



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
CADILLAC DISTRICT OFFICE



DAN WYANT  
DIRECTOR

October 30, 2013

Mr. Lee Krantz  
General Manager  
AAR Mobility Systems  
201 Haynes Street,  
Cadillac, MI 49601

SRN: B4197, Wexford County

Dear Mr. Krantz:

**VIOLATION NOTICE**

On August 20, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), was present when the performance stack test was conducted of the regenerative thermal oxidizer (RTO) located at AAR Mobility Systems, 201 Haynes Street, Cadillac, Michigan. The purpose of this testing was to determine 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.

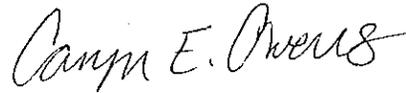
On October 23, 2013 the DEQ received the Regenerative Thermal Oxidizer Destruction Efficiency Emission Test Report, dated October 2013, #081370. Based on the report, the average destruction efficiency for the RTO was 89.6 percent. According to the ROP in FGCOATINGS, Condition III.5, the permittee shall maintain a minimum VOC destruction efficiency of 95 percent in the RTO.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 20, 2013 (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 recurrence.

If AAR Mobility Systems 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. 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,



Caryn E. Owens  
Environmental Quality Analyst  
Air Quality Division  
231-876-4414

cc: Mr. Greg Shay, AAR Mobility Systems  
Ms. Janis Denman, DEQ  
cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ