



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

March 31, 2016

Ms. Cheryl Neades, Air Quality Manager
U.S. Army Garrison - Detroit Arsenal
Directorate of Public Works (MS#117)
6501 East 11 Mile Road
Warren, Michigan 48397-5000

SRN: B2763, Macomb County

Dear Ms. Neades:

VIOLATION NOTICE

On March 17, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of U.S. Army Garrison – Detroit Arsenal located at 6501 East 11 Mile Road, Warren, Michigan. The purpose of this inspection was to determine U.S. Army Garrison’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 Michigan Air Pollution Control Administrative rules; and the conditions of Permit to Install (PTI) No. 146-02 and No. 566-96B.

During the inspection I observed the following:

Process Description/Equipment	Rule/Permit Condition Violated	Comments
10 Engine test cells	Administrative Rule 201	New engine dynamometers, including support equipment were installed in the engine test cells without a permit.
Non-emergency spark ignition natural gas-fired engine co-generator	40 CFR 60.4243(a)(2)(ii)	Performance test was conducted late.

During the inspection, I observed that U.S. Army Garrison installed or is installing new engine dynamometers, including support equipment without getting a permit-to-install. AQD Administrative Rule 201 states in part:

“A person shall not install any process or process equipment, including control equipment pertaining thereto, which may emit an air contaminant, unless a permit to install which authorizes such action is issued by the department.”

The non-emergency spark ignition natural gas-fired engine co-generator is subject to the federal Standards of Performance for New Sources (NSPS) for Stationary Spark Ignition Internal Combustion Engines. These standards are found in Title 40 of the Code of Federal Regulations Part 60, Subpart JJJJ. 40 CFR 60.4243(a)(2)(ii) states that an initial performance test must be conducted within one year of engine startup to demonstrate compliance. The performance test was conducted late on February 11, 2015.


Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 21, 2015 (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. A permit to install application is available at the AQD website at:

http://www.deq.state.mi.us/aps/nsr_information.shtml

If U.S. Army Garrison 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. 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,


Francisco S. Lim
Environmental Engineer
Air Quality Division
586-753-3742

FL/DC

cc: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ