



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

January 30, 2015

Mr. Paul Clark
PPI Aerospace
23514 Groesbeck
Warren, MI 48089

SRN: N6857, Macomb County

Dear Mr. Clark:

VIOLATION NOTICE

On January 9, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of PPI Aerospace located at 23514 Groesbeck, Warren, Michigan. The purpose of this inspection was to determine PPI Aerospace's 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); the administrative rules and the conditions of Permit to Install (PTI) numbers 120-02, 3-03, and 294-00D.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Recordkeeping Provisions for Halogenated Degreaser	PTI #294-00D, Appendix E.2	Company failed to maintain monthly cover inspection records for the 2014 calendar year
Recordkeeping Provisions for Halogenated Degreaser	PTI #294-00D, Appendix E.5	Company failed to maintain monthly hoist speed determination records for the 2014 calendar year
Recordkeeping Provisions for Halogenated Degreaser	MACT Subpart T (40 CFR Part 63, Subpart T) for Halogenated Cleaning	Company is not maintaining monthly cover inspection records or monthly hoist speed determination records as required by MACT Subpart T.

This process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaners. These standards are found in 40 CFR Part 63, Subpart T.

During this inspection, PPI Aerospace was unable to produce maintenance records for the halogenated solvent cleaner.

This is a violation of the recordkeeping requirements specified in Appendix E of PTI number 294-00D.

The conditions of PTI number 294-00D Appendix E requires PPI Aerospace to maintain monthly records of monthly cover inspections and monthly hoist speed determinations. These records were not available for the 2014 calendar year at the time of the inspection.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 20, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If PPI Aerospace believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of PPI Aerospace. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Erik Gurshaw
Environmental Quality Analyst
Air Quality Division
586-753-3743

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ