

## State of Michigan DEPARTMENT OF ENVIRONMENTAL QUALITY

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DAN WYANT

DETROIT FIELD OFFICE

March 13, 2014

Mr. Gary Cronn, Facilities Manager McLaren Performance Technologies 32233 West Eight Mile Road Livonia, Michigan 48152

SRN: A8217, Wayne County

Dear Mr. Cronn:

## VIOLATION NOTICE

On February 24, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of McLaren Performance Technologies (McLaren) located at 32233 West Eight Mile Road, Livonia, Michigan. The purpose of this inspection was to determine McLaren'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-A8217-2012.

Based on review of the information provided to AQD staff during the inspection and records received on January 13, 2014 and March 3, 2014, the following violations were identified.

Process Description	Rule/Permit Condition Violated	Comments
EU-TestCell10	MI-ROP-A8217-2012, EU-TestCell10, Condition I. 1	Facility exceeded the daily CO emission limit of 985 pound per day on May 22 and 23, 2013 and June 24, 2013.
	MI-ROP-A8217-2012, EU-TestCell10, Condition II. 1	Facility exceeded the daily fuel usage limit of 250 gallons per day on May 22 and 23, 2013 and June 24, 2013.
	MI-ROP-A8217-2012, EU-TestCell10, Condition VII. 1	Facility failed to report deviations from ROP requirements

The records provided demonstrate that actual emissions of carbon monoxide from EU-TestCell10 are greater than the emission limit of 985 pounds per day (lbs/day). The days with reported fuel usage greater than ROP limit and the calculated daily CO emission are outlined below.

	Fuel Usage Reported (gallons)	Calculated CO emissions (lbs/day)*
Date	ROP Limit 250 Gallons	ROP Limit 985 lbs/day
5/22/2013	470	1852
5/23/2013	478	1883
6/24/2013	419	1651

<sup>\*</sup>Calculated emissions based on worst-case emission factor CO=3.94 lbs/gallon

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Additionally, McLaren failed to report the deviations within the ROP Report Certification as required by Rule 213(3)(c).

Additional record information provided by McLaren via email on March 3, 2014 indicated the same fuel usage for EU-TestCell10 on the days listed above. The fuel usage back up logs and emails did not coincide with reported fuel usage values reported in the Fuel Consumption Report for EU-TestCell10.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 3, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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

Sincerely

Toda Zynda

Environmental Engineer Air Quality Division

313-456-2761

cc via email:

Ms. Lynn Fiedler, DEQ

Ms. Teresa Seidel, DEQ Mr. Thomas Hess, DEQ

Ms. Wilhemina McLemore, DEQ