

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

N823233243

FACILITY: AW TECHNICAL CENTER USA INC (AW-TC)		SRN / ID: N8232
LOCATION: ANN ARBOR TECHNOLOGY PARK, ANN ARBOR		DISTRICT: Jackson
CITY: ANN ARBOR		COUNTY: WASHTENAW
CONTACT: Kathy Alkire , Quality & Environmental Coordinator		ACTIVITY DATE: 02/03/2016
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of PTI 115-09A.		
RESOLVED COMPLAINTS:		

### Contacts

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### Purpose

This was a scheduled, announced inspection of the facilities and emission units as described in Permit to Install (PTI) 115-09A. I arrived at the location at about 1:00pm and met with Kathy Alkire and Dave Toeppe. The site consists of one main building that houses the testing processes, offices, and other work areas. They also have three underground storage tanks (USTs) in the rear parking lot area.

### Background

AW Technical Center is a branch of a larger parent company that performs engine and transmission testing using five engine and two chassis dynamometers. Some of the work they conduct includes transmission durability testing, which can require several months of testing.

They are classified as a Synthetic Minor Opt-out source because of the potential to emit (PTE) greater than 100 tons of Carbon Monoxide (CO). PTI 115-09A includes a facility wide flexible group that limits the emission of CO to below major source thresholds, therefore avoiding the need to obtain a Title V Renewable Operating Permit (ROP).

This facility was issued a violation notice (VN) in March 2009 for failing to obtain a Opt-out permit or ROP before operating the equipment and processes on site that had a PTE of >100 tons of CO per year. The issue was resolved with the issuance of PTI 115-09, which has since been modified to the latest version, PTI 115-09A. The company was also referred to enforcement for the violation, where they entered into a Consent Order. The Consent Order, under paragraph 20, states that the duration will last for a minimum of two years, and only then can the company submit a termination request.

This facility was last inspected in 2014 by Glen Erickson and was found to be in compliance with PTI 115-09A. Because the Consent Order is still active, any non-compliance violations can result in stipulated fines according to paragraph 15 of the Consent Order.

### Summary

Kathy, Dave and I had a pre-tour meeting and I gave them both a copy of the Environmental Inspections brochure and boiler MACT card. They indicated that they do not operate any boilers at this location. From there we began to walk through PTI 115-09A and the special conditions for this location, particularly the CO emission limit. Dave showed me the spreadsheet they keep to track material throughput and emissions and printed a copy for my use (see attached). Also attached is a copy of individual dynamometer cell gasoline usage (Gas usage

calculation sheet).

The first thing Kathy and Dave showed me was an area where parts are coated with a red water-based dye that can reveal cracks in equipment being tested. This dye is then rinsed off and collected in a drum to be disposed of by their contracted waste hauler.

We proceeded on the walk-through of the rest of the facility and the parking lot out back where the USTs are located. While on site only one of the chassis dynamometers was running a test, which was equipped with a road legal vehicle. I observed the Veeder-Root system that is installed and tracks the amount of gasoline consumed by each test cell and fed from one of three USTs. They have two 1,000 gallon and one 2,000 gallon tanks for fuel they store on site. The most recent inspection of the tanks was posted and indicated that it expires in June 2016.

Finally, we headed back to the conference room for the closing meeting. After comparing the two documents they provided to me, it was apparent that some of the data didn't match. Dave informed me that the emissions spreadsheet included fuel used in the road legal vehicles when street tests are performed, while the gas usage calculation sheet only includes gasoline used in the five engine dynamometer cells. I communicated to them that emissions from mobile sources, like the road tests, are not required to be reported in their MAERS submittal. The total discrepancy between the two documents doesn't appear to approach the limits set out in their permit.

I also informed them to review the conditions of the active consent order, in particular paragraph 20 as it refers to the actions required by the company in order to process the termination.

Having completed the inspection and received the necessary recordkeeping and monitoring documents, I left the facility at about 2:45pm.

### **Compliance Evaluation**

PTI 115-09A has one flexible group identified at FGFACILITY, which accounts for the source-wide emissions. The conditions outlined include a CO emission rate and 12-month rolling totals for both CO and gasoline usage. The CO emission rate of 2.185 lb/gallon was determined by a stack test performed in February 2010 by their consulting firm, Derenzo, and ran engine tests that averaged what would constitute normal operations for the company. This facility specific rate is now used to calculate total emissions for the company's recordkeeping requirements.

Attached to this report is a worksheet that tracks fuel use and CO emissions per month and for rolling 12-month emissions. As of December 2015, the rolling 12-month emissions of CO are 39.7 tons and gasoline usage at 36,301 gallons. These are both below the limits of 99.9 tpy of CO and 88,785 gallons of gasoline. The Gas usage calculation sheet reports a slightly lower total volume of gasoline throughput in the test cells than the value used in the emission calculations, which currently includes fuel use from on-road testing.

Review of their 2014 MAERS submittal appears to be accurate and matches the data they have provided. Going forward, a slight decrease in reported emissions in MAERS reports may reflect the omission of gasoline fuel that has been included from road tested vehicles.

### **Compliance Status and Recommendations**

I have determined that this facility is in compliance with PTI 115-09A.

It is advisable to track fuel use from mobile and stationary sources as it applies for reporting to MAERS. The current emissions spreadsheet reports total fuel consumed, which differs slightly from the Gas usage calculation sheet that tracks fuel used in test cells but not road testing. Road tests, which are a mobile source of emissions, are not required to be reported to MAERS.

Also, considering the continued compliance of the company since the issuance of their permit and adherence to the Consent Order, I recommend that the facility begin to take steps for its termination.

NAME Fack Durham

DATE 2/16/16

SUPERVISOR 