

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N808659359

FACILITY: Sanhua Automotive North American Tech Center		SRN / ID: N8086
LOCATION: 3729 AUBURN RD, AUBURN HILLS		DISTRICT: Warren
CITY: AUBURN HILLS		COUNTY: OAKLAND
CONTACT: Buddie Dotter , Research & Development		ACTIVITY DATE: 08/13/2021
STAFF: Kaitlyn Leffert	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY2021 Scheduled Inspection		
RESOLVED COMPLAINTS:		

On August 13, 2021, I, Kaitlyn Leffert, conducted a scheduled inspection of Sanhua Automotive, located at 3729 Auburn Road, Auburn Hills. Sanhua Automotive is identified by Source Registration Number (SRN) N8086. The purpose of the inspection was to determine the facility's compliance with 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); and the administrative rules.

The facility was previously occupied by Arrow Racing Engines, who was permitted to operate three dynamometers (Permit to Install No. 207-08). Based on information available on the company online, it appears that Arrow Racing Engines has permanently shut down. I previously visited Sanhua Automotive in June 2019 to determine whether the permitted equipment was still located at the facility. During that visit, it was identified that the dynamometers were removed from the facility. However, a follow-up visit was determined to be necessary to confirm that the new facility is operating in compliance with all applicable air quality regulations.

I first arrived at the facility on Tuesday, August 10th. I entered the facility and met Jing Kuo, Human Resources Administrator, Sanhua Automotive. I presented my badge, explained the purpose of my visit, and asked if there was anyone who could walk me through the facility. Ms. Kuo requested that I first email additional information and that she would then connect me with someone who would be able to meet me on a different day to do the inspection. I departed the facility and sent an email with additional information on the purpose of my visit, along with a copy of the permit. I was connected with Buddie Dotter, Research and Development, and scheduled an inspection for Friday, August 13th.

On Friday, August 13th, I arrived at the facility to conduct my inspection. I met Buddie Dotter, who led me back to the area where the Research and Development (R&D) activities take place at the facility. Sanhua Automotive develops thermal management systems for both conventional and electric vehicles, with the aim of improving fuel economy and increasing efficiency. The R&D Center located in Auburn Hills focuses on testing climate control for electric vehicles.

The facility operates two main test cells, one trailer that is used as a climate chamber for testing electric vehicle engines and the one that operates as a test stand for air conditioning and climate control in electric vehicles. The test cells are powered by the electrical grid and there is not any on-site electric generation or fuel usage. Therefore, the climate chamber and test stand do not generate any emissions at the facility.

Mr. Dotter informed me that the dynamometers had been removed by the previous occupants, so he was not sure where they were located. There are three large squares and some smaller circular holes in the roof that had been patched, which are located above the current testing

area. The size and arrangement of these patched spots in the roof indicates that was where the stacks and vents for the dynamometers had previously been located.

In addition to testing area, the facility also has a small machine shop, which contains a welding station, a blast cabinet, one long table saw, and three standing saws and drills. All of this equipment vents into the general in-plant environment. The welding station is considered exempt from the requirement to obtain a an air permit per Rule 285(2)(i) and the saws, drills, and blast cabinet would all be considered exempt per Rule 285(2)(l)(vi).

The facility also does not have any cold cleaners, parts washers, or painting operations. After the inspection, I noted that there were also not any stacks or any potential emissions sources observable from the exterior of the building.

Conclusion

Based on my on-site inspection of Sanhua Automotive, the facility appears to be operating in compliance with all applicable air quality rules and regulations. In addition, it was confirmed that the dynamometers covered by PTI No. 207-08 have been removed from the site and that the permit can be voided.

NAME *Kaitlyn Jeffert*

DATE 08/24/21

SUPERVISOR *K. Kelly*