



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GAYLORD FIELD OFFICE



KEITH CREAGH  
DIRECTOR

May 10, 2016

Mr. Mark Platko, General Manager  
AAR Mobility Systems  
201 Haynes Street  
Cadillac, MI 49601

SRN: B4197, Wexford County

Dear Mr. Platko:

**VIOLATION NOTICE**

On April 7, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), reviewed files pertaining to AAR Mobility Systems located at 201 Haynes Street, Cadillac, Michigan to determine AAR'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 administrative rules and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B4197-2011. During this review, staff observed the following:

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Facility boiler	Federal Boiler MACT, 40 CFR Part 63, Subpart DDDDD	Notifications and energy efficiency survey not completed on time.

This process is also subject to the federal Nation Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters. These standards are found in Federal Boiler MACT, 40 CFR Part 63, Subpart DDDDD. Subpart DDDDD required an Initial Notification on January 31, 2013. It requires a onetime Energy Assessment, annual tune-up of the boiler, and annual compliance reports. As of the writing of this letter, the AQD staff are not able to find any documentation or reports in our files indicating that any of these requirements were met.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 31, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If AAR 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 violation cited above and for the cooperation that was extended to me during my inspection of AAR. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Handwritten signature of William J. Rogers Jr. in black ink.

William J. Rogers Jr.  
Environmental Quality Analyst  
Air Quality Division  
989-705-3406

cc: Ms. Janis Ransom, DEQ  
cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Heidi Hollenbach, DEQ  
Mr. Thomas Hess, DEQ