AAR MOBILITY SYSTEMS
201 Haynes Street/P.O. Box 550/Cadillac, MI 49601 USA/231-779-8800/Fax 231-779-4931

October 7, 2014

Caryn E. Owens
Environmental Quality Analyst
Air Quality Division
Michigan Department of Environmental Quality
Cadillac District Office
120 W. Chapin
Cadillac, MI 49601

RE: SRN B4197 Violation Notice Stack Heights EUCONTNRNOCTRL

Dear Ms. Owens:

Summary:

AAR Mobility Systems began corresponding with the MDEQ Cadillac District office on June 3rd, 2014 through September 4th, 2014. During this time, we collaborated with the MDEQ-AQD Cadillac District Office to obtain MDEQ-AQD Correspondences around several PTI's for EUCONTRNOCTRL to better understand the historical events for each PTI which involved EUCONTRNOCTRL. This culminated in our self-disclosing to the MDEQ that we believed the stack heights for EUCONTRNOCTRL were outside permitted limits (see attached email dated September 4, 2014).

Based on documentation within AAR Mobility Systems files and documentation provided by the MDEQ-AQD Cadillac District Office, AAR reviewed several PTI's for EQUCONTRNOCTRL. The focus was primarily on three PTI's, **PTI 262-00** submitted in 2000, **PTI 163-07B** submitted in 2009 and **PTI 163-07C** submitted in 2010.

In reviewing the documentation for **PTI-262-00**, the MDEQ-AQD PTI evaluation form stated the requirement to raise EUCONTRNOCTRL stacks when by-passing the RTO from 25' to 50' due to an Emissions Evaluation and Modeling that was conducted for hexamethyl diisocyanate (MDI). The stack diameters in 2000 were not changed from the original stack diameter of 26" and 8" when EUCONTRNOCTRL stacks were raised in 2000 to 50'.

In reviewing the documentation for **PTI 163-07B**, the MDEQ-AQD PTI evaluation/approval form did not indicate raising the stack heights for EUCONTRNOCTRL. Clearly the evaluation was focused on p-chlorobenzotrifluoride (PCBTF) when by-passing the RTO and using coatings containing PCBTF.

One item that was not clear with the **PTI 163-07B** evaluation was calling out the requirement to raise the stack heights from 50' to 60'. Page 9 of 11 of the evaluation form for **PTI 163-07B** from the MDEQ indicates the following;

"The 10.5 lbs VOC/hr emission limit established per Permit 261-00 was retained in this permit to keep in place the limit established under this permit for the coatings approved under the Permit 261-00 review. This VOC limit was set at that time as a surrogate emission limit for the toxic air contaminants evaluated. I believe it was not necessary include the old coatings in the present review based on my understanding is that AAR will be running predominantly the new PCBTF-based coatings on EUCONTNRNOCNTRL in the future; and that stack heights have been increased on this line since the approval of Permit 261-00, which adds a safety factor for the previous toxics review".

In reviewing the documentation for **PTI 163-07C**, the PTI is confusing with the stacks being identified as SVBOOTHSTACK and SVOVENSTACK in the evaluation form. AAR Mobility Systems has on file a plot plan calling

out EUCONTRNOCTRL stacks as CONTAINERLINEBOOTH and CONTAINERLINEOVEN which identifies that the stacks are at 24" and 8" diameter and are 60' high as of May, 2007.

AAR Mobility Systems has conservatively cited that **PTI 163-7B** in July, 2009 and approved by the MDEQ-AQD in December, 2009 was the PTI that differentiated coatings containing the p-chlorobenzotrifluoride (PCBTF) and emissions being emitted to atmosphere for EUCONTRNOCTRL. This is the date that AAR Mobility Systems needed to start exhausting the PCBTF emission from EUCONTRNOCTRL to atmosphere.

At the end March, 2014 AAR Mobility Systems ceased using Type IV coatings containing PCBTF at EUCONTRNOCTRL. Our current plan is not to use any coatings containing PCBTF. In addition, we plan to raise the Booth Stacks to 60' and reduce stack diameter down from 26" to 24" in order to provide flexibility at EUCONTRNOCTRL in the event a request to use a coating containing PCBTF is required.

Root Cause for the violation:

A contributing cause for not having raised EUCONTRNOCTRL is believed in part to the PTI evaluation summaries not being fully understood by AAR Mobility Systems at the time they were issued. Additionally, AAR has plot plans with stack heights for EUCONTRNOCTRL at 24" dia. and 60' high on file as early as May, 2007. Based on this documentation, it was believed that EUCONTRNOCTRL stacks had already been raised before **PTI 163-7B** or **PTI 163-7C** were submitted.

The direct cause has been identified as EUCONTRNOCTRL stacks were not measured and the height, diameters were not verified in 2009 when the PTI was submitted.

Corrective Actions:

AAR Mobility Systems preventative corrective action is to establish an accurate historical perspective for all PTI's associated with all of AAR's emission units from 2000 to present and create a database which includes narratives describing each of the PTI's, with complete documentation and recordkeeping for each of the PTI's associated with all emission unit modifications.

Additionally, AAR Mobility Systems is working toward improving the Environmental Management System (EMS) for the environmental recordkeeping. Part of the EMS improvement will look at implementing an Environment Management of Change (EMOC) check list. The EMOC checklist can be used to identify and review environmental aspects associated with an initiated or intended change for an improvement project or equipment modification, raw material or coatings change. The check list will assist in identifying environmental actions and assign responsibilities to proactively manage potential non-compliances identified during the environmental EMOC review.

AAR will be raising EUCONTRNOCTRL Booth/Oven stacks from 52' to 60' and will reduce the Booth stack diameter to 24" by December 31st, 2014.

Based on these actions, we ask that the matter be closed without further action. Thank you.

Sincerely,

Mark Platko
General Manager
AAR Mobility Systems