



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GRETHNER  
DIRECTOR

June 12, 2018

Mr. Paul Clark, President  
PPI Aerospace  
23514 Groesbeck Highway  
Warren, Michigan 48089

SRN: N6857, Macomb County

Dear Mr. Clark:

**VIOLATION NOTICE**

On May 3, 2018 and May 16, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of PPI Aerospace located at 23514 Groesbeck Highway, Warren, Michigan. The purpose of this inspection was to determine PPI Aerospace'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 (PTI) number 294-00D and 120-02;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Batch halogenated solvent degreaser (EUDEGREASER)	PTI 294-00D Conditions 2.2, 2.3, 2.4, 2.5, and 2.6	The degreaser cover was not completely covering the degreaser opening while in downtime mode.
Batch halogenated solvent degreaser (EUDEGREASER)	PTI 294-00D Conditions 2.1, 2.7, 2.8, and 2.9	The permittee did not keep/submit the following records/reports: <ul style="list-style-type: none"> <li>• Monthly and 12-month rolling TCE emissions</li> <li>• Monthly cover inspections</li> <li>• HAP content of solvent used</li> <li>• Maintenance and repairs</li> <li>• Hoist speed determinations</li> <li>• Idling emission rate</li> <li>• Semi-Annual exceedance report required in 40 CFR 63.468</li> <li>• Annual report required in 40 CFR 63.468</li> </ul>

Electroplating line (EUBLINE)	PTI 294-00D Condition 3.3	The permittee did not keep records of scrubber flow rate monitoring.
All equipment at the stationary source, including equipment covered by other permits, grand-fathered equipment and exempt equipment (FGFACILITY)	PTI 294-00D Condition 4.1a, 4.1b, and 4.3	The permittee did not keep monthly and 12-month rolling time period individual HAP and total HAP emission rate calculations for FGFACILITY.
Masking operation (FG-COATING)	PTI 120-02 FG-COATING Conditions I.1, I.2, VI.3, VI.4	The permittee did not keep records of: <ul style="list-style-type: none"> <li>• Coating purchase orders</li> <li>• Gallons of coating and clean-up solvent used</li> <li>• Monthly and 12-month rolling time period VOC emissions for the masking process</li> </ul>
All coating operations at the facility (FG-SOURCE)	PTI 120-02 FG-SOURCE Conditions I.1 and VI.1	The permittee did not keep monthly and 12-month rolling time period VOC emissions for the masking process.
HCl tank on C Line vented to a scrubber	Rule 201	The permittee operated an HCl tank on C Line vented to a scrubber without first obtaining a permit to install.
Copper strip solution evaporation	Rule 201	The permittee operated a process involving boiling waste copper strip solution to evaporate liquids.

This process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning. These standards are found in 40 CFR Part 63, Subpart T.

During this inspection, PPI Aerospace was unable to produce emission records.

This is a violation of the recordkeeping and emission limitations specified in Special Condition number 2.1, 2.7, 2.8, 2.9, 4.1a, 4.1b, and 4.3 of PTI number 294-00D and FG-COATING Conditions I.1, I.2, VI.3, VI.4 and FG-SOURCE Conditions I.1 and VI.1 of PTI number 120-02.

The conditions of PTI number 294-00D and 120-02 require maintenance of records, which shall be made available for review upon request by the AQD staff.

During this inspection, it was noted that PPI Aerospace had commenced operation of an unpermitted process at this facility. The AQD staff advised PPI Aerospace on May 17, 2017, that this is a violation of Act 451, Rule 201.

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A program for compliance may include a completed PTI application for the HCl tank and copper strip evaporation process equipment. An application form is available by request, or at the following website: [www.michigan.gov/deqair](http://www.michigan.gov/deqair) (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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 3, 2018 (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 the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If PPI Aerospace 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 violations cited above and for the cooperation that was extended to me during my inspection of PPI Aerospace. 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,



Kerry Kelly  
Environmental Quality Analyst  
Air Quality Division  
586-506-9817

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Joyce Zhu, DEQ