



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

September 19, 2022

VIA E-MAIL AND U.S. MAIL

Erica Fultz, Operations Group Manager
General Motors LLC - Milford Proving Ground
3300 General Motors Road
Milford, Michigan 48380

SRN: A5262, Oakland County

Dear Erica Fultz:

VIOLATION NOTICE

On July 13, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of General Motors LLC - Milford Proving Ground located at 3300 General Motors Road, Milford, Michigan. The purpose of this inspection was to determine General Motors LLC - Milford Proving Ground'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 Renewable Operating Permit (ROP) number MI-ROP-A5262-2021.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Source-wide	Source-wide SC VI.3.d	Record provided for the inspection indicate GM-MPG did not calculate ethylene glycol emissions using a mass balance approach and emission factors as approved by the AQD District Supervisor. Specifically, the AQD District Supervisor does not approve of GM-MPG's current method of calculating ethylene glycol emissions because it results in negative monthly and 12-month rolling ethylene glycol emissions.

Erica Fultz
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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 10, 2022 (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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If General Motors LLC - Milford Proving Ground 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 General Motors LLC - Milford Proving Ground. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Kerry Kelly
Senior Environmental Quality Analyst
Air Quality Division
586-506-9817; kellyk6@michigan.gov

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE