



AAR MOBILITY SYSTEMS

201 Haynes Street Cadillac, MI 49601 USA/231-779-8800/Fax 231-779-4931



May 27, 2016

William J. Rogers Jr.
Environmental Quality Analyst
Air Quality Division
Michigan Department of Environmental Quality
Gaylord Field Office
2100 W M-32
Gaylord, MI 49735-9282

RE: SRN B4197 Violation Notice, Facility Boiler, Federal Boiler MACT

Dear Mr. Rogers

Summary:

AAR Mobility Systems began corresponding with the MDEQ Cadillac /Gaylord District office regarding the Renewable Operating Permit MI-ROP-B4197-2011. During this time, we collaborated with the MDEQ-AQD that AAR's 500HP Model 105E boiler falls under the Federal Boiler MACT, 40CFR Part 63, Subpart DDDDD rule.

Root Cause for the violation:

EPA's Boiler MACT rules had changed since the last ROP approval process. AAR Mobility Systems believed the boiler was compliant and listed as exempt Emission Unit and was not required to register with CEDRI on January 31, 2013.

Corrective Actions:

After AAR Mobility Systems began corresponding with the MDEQ about the Federal Boiler MACT rule requirements in early April of 2016, AAR has had the Boiler MACT 40 CFR Subpart DDDDD annual tune-up performed by our boiler contractor. This "tune-up" was more detailed than the annual tune-up that was performed in December 28, 2015. At this time AAR is getting quotes for the one-time Energy Assessment for the Boiler System and expects this to be performed in the next few months depending on a contractor's availability.

Once AAR has the required documentation and reports these will be registered on the CEDRI database.

Sincerely,

Mark Platko
General Manager
AAR Mobility Systems

Cc/via mail: Ms. Janis Ransom, Cadillac DEQ