

DEPARTMENT OF ENVIRONMENTAL QUALITY  
 AIR QUALITY DIVISION  
 ACTIVITY REPORT: Stack Test Observation

B419724890

FACILITY: AAR Mobility Systems		SRN / ID: B4197
LOCATION: 201 Haynes St., CADILLAC		DISTRICT: Cadillac
CITY: CADILLAC		COUNTY: WEXFORD
CONTACT: Greg Shay , Environmental Specialist		ACTIVITY DATE: 02/18/2014
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Destruction Efficiency stack test field observations.		
RESOLVED COMPLAINTS:		

On February 18, 2014, Ms. Caryn Owens and Mr. Rob Dickman of the DEQ-AQD observed a stack test for the destruction efficiency (DE) of the Regenerative Thermal Oxidizer (RTO) at AAR Mobility Systems (AAR) located at 201 Haynes Street in Cadillac, Michigan. The current ROP (MI-ROP-B4197-2011) requires the DE of the RTO to be at least 95%. Previous stacks tests for the DE (one test completed on August 21, 2014 and one February 12, 2014) failed the destruction efficiency testing.

DEQ met with Mr. Greg Shay, the Environmental Specialist at AAR who escorted us to the stack testers' trailer. The weather was sunny and calm winds with a temperature of 20 °F. The stack test company was completed by Conestoga-Rovers & Associates, Inc. (CRA). Mr. Dickman stayed with CRA while Mr. Shay and Ms. Owens observed operating conditions in the plant. Mr. Shay & Ms. Owens observed the EUBALSACORE, EUSKINORRAIL, EU197, and EUCONTAINERLINE operating during the testing which were the emission units venting to the RTO. Mr. Shay appeared to keep well documented records of daily operations at the facility, including amount of adhesives, thinners, paints, and coatings used on a daily basis and per shift. Each sheet of paperwork contained the dates, the shift, the product used, the operator's initials and the amount of hours operated. DEQ recorded the pressure drops on the EUBALSACORE booth and oven, which were 0.2 and 0.7 inches of water column (wc), respectively. On EUCONTAINERLINE, DEQ recorded a pressure drop of 1.9 inches wc. Ms. Owens and Mr. Shay recorded the temperature of the RTO, which had an average temperature of 1585°F. Ms. Owens checked the readout of each bed in the RTO, and the lowest temperature was 1446 °F. According to the ROP, the RTO shall not operate below 1400 °F. The rate of operation appeared to be at full production of the facility's maximum daily load.

After the first run of the RTO, the destruction efficiency was at 96.1%. Mr. Dickman and Ms. Owens observed that the facility was operating properly for the observed test period. Later in the day Mr. Shay e-mailed Ms. Owens indicating that CRA was able to complete all three test runs, and the average destruction efficiency was 96.3%. Mr. Shay will be sending the DEQ the Official Stack Test report when he receives it.

NAME Caryn Owens

DATE 3/21/14

SUPERVISOR 