

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

N685744392

FACILITY: PPI Aerospace		SRN / ID: N6857
LOCATION: 23514 Groesbeck Highway, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Paul Clark , President		ACTIVITY DATE: 05/03/2018
STAFF: Kerry Kelly	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FCE: Facility appears to be in non-compliance with conditions in PTI 294-00D and PTI 120-02.		
RESOLVED COMPLAINTS:		

On May 3, 2018 and May 16, 2018, I (Kerry Kelly) conducted a targeted, unannounced inspection at PPI Aerospace located at 23514 Groesbeck in Warren, Michigan. Adam Bognar, DEQ, and Joe Forth, DEQ, accompanied me on the May 3, 2018 inspection. The purpose of the inspection was to determine the facility's 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; National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR 63 Subpart N); National Emission Standards for Halogenated Solvent Cleaning (40 CFR 63 Subpart T); and Permit-to-Install numbers 294-00D, 120-02, and 3-03.

Upon arriving at the facility, Adam, Joe, and I entered the office, introduced ourselves, and stated the purpose of the visit to Mr. Paul Clark, President PPI Aerospace. Mr. Clark indicated that PPI Aerospace operates two shifts Monday through Friday from 6:00 AM until 10:00 PM and employs approximately 40 people. The facility also operates on Saturdays and Sundays when necessary. Mr. Clark assisted Adam, Joe, and me during the inspection.

PPI Aerospace performs surface finishing, electrolytic and electroless metal plating, and conversion coating of metal parts for gear companies in the area. According to Mr. Clark, the chemistry requirements for the coatings are specified by end users, including Rolls-Royce. This facility is located in southern Macomb County and is bounded by commercial and industrial properties to the north, south and west and residential to the east.

Equipment/processes used in the surface finishing, electrolytic and electroless metal plating, and conversion coating of metal parts at PPI Aerospace include; six plating/coating lines (A, B, C, D, E, and F), a halogenated solvent degreaser, sand blasting units, four electric ovens, a cold cleaner, a boiler, and a masking application. Mr. Clark stated he is not aware of any surfactant or fume suppressant use at the facility.

Three permits (PTI 294-00D, PTI 120-02, and PTI 3-03) were approved by the AQD for the A Line, B Line, halogenated solvent degreaser, masking application, and black oxide processes at PPI Aerospace on Groesbeck. PTI 294-00D is a synthetic minor opt-out permit for hazardous air pollutants (HAPs). Emission units permitted in PTI 294-00D include; A Line (EUALINE), B Line (EUBLINE), and the halogenated solvent degreaser (EUDEGREASER). PTIs 120-02 and 3-03 are both general surface coating permits. PTI 120-02 was issued for the black oxide coating process and PTI 3-03 was issued for the masking application process.

PTI 294-00D

Adam, Joe, and I inspected the six plating/coating lines at PPI Aerospace on Groesbeck. Lines A through E are located in the main "front" building and Line F is located in the "back" building. A list of the tanks at the facility and whether each tank is permitted or exempt from permitting was provided by PPI Aerospace following the February 15, 2017 inspection (attachment 1). According to Mr. Clark, the tank configuration has not changed since last inspection. Based on my observations at the facility the information in the tank list appears to be accurate other than an HCl tank on the C-Line (C-8) is listed as not being ventilated, however, I observed a ventilation hood for this tank. The plating lines appear to be subject to the National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations in 40 CFR 63 Subpart WWWWWWW. Compliance with 40 CFR 63 Subpart WWWWWWW was not evaluated during this inspection because the AQD has not accepted delegation to enforce 40 CFR 63 Subpart WWWWWWW.

EUALINE

The A Line process previously included hard and decorative chrome plating and was permitted in PTI 294-00D. According to Mr. Clark, the company removed the chrome plating tanks in 2011. I observed gaps in the A Line where Mr. Clark indicated the chrome tanks had been. I did not observe any tanks identified as chrome plating

tanks nor tanks that appear to be electrolytic chrome plating tanks during the inspection. According to PTI 294-00D, emissions from 18 of the tanks on the chrome plating line were controlled by a draft being drawn across the surface of each tank and sent to a packed bed scrubber (PBS) with mist eliminator. Currently, there are six tanks on the A Line vented to the PBS through the A Line plenum; two HCl tanks (A-5 & A-6), the copper strip tank (A-21), the rack stripper tank (Tank A-29), the passivation tank (Tank A-31), and the sulfamate nickel tank (A-35). These tanks are included in PTI 294-00D under EUALINE and are identified as venting to the PBS. Tanks A-5 and A-6 are labeled as containing HCl, however, Mr. Clark stated they contain water. Neither Tank A-5 nor A-6 appeared to be part of the active plating process and were included in the PTI as containing HCl and sulfuric acid respectively. Tank A-29, which now is identified as containing rack stripper, was permitted as containing olive drab. Currently, silver-plating takes place on the A Line. The conditions pertaining to chromium plating and 40 CFR 63 Subpart N, delineated in PTI 294-00D Special Conditions (SCs) 1.1a through 1.15, appear to no longer be applicable to the company's operations because the chrome plating tanks have been removed, SCs 1.1a through 1.15 were not evaluated as a result. Mr. Clark inquired, via email, about modifying PTI 294-00D to reflect the current operations at the facility. I informed Mr. Clark of the procedure to have PTI 294-00D modified to reflect the company's current business model.

Mr. Clark showed me five tanks parallel to the A-Line which are not used for plating. According to Mr. Clark, one of these tanks contained crusty chrome and another contained waste copper strip solution. The waste copper strip solution is heated to evaporate off liquid creating a sludge which is pumped out. Copper strip contains cyanide compounds. Emissions from these tanks are released to the general in-plant environment. It appears the process of evaporating the copper strip solution is not permitted. A violation of R 336.1201 will be issued for this process.

EUBLINE

The B Line is an emission unit (EUBLINE) in PTI 294-00D. There are tanks on EUBLINE identified as containing hydrochloric acid, hydrochloric acid and nickel, sulfuric acid, and copper strip. A list of tanks on the B-Line is attached (Attachment 1). During the inspection I noted there were eleven tanks on the B-Line with hoods that were connected to the B Line plenum which is directed to the same PBS with mist eliminator as the A line. PTI 294-00D SCs 3.1 through 3.3 apply to EUBLINE. These conditions require a PBS with mist eliminator be installed (SC 3.1) and operated at a minimum flow rate of 120 gallons per minute (SC 3.1). A device to monitor and record the scrubber flow rate is required in SC 3.2 and records of the scrubber flow rate are required in SC 3.3. During the opening meeting Mr. Clark stated the scrubber water should be running but he hasn't looked in a week or so. Records of the scrubber flow rate, required in SC 3.3, were requested for 2017 and have not been received to date. Mr. Clark also stated during the opening meeting that the filters on the scrubber had been cleaned even though chrome is no longer being used. While in the plant I inspected the control panel for the PBS and noted the blower was on and the water flow meter was fluctuating between 150 – 200 gallons/minute. The pressure drop gauge for Line B, located near scrubber stack, read approximately 2.25 inches of water. A violation notice for special condition 3.3 of PTI 294-00D will be issued for failure to maintain scrubber flow rate records.

C Line

Electroless nickel plating and white layer removal takes place on the C Line. All tanks on the C-Line, except a tank labeled as containing HCl (C-8), vent to the general in-plant environment. In 2017, tank C-8 was operating under R 336.1290(2)(a)(i) exemption. The records provided in 2017 demonstrating compliance with R 336.1290(2)(a)(i) indicated the HCl emissions from this tank were approximately 9 lbs per year. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions from tank C-8 were not provided during the May 3, 2018 inspection. Operation of tank C-8 appears to be a violation of R 336.1201.

EUDLINE

The D Line is an electroless plating line with emissions that vent to the general in-plant environment. The D Line was listed as a gold plating line (EUDLINE) in PTI 284-00D but did not have an associated table with requirements. Currently an Alodine layer is applied to parts on the D-Line. Tanks on the D-Line include Alodine 1600 (contains <1% hexavalent chromium) and Ridoline 289. This line appears to be exempt from PTI requirements pursuant Rule 285(2)(r)(i) because it is a surface treatment process with emissions released only into the general in-plant environment. These tanks do not appear to be subject to 40 CFR 63 Subpart N because, according to 40 CFR 63.340(c), tanks that contain a chromium solution, but in which no electrolytic process occurs, are not subject to this subpart

E Line

The E-Line is used for conversion coating and the tanks vent to the general in-plant environment. This line appears to be exempt from the requirement to obtain a PTI pursuant to R 336.285(2)(r)(i) because it is a surface

treatment process with emissions released only into the general in-plant environment.

F Line

The F-line is an electroless chemical conversion line with emissions that vent to the general in-plant environment. The F line is another Alodine application line. Tanks on the F-Line are identified as containing Alodine 5200 and Alodine 5900. Alodine 5200 and Alodine 5900 contain tri-valent chromium. It appears the F Line is exempt from PTI requirements pursuant Rule 285(r)(i) because it is a surface treatment process with emissions released only into the general in-plant environment. These tanks do not appear to be subject to 40 CFR 63 Subpart N because, according to 40 CFR 63.340(c), tanks that contain a chromium solution, but in which no electrolytic process occurs, are not subject to this subpart.

EUDEGREASER

The "Detrex Model VS800" batch vapor degreaser at the facility is identified as EUDEGREASER in PTI 294-00D. EUDEGREASER is subject to the National Emission Standards for Halogenated Solvent Cleaning (40 CFR 63 Subpart T). Applicable 40 CFR 63 Subpart T requirements were incorporated into PTI 294-00D under EUDEGREASER.

Emission limits, process/operational limits, monitoring, and recordkeeping/reporting/notification requirements for EUDEGREASER are identified in SCs 2.1 through 2.9 in PTI 294-00D.

SC 2.1 limits trichloroethylene emissions to 8.9 tons/year. Compliance with the emissions limit is determined by monitoring and recordkeeping requirements in SCs 2.6, 2.7, 2.8, and 2.9. These conditions include, but are not limited to, keeping machine openings completely covered during idling mode, monitoring records, emissions records, and reporting. Records required in SCs 2.7 - 2.9 were requested and have not been received. A violation notice for SCs 2.1, 2.7, 2.8, and 2.9 of PTI 294-00D will be issued.

Appendix A: Control Requirements for Degreasers

Special Condition 2.2 requires compliance with the control requirements of 40 CFR 63.463(b), (e) & (f) which are included in Appendix A of PTI 284-00D. 40 CFR 63.463(b), (e) & (f) and Appendix A of PTI 284-00D require the following:

1. The ratio of the solvent cleaner freeboard height to the smaller interior dimension (length, width or diameter) of the solvent cleaner shall be at least 1.0
2. A demonstration that the degreasing equipment can achieve and maintain an idling mode emission limit of 0.045 pounds per hour per square foot of solvent/air interface area using the procedures in 40 CFR 63.465(a) and Appendix A of Subpart T to make this demonstration
3. The idling mode cover shall be in place and completely cover the machine openings when parts are not in the solvent cleaner and the cover shall be maintained free of cracks, holes and other defects to control emissions.

I inspected the vapor degreaser located at the end of the A Line. Emissions from the degreaser are released to the general in-plant environment. The ratio of the freeboard height to the interior width appeared to be at least 1 based on my observation. PPI Aerospace appears to be in compliance with number 1 of Appendix A.

Records of the idling mode emission limit demonstration, required in SC 2.8 and Appendix E number 7 of PTI 284-00D, were not provided. It appears PPI Aerospace is in violation of SC 2.2 (Appendix A, Number 2) and 2.8 (Appendix E, Number 7) of PTI 294-00D for not providing records to demonstrate an idling mode emission limit of 0.045 pounds per hour per square foot of solvent/air interface area.

During the May 3, 2018 inspection, I noticed and pointed out a space approximately 2 inches wide and 36 inches long where the degreaser cover didn't completely cover the degreaser opening. Mr. Clark adjusted the cover at that time to more completely cover the opening. On May 16, 2018, Mr. Clark showed me that he had the seals replaced on each side of each degreaser door. The previous gap was covered nearly completely, leaving an approximately 0.5 inch x 1 inch gap on one side. Records of the monthly cover inspections, required in SC 2.8 (Appendix E, Number 2) of PTI 294-00D, were requested and have not been received to date. It appears PPI Aerospace is in violation of SC 2.2 (Appendix A, Number 3) and SC 2.8 (Appendix E, Number 2) because the idling mode cover did not completely cover the openings to EUDEGREASER and records of the monthly cover inspections were not provided. The cover not completely covering the degreaser opening is also a violation of SC 2.3 (Appendix B, Number 1). A notice of violation will be sent for the violation of SC 2.2, 2.8, and SC 2.3 of PTI 294-00D.

Appendix B: Work and Operation Practices for Degreasers

Special Condition 2.3 requires compliance with the control requirements of 40 CFR 63.463(d)(1) through (d)(12) which are included in Appendix B of PTI 284-00D. 40 CFR 63.463(d)(1) through (d)(12) and Appendix B of PTI 284-00D require the following:

1. Covers that completely cover the EUDEGREASER openings shall be in place during the idling mode and the downtime mode (unless the solvent has been removed from EUDEGREASER or maintenance or monitoring is being performed that requires the covers to not be in place),
2. Parts baskets or parts being cleaned in an open-top batch solvent cleaner not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 3 feet per minute or less,
3. Spraying operations be done within the vapor zone or within a section of EUDEGREASER that is not directly exposed to the ambient air
4. Parts be oriented so that the solvent drains from them freely
5. Parts or parts baskets not be removed from EUDEGREASER until dripping has stopped
6. The primary condenser be turned on before the sump heater during start-up of EUDEGREASER
7. The sump heater shall be turned off, and the solvent vapor layer allowed to collapse before the primary condenser is turned off during shut-down of EUDEGREASER
8. The solvent be transferred using threaded or other leak-proof couplings and closed plumbing directly to the sump or waste drum, and the end of the pipe in the solvent sump or waste drum shall be located beneath the liquid solvent surface when solvent is added to or drained from EUDEGREASER
9. EUDEGREASER and associated controls shall be maintained as recommended by the manufacturer of the equipment or by using alternate maintenance practices that have been demonstrated to the Department's satisfaction to achieve the same or better results as those recommended by the manufacturer
10. Each operator of EUDEGREASER shall complete and pass the applicable sections of the solvent cleaner operating procedures tests as given in Appendix B of 40 CFR Part 63 Subpart T if requested by the Department
11. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers
12. Sponges, fabric, wood, and paper products shall not be cleaned in EUDEGREASER.

Compliance with number Appendix A, Number 1 was addressed in the preceding paragraph.

I did not see an operator for the degreaser during the inspection and, therefore, was unable to determine the start-up and shut-down procedures used by the operator and did not request an operator take the test on solvent cleaning procedures addressed in 40 CFR 63.463(d)(10). In addition, parts were not being loaded into or unloaded from the degreaser during the inspection. I did observe, briefly, documents regarding operating instructions for the degreaser and asked Mr. Clark to send me a copy. I have not yet received the copy of the operating instructions. Compliance with conditions that involved machine operating procedures and loading and unloading parts were not evaluated.

I spoke with the maintenance person, Dave, regarding how the degreaser is maintained. Dave showed me the manual for the degreaser and stated he follows the maintenance procedures recommended by the manufacturer. According to Mr. Clark, the chiller on the degreaser was low on freon at some point in the last year and this issue was addressed. I asked for records of maintenance/repairs on the degreaser, as required in Appendix E, Number 4, and have not received records to this date.

According to Mr. Clark, waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. I did not observe any storage containers for waste TCE during the inspection.

Mr. Clark and Dave stated that only metal parts and aluminum are cleaned in the degreaser.

Appendix C: Design Requirements for Degreasers

Compliance with the design requirements in 40 CFR 63.463(a)(1) through (a)(7), included in Appendix C of PTI 284-00D, is required in SC 2.4.

Compliance with numbers 1 and 2 in Appendix C of PTI 294-00D were evaluated in previous conditions of EUDEGREASER.

Numbers 3 through 6 of Appendix C require:

- The use of an automated parts handling system, capable of moving parts or parts baskets at a speed of 11 feet per minute or less from the initial loading of parts through the removal of cleaned parts
- EUDEGREASER be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils
- EUDEGREASER be equipped with a vapor level control device that shuts off the sump heat if the vapor level rises above the height of the primary condenser
- EUDEGREASER shall be equipped with a primary condenser

Compliance with the parts handling system capable of moving parts at a speed of 11 feet per minute or less is demonstrated by compliance with recordkeeping requirement in number 5 of Appendix E of PTI 294-00D. Records of the monthly hoist speed determinations were requested and have not been received to date. Failure to submit records of the hoist speed determinations indicates a violation of SC 2.4 (Appendix C, Number 3 and Appendix E, Number 5).

I briefly observed the manual for the degreaser which appear to include equipment design specification and asked Mr. Clark for a copy of the manual or maintenance instructions. I have not received a copy of the manual to date. Based on my inspection, and brief review of the manual, I was unable to determine if the degrease is equipped with a device that shuts off the sump. These conditions were not evaluated.

During my inspection of EUDEGREASER I observed a primary condenser as required in 40 CFR 63.463(a)(6) and number 6 of Appendix C.

Appendix D: Monitoring Requirements for Degreasers

SC 2.6 requires EUDEGREASER be operated in compliance with the monitoring requirements in 40 CFR 63.466 which are included in Appendix D of PTI 294-00D. Compliance with the requirements in 40 CFR 63.466 (c) and Appendix D of PTI 294-00D (cover inspections, hoist speed monitoring, and hoist speed determination) were evaluated in previous paragraphs.

Appendix E: Recordkeeping Requirements for Degreasers

Records required in SCs 2.7 and 2.8 have been addressed in previous paragraphs. SC 2.9 requires submittal of reports specified in 40 CFR 63.468. Required reports in 40 CFR 63.468 include an annual report submitted by February 1 of the year following the reporting year (40 CFR 63.468(f)) and a semi-annual exceedance report, postmarked by the 30th day following the end of each calendar half (40 CFR 63.468(h)). The annual report for 2017 and semi-annual exceedance report for the second half of 2017 have not been received. Failure to receive these reports by February 1, 2018 appears to be a violation of SC 2.9 of PTI 294-00D and 40 CFR 63.468(f) and (h).

FGFACILITY

PTI 294-00D is a synthetic minor opt-out permit for HAPs. PPI Aerospace's status as a minor source of HAPs is contingent upon compliance with the facility-wide individual HAP limit of 8.9 tons per 12-month rolling time period and the facility-wide aggregate HAP emission limit of 22.4 tons per 12-month rolling time period set forth in SCs 4.1a and 4.1b of PTI 294-00D.

Compliance with SC 4.1a and 4.1b of PTI 294-00D is demonstrated by the recordkeeping requirements set forth in SC 4.3 of PTI 294-00D. Records of the facility-wide HAP emissions required in SC 4.3 were requested and have not been received to date.

EUCOLDCLEANER1 and EUCOLDCLEANER2

Two "Graysmills Clean-O-Matic" cold cleaners are included in PTI #294-00D. The cold cleaners, according to PTI #294-00D, use a 50% mixture of toluene and methyl ethyl ketone (MEK). I observed one cleaner tank with an approximately 6 foot air vapor interface, closed lid, and instructions posted on it. According to Mr. Clark, the cold cleaner I inspected is the only cold cleaner at the facility and uses MEK. MEK is also used in the masking area to clean parts. I did not see a cold cleaner in the masking area. MEK has a Reid vapor pressure of 3.5 psia and was removed from the HAP list by the EPA in December 2005. The ratio of the freeboard to the width of the cleaner I inspected appeared to be equal to or greater than 0.7. An exhaust hose was hanging approximately four feet above the top of the cold cleaner. Mr. Clark said the exhaust is not yet operational but its function, when operational, will be to draw any vapors away from the operator when the lid is opened to insert or remove

parts. The cold cleaners included in PTI 294-00D have no table of applicable requirements. The cold cleaner observed appears to meet the requirements in R 336.1707.

PTI 03-03

PTI 03-03 is a general PTI for three black oxide dip coating tanks used to apply a conversion coating to the metal parts. Generally, black oxide provides corrosion resistance by converting the surface of metal to magnetite (https://en.wikipedia.org/wiki/Black_oxide). I inspected the black oxide process at PPI Aerospace. The black oxide process tanks include Enprep 146 cleaner, black oxide, oil dip, and chromic acid rinse and vent to the general in-plant environment. This process appears to exempt from the requirement to in R 336.1201 to obtain a permit to install per R 336.1285(2)(r)(i). In addition, the requirements in PTI 03-03 do not appear to apply to this process, and were not evaluated, because black oxide does not meet the definition of surface coating (it is not applied on the surface of a material).

PTI 120-02

Masking takes place in the masking room and primarily involves the use of MEK and Microstop. The masking process involves cleaning parts and applying, with a brush, a masking agent to areas of parts that the company does not want plated, before plating the part. Emissions from the masking application area are drawn through hoods, uncontrolled, to a stack that is vertical and unobstructed. I did not inspect the stack during the inspection and, as a result, did not determine compliance with the stack restrictions in PTI 120-02. Conditions I.1. and I.2. restrict the VOC emissions from the masking process to 2,000 lbs per calendar month and 10 tons per year respectively. Compliance with the emission limits is shown through records required in SC VI.3 of PTI 120-02. Records of the VOC emissions were requested and have not been received to date. PPI Aerospace appears to be in violation of FG-COATING SCs I.1, I.2, VI.3, and VI. 4 and FG-SOURCE Conditions I.1 and VI.1 of PTI 120-02.

BLAST CLEANING

There are a total of five blast cleaning units at the facility. All blast cleaners vent to one of two Torit filters 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 cleaning metal parts and vent to the general in-plant environment.

BOILER

An Industrial Boiler Company natural gas-fired boiler is used to heat the metal plating and treatment tanks. I inspected the burner nameplate for the boiler. According to the burner nameplate, the boiler has a maximum rated heat capacity of 5.2 MMBtu/hour (5,200 MBtu) and was manufactured in 1987. The boiler appears to be exempt from the requirement in R336.1201 to obtain a permit to install pursuant to R336.1282(2)(b)(i) and not subject to 40 CFR 63 Subpart DDDDD because the facility is not a major source of HAPs. Compliance with the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources in 40 CFR 63 Subpart JJJJJJ were not evaluated because the AQD has not accepted delegation to enforce 40 CFR 63 Subpart JJJJJJ. The This boiler does not appear to be subject to the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 63 Subpart Dc) because the rated heat input capacity is less than 10 MMBtu/hour.

EMERGENCY GENERATOR

According to Mr. Clark there is a natural gas-fired emergency generator at the facility that has not been used recently. The generator is located outside the building and is approximately 1.5 feet x 3 feet x 3 feet. Regulatory applicability and compliance was not evaluated for the generator.

METAL FABRICATING/MACHINING EQUIPMENT

Located in the back building there is a drill press, band saw, two welders and a drill that vent to the general in-plant environment. This equipment appears to be exempt from the requirement to obtain a permit to install per R336.1285(2)(i) and R336.1285(2)(l)(vi) because the emissions are released into 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). To date, the 2017 emissions have not reported to MAERS as required. The deadline for submitting the 2017 MAERS report was March 15, 2018. A violation notice will be sent for failure to submit the 2017 MAERS report.

COMPLIANCE DETERMINATION

PPI Aerospace, based on this inspection, appears to be in violation of the following:

- PTI 294-00D Special Conditions 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 2.9, 3.3, 4.1a, 4.1b and 4.3
- PTI 120-02 FG-COATING Special Conditions I.1, I.2, VI.3, and VI. 4 and FG-SOURCE Special Conditions I.1 and VI.1.
- Failure to submit 2017 MAERS report

A violation notice will be issued to PPI Aerospace for the aforementioned violations

NAME K. Kelly

DATE 5-17-18 SUPERVISOR

James St