

State Registration Number
A8217

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-A8217-2023

McLaren Performance Technologies

State Registration Number (SRN): A8217

Located at

32233 West Eight Mile Road, Livonia, Wayne County, Michigan 48152

Permit Number: MI-ROP-A8217-2023

Staff Report Date: October 2, 2023

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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OCTOBER 2, 2023- STAFF REPORT

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Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act; and Michigan’s Administrative Rules for Air Pollution Control promulgated under Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source’s applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Stationary Source Mailing Address:	McLaren Performance Technologies 32233 West Eight Mile Road Livonia, Michigan 48152
Source Registration Number (SRN):	A8217
North American Industry Classification System (NAICS) Code:	541330
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	2016001621
Responsible Official:	Kevin Ledford, Vice President, Global Engineering 248 477 6240, ext. 41543
AQD Contact: District	Jeff Korniski, Assistant District Supervisor 313 456 4681
AQD Contact: ROP Writer	Sebastian Kallumkal, Environmental Quality Specialist 586 201 0175
Date Application Received:	October 14, 2016
Date Application Was Administratively Complete:	October 14, 2016
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	October 2, 2023
Deadline for Public Comment:	November 1, 2023

Source Description

McLaren Performance Technologies (McLaren), a subsidiary of Linamar Corporation, is located at 32233 West Eight Mile Road, in Livonia, Michigan and has historically provided engine diagnostic testing services to engine manufacturers, automotive suppliers, and catalyst manufacturers. Within the last several years, due to a significant decrease in demand for conventional engine testing, the facility has added electrical testing of drive train units, transmission components, and electrical motors.

The larger main building (Building 1) currently houses most of the offices, engine test cells 1 through 13, with dynamometers, testing equipment, and cold cleaners. Building 2, located east of Building 1, houses electric motor dynamometers, and cold cleaners. McLaren is one of several commercial and light industrial establishments lining the north and south sides of Eight Mile Road. Residential neighborhoods lie in the rear of these facilities. The residential neighborhood to the south of McLaren borders the facility and is within an estimated 500 feet of the engine test cell building.

A dynamometer is an electrical device that measures torque and horsepower for each engine. Testing consists of applying a load to the engine while measurements are taken from torque and strain gauges. A small portion of the engine exhaust is routed through an emission bench for analysis. Emissions from the emission bench are vented directly to the outside ambient air.

In 1999, McLaren operated 13 dynamometer engine test cells (6 uncontrolled and 7 controlled at this facility). Six of the engine test cells were installed in 1987 and issued the Certificate of Operation 5-02678 by Wayne County Department of Environment-Air Quality Management Division (State's delegated regulatory authority at that time). As they emit to the ambient air uncontrolled, potential CO emissions from these six engine test cells are approximately 600 tons per year, classifying this source as a major source under Prevention of Significant Deterioration (PSD) regulations codified under 40 CFR Part 52. In 1999, the facility installed two more controlled test cells.

McLaren currently has limited operation of conventional engine test cells. McLaren has the capability to operate thirteen test cells equipped with dynamometers (previously there were 16 cells, but 3 cells have been permanently converted or removed from the facility). The test cells were originally designed for testing gasoline fired engines. The original test cell configuration utilized gasoline, the combustion fuel, which is metered to the test stands from one of three above-ground, fixed-roof, vertical storage tanks bordering the main building's eastern edge. The test cells are housed individually in small rooms outlining the laboratory/workshop areas on the northeast side of the main building. Exhaust gases vent vertically out of the roof of the building (the presence of stacks on the east roof of the main building may be observed from ground level) through stacks ranging 29 feet to 36 feet in height, one stack dedicated for each test cell.

McLaren's clients deliver engines, the engines are secured in one of the test stands, and the engines are operated for the time, loads, and characteristics requested by the client. McLaren measures and records engine performance on computer consoles located outside the door of each engine test cell.

Five of the test cells (Cell Nos. 8, 9, 10, 11, and 12) are equipped with catalytic converters for carbon monoxide (CO), nitrogen oxides (NOx), and volatile organic compound (VOC) control and are under permitted fuel (unleaded gasoline) restrictions. The catalytic converters are installed and monitored by McLaren and serve as pollution control devices. Catalytic converters control emissions from individual test cells and are inserted into the exhaust pipes leading out from the engine test stand; they appear as annular cylinders with a diameter larger than that of the exhaust pipe and are located between the engine and the muffler. The catalytic converter containers may be unbolted, removed from the exhaust line, replenished with active catalyst, and reinstalled. Cells used for testing engines with dual exhaust are equipped with two converters; one for each exhaust. In addition to unleaded gasoline, Test Cell Nos. 9 and 10 are permitted to combust diesel, kerosene, compressed natural gas, and liquid petroleum gas. Since the last ROP renewal, EU-TESTCELLCC6 was permanently converted to electric motor testing.

EU-TESTCELL1, a dynamometer test cell with no primary control device, installed in 1987, had no fuel restrictions and had uncontrolled emissions vented to the atmosphere. This test cell was exempt from permit to install requirements pursuant to R 336.1285(g) and was installed prior to the promulgation of Rule 278 (R 336.1278) which excludes certain types of processes from using rules R 336.1280 through 1291 which exempts processes from obtaining a permit to install required per R 336.1201. McLaren modified EU-TESTCELL1, which was originally used for testing gasoline combusted engines, in 2017 to test natural gas type burner. AQD agreed that although modified, the change in Test Cell 1 operation is exempt from R 336.1201-Permit to Install (PTI) requirements and New Source Review (NSR) and meets the R 336.1282(2)(b) exemption rule and it is not excluded from exemption by R 336.1278. McLaren informed AQD that it decided not test fuel engines in this test cell and requested its removal from the draft ROP. It is included in the “Processes In Application Not Identified in Draft ROP” in the Staff Report.

EU-TESTCELLCC2 and EU-TESTCELLCC3, which were equipped with catalytic converter controls and were originally used for testing gasoline combusted engines, were modified to test electric motors since the previous ROP issuance. McLaren informed AQD that it decided not to test fuel engines in these test cells and requested these test cells be removal from the draft ROP. Cell Nos. 14 and 15 have been converted to electronics and networking rooms, and Cell No. 16 has been physically removed; therefore, these cells have been removed from the ROP.

EU-TESTCELL4, EU-TESTCELL5, EUTESTCELL7, and EU-TESTCELL13 emit uncontrolled to the atmosphere. These cells may have a catalytic converter installed for any given test, however, in these cases, the converter is typically the subject of the test (e.g., catalyst age testing).

In addition to the dynamometer test cells, the facility houses eight cold cleaners; six cold cleaners located in the main building and two cold cleaners located in Building 2. All of the cold cleaners vent to the general in-plant environment. A paint spray booth is located in a small room in Building 1. Emissions from the paint area are vented through panel filters and a vertical stack.

Since the last ROP, Building 3 was demolished for the construction of an expanded office area and flexible manufacturing complex (completed in 2016).

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2022**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	18.82
Lead (Pb)	NA
Nitrogen Oxides (NO _x)	2.16
Particulate Matter (PM10)*	0.19
Sulfur Dioxide (SO ₂)	0.17
Volatile Organic Compounds (VOCs)	3.45

* Particulate matter (PM) that has an aerodynamic diameter less than or equal to a nominal 10 micrometers.

This source is an area source of hazardous air pollutants (HAPs), emissions pursuant to Section 112(b) of the federal Clean Air Act. No HAP emissions data is reported.

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is located in an area of Wayne County which is currently designated by the United States Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants. A portion of Wayne County is currently designated by the USEPA as a non-attainment area with respect to the sulfur dioxide standard (SO₂). This stationary source is not located in this portion of Wayne County.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70 because the potential to emit of carbon monoxide exceeds 100 tons per year.

The stationary source is an area source of HAP emissions because the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is less than 10 tons per year and the potential to emit of all HAPs combined are less than 25 tons per year.

EU-PAINTAREA was installed prior to August 15, 1967. As a result, this equipment is considered "grandfathered" and is not subject to New Source Review (NSR) permitting requirements.

Although EU-TESTCELL4, EU-TESTCELL5, EUTESTCELL7, and EU-TESTCELL13 were installed after August 15, 1967, this equipment was exempt from New Source Review (NSR) permitting requirements at the time it was installed.

McLaren is considered a major source of Carbon Monoxide emissions under the Prevention of Significant Deterioration (PSD) regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because the potential to emit of carbon monoxide is more than 250 tons per year. However, during each New Source Review permitting for the modifications, McLaren accepted legally enforceable permit conditions limiting the potential increase of CO to less than PSD significance level for CO, preventing the facility from having to undergo PSD NSR review.

In 1996, Wayne County Department of Environment-Air Quality Management Division (DoE-AQMD), then air quality permitting authority for Wayne County, issued McLaren a Permit to Install No. C-11440 for the installation of seven additional dynamometer test cells. These seven test cells are controlled with catalytic converters.

On January 11, 1999, the initial Renewable Operating Permit (ROP) No. 199600113 was issued to McLaren. In the ROP, the six uncontrolled test cells are combined into one emission unit, EG-TESTCELLS, and the seven controlled test cells are placed into another, EG-TESTCELLS-CC. Upon issuance of the ROP, Wayne County DoE-AQMD Certificate of Operation APC 5-02678 and Permit No. C-11440 were voided.

On November 15, 1999, PTI No. 177-99 was approved for installation of additional two controlled dynamometer test cells to the seven already permitted as EG-TESTCELLS-CC in the ROP. Emissions from each test cell will be controlled with a catalytic converter. McLaren proposed to maintain the daily and yearly CO limits currently within the ROP. As the Permit to Install for the previous seven controlled test cells has been voided, this Permit to Install application will cover the installation of all nine controlled test cells as one emission unit.

On September 27, 2001, PTI No.177-99A was issued to add test cell #16. On February 10, 2003, PTI No. 177-99B was issued to increase gasoline usage limit. On June 30, 2004, PTI No. 177-99C was issued to allow multiple fuels (diesel, kerosene, compressed natural gas and liquified petroleum natural gas) and increase daily gas usage.

On April 25, 2005, PTI No. 67-05 was issued for the modification/replacement of Test Cell 10 (EU-TESTCELL10). The permittee proposed the daily gasoline fuel usage to 250 gallons and an annual limit of 57,000 gallons. This test cell along with the other uncontrolled test cells which are currently in FG-TESTCELLS (EU-TESTCELL1, EU-TESTCELL4, EU-TESTCELL5, EU-TESTCELL7, EU-TESTCELL13) were installed in 1986/1987 and were considered exempt from the Permit to Install requirements at the time of installation. These five test cells are not permitted other than having stack height restrictions in this PTI.

On April 18, 2012, PTI No. 67-05A was issued to increase fuel usage and installation of catalytic converter control for EU-TESTCELL10. PTI No. 67-05A detailed that McLaren Performance Technologies, Inc. has multiple previously permitted test cells, and some uncontrolled test cells that only have their stacks permitted as they were installed when test cells were considered exempt from permit to install requirements. EU-TESTCELL10 was permitted for uncontrolled unleaded gasoline. It had limits of 57,000 gallons/year (gal/yr) and 250 gallons/day (gal/day). With this application for PTI No. 67-05A, they requested to add a catalytic converter for control and to increase their fuel usage limits to 77,000 gal/yr and 1,800 gal/day.

On August 19, 2013, PTI No. 67-05B was issued to allow use of multiple fuels (diesel, Kerosene, compressed natural gas and liquified petroleum natural gas in EU-TESTCELL10. PTI No. 67-05C was issued on February 22, 2018 to revise emission factors.

With PTI No.32-22, approved March 29, 2022, the facility proposed to modify EU-TESTCELLCC9 to allow the combustion of fuels besides gasoline. These fuels are diesel, kerosene, compressed natural gas (CNG) and liquid propane gas (LPG). The test cell was previously part of the flexible group FG-TESTCELLCC. This change did not impact its potential emissions from that flexible group which had potential emissions based on permitted fuel limits rather than equipment capacity.

PTI No. 32-22A was issued on May 2, 2023. McLaren requested via this PTI modification, the following changes to PTI No. 32-22 (EU-TESTCELLCC9 & FG-TESTCELLSCC) and PTI No. 67-05C (EU-TESTCELL10). McLaren submitted this PTI application to modify emission factors and limits and testing requirements contained in PTI Nos. 67-05C and 32-22 and ROP No. MI-ROP-A8217-2012 such that they are consistent with actual facility operations and similar permitted facilities.

PTI No. 32-22:

- Remove emission factor limit and test condition for PM2.5 in EU-TESTCELLCC9
- Remove emission limit and test condition for 1,3-butadiene in EU-TESTCELLCC9
- Remove a “may test” condition for several pollutants in FG-TESTCELLSCC

PTI No. 67-05C:

- Remove emission limit for 1,3-butadiene in EU-TESTCELL10

There are no physical or operational changes associated with this PTI application. Given that the application would affect multiple PTIs, the applicant decided to combine the two PTIs (PTI No. 32-22 and PTI 67-05C) into one PTI (No. 32-22A). This PTI would be incorporated into the ROP during this renewal. PTI No. 32-22 and PTI No. 67-05C have been voided because the equipment is now covered by PTI No. 32-22A. PTI Nos. 32-22 and 67-05C were not incorporated into the ROP previously. ROP Modification applications to incorporate these PTIs were submitted, but these applications are voided after submittal of ROP modification application to incorporate PTI No. 32-22A.

Each of the fuel storage tanks (EU-GASOLINETANK1, EU-GASOLINETANK2, EU-GASOLINETANK3) at the stationary source do not exceed 75 cubic meters volumetric capacity and therefore, are not subject to the Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification commenced after July 23, 1984, promulgated in 40 CFR Part 60, Subparts A and Kb.

EU-GASOLINETANK1, EU-GASOLINETANK2, EU-GASOLINETANK3 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (Gasoline Dispensing Area Source MACT) promulgated in 40 CFR Part 63, Subparts A and CCCCC. Conditions applicable to Gasoline dispensing operations ≥ 10,000 gallons per month and <100,000 gallons per month, subject to 40 CFR Part 63, Subpart CCCCC, have been added to the ROP under FG-GASDISPENSING. The AQD is not delegated the regulatory authority for this Area Source MACT.

EU-EMERGENCYGEN1 at the stationary source is subject to the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and JJJJ; applicable requirements have been added to the ROP under FG-EMERGENCYGEN.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the “Procedure for Evaluating Periodic Monitoring Submittals.”

The emission limitation(s) or standard(s) for carbon monoxide from EU-TESTCELLCC9, EU-TESTCELL10, and FG-TESTCELLSCC (EU-TESTCELLCC2, EU-TESTCELLCC3, EU-TESTCELLCC8, EU-TESTCELLCC11, EU-TESTCELLCC12) at the stationary source are subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR Part 64. These emission units each have a control device and potential pre-control emissions of carbon monoxide greater than the major source threshold level.

Emission Unit/ Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexibl e Group for CAM	PAM?
EU-TESTCELL9CC	CO= 1.1 lb/gal	R 336.1205 (1)(a) and (3))	Catalytic Converter	Catalyst bed temperature readings more than the inlet temperature readings or more than 230°C, based on a 2 consecutive 1- hour block average, excluding during the extended period of engine idling, warm up	FG-CAM	No
	58.0 tpy	R 336.1205 (1)(a) and (3))				
EU-TESTCELL10	CO: 709.2 lb/day	R 336.1205(1) (a) & (3), 40 CFR 52.21(d)	Catalytic Converter			No

Emission Unit/ Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexibl e Group for CAM	PAM?		
	CO:16 tpy	R 336.1205(1) (a) & (3), 40 CFR 52.21(d)		periods or customer specified operating conditions.				
FG-TESTCELLSCC	CO: 0.59 lb/gal	R 336.1205(1) (a) & (3)	Catalytic Converters					No
	CO: 133.4 tpy	R 336.1205(1) (a) & (3)						

*Presumptively Acceptable Monitoring (PAM)

McLaren Engineering operates catalytic converters to control for CO emissions from engines tested in these test cells. The catalyst is monitored continuously and recorded every 15 minutes for the catalyst inlet and bed temperature as an indicator to ensure the catalyst is functioning as intended. A test cell may incorporate more than one catalyst depending upon the testing. Each catalyst is treated individually for functionality, but one inlet temperature of all catalysts over a 24-hour period in a cell is recorded. If a catalyst is suspected to be faulty due to temperature differential, an investigation with dyno resources will occur to determine the potential of emission control device failure. Monitor engine exhaust temperature and both catalyst inlet and bed temperatures. Monitoring the engine exhaust temperature gives an indicator of engine load and health. If the temperature goes too high the engine can be damaged.

If a catalyst is functioning, then the inlet temperature is always less than catalyst bed temperature. The parameters are recorded every six minutes. The catalyst deterioration happens over a period of time and the failure is not instantaneous. The catalysts are replaced as needed. The records for this activity will be documented and reported in the semi-annual & annual report if a deviation or excursion occurs. When an excursion occurs, EGLE will be notified as required in our permits.

If the engine runs on an idle mode or on certain customer specified operating conditions, the catalyst inlet temperature may be greater than bed temperature.

Also, at very low speeds such as idle and during warm-up periods, the temperature could be low. This is not an abnormal condition for an engine. There is a certain amount of time required to bring the engine under test to operating temperature. During this time, the catalyst is not operating in its nominal range.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-Wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-Wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-A8217-2012 are identified in Appendix 6 of the ROP.

PTI Number			
C-10264	67-05	177-99	177-99B
C-11440	67-05A	177-99A	177-99C

Streamlined/Subsumed Requirements

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

Processes in Application Not Identified in Draft ROP

The following table lists processes that were included in the ROP Application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212 Citation	PTI Exemption Rule Citation
EU-TESTCELL1	A dynamometer test cell with no primary control device. Installed in 1987. Test Cell 1, originally used for testing gasoline combusted engines, was modified in 2017 to test natural gas type burners.	R 336.1212(4)(c)	R3 36.1282(2)(b)
EU-MACHINING	Pinion Gear Cutting Machine with associated small assembling line and electrical testing and other machining equipment; all emissions are vented to the general in-plant environment. Located in Building 1.	R 336.1212(3)(f)	R 336.1285(2)(l)(vi)(B)
EU-NATGASOVEN	Bayco oven - 600 BTU/hr. Located in Building 1.	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-DUNNAGEWASHER	Dunnage Washer located in Building 1.	R 336.1212(3)(a)	R 336.1281(2)(e)
EU-BLOCKWASHER	Block Washer located in Building 1.	R 336.1212(3)(f)	R 336.1285(2)(l)(iii)

Draft ROP Terms/Conditions Not Agreed to by Applicant

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by EGLE, AQD

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Brad Myott, Field Operations Manager. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

State Registration Number
A8217

RENEWABLE OPERATING PERMIT
NOVEMBER 3, 2023 - STAFF REPORT ADDENDUM

ROP Number
MI-ROP-A8217-2023

Purpose

A Staff Report dated October 2, 2023, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Kevin Ledford, Vice President, Global Engineering 248 477 6240, ext. 41543
AQD Contact: District	Jeff Korniski, Assistant District Supervisor 313 456 4681
AQD Contact: ROP Writer	Sebastian Kallumkal, Environmental Quality Specialist 586 201 0175

Summary of Pertinent Comments

No pertinent comments were received during the 30-day public comment period.

Changes to the October 2, 2023 Draft ROP

No changes were made to the draft ROP.