

DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N272118923

FACILITY: DELPHI AUTOMOTIVE SYSTEMS LLC		SRN / ID: N2721
LOCATION: CUSTOMER TECH CENTER, AUBURN HILLS		DISTRICT: Southeast Michigan
CITY: AUBURN HILLS		COUNTY: OAKLAND
CONTACT: Gary Jones, EHS Coordinator		ACTIVITY DATE: 08/28/2012
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

On August 28, 2012, I conducted a scheduled inspection of Delphi Automotive Systems, LLC (Delphi), located at 3000 University Drive, Auburn Hills, Michigan. This facility is uniquely identified by the Air Quality Division with the State Registration Number (SRN) of **N2721**. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules, and Permit to Install (PTI) number 305-08A.

COMPANY DESCRIPTION

Delphi conducts performance and durability tests on emission sensors plus prototype engine development. Per the Delphi web site (<http://delphi.com/manufacturers/testing-services/michigan-technical-center/vehicle-emissions-testing-laboratory/>), The Vehicle Emissions Testing Laboratory at the Delphi Customer Technology Center Michigan (CTCM) offers vehicle manufacturers and automotive component suppliers state-of-the-art test chambers for engine and exhaust aftertreatment development and regulatory compliance support. Real-time modal and/or tailpipe emissions data can be collected for:

- U. S. Environmental Protection Agency (EPA)
- California Air Resources Board (CARB)
- European regulatory schedules (ECE)
- Extra Urban Driving Cycle (EUDC)
- Asian regulatory schedules
- Custom-tailored testing and development.

In addition to the permitted engine dynamometers, Delphi also has two chassis dynamometers that are used to test emissions from retail vehicles that are fully equipped with standard emission controls.

PERMIT 305-08A

PTI 305-08A was approved on September 15, 2011. This revision was generated in response to the inspection I conducted earlier in 2011 where I observed discrepancies between the approved permit versus actual conditions.

I entered the site and met with Mr. Gary R. Jones, EHS Coordinator; Mr. Matt Malott, Senior Environmental Engineer; Mr. Michael Melekian, Senior Environmental Engineer; Mr. Richard (Dick) L. Moldenhauer, Manager – Powertrain and Common Labs; and Mr. David B. Quinn, Staff Test Engineer. I presented my DEQ employee photo identification. We began the meeting in a conference room where I explained the purpose of the inspection.

A review of records (see attached) appears to indicate compliance with all of the recordkeeping conditions specified in special condition VI.2 a, b, d, e, f, g and h. The only recordkeeping deficiency I observed related to special condition VI.2.c. The permittee did maintain a record of the type of control device used on each engine but did not record the cause for bypassing the add-on control device. This recordkeeping deficiency was corrected the same day of the inspection (see attached) and does not appear to warrant a violation notice considering that it is the only recordkeeping deficiency observed, it is not a repeated deficiency and it was corrected in a timely manner.

EMISSION UNITS

Six engine dynamometer test cells were approved per PTI No. 305-08A. All of the dynamometer test cells are combined into one flexible group called FG-DynoTestLabs. Although the permit summary table indicates that a maximum of 16 engines are allowed to run simultaneously, the facility is currently configured to operate a maximum of 11 engines. A total of 6 engines (one performance test and five durability tests) were operating during this

inspection.

MATERIAL LIMITS

A review of records appears to indicate that the permittee is in compliance with 12-month rolling total limit of 101,500 gallons of gasoline and/or E85 fuel, and the 56,500 12-month rolling total limit of diesel fuel usage.

PROCESS / OPERATIONAL RESTRICTIONS

Each dynamometer lab has the capability of conducting performance tests on only one engine at a time even though the permit allows performance testing of two engines simultaneously. During this inspection, test cell EU-3J-EDL3 was the only dynamometer conducting performance testing. Dynamometer test cell EU-3D-EDL6 is dedicated to conducting durability testing. Test cell EU-3D-EDL6 can operate a maximum of 7 engines simultaneously but only 5 engines were operating during this inspection.

CONCLUSION

With the exception of one minor recordkeeping deficiency that was corrected in a timely manner, it appears that Delphi Automotive Systems, LLC is in compliance with the conditions of PTI 305-08A.

NAME *Robert L. ...*

DATE *8/28/2012* SUPERVISOR *CTE*