DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
**ACTIVITY REPORT: Self Initiated Inspection**

N698423525

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| **FACILITY:** Dana Corp Long MFG Div | | **SRN / ID:** N6984 |
| **LOCATION:** 2020 Christian B Hass Er, SAINT CLAIR | | **DISTRICT:** Southeast Michigan |
| **CITY:** SAINT CLAIR | | **COUNTY:** SAINT CLAIR |
| **CONTACT:** | | **ACTIVITY DATE:** 10/30/2013 |
| **STAFF:** Rebecca Loftus | **COMPLIANCE STATUS:** Compliance | **SOURCE CLASS:** Minor |
| **SUBJECT:** | | |
| **RESOLVED COMPLAINTS:** | | |

On October 30, 2013, I, Rebecca Loftus, from the Department of Environmental Quality's (DEQ), Air Quality Division (AQD), conducted an inspection of Dana Corporation, SRN: N6984, located at 2020 Christian B. Haas Drive, in St. Clair, Michigan. The inspection was prompted by Mr. Tiejema's questions regarding permit applicability (see phone notes below). The purpose of this inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules.

Phone Notes
On October 17, 2013, I spoke with Mr. Bruce Tiejema, Dana Corporation's Region Environmental Manager. Mr. Tiejema explained that in 2007, he worked with Bernie Sia (former AQD inspector) to estimate the fugitive emissions from the facility. In March of 2007, Dana Corp. decided to void Permit to Install (PTI) No.144-01a and operate all equipment under an exemption, Rule 285(l)(i). Dana Corp. would like to consolidate two of their plants and bring additional presses to this location from the Rochester Hills Plant. Mr. Tiejema is concerned that the fugitive emissions from the vanishing oil will increase above significant levels and per Rule 278(1)(b), Dana Corp. will need to apply for a permit.

Inspection
I arrived on-site at 9:00am and met with Mr. Tiejema and Ms. Anne Oldham, both are Regional Environmental Managers. They escorted me through the building and explained the processes at this Dana Corp. facility.

At this location, Dana Corp. currently utilizes twelve metal stamping presses and nine mental stamping turbulizers to manufacture aluminum transmission oil and engine oil thermal coolers for the automotive industry. Dana Corp. operates this equipment as exempt from obtaining a PTI pursuant to Rule 285(l)(i).

To assist the metal forming process, Dana Corp. uses two types of aliphatic petroleum distillates (a.k.a. vanishing oil - see attached MSDSs). Based on the provided records (see attached), the facility calculated the following facility-wide VOC emissions:

| Date | VOC emissions (tons) |
|---|---|
| 2007 | 9.62 |
| 2008 | 4.37 |
| 2009 | 5.93 |
| 2010 | 9.78 |
| 2011 | 18.52 |
| 2012 | 26.76 |
| 2013 | 37.69 |

Mr. Tiejema explained that the increase in emissions over the years is due to business growth at this location and the closure/relocation of equipment from their Rochester Hills facility. Because the facility is trending toward, and will likely exceed significant levels, Mr. Tiejema contacted the AQD to help determine the best way to continue compliance with air regulations.

At this facility, Dana Corp. also operates 11 electric ovens and one aqueous degreaser. This facility does not have any emergency generators, space heaters, or boilers.

Conclusion

At the time of my inspection, Dana Corporation appeared to be in compliance with the Clean Air Act and Michigan's Air Pollution Control Rules. Based on the growth in business and VOC emissions increase, I recommended that Dana Corp. submit a PTI application for the process equipment. Once they are above significant levels, and no longer able to use the Rule 285(l)(i) exemption, they may trigger Major Source regulations and need to obtain enforceable emission limits.

Update

On November 13, 2013, Dana corp. submitted a permit application for the equipment at this facility (PTI. No. 165 -13). In the application, Dana Corp. request a 70 ton VOC emission limit to allow for further growth and a Hazardous Air Pollutant (HAP) opt-out limit. Compliance with the permit conditions will be evaluated during the next AQD inspection.

NAME Rebecca J. Hall DATE 11/13/13 SUPERVISOR CJE