



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

October 8, 2019

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

SRN: N6857, Macomb County

Dear Mr. Clark:

VIOLATION NOTICE

On September 10, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), 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) numbers 120-02 and 294-00F.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
One Detrex VS800 batch vapor degreaser with a built-in freeboard chiller.	PTI No. 294-00F Section III – Special Condition 1. 40 CFR Part 63, Subpart T – National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning.	The permittee did not maintain the vapor degreaser as required by the PTI. The permit requires that the degreaser should contain only clean liquid solvent on the first operating day of each month.

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.

PTI No. 294-00F Section III – Special Condition 1 states, in part, that the permittee shall, on the first operating day of every month ensure that the degreaser contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils.

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The solvent contained in the degreaser on the first operating day of every month does not appear to meet the definition of "Clean Liquid Solvent" as described in PTI No. 294-00F Section III – Special Condition 1. PPI Aerospace must ensure that on the first operating day of every month the degreaser contains only clean liquid solvent.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 29, 2019 (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 Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, 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 violation cited above and for the cooperation that was extended to me during my inspection of PPI Aerospace. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Bognar
Environmental Engineer
Air Quality Division
586-753-3744

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