

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N685839170

FACILITY: PPI Aerospace		SRN / ID: N6858
LOCATION: 23230 Amber Street, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Paul Clark , President		ACTIVITY DATE: 02/16/2017
STAFF: Kerry Kelly	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FCE		
RESOLVED COMPLAINTS:		

On February 16, 2017, I (Kerry Kelly, DEQ-AQD) and Robert Elmouchi (DEQ-AQD) conducted a targeted, unannounced inspection at PPI Aerospace located at 23230 Amber St. in Warren, Michigan. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Rules; NESHAP Subpart T for Halogenated Solvent Cleaners; Permit-To-Install (PTI) 313-00; and Consent Order 43-2001.

Upon arriving at the facility, Robert and I introduced ourselves and stated the purpose of the visit to Ms. Theresa McBride, Plant Manager. Mr. Paul Clark, President, PPI Aerospace and Ms. Layne Joss, Chemistry Lab Technician, came to the facility to participate in the inspection as well. Mr. Clark indicated that PPI Aerospace's Amber Street facility operates from 7:00 AM until 3:30 PM Monday through Friday and employs nine people. The facility also operates on Saturdays and Sundays when necessary. Ms. McBride, Mr. Clark, and Ms. Joss assisted AQD staff during the inspection.

PPI Aerospace's Amber St. facility receives metal and aluminum aircraft and military parts from various clients and primes and coats them prior to sending them back to their customers. PPI Aerospace is located in southern Macomb County and is surrounded by commercial and industrial properties. The nearest residential area is approximately two-tenths of a mile from PPI Aerospace.

Consent Order (CO) 43-2001 became effective November 13, 2001 following violations of R 336.1201 for installing a TCE Batch Vapor Degreaser and a Nital etchline without first obtaining a PTI and failure to comply with 40 CFR 63.463 for alleged violations of the requirements for record keeping, reporting, and monitoring for the degreaser. PTI 313-00, issued to PPI Aerospace on January 25, 2001, included all hazardous air pollutant (HAP) emitting equipment and processes observed at the facility during the August 15, 2000 inspection, including an exempt paint booth. All of the HAP emitting equipment and processes were combined into one flexible group (FG-AIRCRAFT_PARTS) making it a synthetic minor opt-out permit for hazardous air pollutants (HAPs). In addition, the Permit Engineer noted in the permit evaluation "The permit will be an OPT-OUT permit, which will keep the facility from being subject to the ROP." Equipment and processes in PTI 313-00 include: a large paint booth, a nickel etching line, and a batch vapor degreaser. CO 43-2001 reinforces the terms and conditions of PTI 313-00.

PTI 313-00

FG-AIRCRAFT_PARTS

The flexible group FG-AIRCRAFT_PARTS in PTI 313-00 consists of the coating spray booth (EU-SPRAYBOOTH), natural gas-fired oven (EU-METALS_OVEN), Nital etch line (EU-ETCHLINE) and acid tanks, and batch vapor degreaser (EU-DEGREASER). As will be discussed in subsequent paragraphs, it appears EU-ETCHLINE and EU-DEGREASER have been removed from the facility. Special conditions 1 through 7 of PTI 313-00 apply to FG-

AIRCRAFT_PARTS. The 12-month rolling time period HAP emissions from FG-AIRCRAFT_PARTS are limited, in special conditions 1 and 2 of PTI 313-00, to 8.9 tons for each individual HAP and 22.4 tons for aggregate HAPs. Compliance with these limits are demonstrated by the recordkeeping requirements in SC 6. of PTI 313-00. Ms. Joss provided records, required in SC 6, of the gallons used of each HAP containing material (attachment 1), HAP content in lbs/gal of each material (attachment 2), and monthly HAP emissions for the facility (including two exempt paint booths) for July 2016 through February 2017 (attachment 1). Akzo Nobel 666-58-6375, NCP- 53039A 686 Tan, Sherwin Williams - MIL-PRF-23377J, and NCP- N1981A were the coatings most used during this time period according to the records provided. Ms. Joss provided SDSs for the most used coatings (see attachment 3). The highest reported monthly HAP emissions for all paint booths combined (including non-permitted) was 8 lbs (0.004 tons) of xylene and 16 lbs (0.008 tons) aggregate HAPs in January 2017. Both the individual and aggregate HAP reported monthly emissions were within permit limits (each less than one percent of the limits in SC 1 and 2). VOC emissions from FG-AIRCRAFT_PARTS are limited to 0.73 ton (1460 lbs) per 31-day rolling time period and 8.7 tons per 12-month rolling time period in SCs 3. and 4. of PTI 313-00. Compliance with these limits are demonstrated by the recordkeeping requirements in SC 7. of PTI 313-00. Ms. Joss provided records, required in SC 7, of the gallons used of each coating material used (attachment 1), VOC content in lbs/gal of each material (attachment 2), and monthly and yearly VOC emissions for the facility for July 2016 through February 2017 (attachment 1). The highest monthly VOC emissions reported was 0.04 tons (75 lbs) in January 2017. Based on the records provided, the monthly VOC emissions for all paint booths are within permit limits (approximately 5.2 percent of the emission limit in SC 3). Ms. Joss provided records (attachment 4) of the highest possible facility-wide yearly emissions for January 2016 through February 2017, based on actual usage and the coating with the highest VOC content (Catalyst Unitech 10125B at 8.757 lbs/gal). The facility-wide yearly VOC emissions reported was 0.8221 tons, which is below the permit limit (approximately 9.5 percent of the limit in SC 4). Robert and I inspected the coating booth and filter system. There are two HVLP guns in the booth, and the booth can be heated to 110 degrees Fahrenheit. Robert noticed and pointed out the filters, located on the booth floor, were not completely covering the ventilation system opening in at three places in EU-SPRAYBOOTH. Mr. Clark and Ms. McBride said they would have an employee apply filter material to the areas where the filters were missing, mostly along the edge of the ventilation system. During a phone conversation on March 30, 2017, Ms. McBride stated the filters gaps were filled the day of the inspection. Ms. McBride sent photos (attachment 5) of the filter placement. A notice of violation will not be issued for non-compliance with SC 5 because the company has been informed of the violation, appears to have corrected the violation, and has not received any complaints regarding particulate emissions or odors.

EU- ETCHLINE

The nickel etch line (EU-ETCHLINE) permitted in PTI 313-00 was removed from the facility in approximately 2006, according to Ms. McBride. Ms. McBride and Mr. Clark showed Robert and me the area of the building that was once occupied by the etching line; this area is now used for storage. There are three vertical ducts above the area where the etch line used to be that have been cut off approximately three feet below the main horizontal duct near the ceiling. I did not observe an etch line at the facility. The conditions that pertain to EU-ETCHLINE (special conditions 8 through 11 of PTI 313-00) were not evaluated because EU-ETCHLINE appears to have been removed.

EU-DEGREASER

The halogenated solvent degreaser (EU-DEGREASER) permitted in PTI 313-00 was

removed from the facility approximately two to three years ago, according to Ms. McBride. The 2015 annual report, required in 40 CFR 63 Subpart T, and submitted in January 2016 by PPI Aerospace, indicated the degreaser was removed March 20, 2015. Ms. McBride and Mr. Clark showed Robert and me the area of the building that was once occupied by the degreaser. There is a crane above the area where the degreaser had been. The crane was previously used to place parts in the degreaser. I did not observe a degreaser at the facility. The conditions that pertain to EU-DEGREASER (special conditions 12 through 19 of PTI 313-00) were not evaluated because EU-DEGREASER appears to have been removed.

PAINT BOOTHS

In addition to the paint booth permitted in PTI 313-00, there are also two smaller paint booths each with HPLV guns, and associated ovens, used to prime and coat parts. As discussed in the FG-AIRCRAFT_PARTS paragraph; coating usage, HAP, and VOC emissions for these booths were provided by Ms. Joss. The maximum monthly usage reported for all booths combined 30.358 gallons. During the inspection, the filters for each of these booths appeared to be properly installed. According to Ms. McBride the filters are changed as needed. Filter system functionality is checked by dropping a piece of paper in the booth while the booth ventilation is on, according to Ms. McBride. Robert and I inspected the mixing room and waste storage area. Waste is stored in a closed container in a cabinet in the mixing room. Paints are stored in closed containers. Each of these two smaller booths appear to be exempt from the requirement in R 336.1201 to obtain a permit to install pursuant R 336. 1287 (2)(c) because they have a properly installed and operated filtration system, use less than 200 gallons of coating per month, and records of coating use are being kept.

BLASTING UNITS

Robert and I inspected two blast cleaning units at the facility. One of the blast cleaning units uses glass beads and the other uses plastic urea beads. Both blast cleaners vent to a filter located in the building and vented to the general in-plant environment. The blasting machines are exempt from PTI requirements pursuant R336.1285 (2)(l)(vi)(B) because they are used for sand blasting metal parts and vent to the general in-plant environment.

EMISSIONS REPORTING

As a synthetic minor opt-out facility, PPI Aerospace is required to report emissions annually to the Michigan Air Emissions Reports System (MAERS). The 2015 emissions were not reported to MAERS in 2016 as required. Two violation notices were sent to PPI Aerospace for failure to submit the 2015 MAERS report. A response to the violations was never received by the AQD. On June 29, 2016 I visited PPI Aerospace on Groesbeck and spoke with Mr. Clark. Mr. Clark and I phoned Renee Denison, AQD MAERS Coordinator, who helped Mr. Clark access the MAERS database. Mr. Clark said he was busy at the moment and would call Renee on June 30, 2016 to submit the MAERS. Mr. Clark did not call Ms. Denison and did not respond to voicemail messages I left for him on multiple occasions after the June 29, 2016 visit. The 2015 MAERS non-submittal and lack of response from the facility was brought to the attention of the AQD Enforcement Section. AQD decided to target PPI Aerospace for fiscal year 2017 inspection, after which a decision would be made whether or not to proceed with enforcement. The 2015 MAERS was submitted via email on April 10, 2017. During the February 16, 2017 inspection, Mr. Clark said the employee who was responsible for emission reports and records, prior to 2016, Bill Dunn, retired in December 2015 and was not replaced. Ms. Joss, following the inspection, has been compiling and submitting emission records for PPI Aerospace. The submittal of the 2015 MAERS report and the replacement of Mr. Dunn with Ms. Joss will serve as resolution to the

violation notices sent in 2016 for failure to submit the 2015 MAERS report and enforcement action will not be requested as a result. PPI Aerospace submitted the 2016 MAERS report, due March 15, 2017, on March 31, 2017.

CONSENT ORDER 43-2001

CO 43-2001 became effective November 13, 2001 following violations of R 336.1201 for installing a TCE Batch Vapor Degreaser and a Nital etchline without first obtaining a PTI and failure to comply with 40 CFR 63.463 for alleged violations of the requirements for record keeping, reporting, and monitoring for the degreaser. The degreaser and the Nital etchline have been removed from the facility. Compliance with PTI 313-00, included in CO 43-2001, was evaluated in previous paragraphs. I informed Mr. Clark of the CO, that the CO will only be terminated by written request from the company, and the procedure and applicability requirements for having the CO terminated.

CONCLUSION

Based on this inspection, PPI Aerospace's Amber St. facility appears to be in compliance with the applicable conditions of PTI 313-00, CO 43-2001, and the evaluated air quality rules and regulations.

Mr. Clark inquired, via email, about modifying PTI 313-00 to reflect the current operations at the facility. I informed Mr. Clark of the procedure to have PTI 313-00 modified to reflect the company's current business model.

NAME K. Kelley DATE 4/12/17 SUPERVISOR SK