ's ability to initiate any other enforcement action under federal or state law as appropriate.

<u>Please contact me at 517-284-6797, or by email at rathbunj1@michigan.gov, no later</u> than November 21, 2018, to schedule a meeting to discuss the resolution of this matter.

> STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

By:

Jeff Rathbun

Air Quality Division, Enforcement Unit

Date: 11-7-18

cc: Ms. Sarah Marshall, U.S. EPA, Region 5 Mr. Neil Gordon, MDAG Ms. Joyce Zhu, MDEQ Ms. Jenine Camilleri, MDEQ