



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 29, 2018

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

SRN: N3303, Calhoun County

Dear Mr. Irvine:

VIOLATION NOTICE

On August 15, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Duncan Aviation (Facility), located at 15745 South Airport Road, Battle Creek, Michigan. The purpose of this inspection was to determine the Facility'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) No. 254-05A.

Based on the inspection and records review, staff of the DEQ, AQD, observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-2005Equipment (EU-PaintHangar6)	Rule 201	Paint stripper Ardrex 2871 that was evaluated as part of air toxics review under PTI No. 254-05 was replaced approximately one year ago with a new paint stripper PS-3010. The AQD district staff requested a meaningful change demonstration and change in calculated hazard potential for PS-3010 versus Ardrex 2871 was determined to constitute a meaningful change under Rule 285(2)(b).
EU-PaintHangar4	PTI No. 254-05A; Condition No. I.2 and I.3	Permit limits the volatile organic compounds (VOC) coating content for primers and topcoats to a daily volume-weighted average of 5.0 pounds/gallon (minus water), as applied. Based on provided records for January-May 2018, the daily VOC

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		limit was exceeded on 1/10; 1/11; 2/16; 2/23; 3/2; 3/28; 4/5; 4/11; 5/10; and 5/16/18. The VOC coating content limit exceedance for these dates ranged between 5.53 and 8.34 pounds/gallon.
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 19, 2018 (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 the DEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, 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.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Rex I. Lane
Senior Environmental Quality Analyst
Air Quality Division
269-567-3547

RIL:CF

Enclosure

cc: Mr. Ryan Herbstreith, Duncan Aviation
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Mary Douglas, DEQ