



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

July 7, 2022

Timothy Irvine  
Duncan Aviation, Inc.  
15745 South Airport Road  
Battle Creek, Michigan 49015

SRN: N3303, Calhoun County

Dear Timothy Irvine:

**VIOLATION NOTICE**

On June 3, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Duncan Aviation located at 15745 South Airport Road, Battle Creek, Michigan. The purpose of this inspection was to determine Duncan Aviation'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 254-05B;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-PaintHangar4	PTI No. 254-05B Special Condition (SC) VI.3.a	The facility is required to keep a record of the date and differential pressure measurement, for EU-PaintHangar4, on a calendar day basis. No records were available to review of the daily differential pressure measurement.
EU-PaintHangar5	PTI No. 254-05B SC VI.3.a	The facility is required to keep a record of the date and differential pressure measurement, for EU-PaintHangar5, on a calendar day basis. No records were available to review of the daily differential pressure measurement.

FG-2005Equipment	PTI No. 254-05B SC VI.3.a	The facility is required to keep a record of the date and differential pressure measurement, for FG-2005Equipment, on a calendar month basis. No records were available to review of the daily differential pressure measurement.
EU-PaintHangar4, EU-PaintHanger5, FG-2005Equipment, FG-Facility	PTI No. 254-05B, SC V.1	The facility is required to determine the VOC content, water content, and density of any coating, stripping, and/or other material (material), as applied and as received, using federal Reference Test Method 24. The facility may request written approval by the AQD District Supervisor, to determine the VOC content from manufacturer's formulation data. The facility has not completed the Method 24 testing no written approval has been given, by the AQD to use manufacturer's formulation data.
FG-FACILITY	PTI No. 254-05B, SC II.1	The facility is limited to 55 gallons/year for low-use coatings. According to records provided, between May 2021 and April 2022, the facility used 805.5 gallons of this type of coating.

During this inspection, Duncan Aviation was unable to produce daily or monthly differential pressure measurement records for EU-PaintHangar4, EU-PaintHangar5, or FG-2005Equipment which contains EU-PaintHangar6.

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This is a violation of (the recordkeeping and emission limitations) specified in Special Condition VI.3.a for the above cited emission units and flexible group in PTI number 254-05B.

The facility is required to determine the VOC content, water content, and density of any coating, stripping, and/or other material (material), as applied and as received, using federal Reference Test Method 24. The facility may request written approval by the AQD District Supervisor, to determine the VOC content from manufacturer's formulation data. The facility has not completed the Method 24 testing no written approval has been given, by the AQD to use manufacturer's formulation data.

Under FG-FACILITY, the facility is limited to 55 gallons/year for low-use coatings. According to records provided, between May 2021 and April 2022, the facility used 805.5 gallons of this type of coating. This is an exceedance of the allowable limit by 750.5 gallons.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 28, 2022 (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.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49015 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Duncan Aviation, Inc.. 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,

A handwritten signature in cursive script, appearing to read "Amanda Chapel".

Amanda Chapel  
Senior Environmental Quality Analyst  
Air Quality Division  
(269)910-2109

cc: Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Jenine Camilleri, EGLE  
Christopher Ethridge, EGLE  
Rex Lane, EGLE