

Post
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Rex



DUNCAN
AVIATION



September 14, 2018
Michigan DEQ
7953 Adobe Road
Kalamazoo, MI 49009

Dear Mr. Rex Lane,

We received the **Violation Notice** regarding Air Permit 254-05A dated **August 29, 2018**.

Our response to the violation of **Rule 201** for **FG-2005Equipment (EU-PaintHangar6)**:

Paint Strippers

Duncan Aviation has stopped using the PS-3010 paint stripper and has resumed use of the Ardrox 2871. We are working with the manufacturer to reformulate the PS-3010 with the result that the change in hazard potential is less than 10%.

Our response to the violation of **Condition I.2** and **I.3** for **EU-PaintHangar4**:

VOC Exceedance

Duncan Aviation was in violation on dates: 1/10/18; 1/11/18; 2/16/18; 2/23/18; 3/2/18; 3/28/18; 4/5/18; 4/11/18; 5/10/18; and 5/16/18. This was a result from the use of top coats and primers that are required by aircraft manufacturer operations, maintenance manuals, and FAA regulations that exceeded the 5.0 pounds/gallon VOC limit.

Duncan Aviation provides custom painting of aircraft, and is constrained in product choice by aircraft manufacturer operations, maintenance manuals, and FAA regulations. This ensures safety of flight for the aircraft. Deviating from these products could create a safety of flight issue for the aircraft, and could expose Duncan Aviation to liability. The "excess" VOC emissions on days that the average VOC content of topcoats and primers exceeded the permit limit of 5.0 pounds/gallon is less than 25 pounds per 12-month period. Since the impact to the environment is negligible, Duncan Aviation does not believe product substitutions are warranted. Instead, we will modify procedures in Paint Hangar 4 to avoid daily exceedance, and may relocate some of our operations into other hangars onsite.

Sincerely,

Tim J. Irvine
Environmental Supervisor
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