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RE: N6857 PPI Aerospace VN 5-8-2017

The scrubber installation and in particular the waterfall function was solely designed for the removal of Chrome 6 (hexavalent chrome) associated with the chrome plating operations that ceased to operate and were removed from service at PPI in 2010 after the acquisition by Xray Industries. The hexavalent chrome and related chemistry tanks were removed in early 2011 reflecting a business decision to no longer participate in any chrome 6 plating activities consistent with a related commitment to provide non-hexavalent chrome conversion coating options both with the intended objective of providing significantly lower environmental impact options.

Apparently, a request to modify the permit that had been reported as submitted by former employees in 2012 has not been done and needs to be done to formally document the removal of the chrome and request the permit be modified/rescinded. Based on your feedback that regardless of chrome not being part of any ongoing processing or being retained on site a request to modify the old permit must be submitted as the mechanism for the system to reflect what has factually occurred as confirmed during your audit.

The scrubber observed on 2/15/17 was functioning and continuing to provide ventilation for the non-chrome VOC's as documented and audited by your group. Later the next day (after allowing the heating coils to defrost the water supply lines) we did confirm that the pack bed water supply and other components of the system related to managing Chrome 6 was mechanically functional.

We understand the focus of your letter is referring to a violation of the permit for managing chrome 6 emissions, however the processes and the chemistries for the basis of the permit have not existed in the facility for several years. We will submit a request to remove the permit yet this week.

We also need to address the 23230 Amber Street, Warren consent issue regarding again processes that do not exist at the facility and in the case of the nital etch line have not been in place since late 2007 and the trichlor degreaser removed in 2015.

It is absolutely the intent of PPI Aerospace to meet the relevant environmental requirements and continue to seek alternative chemistries wherever possible to work towards REACH protocol objectives. The loss of the chrome 6 process was a financially painful decision commercially as it was a critical component of the revenue in the past but an indication of PPI's commitment to proactively explore less hazardous options for other legacy chemistries as well.

We have reduced headcounts aggressively over the last 4 years trying to realize a profitable operation consistent with the market dynamics and change in product offerings, this has resulted in gaps in paperwork and quality communication and we are scrambling to get all of our commitments up to date and right. Layne Joss will be the primary interface on the go forward for environmental issues and brings a solid chemistry background to our team.

We thank you for your support and continued communication as we work to meet your expectations.