



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



DAN WYANT
DIRECTOR

September 21, 2015

Mr. Lee Gibson, Supervisor, Engine Testing
Westport LD, Inc.
14900 Galleon Court
Plymouth, Michigan 48170

SRN: P0316, Wayne County

Dear Mr. Gibson:

VIOLATION NOTICE

On August 18, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Westport LD, Inc. located at 14900 Galleon Court, Plymouth, Michigan. The purpose of this inspection was to determine Westport LD, Inc. compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules and the conditions of Permit to Install (PTI) number 19-12A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-TESTCELLS	Permit 19-12A S.C. VI.2	Emission records for formaldehyde were requested during the onsite inspection on 8/18/2015. A second request was emailed on 8/27/2015. No records have been received.
FG-TESTCELLS	Permit 19-12A S.C. VI.3 d, e, f	Emission records were requested for PM2.5, 1,3-butadine, and acetaldehyde during the onsite inspection on 8/18/2015. A second request was emailed on 8/27/2015. No records have been received.
FG-FACILITY	Permit 19-12A S.C. VI.2	Emission records for CO were requested during the onsite inspection on 8/18/2015. A second request was emailed on 8/27/2015. No records have been received.

In addition to the above listed emission records requested, Westport LD, Inc. reported emitting 412 tons of NOx, which exceeds the PSD/Major Offset threshold of 100 tons per year. The NOx emission limit in permit 19-12A is 6.40 pph, with the yearly emission limit if the engines operated continuously calculated to be 28.03 TPY. Westport Ld, Inc. reported 92 tons of CO in 2014. FG-FACILITY limits the CO emissions to 89.9 TPY.

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Records were requested during the onsite inspection and again on August 18, 2015 to verify the emissions reported in MAERS. The emissions reported would be a violation of Rule 205, Rule 210 and Part 18.

During this inspection, Mr. Gibson was unable to produce emission records.

This is a violation of the recordkeeping and emission limitations specified in Special Condition for Emission Limits and Monitoring/Recordkeeping of PTI number 19-12A.

The conditions of PTI number 19-12A require the permittee to complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 12, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Mr. Gibson believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Westport LD, Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jill C. Zimmerman
Environmental Engineer
Air Quality Division
313-456-4689

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Barb Rosenbaum, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski DEQ