

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Eaton Corporation - Marshall Proving Ground	SRN : N2950
Location : 19218 B DRIVE S	District : Kalamazoo
	County : CALHOUN
City : MARSHALL State: MI Zip Code : 49068	Compliance Status : Compliance
Source Class : SM OPT OUT	Staff : Rex Lane
FCE Begin Date : 5/30/2013	FCE Completion Date : 5/30/2014
Comments : FCE Summary Report	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
05/12/2014	MAERS	Compliance	Audit of 2013 MAERS Report: Facility added two emission unit IDs in 2013; a diesel test cell and a diesel emergency generator. MAERS emission factors and calculated emission values were used for all reporting groups. Facility had reported 1000 gallons diesel fuel throughput on EU-G-003 emergency generator and reported zero emissions with a notation that generator was set and tested only for one hour in 2013. Staff changed fuel throughput to 0.01 E3 gallons and changed emissions to the MAERS calculated values. -RIL
05/06/2014	Self Initiated Inspection	Compliance	Self Initiated Inspection

Activity Date	Activity Type	Compliance Status	Comments
01/28/2014	MACT (Part 63)		<p>40 CFR Part 63, Subpart ZZZZ: Semi-Annual Compliance Report</p> <p>On January 21, 2014, MDEQ-AQD received a 40 CFR Part 63, Subpart ZZZZ semi-annual compliance report from Eaton Proving Grounds for a 400 HP diesel engine (Eckford EU-T-006). The cover letter states that the facility did not install the oxidation catalyst that may have been required under the area source MACT standard. The facility further states that EU-T-006 was last run on 10/8/13 and has since been taken out of service and removed from the facility. MDEQ has not taken delegation of area source MACT requirements from USEPA under 40 CFR Part 63, Subpart ZZZZ. The facility sent a carbon copy of the semi-annual compliance report to USEPA, Region V who will make the determination whether further enforcement proceedings are necessary. -RIL</p>
10/09/2013	Telephone Notes	Unknown	RICE MACT - Existing 400 HP diesel engine (Eckford EU-T-006)

Activity Date	Activity Type	Compliance Status	Comments
09/30/2013	MACT (Part 63)	Unknown	<p>40 CFR Part 63, Subpart ZZZZ: Initial Notification & Semi-Annual Reports</p> <p>Cover letter dated 8/26/13 indicates that a 400 HP diesel engine designated Eckford EU-T-006 is subject to 40 CFR Part 63, Subpart ZZZZ. This letter further states that the facility has not yet installed the oxidation catalyst as may be required under the rule. However, we have no information at this time to indicate that the engine, as currently operated, exceeds the emission limits.</p> <p>Staff played phone tag with Mr. Vincent Paige, Eaton EHS Contact for several days following receipt of this notification in an attempt to obtain further information. The initial MACT notification indicates that the facility is an area source of HAPs. This facility is known by the inspector to have several engine test stands. Engine test cells/stands are exempt from the RICE MACT by definition and are potentially subject to 40 CFR Part 63, Subpart PTTTT if the facility is a major source of HAPs (would not apply to Eaton - Marshall Proving Grounds based on their initial notification). Per MAERS, EU-T-006 is described as an engine test cell. Therefore, this emission unit appears to be exempt from the RICE MACT and is also not subject to Part 63, Subpart PTTTT based on the facility being an area source for HAPs. This information was relayed in a voice mail message to Mr. Paige and no further oral or written correspondence has been received by staff. -RIL</p>

Name: RIL

Date: 5/30/14

Supervisor: MOB/14/2014

