

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

N291525505

FACILITY: TOYOTA MOTOR ENGINEERING AND MANUFACTURING		SRN / ID: N2915
LOCATION: 1555 WOODRIDGE, ANN ARBOR		DISTRICT: Jackson
CITY: ANN ARBOR		COUNTY: WASHTENAW
CONTACT: Kristen Baumia , Specialist SSE		ACTIVITY DATE: 06/11/2014
STAFF: Glen Erickson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection with Scott Miller, Supervisor, Jackson AQD.		
RESOLVED COMPLAINTS:		

Scheduled inspection with Kristen Baumia, Senior Specialist, Toyota, and Scott Miller, Supervisor, Jackson AQD.

First we went to a conference room to look at their recordkeeping and to discuss the on-going construction project covered under PTI No. 186-13.

Their current ROP No. MI-ROP-N2915-2012 contains material limit conditions for fuel usage for the various test cells located at the 2 buildings on this campus:

EU-ANECHOIC: limit = 2000 gals./12-mo. rolling. May-13 to May-14 records show that 89.5 gals. were consumed in this cell.

EU-ENVIRON: limit = 2245 gals./12-mo rolling. May-13 to May-14 records show that 635 gals. were consumed in this cell.

EU-TESTCELL-EG3: limit = 50,000 gals. gasoline/12-mo. rolling. May-13 to May-14 records show that 4144.66 gals. were consumed in this cell.

" limit = 20 gals./hr. May-13 to May-14 records show that the rate of fuel usage was 3.5 gal./hr.

" limit = 158 tons CO emissions /12-mo rolling. May-13 to May-14 records show that CO emissions were 10.5 tons/ 12-mo. rolling.

They have not combusted any ethanol in this uncontrolled test cell, and therefore, have not triggered the performance testing conditions yet.

FG-DYNOS: limit = 3,520 gal./12-mo. rolling. May-13 to May-14 records show that 2763 gals. were consumed in these test cells.

FG-CHDY5-6: limit = 1500 gal./12-mo. rolling. May-13 to May-14 records show that 1430 gals. were consumed in these test cells.

" " limit = 15 gal./hr. The fuel usage rate was 0.5 gals./hr.

FG-TESTCELLS: limit = 300,000 gals. gasoline/12-mo. rolling. May-13 to May-14 records show that 43276 gals. were consumed in these cells controlled with a thermal oxidizer.

They experienced a thermal oxidizer failure on 4-10-14, for which they sent notice to AQD. They finished off the testing that was occurring without the oxidizer according to the allowance in their ROP for such uncontrolled operation for 80 gal./hr., and 6,000 gals. gasoline/12-mo rolling. During this episode they operated uncontrolled for 8.44 gals./hr. and 12-mo rolling fuel usage uncontrolled was zero for the first 11-mo. of this last period and then 463 gal. in the 12-th month.

The new permit, No. 186-13 involves reconstruction and remodelling of existing test cells and addition of a couple of new test cells. All of these test cells will have individual catalytic oxidizers or production catalysts for each test cell. They will no longer use the thermal oxidizer that controls 4 test cells currently.

They included the chassis dynamometers that are in the current ROP in this new PTI so they can keep monitoring facility-wide emissions even though EPA recently passed along guidance to AQD that chassis dynamometer testing is regulated under Title II of the Clean Air Act as mobile sources equipped with production catalyts, and not regulated under Title V as stationary sources.

Very thorough recordkeeping for fuel usage throughout facility. Good records for thermal oxidizer operations.

Company plans on testing the 2 new test cells, probably with 6-cylinder engines, as soon as they start conducting high speed testing, when the is uncontrolled. Testing will also occur in the reconstructed cells in FG-TM145, and FG-EG125. Baumia wants to conduct the testing well before the 180 days after initial start-up of the high speed testing in the 2 new cells, and after the initial control of emissions with individual cell catalytic oxidizer in the 5 reconstructed cells.

We toured the facility which was only operating limited testing on some of the tests where production catalyts are currently used. The 4 engine testing cells that were controlled by the common thermal oxidizer are not operating at this time as they have not yet had their individual catalytic oxidizers installed. They are most of the way through dismantling and cutting apart the thermal oxidizer for scrap.

The facility operates two underground gasoline storage tanks; a 12,000 gal. tank and a 5,000 gal. tank, and a 15,000 gal. above ground storage tank. All are subject to the gasoline dispensing facility MACT standard due to the use of some of the fuel for filling company fleet vehicles. The standard requires submerged fill pipes, which these have. The standard also requires monthly throughput to be less than 100,000 gals. Last year's throughput was 47,000 gal., or 3,900 gals./month.

Overall the facility is in compliance with all of the conditions of their ROP No. MI-ROP-N2915-2012. In addition, they are well along in their construction for the new test cells and the re-constructed test cells covered under their new PTI No. 186-13.

NAME GLEN ERIKSON

DATE 6-17-14

SUPERVISOR 