

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

N685850447

FACILITY: PPI Aerospace		SRN / ID: N6858
LOCATION: 23230 Amber Street, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Paul Clark, President		ACTIVITY DATE: 09/11/2019
STAFF: Adam Bognar	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On Wednesday, September 11, 2019, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I, Adam Bognar, conducted a scheduled inspection of PPI Aerospace ("PPI" or the "Facility") located at 23230 Amber Street, Warren, MI. The purpose of this inspection was to determine the facility's compliance status 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 Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) rules; and Permit to Install No. 313-00.

I arrived at the facility at around 9 am. I met with Mr. Paul Clark, President, and Ms. Janette Lutz, Consultant. I identified myself, provided credentials, and stated the purpose of the inspection. Mr. Clark and Ms. Lutz accompanied me during my inspection and explained the current operations at PPI Aerospace.

PPI Aerospace's Amber street facility primes and coats metal military parts received from various clients and sends the coated part back to the client. There are three spray booths at the facility. One relatively large downdraft spray booth, and two smaller booths. The hours of operation are currently 7 am to 3:30 pm.

Mr. Clark stated that PPI Aerospace is working on a plan to move all equipment and processes from this facility to the PPI Aerospace Groesbeck facility. The current owner of this facility wants to sell the building.

**Permit to Install No. 313-00**

PTI No. 313-00 was issued on January 25, 2001 for a spray booth, a natural gas fired hydrogen embrittlement oven, a nitral etch line and acid tanks, and a vapor degreaser. The only permitted equipment remaining at the facility is the spray booth and embrittlement ovens. The nitral etch line and vapor degreaser have been removed from the facility.

**FG-AIRCRAFT\_PARTS**

This flexible group includes all emission units in the permit.

Special Conditions 1,2,3,4: Establishes facility-wide emission limits. Hazardous Air Pollutant (HAP) emissions are limited to 8.9 tons/year of each individual HAP and 22.4 tons/year of total HAP emissions. HAP emission limits are based on a 12-month rolling time period. Facility-wide VOC emissions are limited to 0.73 tons/month based on a 31 day rolling time period and 8.7 tons/year based on a 12-month rolling time period. Based on the records I reviewed during my inspection, VOC and HAP emissions are much lower than this. Mainly water-based paints are used. PPI Aerospace appears to comply with these emission limits.

Special Condition 5: Requires PPI Aerospace to install fabric filters on each spray booth to capture overspray. All three booths were equipped with dry filters during my inspection. The filters appeared to be installed correctly with no gaps. Mr. Clark stated that the filters are changed as needed.

Special Condition 6,7: Specifies recordkeeping requirements. PPI must maintain records of the gallons used of each HAP containing material, the gallons reclaimed of each HAP containing material, the VOC & HAP content of each material, and the hours of operation. This information must be used to calculate individual HAP emissions, aggregate HAP emissions, and VOC emissions on a monthly and 12-month rolling basis.

PPI maintains records of the gallons of each HAP containing material used, the VOC & HAP content of each material used, and the VOC & HAP emission rates of each booth on a monthly/yearly basis. PPI does not currently have a document that sums this information into facility-wide emission rates. This is a violation of PTI No. 313-00 (see discussion at the end of report). Creating this document is as simple as summing the emissions from all three booths into a new excel spreadsheet. I asked PPI Aerospace to create a facility-wide monthly/12-month rolling emissions spreadsheet. I requested that Mr. Clark send me this spreadsheet by the end of September 2019.

EU-ETCHLINE & EU-DEGREASER sections of PTI 313-00 were not evaluated since this equipment has been removed from the facility.

### **Spray Booths**

There are two smaller spray booths located in a separate room from the large downdraft booth. Both booths are equipped with dry filters that appeared to be installed correctly with no gaps in the filter material. Paint usage records in these booths is maintained in the same way as in the large booth. Usage is less than 200 gallons/month based on the records I reviewed. These booths appear to be exempt from Rule 201 requirements pursuant to Rule 287 (2)(c).

In all three booths, waste solvent was stored in sealed drums. There are no cold cleaners at the facility. To clean the guns, an operator pours paint thinner into the gun, shakes it around, then pours the paint thinner into the waste solvent drum.

### **Consent Order**

Consent order 43-2001 became effective on November 13, 2001 following violations of R336.1201 for installing a TCE batch vapor degreaser and a nital etchline without first obtaining a permit to install, and failure to comply with 40 CFR 63.463 for alleged violations of the recordkeeping, reporting, and monitoring requirements for the degreaser. The degreaser and the Nital etchline have been removed from the facility. This consent order is still active. I informed Mr. Clark that he needs to provide the AQD a written request to void this consent order.

### **Compliance Determination**

PPI Aerospace is not operating in 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); Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules; and Permit to Install No. 313-00.

PPI Aerospace failed to maintain records of facility-wide VOC and HAP emissions in accordance with PTI No. 313-00. I discussed this issue with AQD Warren District supervisor Ms. Joyce Zhu. Since PPI Aerospace appears to be in compliance with all other applicable regulations, AQD will use discretion and not issue a violation notice for this permit violation. To make sure this violation is resolved, I asked PPI Aerospace to submit facility-wide emissions to the AQD every month for six months (until March 2020).

NAME Adam Bogren DATE 9/29/2019 SUPERVISOR SK