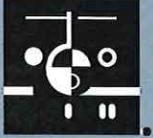


**DUNCAN
AVIATION**



RECEIVED
AUG 01 2022
AQD - KALAMAZOO

July 27, 2022

EGLE
7953 Adobe Road
Kalamazoo, MI 49009

Dear Ms. Amanda Chapel,

We received the **Violation Notice** regarding Air Permit 254-05B dated **July 7, 2022**.

Our response to the violation of **SC VI.3.a** for **EU-PaintHangar4, EU-PaintHangar5, and FG-2005 Equipment**:

Duncan Aviation has made changes to comply with this special condition by adding a paint booth pressure document to each booth to be monitored when in use.

Our response to the violation of **SC V.1** for **EU-PaintHangar4, EU-PaintHangar5, and FG-2005 Equipment**:

Duncan Aviation uses numerous new products every month and Method 24 testing would be unworkable. Therefore, Duncan Aviation requests permission to use manufacturer data to calculate VOC emission content and associated emission factors.

Our response to the violation of **SC II.1** for **FG-Facility**:

Per our discussion on the phone, this violation was not going to be enforced because this special condition was in correlation to VOC daily limit for EU-PaintHangar4 and was to be removed with the new PTI 254-05B. Duncan Aviation will comply with this special condition by documenting each month and rolling 12-month period the low coating usage as part of their monthly & yearly record keeping.

As stated above, Duncan strives to maintain compliance with all environmental laws and takes the alleged violations in the Violation Notice seriously. Duncan believes that the actions outlined in this letter have remedied the item noted in the Violation Notice and that Duncan Aviation will remain in compliance with EGLE (AQD) regulations hereafter.

Sincerely,

Tim J. Irvine

Tim J. Irvine
Environmental Supervisor
269.565.3659
Timothy.J.Irvine@duncanaviation.com