

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection**

N085434560

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: 05/18/2016
STAFF: Sydney Bruestle	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: On site inspection to determine compliance with MI-ROP-N0854-2013 and all other applicable state and federal air regulations		
RESOLVED COMPLAINTS:		

I (Sydney Lee Bruestle) visited TI Group Automotive Systems on May 18, 2016. I arrived onsite around 9:15 am. The purpose of my visit was to determine compliance with MI-ROP-N0854-2013 and all applicable state and federal air quality regulations. While onsite I met with Dave Schramski (Facilities Manager) and Kurt Nickel (Test Center Manager).

**FACILITY DESCRIPTION:**

TI Automotive is a test center and production facility located at 628 and 630 Columbia Street in Caro, Michigan. In the manufacturing building they, manufacture and test fuel pump modules for an aftermarket automotive industry. The production facility includes 16 lines used for component assembly and quality control. The lines test each component with Solvent 142 66, which is mineral spirit based and less refined than most fuel. The production facility also includes several (electric) plastic injection mold lines. The Test Center is located next to the Manufacturing Facility and performs durability, environmental variability, and general performance tests on automotive fuel pumps, fuel tanks, fuel modules and other components. The Facility is part of a global company network of over 130 locations in 27 countries. The facility is ISO1400 certified. This facility employs around 150 people.

TI Automotive is a major source for Hazardous Air Pollutants (HAPs). They are currently 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 and the following emission units EULABR, EUGASRACK, RGFUELCHAMBERS, and RGD LABS (EUDLAB1, EUDLAB2, EUDLAB3, EUDLAB4).

Testing is performed in individual labs in the facility. Each lab is designed to withstand explosion and/or fire. The facility also has air exchangers installed to maintain low VOC levels in each lab. The D labs are used for durability testing of equipment, with tests lasting from thousands to tens of thousands of hours to mimic continued use of a component over the life of the vehicle. The R labs are used for reliability testing of products under heat or pressure, as well as for permeability during soak tests. 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 testing center also performs short functionality tests. The facility also has an analytical lab used to characterize fuel. The facility uses solvent 142-66 to QA/QC components assembled onsite. This solvent is stored in two 5,000 gallon tanks, one tank stored spent solvent. There are 9 bulk underground storage tanks used to store fuels, they range from 3,000 to 10,000 gallons each (total capable storage 40,000 gallons of fuel). There are also several 50 gallon drums containing a wide range of fuels for testing. There were no spills at the time of my inspection.

**Material Usage Rates:**

There are no fuel or material usage limits in MI-ROP-N0854-2013.

**Emission Points and Limits:**

There are multiple stacks along the backside of the facility. These include two tall, narrow stacks associated with the boilers, as well as a large stack associated with the air exchanger. There are no emission limits associated with these units.

**Monitoring/ Record Keeping:**

TI Automotive has submitted all semi annual and annual Renewable Operating Permit (ROP) certifications and deviation reports on time. There are no other monitoring and record keeping requirements in MI-ROP-N0854-2013.

Testing:

There are currently no emission testing requirements in MI-ROP-N0854-2013.

BOILER MACT DETERMINATION:

It appears the facility boilers are not subject to 40 CFR 63.7480 Subpart DDDDD because they meet the following requirements:

They meet the requirements of 63.7491 (D) and the definition of a water heater.

The boilers contain less than 120 gallons of water (Boiler volumes attached)

The boilers have a heat input rating of less than 1.6 million BTU.

278A Demonstration:

On November 3, 2005 TI Automotive submitted a 278A demonstration explaining how onsite activities do not result in an increase in actual emission greater than the significance levels defined in R. 336.1119. The actual emissions were significantly below the threshold for VOCs of 40 tons per year and do not trigger the exclusion from exemption in Rule 278.

Compliance Determination:

At the time of my inspection it appeared that TI Automotive Inc. was in compliance with MI-ROP-N0854-2013 and all other applicable state and federal air quality regulations.

NAME



DATE

06/09/16

SUPERVISOR

