



GRETCHEN WHITMER
GOVERNOR

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

EGLE
LIESL EICHLER CLARK
DIRECTOR

December 9, 2020

Randy Zimmermann
Thomas Aerospace & Defense
628 North Hamilton
Saginaw, Michigan 48602

SRN: B3607, Saginaw County

Dear Mr. Zimmermann:

VIOLATION NOTICE

On November 18, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an off-site inspection of Thomas Aerospace & Defense located at 628 North Hamilton, Saginaw, Michigan. The purpose of this inspection was to determine Thomas Aerospace & Defense'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 383-08.

During the off-site inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPPLATING	SC III.1a. through c. The permittee shall not operate EUPPLATING unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the packed bed wet scrubber system with mist eliminator, has been implemented and maintained.	The facility does not implement and maintain a MAP.

To comply with PTI 383-08, the facility shall implement and maintain a Malfunction Abatement Plan as described in Rule 911(2), for the packed bed wet scrubber system with mist eliminator. Pursuant to Rule 911(1), the AQD is also requesting a MAP for the baghouse associated with EUWHLBLASTER. The MAP shall, at a minimum, specify the information described in SC III.1.a-c of EUPPLATING in PTI 383-08. The facility shall submit the MAP to the AQD District Supervisor for review and approval.

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Enclosed is a copy of the above cited (rule/regulation).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 5, 2021. 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, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Thomas Aerospace & Defense 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 off-site inspection of Thomas Aerospace & Defense. 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,



Gina L. McCann
Senior Environmental Quality Analyst
Air Quality Division
989-439-2282

cc: Mr. Ryan Rayburn, Thomas Aerospace & Defense
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Chris Hare, EGLE