



October 29, 2019

Mr. Adam Bognar  
Environmental Engineer  
Air Quality Division  
Michigan Department of Environment, Great Lakes, and Energy (EGLE)  
27700 Donald Ct.  
Warren, MI 48092

Subject: PPI Aerospace, Inc. Response to EGLE-AQD October 8, 2019, Violation Notice  
PPI Aerospace's Groesbeck facility (SRN N6857)

Dear Mr. Bognar:

PPI Aerospace (PPI) is providing this letter in response to the Department of Environmental Quality Air Quality Division Violation Notice provided to PPI on October 10, 2019 via mail.

The following is taken from the Violation Notice:

*"Rule/Permit Condition Violated: PTI No. 294-00F Section III – Special Condition 1. 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."*

The following is taken from the Activity Report:

*"The degreaser is not cleaned of soils and filled with clean liquid solvent at the beginning of every month. This is a violation of PTI No. 294-00F (Section III – SC 1) and NESHAP T. The degreaser must contain only clean liquid solvent on the first operating day of each month. A violation notice will be issued to PPI Aerospace for this issue."*

#### **Response to Violation Notice**

As stated in our letter of October 3, 2019, PPI Aerospace disagrees that its operations are a violation of PTI No. 295-00F (Section III-SC 1) and Subpart T of Part 63. 40 CFR 63.465 requires that the owner of a batch vapor degreaser, on the first operating day of every month, ensure that the solvent cleaning machine system 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. This is further explained in 40 CFR 63.461, which states that “clean liquid solvent means fresh unused solvent, recycle solvent, or solvent that has been cleaned of soils (*e.g., skimmed of oils or sludge and strained of metal chips*)”.

It is PPI Aerospace’s standard operating procedures to inspect the solvent periodically as required, or at a minimum on the first operating day of the month, to see that the solvent is free of water, oils or sludge. This is necessary to ensure that the vapor degreaser is working efficiently. If water, oil or sludge is observed, the solvent is cooled and skimmed to remove soils as described in 40 CFR 63.461. Upon cooling of the solvent, the less dense water containing any oils, soils or sludges rises to the top and is decanted.

PPI Aerospace’s operations do not produce metal chips; therefore, the remaining solvent meets the definition of clean liquid solvent. Following the inspection and skimming (if required) of the remaining solvent on the first operating day of the month, fresh unused solvent, is used to return the solvent level to the fill line. ***As stated in the 40 CFR 63.465, the solvent machine does not have to be emptied and filled with fresh unused solvent.***

PPI Aerospace has routinely employed this skimming process whenever regular inspections or poor parts cleaning indicated it is required. We regret this process was not adequately described during your site visit on September 10, 2019. On October 1, 2019, the required inspection was performed and the skimming process was not deemed necessary. Fresh unused solvent was added to return the solvent level to the fill line.

#### **Corrective Actions**

Immediately and going forward, PPI Aerospace will ensure this inspection and skimming process (if required) occurs on the first operating day of the month and will maintain appropriate records.

Sincerely,



R. Paul Clark - President  
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Cc/via mail: Ms. Jenine Camilleri, Enforcement Unit Supervisor, EGLE