

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

N085424169

FACILITY: TI GROUP AUTOMOTIVE SYSTEMS LLC - Caro Test Center		SRN / ID: N0854
LOCATION: 628 COLUMBIA ST, CARO		DISTRICT: Saginaw Bay
CITY: CARO		COUNTY: TUSCOLA
CONTACT: Dave Schramski , Facilities Manager		ACTIVITY DATE: 01/28/2014
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

I (glm) visited TI Group Automotive on January 28, 2014. The purpose of my visit was to determine if emission units at the facility were in compliance with the facilities ROP (MI-ROP-N0854-2013) and the applicable state and federal air quality regulations. I met with Dave Schramski (facilities manager) and Kurt Nickel (test center manager).

### FACILITY DESCRIPTION

TI Group Automotive is a test center and production facility located at 628 and 630 Columbia Street, Caro, Michigan, respectively. The facility manufactures and tests fuel delivery components for the aftermarket automotive industry. The production facility consists primarily of component assembly (16 lines) and quality checking. A small portion of the facility is for plastic injection molding (electric). The test center performs durability, exposure, and general performance testing on automotive fuel pumps, fuel tanks, fuel modules and other components. The facility is part of a global company network that consists of 130 locations in 27 countries and an estimated 15,000 employees. The facility is ISO1400 certified.

The facility is a major source for HAPS, and presently is operating under Renewable Operating Permit (ROP) number MI-ROP-N0854-2013. Emission sources are limited to sources in the automotive testing portion of the facility. A review of the most recent MAERS (2012) identified the following emission units:

- RGD LABS (EUDLAB1, EUDLAB2, EUDLAB3, EUDLAB4),
- RGFUELCHAMBERS (EUFuelchmbrH1, EUFuelchmbrH2),
- EUGasRack,
- EULABR

Testing is conducted in individual labs (rooms/wings) in the facility, each designed to withstand explosion and/or fire. Air exchangers have been installed to keep VOC levels in the labs low. The D-Labs are used for durability testing of equipment, with tests lasting from thousands to tens of thousands of hours to reflect the use of a component over the life of the vehicle. The H-chambers hold testing fuels for ongoing tests. The gas rack is used to test initial fuel pump performance prior to durability and performance testing. The R-Labs are used for reliability testing of products under heat or pressure, as well as for permeability during soak tests. In addition, the facility has an analytical lab to test for fuel characteristics as well x-ray and infrared spectrometry capabilities for determining product wear and product composition signatures. Previously, the facility used mineral spirits as their solvent to QA/QC components assembled onsite. The facility recently switched to solvent 142-66 (*MSDS attached*) to meet Department of Transportation (DOT) regulations, which allows shipment by air. The switch is customer driven. Two 5,000-gallon tanks are located onsite, one of which stores spent/used solvent. USTS9-17 are bulk underground storage tanks for fuels, and range from 3,000 to 10,000 gallons each. Two of the tanks are for waste fuels, the remaining tanks were reported to hold generic type fuel for testing. The facility also houses racks of barrels containing fuel sent in by

customers for use during testing their components. At the time of the inspection there were no open drums, spills or stains.

### FGBOILERMACT

The facility reports two boilers used for heating the plant. Both were reported to 985,000 BTUS (input) and 797,850 BTUs (output). At the time of the ROP renewal the facility chose to add the boilers to the permit, because the Boiler MACT (40 CFR Part 63 Subpart DDDDD) had not yet been finalized and it appeared that they may be subject. The facility maintains that they are not subject to the standard per Part 63.7491 (see attached email from 2/4/2014). Mr. Schramski did note that the appropriate maintenance had been performed early this year.

Both portions of the facility reported that they are not operating at full potential, mainly due to fluctuations in the economy and the automobile industry, which also results in a variation in emissions from one year to the next. Additionally, the facility is currently using more diesel for their testing operations which is customer driven.

### COMPLIANCE EVALUATION

Operational Status – During the facility tour the facility was open with most phases of process activities ongoing.

Material Usage Rates – No fuel or material specific limits were incorporated into the existing permit.

Emission Points/Limits – Multiple stacks were noted from the back side of the facility along Green Street. These included two tall, narrow stacks associated with the boilers, as well as larger diameter stacks associated with the air exchange and vapor collection systems for the facility. No visible emissions were noted during the site inspection.

Operational Parameters – No operational conditions are present in the ROP for the facility.

Equipment/Maintenance – No conditions for equipment maintenance are included in the ROP for the facility. As previously noted the facility reports that equipment onsite is on a scheduled maintenance program, and records are kept electronically of the activities.

Monitoring and Testing – No monitoring and testing requirements are specified in the ROP for the facility.

Record Keeping and Reporting – Recordkeeping and reporting requirements associated with the facility include annual and semi-annual certification and deviation reports, as well as annual emission reporting.

### SUMMARY

At the time of my inspection the facility reported no changes in equipment and was in compliance with MI-ROP-N0854 and the applicable state and federal air regulations.

NAME Gina L. McCarra

DATE 2/4/14

SUPERVISOR Chris Hare