

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

FY 2015 Insp

U6310053527936

FACILITY: Mazda North American Operations	SRN / ID: U63100535
LOCATION: 46976 Magellan Drive, Wixom	DISTRICT: Southeast Michigan
CITY: Wixom	COUNTY: OAKLAND
CONTACT:	ACTIVITY DATE: 11/25/2014
STAFF: Iranna Konanahalli <i>IK</i>	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2015 inspection of Mazda North American Operations ("Mazda"), Powertrain Engineering Group, formerly operated by Suzuki as Suzuki Tech Center ("Suzuki")	
RESOLVED COMPLAINTS:	

E-file: U-63-10-0535 - SAR - 2014 11 25

Mazda North American Operations (U-63-10-0535)
Powertrain Engineering Group
46976 Magellan Drive
Wixom, Michigan 48393-

SRN reassign (Dec 2014): Suzuki Tech Center (U-63-10-0535) → Mazda North American Operations (U-63-10-0535)

Permit-to-Install: Based upon AQD's interim policy, at the option of the company, AQD will issue Rule 201 permit for Chassis Dynamometers, if requested.

Not subject to (not major source for HAPs): Major Source NESHAP / MACT 5P, 40 CFR Part 63, Subpart P, National Emission Standards for Hazardous Air Pollutants: Engine Test Cells/Stands, (Page 28774, Federal Register / Vol. 68, No. 101 / Tuesday, May 27, 2003 / Rules and Regulations) / Final rule.

On November 25, 2014, I conducted a level 2 self-initiated inspection of Mazda North American Operations ("Mazda"), Powertrain Engineering Group, formerly operated by Suzuki as Suzuki Tech Center ("Suzuki") located at 46976 Magellan Drive, Wixom, Michigan 48393. The inspection was conducted to determine 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; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Bill Kocher (Phone: 248-295-7860; Fax: 248-295-7857; Cell: 248-978-5325; E-mail: bkocher@mazdausa.com), Engineer, Powertrain Engineering Group, and Mr. Brian Zatyrcz (Phone: 248-295-7862; Fax: 248-295-7857; Cell: 313-999-3156; E-mail: bzatyrcz@mazdausa.com), Engineer, Powertrain Engineering Group, assisted me.

American Suzuki Motor Corporation, on November 5, 2012, filed for Chapter 11 bankruptcy protection. A U.S. Bankruptcy Court in Santa Ana, Calif., approved the plan. The Chap 11 reorganization was to be completed by March 31, 2013. Accordingly, Suzuki stopped selling cars in US. According to Mr. Philip Sprange (Phone: 248-353-5400) of CBRE, a commercial real-estate company, Suzuki moved out about March 2013. Suzuki moved to Wixom in 2003.

About September 2013, Mazda bought Suzuki's facility including building, equipment, instruments, computers, etc. Mazda moved into this building about November 2013. At the Wixom site, Mazda conducts research and development, testing, administrative, and office

activities. Manufacturing is not taking place.

At Mazda's Wixom facility, fully assembled, road-worthy vehicles, with the required US EPA mobile source catalytic converters, are tested for exhaust analyses. There is no engine dyno; only chassis dyno. Only automotive exhaust testing according to US EPA protocols takes place.

Two chassis dynamometers (dynos) are present. Automotive exhaust is analyzed for CO, CO₂, HC and NO_x as required by US EPA per Mobile Sources part of Clean Air Act. From two dynos, exhaust gases are discharged via two 35-foot stacks: one analyzer stack and other non-analyzer stack. If the gases are analyzed, they go through analyzer stack or else they go through non-analyzer stack.

One of two test cells (associated with analyzer stack), is capable of testing both 2-wheel and 4-wheel drive vehicles.

AQD will review and issue a construction permit for the dyno test cells if requested.

One cold-cleaner

There is one (1) Safety-Kleen 3'x4' parts cold-cleaners. The cold-cleaner is subject rule 336.611 or 336.1707 depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaner is placed into operation prior to July 1, 1979. New cold cleaner is placed into operation on or after July 1, 1979. This is a brand new cold cleaner.

The solvent is stored in the tank (25-gallon drum, enclosed reservoir) of about 25 gallons capacity. Parts are placed in the sink area and solvent is pumped over the part. The solvent then drains back into the drum. Mineral spirits, a low vapor pressure organic solvent, is used as a cleaner.

Mechanically assisted lid is present; it was open during the FY 2015 inspection. The operating procedures were not posted. Both are violations of Rule 336.1707.

On November 25, 2014, I gave Mr. Bill Kocher DEQ's decals for "cold-cleaner operating procedures" for posting and complying with work-practice rules. I asked the company to follow the common sense work practice in the procedures.

Mineral spirits containing no halogenated solvents is used. The Cold-cleaner is NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used.

Mineral Spirits aliphatic hydrocarbons petroleum distillates (CAS 64742-88-7)

MSDS: data not available at this time.

Tax Exemption 1-3223

AQD (Jim Day) denied Tax Exemption 1-3223 for \$3,856,128.00 (entire Wixom facility) in 2004. Suzuki sued State Treasury in Oakland County Circuit Court. The tax exemption claim was based upon CAA Mobile Source requirements.

August 16, 2010, Hyundai letter

In connection with Hyundai America Technical Center, Inc., AQD sought US EPA determination, via December 10, 2008, letter, regarding potential-to-emit (PTE) calculations and permitting of engine and chassis dynamometers. EPA communicated to AQD, via August 16, 2010, letter, its determination that chassis dynamometers were regulated as stationary sources since the vehicles were not put into commerce. AQD Chief Hellwig wrote a letter dated September 1, 2010, to each known affected source with a copy of US EPA's determination (August 16, 2010, letter to Mr. Hellwig from Ms. Cheryl L. Newton, Division Director, Air and Radiation Division of US EPA Region V).

June 12, 2013, AQD Chief Hellwig e-mail: At this time, AQD will not enforce Rule 336.1201 for chassis dynos. However, AQD will review and issue a construction permit if requested. Mazda can benefit from a NESHAP / MACT 5P opt-out permit.

Conclusion

AQD will review and issue a Rule 201 permit for the dyno test cells if requested.

NAME L. S. Khanabadi DATE 12/08/2014 SUPERVISOR CJE