

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

P095763939

FACILITY: SAPA Transmission		SRN / ID: P0957
LOCATION: 51901 Shelby Parkway, SHELBY TWP		DISTRICT: Warren
CITY: SHELBY TWP		COUNTY: MACOMB
CONTACT: Ruben Gonzalez , Engineering Manager		ACTIVITY DATE: 06/29/2022
STAFF: Mark Dziadosz	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2022 Inspection		
RESOLVED COMPLAINTS:		

On Wednesday, June 29, 2022, I, Michigan Department of Environment Great Lakes and Energy-Air Quality Division staff Mark Dziadosz, conducted an announced scheduled inspection of SAPA Transmission (P0957), located at 51901 Shelby Parkway Shelby Township, Michigan. The purpose of this inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Permit to Install (PTI) No. 107-20.

I arrived at SAPA Transmission at 10:00 AM and met with Ruben Gonzalez, Engineering Manager. Also present were Jack Born, Test Engineer, and Craig Burke, Lee Contracting. Jack is responsible for the recordkeeping requirements. Prior to the inspection, records were requested and were made available during the inspection. Upon arrival, Ruben and I discussed the records and operations. I was then taken on a tour of the facility.

SAPA Transmission is a transmission testing facility. The equipment was originally permitted under PTI 133-18 at a different address. However, according to Craig, this equipment was never put into production mode at this location due to power supply issues. The current facility was built new for the equipment. The facility has 1 dynamometer test cell where transmissions are tested while connected to a diesel engine. The U.S. Military is the end user of these transmissions. The facility has a large warehouse and intends to expand operations. Ruben mentioned adding testing and repair of up to 10 transmissions, transferring production of transmission assembly lines by the end of 2023, and being to full production in 4-5 years. I advised Ruben that the additional operations could require a permit to install. The plant started operation on March 31, 2021. There is no emergency generator onsite. The facility has approximately 14 employees. According to Ruben, approximately 80% of the time, the facility operates 1 8-hour shift per day.

### Compliance

SAPA Transmission provided an excel spreadsheet of all calculations. The document can be found in: S:\Air Quality Division\Staff\Mark Dziadosz\P0957 SAPA Transmission FY22 Inspection or the facility plant file.

**PTI No. 107-20**

This PTI is for a transmission-testing dynamometer in a test cell where engines burn diesel fuel.

The facility provided digital records for the dynamometer. The records were for March 31, 2021-June 2022.

**SC II.1** According to Ruben and the usage records, the facility only burns diesel fuel.

**SC II.2** A material limit of 20 gallons of diesel per hour. The facility tracks diesel fuel usage through purchasing. For the time reviewed, the average gallons per hour was 14.7. This average is based on 16 hours/day. Jack indicated some tests can run up to 24 hours and 16 hours was an average. Jack said he was not sure if he could obtain records for previous hours of operation of the dynamometer. I asked Jack to add daily hours of operation and fuel use to the recordkeeping spreadsheet to ensure compliance with the limit.

**SC II.3** A material limit of 20,000 gallons of diesel per rolling 12-month time period. The facility began operations in March 2021 although only approximately 1,000 gallons was burned between March 2021 and March 2022. From March 1, 2022, until June 29, 2022, the facility has burned approximately 11,347 gallons. April fuel usage was approximately 5925.5 gallons. The facility provided records of fuel purchased and fuel used. I notified the facility to begin the 12-month rolling average from March 2022 on since the fuel usage was closer to normal operation. Based on current fuel use, the facility will go over the rolling 12-month average of 20,000 gallons. The facility inquired about obtaining a new permit on 7/13/2022.

**SC VI.1** The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. SAPA provided a spreadsheet with monthly fuel usage based on purchasing. However, the sheet provided was not set up to calculate a rolling 12-month average of diesel fuel usage once 12-months of fuel usage have passed (the facility did not start full production until March 2022). I provided the facility a spreadsheet that would track daily fuel usage and hours of operation and would calculate a 12-month rolling average of fuel usage. I will ask the facility to provide monthly records for at least the next six months.

**SC VI.2** The permittee shall keep, in a satisfactory manner, records of the gallons of diesel used per hour in EUTESTCELL on an hourly basis. The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. SAPA provided a spreadsheet

with monthly fuel usage based on purchasing as well as a gallon per hour average. The hourly fuel usage is an estimate based on an average of 16 hours run time for the test cell. Jack indicated some tests can run up to 20-24 hours. I asked Jack and Ruben to provide any records of the hours of operation for the test cell and to provide additional information about the duration of tests but did not receive any information. I provided a spreadsheet to the facility to track daily fuel usage and hours of operation. Based upon the information provided it appears SAPA meeting this condition.

**SC VI.3 The permittee shall keep records of the following information on a monthly basis for EUTESTCELL:**

- a. Diesel use calculations determining the gallons of diesel used per calendar month. SAPA is tracking fuel usage based on purchasing.
- b. Diesel use calculations determining the annual usage rate in gallons per 12-month rolling time period as determined at the end of each calendar month. At the time of inspection 12-months of full production had not yet occurred. I provided the facility a spreadsheet to calculate the rolling 12-month annual diesel fuel usage.

**SC VII.1 Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUTESTCELL. Operations began on March 31, 2021. SAPA sent notification on May 6, 2021. A violation notice will not be sent for this.**

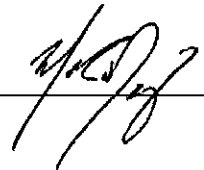
**SC VIII.1 Exhaust gases from the boilers shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 8 inches at an exit point not less than 48.8 feet above ground level. The exhaust stack for the dynamometers appear to discharge vertically and unobstructed. Stack dimensions were not confirmed during this inspection.**

#### **Fuel storage tank**

The facility has a 2,000-gallon above ground fuel storage tank as part of the dynamometer operations. The tank appears to be exempt from the requirements to have a PTI pursuant to Rule 284(2)(g)(iii).

Based on the information gathered during the inspection, SAPA Transmission, Inc. appears to be in compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and

**Environmental Protection Act of 1994, PA 451, as amended, and PTI No. 107  
-20.**

NAME 

DATE August 15, 2022 SUPERVISOR 