

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

N685828504

FACILITY: PPI Aerospace		SRN / ID: N6858
LOCATION: 23230 Amber Street, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Bill Dunn , Process Control Engineer		ACTIVITY DATE: 01/14/2015
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 FCE Inspection		
RESOLVED COMPLAINTS:		

SRN: N6858

COMPANY: PPI Aerospace

COMPANY ADDRESS: 23230 Amber St.; Warren, MI 48089

PURPOSE OF INSPECTION: Targeted

CONTACT PERSON: Mr. Bill Dunn, Process Control Engineer (Ph: 586-772-7736; Fax: 586-772-8682; E-mail: bdunn@ppiaerospace.com)

COMPANY PHONE NUMBER: 586-772-7736

On January 14, 2015, AQD staff, Erik Gurshaw, conducted a targeted, unannounced inspection at PPI Aerospace located at 23230 Amber St. in Warren, Michigan. The purpose of the inspection was to determine 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; NESHAP Subpart T for Halogenated Solvent Cleaners; Permit-To-Install (PTI) # 313-00; and Consent Order # 43-2001.

Upon arriving at the facility, AQD staff introduced themselves and stated the purpose of the visit to Ms. Teresa McBride, Plant Manager (Ph: 586-757-4726; Cell: 586-904-1214; Fax: 586-758-7005; E-mail: tmcbride@ppiaerospace.com). Ms. McBride indicated that PPI Aerospace's Amber Street facility operates from 7:00 AM until 3:30 PM Monday through Friday and employs 9 people. The facility also operates on Saturdays and Sundays when necessary. Ms. McBride assisted AQD staff during the inspection.

PPI Aerospace's Amber St. facility receives metal and aluminum aircraft and military parts from various clients, degreases them in a halogenated solvent parts degreaser, and primes and coats them prior to sending them back to their customers. PPI Aerospace's customers include Northstar, Futuramic, Triumph, Boeing, Rolls-Royce, Bell Helicopter, Burttek, Raytheon, General Dynamics, and Goodrich Landing Gear.

PPI Aerospace's Amber St. facility has an opt-out permit (PTI # 313-00) for a large paint booth, a nickel etching line, and a halogenated cold cleaner and a consent order which reinforces the terms and conditions of the permit. The facility has VOC emission limits of 0.73 ton per 31-day rolling time period and 8.7 tons per 12-month rolling time period for the large paint booth and a facility-wide 8.9 ton individual and 22.4 ton aggregate 12-month rolling time period emission limit for HAPs. The nickel etching line was removed from the facility a long time ago and the area of the building once occupied by this line is now used for storage. The facility also has an 8.9 ton per 12-month rolling time period trichloroethylene (TCE) emission limit for its halogenated cold cleaner. During the inspection, AQD staff verified that the facility is recording the following information on a monthly basis: the gallons of each HAP-containing material used; the HAP content, in pounds per gallon, of each material used; and the VOC content of each coating used. The facility is recording this information on a daily basis as required by its permit, but emission calculations had not been made for the 2014 calendar year because the person responsible for compiling the records was fired by the company during 2014 and nobody was hired to replace him. Therefore, AQD staff contacted Mr. William Dunn, Process Control Engineer for the company, and gave him until February 6, 2015, to compile the facility's emission records from the usage records. Mr. Dunn E-mailed AQD staff emission calculations from January 2010 through December 2014 on February 3, 2015. These records indicate that monthly and 12-

month rolling VOC emissions from the large paint, individual HAP and aggregate HAP emissions for the entire facility, and TCE emissions from the halogenated cold cleaner have been well below the emission limits established in the PTI. The facility submitted the annual report for its vapor degreaser as required by NESHAP Subpart T for Halogenated Solvent Cleaners on January 10, 2015 (the report was received by the AQD on January 23, 2015). The annual report demonstrated that the facility is in compliance with the operational limits, equipment limits, and monitoring/recordkeeping requirements of NESHAP Subpart T. The following emission records from January 2010 through December 2014 are attached to this report: 31-day rolling VOC emission records and 12-month rolling VOC emission records from the large paint booth; individual and 12-month rolling HAP emission records for the entire facility; and 12-month rolling TCE emission records from the halogenated solvent cleaner.

The facility also has 2 small paint booths which it uses to prime and coat parts. Based on a review of the company's usage records, these booths are exempt from PTI requirements pursuant Rule 287(c). The company is including emissions from them in its 12-month rolling HAP emission calculations, however. VOC and HAP emission records from the 2 small paint booths are attached to this report.

During the inspection, AQD staff verified that filters were properly installed and maintained on each of the 3 paint booths and that they exhaust vertically unobstructed to the ambient air. The only booth in operation at the time of the inspection was the large paint booth. No visible emissions were observed to be emanating from the stack of the large booth at the conclusion of the inspection. The degreaser had not been operated for more than a week at the time of the inspection and was in need of repair. AQD staff verified that the cover of the degreaser had no holes, cracks, or visual defects during the inspection and noted that the degreaser's operational and maintenance manual was attached to it. The facility records the chiller temperature of the degreaser each time it is used (AQD staff saw the temperature records attached to the degreaser) and operates it in accordance with NESHAP Subpart T for Halogenated Solvent Cleaners.

Based on this inspection, PPI Aerospace's Amber St. facility appears to be in compliance with the terms of its PTI # 313-00, NESHAP Subpart T for Halogenated Solvent Cleaners, and all other applicable air rules and regulations. The annual report required by NESHAP Subpart T is in the facility's blue NESHAP file folder.

NAME Erik Hurshaw DATE 2/10/15 SUPERVISOR CTE