



Corporate Headquarters
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3340 Ranger Road, Lansing, MI 48906
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Michigan Locations
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October 28, 2024

Ms. Diana Serban
Environmental Engineer
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division, Detroit District Office
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202

RE: Response to October 7, 2024 Notice of Violation
14250 Plymouth Road, Detroit, Michigan
PM Environmental Project No. 01-13443-1
SRN: A8627, Wayne County

Dear Ms. Serban,

PM Environmental, a Pinchin Company (PM), on behalf of NP Detroit, Commerce, LLC is providing a response to the October 7, 2024 Notice of Violation (October NOV) issued for the above-referenced property by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD).

The October NOV, a copy of which is include in Attachment A, states that 1) two emergency generators were installed at the property without a Permit to Install (PTI) and 2) that a vapor mitigation system (VMS) was installed at the property without a PTI and that EGLE does not consider the Rule 290 exemption documentation furnished to-date to be sufficient to support a PTI exemption.

As indicated in the October NOV, NP Detroit, Commerce, LLC submitted a PTI application to EGLE in April 2024 and via its consultant, PM, has furnished various documentation, equipment specifications, and calculations to support the PTI application, and has initiated dispersion modeling to further support the PTI application. That information was furnished via several email exchanges between PM and EGLE in June, July, August, and September 2024 (refer to Attachment B).

A request to extend the PTI application period to January 28, 2025 was made to EGLE on Monday October 21, 2024 by NP Detroit, Commerce, LLC, via email.

Per the October NOV, PM also submitted VMS design, commissioning, various VMS emissions testing results, and associated emissions calculations, as outlined in the June 7, 2024 Sub-Slab Depressurization System Installation report, which was furnished to EGLE (refer to Attachment B). EGLE and PM also participated in a conference call on Wednesday, August 28, 2024 to discuss the VMS's design and operational characteristics, contaminants of concern at the property, and the limited vapor capture zone associated with the VMS, which is limited to an 8-inch thick gravel zone sandwiched between two plastic membranes located within the building's interior footprint, immediately beneath the building's floor slab, which is elevated relative to the exterior ground surface.

As requested by EGLE, VMS pressure sensor logs for March and April 2024 were compiled and transmitted to EGLE via electronic link in tandem with the transmittal of this response letter (i.e., included by reference in this response as Attachment C). It must be noted that because the pressure sensors were designed and installed to log continuously, the sensors will remain active even if the VMS fans are not operating.

Further, the VMS pressure sensors will continuously log pressure gradients, whether positive, negative, or neutral, which may be present due to normal building pressure dynamics associated with typical interior or exterior building envelope pressure differentials, even if the VMS fans are not operating.

As described in the June 7, 2024 Sub-Slab Depressurization System Installation report, VMS emissions were tested and the VMS system run through granular activated carbon (GAC), the effectiveness of which was confirmed via analytical testing and associated emissions calculations using worst-case flow rates. The VMS was then operated with GAC in-place while untreated (pre-GAC) emissions were sampled and additional emissions calculations using worst-case flow rates were completed. The analytical results (and lab reports) of pre and post GAC emissions testing and associated emissions calculations were included in the June 7, 2024 Sub-Slab Depressurization System Installation report.

Consistent with the current PTI application, the two emergency generators remain in-place at the property, as does the VMS.

To address the violations identified in the October NOV, NP Detroit, Commerce, LLC proposes the following:

Emergency Generators

- Dispersion modeling requested by EGLE will be completed and submitted to EGLE via email on November 8, 2024;
- Based on the outcome of the dispersion modeling the existing PTI application will be updated and a complete PTI application will be submitted to EGLE by November 30, 2024;
- In the event that dispersion modeling indicates that additional evaluation or related actions are required, NP Detroit, Commerce, LLC will provide notice to EGLE, prepare a plan for the additional actions, and an associated alternate schedule.

VMS Emissions

- Prepare a workplan for actions to demonstrate a Rule 290 exemption for EGLE review by November 30, 2024, which will include the following:
 - Summary of contamination documented in soil, groundwater, and soil gas at the property inclusive of methane and daughter products along with an evaluation of whether the documented contamination is eligible for inclusion under Rule 290;
 - Collection and reporting of additional VMS monitoring data including airflow, sub-slab vacuum, and emissions concentrations;
 - Emissions testing proposed will include corresponding field collection methods, laboratory analytical methods, and target detection limits;
 - Preparation of data package documentation submitted to EGLE including field measurement documentation, laboratory analytical reports, and emissions calculations;
 - A milestone schedule, including advance notice to EGLE for field/sampling events, data package submittal, and emissions calculations.
- Ahead of workplan submittal, PM and NP Detroit, Commerce, LLC will also schedule a meeting with EGLE to discuss the VMS sensor logs, VMS operations, and the proposed workplan tasks/components inclusive of site contaminant documentation, with a target date range of October 30, 2024 through November 6, 2024.

NP Detroit, Commerce, LLC looks forward to working with EGLE to address these issues. If you require additional information or would like to discuss this response, please contact Adam Patton of PM at 517-202-4288 or adam.patton@pinchin.com.

Sincerely,
PM Environmental

A handwritten signature in black ink, appearing to read 'J. Adam Patton', written over a horizontal line.

J. Adam Patton
Vice President

Attachments:

Attachment A: Notice of Violation, October 7, 2024, EGLE;
Attachment B: Email Correspondence Records, June through September 2024, PM;
Attachment C: VMS Pressure Sensor Logs, March and April 2024, PM (transmitted electronically via email/link).

cc: Brett Sroka, NP Detroit, Commerce, LLC
Ted Traskos, Universal Logistics
Mark Baron, City of Detroit BSEED
Crystal Gilbert-Rogers, City of Detroit, BSEED
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Dr. April Wendling, EGLE
Jeff Korniski, EGLE
Jenine Camilleri, EGLE (via U.S. Mail)

Attachment A





GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

October 7, 2024

Brett Stroka
NP Detroit Commerce, LLC
3315 North Oak Trafficway
Kansas City, MO 64116

SRN: A8627, Wayne County

Dear Brett Stroka:

VIOLATION NOTICE

On June 20, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of NP Detroit Commerce, LLC located at 14250 Plymouth Rd, Detroit, Michigan. The purpose of this inspection was to determine NP Detroit Commerce, LLC's 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 Michigan Air Pollution Control Rules; and to confirm equipment previously installed under prior permits were removed.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two Aksa APC-NG1050 Emergency Generators rated at 1185 kW each	R 336.1201 (1)	Two generators were installed at the facility and have been operated without a Permit to Install (PTI).
Sub-slab depressurization system (SSDS) otherwise known as a vapor intrusion mitigation system (VIMS)	R 336.1201 (1)	A VIMS was installed at the facility without a PTI. The VIMS has not been demonstrated to meet the PTI exemption in R 335.1290 because the records and emissions calculations provided were not of sufficient detail and frequency to demonstrate compliance with the exemption.

During this inspection, it was noted that NP Detroit Commerce, LLC installed and commenced operation of two emergency generators and a VIMS without first obtaining a PTI. The AQD staff advised NP Detroit Commerce, LLC on June 21, 2024, that this is a violation of R 336.1201(1), also referenced as Rule 201(1), of the administrative rules promulgated under Act 451.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

A program for compliance may include a completed PTI application for the two emergency generators and the VIMS. The AQD acknowledges that NP Detroit Commerce, LLC submitted a PTI application for the generators in April 2024. In an email on June 21, 2024, the AQD requested a R 336.1278 analysis to demonstrate exemption claims for all equipment that had been installed at the facility absent a PTI. The AQD also requested additional emission records specific to the VIMS in emails on August 5 and on August 22 pursuant to a R 336.1290 (also referenced as Rule 290) exemption claim offered by NP Detroit Commerce, LLC for this equipment. On August 29, AQD staff sent further clarification to the representing consultant to include the soil sampling analytical results and potential emissions calculation prior to the system's installation.

During the inspection record request period, NP Detroit Commerce, LLC was unable to provide sufficient analytical data and monthly emission records (April through July 2024) on the VIMS to demonstrate qualification for the exemption per Rule 290(2)(d). NP Detroit Commerce, LLC did not provide the AQD with information detailing the scope and characterization of soil contamination, therefore it could not be determined whether all potential contaminants emitted to the air via the exhaust stacks are permissible per Rule 290(2)(a)(i), (ii), or (iii). In particular, this information is needed to assess whether carcinogenic contaminants are present which would render the VIMS ineligible for exemption under the rule. Furthermore, it is known that environmental, seasonal, and building factors affect concentration data and the migration of soil contaminants into the air pathway. Therefore, the sampling events provided in March 2024 is insufficient to demonstrate ongoing monthly emissions will continue to meet the limits set in Rule 290.

From the air quality inspection and subsequent records request, it appears that the facility has not maintained records as required by Rule 290 and therefore the equipment, at present, is not exempt from obtaining a Permit to Install under Rule 290.

A program for compliance may include a revised PTI application for the VIMS or a proposal of sufficient detail and frequency to demonstrate continuous future compliance with the requirements and limits of Rule 290.

A proposal to demonstrate the Rule 290 exemption would be expected to include records of the characterization of the site's contamination including any suspected, known, and confirmed contaminants and their breakdown (daughter) products. Be advised to notify the AQD of testing dates and all sample testing conducted must screen substances at expected target detection levels using an appropriate method acceptable to the AQD.

In addition, please provide the Potential to Emit (PTE) demonstration on the VIMS based upon the amounts of soil contamination for all pollutants including methane if

Brett Stroka
NP Detroit Commerce LLC.
Page 3
October 7, 2024

applicable. As stated earlier, this information is needed to assess whether carcinogenic contaminants are present which would render the VIMS ineligible for exemption under the rule.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 28, 2024 (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.

Please submit the written response to Diana Serban at EGLE, AQD, Detroit District, at Cadillac Place, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or SerbanD@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If NP Detroit Commerce, LLC 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 NP Detroit Commerce, LLC. 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,

Diana Serban

Diana Serban
Environmental Engineer
Air Quality Division
313-439-2436

cc: Ted Traskos, Universal Logistics
Mark Baron, City of Detroit BSEED
Crystal Gilbert-Rogers, City of Detroit BSEED
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Jeff Korniski, EGLE

Attachment B



Adam Patton

From: Serban, Diana (EGLE) <SerbanD@michigan.gov>
Sent: Monday, October 7, 2024 6:13 AM
To: Jogesh Panda; Adam Patton; Villalta, Kevin (EGLE)
Cc: ArduinM1; Cvenuti; ttraskos; Brett Sroka; Kelly Lennon; KORNISKIJ; Trey Scovill
Subject: RE: NP Detroit Commerce Inspection Conclusion

This Email is from an **EXTERNAL** source. Ensure you trust this sender before clicking on any links or attachments.

Good Morning Brett & All,

This is a notification of the conclusion on the site's compliance evaluation from the inspection on June 20th, 2024. As mentioned before, we have determined the facility is non-compliant with Rule 201 due to the two installed emergency generators and in addition, the vapor intrusion mitigation system (VIMS) as well. We have determined the demonstration provided of the Rule 290 exemption did not meet the required obligations, therefore the system is not exempt and is unpermitted. Specifically, NP Detroit Commerce did not provide sufficient analytical data (soil sample results/frequent air sampling results) and monthly emission records (April through July 2024) on the VIMS to demonstrate qualification for the exemption per Rule 290(2)(d). It is known that various environmental and other factors affect sampling results thus one sampling event is not sufficient and representative of all future monthly "actual" emissions. Without information regarding the characterization of the site's contamination, we could not conclude whether the soil contains volatile substances that may be emitted to the air that are not permitted per Rule 290(2)(a)(i), (ii), or (iii). Furthermore, it was observed due to dilution levels in air sampling, the air target detection limits set by RRD for these types of systems were not met for at least a few substances. Please refer to the letter of violation that will be issued soon for further information and next steps.

For the accepted facilities painting exemption, please begin tracking monthly usage (and thus emission calculation) and maintain yearly purchase reqs to confirm you continuously meet the limits/requirements of the exemption you are claiming.

Please be advised the engines on the emergency generators and fire pump are subject to federal regulations, 40 CFR Part 60, Subpart JJJJ for the generators, 40 CFR Part 60, Subpart IIII for the fire pump and 40 CFR Part 63, Subpart ZZZZ for both. As this is a new operation, we did not evaluate compliance to the part 60 rules for this inspection but will for future inspections. That being said, the federal regulations for the emergency generators will be incorporated through the permitting process. We do not implement 40 CFR Part 63, Subpart ZZZZ for area source as EPA is the regulatory authority however, I recommend reviewing these to check whether you're meeting the requirements as the engines are subject to them.

In your response to the violation notice, please include the VIMS telemetric pressure readings for **all** of March/April 2024. If the data is too large, you may mail the data to our office on a USB device.

If you have any questions regarding next steps or anything else, please feel free to reach out.

Kind regards,

Diana

From: Serban, Diana (EGLE)
Sent: Thursday, September 26, 2024 10:44 AM
To: Jogesh Panda <Jogi.Panda@pinchin.com>; Adam Patton <Adam.Patton@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>
Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti <Cvenuti@universallogistics.com>; ttraskos <ttraskos@universallogistics.com>; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>
Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

Good Morning Brett & All,

We have concluded the records review of what's been provided on the 278 analysis and the exemption demonstrations with the exception of the VIMS system. Our determination on the VIMS will follow soon in addition to information regarding overall compliance of the facility.

At this time based on the information provided and its evaluation, it appears the project is below significance levels and the provisions of 278(1)-(3) do not apply. In addition, the exemption demonstrations for the diesel storage tanks, fire pumps engines, maintenance painting, and heating units are accepted based on the current understanding of this project's PTE.

Please let me know if you have any questions. Thank you.

Kind regards,
Diana Serban

From: Serban, Diana (EGLE)
Sent: Thursday, September 12, 2024 8:32 AM
To: Jogesh Panda <Jogi.Panda@pinchin.com>; Adam Patton <Adam.Patton@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>
Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti <Cvenuti@universallogistics.com>; ttraskos <ttraskos@universallogistics.com>; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>
Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

Hi Jogi,

Thank you. We will be reviewing the records provided to evaluate your 290 exemption claim on the VIMS system as well as concluding overall compliance with the permitting/rule exemption requirements.

If I have any questions, I'll reach out.

Kind regards,
Diana Serban

From: Jogesh Panda <Jogi.Panda@pinchin.com>

Sent: Monday, September 9, 2024 3:41 PM

To: Serban, Diana (EGLE) <SerbanD@michigan.gov>; Adam Patton <Adam.Patton@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti <Cvenuti@universallogistics.com>; ttraskos <ttraskos@universallogistics.com>; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Hi Diana,

Based on your confirmation through separate email messages, it appears that now you have received all the intended attachments, which we had to send through multiple separate email messages due to their sizes. Apologies for the inconvenience due to the piece-milling that we had to adopt to submit the requested items.

Please let us know if you have any further questions.

Regards,

Jogi



Jogesh C. Panda, PE | *Senior Engineer*

PM ENVIRONMENTAL, a Pinchin Company

4080 West Eleven Mile Road | Berkley, MI 48072 | www.pmenv.com

P: 248-336-9988 | f: 877-884-6775 | c: 734-837-0503 | jogi.panda@pmenv.com

Environmental & Engineering Services Nationwide



From: Serban, Diana (EGLE) <SerbanD@michigan.gov>

Sent: Monday, September 9, 2024 9:05 AM

To: Jogesh Panda <Jogi.Panda@pinchin.com>; Adam Patton <Adam.Patton@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: ArduinM1 <ArduinM1@michigan.gov>; Cvenuti <Cvenuti@universallogistics.com>; ttraskos <ttraskos@universallogistics.com>; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; KORNISKIJ <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

This Email is from an **EXTERNAL** source. Ensure you trust this sender before clicking on any links or attachments.

Hi Jogi,

I've received this email but the first time you sent it, it didn't show up. It sounds like the first email had some attachments and I haven't received those. Below is a screenshot of emails received from you since Aug 30th. It doesn't appear anything ended up in my junk box.

✓

JP From: Jogesh Panda ×

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Folder View Help Search

👤 Sent To ▾

📧 Unread

🚩 Flagged

🔴 Important

+ More ▾

📁 All Mailboxes

📁 Current Mailbox

📁 Current Folder

📁 Subfolders

📁 All Outlook Items

🗑️ Deleted Items

🔍 Recent Searches ▾

🔧 Search Tools

Scope Results Options

JP Jogesh Panda
Jogi.Panda@pinchin.com

Results By Date ▾ ↑

▼ Last Week

Jogesh Panda

RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted ...
CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov Hi Diana, This is the first of the three messages that you said you did not receive. I am sending it without the attachments to make sure we are

Fri 9/6
Inbox

Jogesh Panda

RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted ...
CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov Hi Diana, Did you receive the 1st of the 3 messages yet? At our end, our IT department confirmed that it was delivered. It is unlikely that two

Fri 9/6
Inbox

Jogesh Panda

RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted ...
CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov Hi Diana, This is the third out of the three messages used to transmit the requested files. The files attached here are the analytical reports for

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Thu 9/5
Inbox

Jogesh Panda

RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted ...
CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov This is the second of the three messages used for the submission of the files as attachments (please note, it is taking three messages, not

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Thu 9/5
Inbox 🗑️

▼ Two Weeks Ago

Jogesh Panda

RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted ...
CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov Good afternoon, Diana, Please see our response to your comments in "blue font" below . All reports and computation files referenced in our

↩️
8/30/2024
Inbox

▼ Three Weeks Ago

From: Jogesh Panda <Jogi.Panda@pinchin.com>

Sent: Friday, September 6, 2024 1:16 PM

To: Serban, Diana (EGLE) <SerbanD@michigan.gov>; Adam Patton <Adam.Patton@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti <Cvenuti@universallogistics.com>; ttraskos <ttraskos@universallogistics.com>; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Hi Diana,

This is the first of the three messages that you said you did not receive. I am sending it without the attachments to make sure we are referring to the same email message. Again, our IT department confirms that this message was delivered at your end. Please confirm.

Regards,

Jogi



Jogesh C. Panda, PE | *Senior Engineer*

PM ENVIRONMENTAL, a Pinchin Company

4080 West Eleven Mile Road | Berkley, MI 48072 | www.pmenv.com

P: 248-336-9988 | f: 877-884-6775 | c: 734-837-0503 | jogi.panda@pmenv.com

Environmental & Engineering Services Nationwide



From: Jogesh Panda

Sent: Thursday, September 5, 2024 11:31 AM

To: 'Serban, Diana (EGLE)' <SerbanD@michigan.gov>; Adam Patton <Adam.Patton@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: ArduinM1 <ArduinM1@michigan.gov>; Cvenuti <Cvenuti@universallogistics.com>; ttraskos <ttraskos@universallogistics.com>; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; KORNISKIJ <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

Hi Diana,

Per your request, I am attempting to send the files as attachments in two separate email messages. The following files are attached in this message:

1. Revised PTE calculations for the criteria pollutants.
2. Pre and Post carbon PTE calculations for the VIMS system for actual flow rates as well as the worst case PTE calculations.
3. The VIMS commissioning report

Please note that the VIMS commissioning report includes copies of the original laboratory reports. However, I will be sending over the original laboratory reports in a separate second email due to the file size limitations. Hope this goes through. Please confirm upon receipt.

Regards,

Jogi



Jogesh C. Panda, PE | *Senior Engineer*

PM ENVIRONMENTAL, a Pinchin Company

4080 West Eleven Mile Road | Berkley, MI 48072 | www.pmenv.com

P: 248-336-9988 | f: 877-884-6775 | c: 734-837-0503 | jogi.panda@pmenv.com

Environmental & Engineering Services Nationwide



From: Serban, Diana (EGLE) <SerbanD@michigan.gov>

Sent: Thursday, September 5, 2024 7:15 AM

To: Jogesh Panda <Jogi.Panda@pinchin.com>; Adam Patton <Adam.Patton@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: ArduinM1 <ArduinM1@michigan.gov>; Cvenuti <Cvenuti@universallogistics.com>; ttraskos <ttraskos@universallogistics.com>; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; KORNISKIJ <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

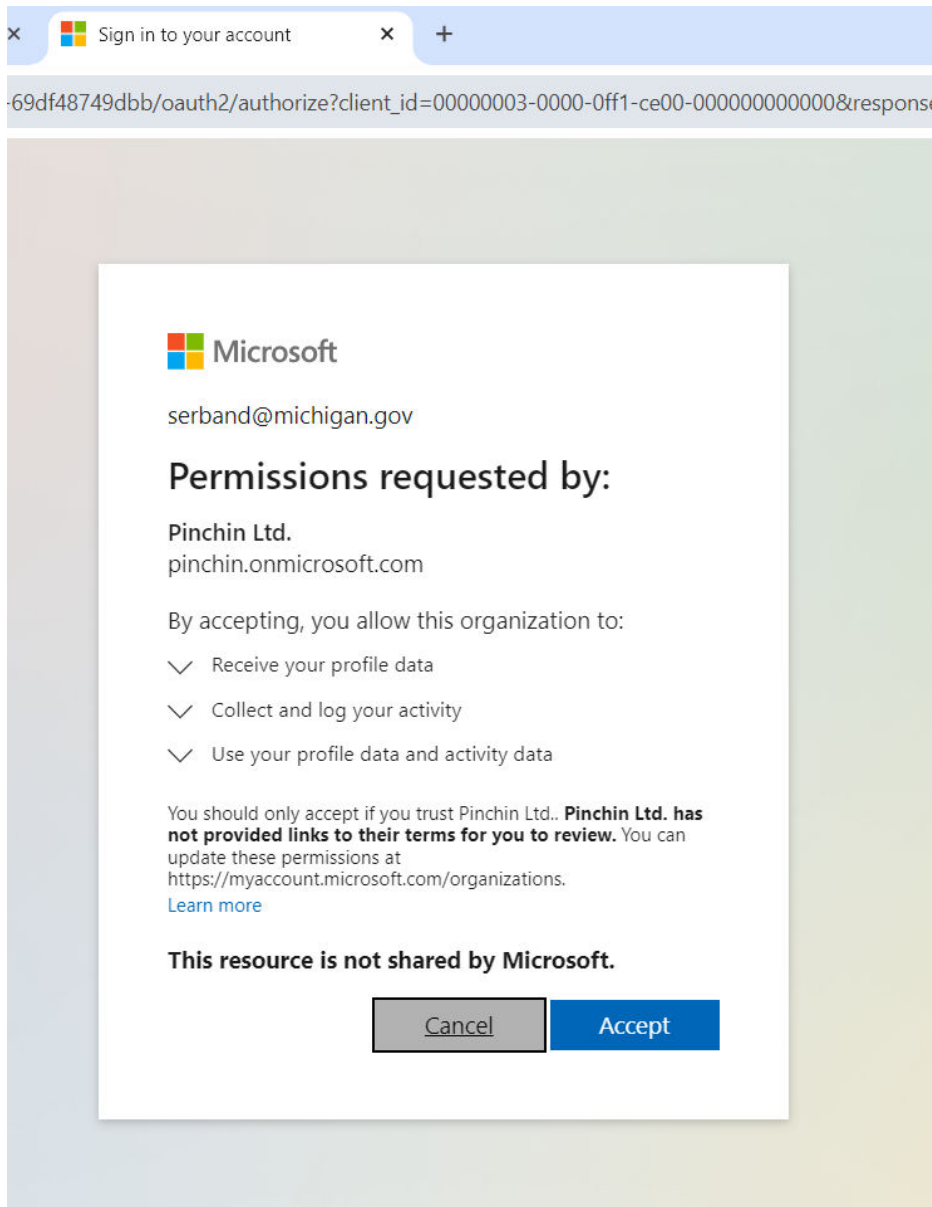
Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

This Email is from an **EXTERNAL** source. Ensure you trust this sender before clicking on any links or attachments.

Hi Jogi,

Thanks for the submission. In order to view the files on the sharepoint provided, the prompt is asking for permissions that I've been advised not to accept. Would you mind zipping and emailing the files? It's acceptable to send the submission piecemeal in multiple emails. If any one file is too big, we can make other arrangements so please let me know if that's the case.

If you could re-submit the files over email at your earliest convenience so we can begin our review, it would be greatly appreciated. Thank you.



Kind regards,
Diana Serban

From: Jogesh Panda <Jogi.Panda@pinchin.com>

Sent: Friday, August 30, 2024 4:12 PM

To: Serban, Diana (EGLE) <SerbanD@michigan.gov>; Adam Patton <Adam.Patton@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti <Cvenuti@universallogistics.com>; ttraskos <ttraskos@universallogistics.com>; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Good afternoon, Diana,

Please see our response to your comments in “blue font” below . All reports and computation files referenced in our response below can be found at this link [01-13443-5-0018 NP](#).

Please contact us with further questions.

Regards,

Jogi



Jogesh C. Panda, PE | *Senior Engineer*

PM ENVIRONMENTAL, a Pinchin Company

4080 West Eleven Mile Road | Berkley, MI 48072 | www.pmenv.com

P: 248-336-9988 | f: 877-884-6775 | c: 734-837-0503 | jogi.panda@pmenv.com

Environmental & Engineering Services Nationwide



From: Serban, Diana (EGLE) <SerbanD@michigan.gov>

Sent: Thursday, August 22, 2024 11:36 AM

To: Adam Patton <Adam.Patton@pinchin.com>; Jogesh Panda <Jogi.Panda@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com; ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

Importance: High

This Email is from an **EXTERNAL** source. Ensure you trust this sender before clicking on any links or attachments.

Good Morning All,

I have reviewed your submission and have the following questions, comments, and further requests. Upon further evaluation, it appears the 290-exemption calculation for the VI system was not utilized according to the procedure at the time of “worst case condition” and therefore must be corrected and resubmitted. This tool is for potential air emission calculation **prior** to system installation (pls refer to instructions in the tool to the right of calculations) to determine if controls must be added and/or whether an air permit is required prior to installation.

According to your baseline environmental assessment submittal in 2022, there were a few compounds detected (including carcinogenic compounds) above criteria and screening level at values that at first glance appear to result in exclusion from using 290 as an exemption. Based on this information, I’ll need further information to adequately determine what the worst-case air emissions from this system was/is and compare to current air emissions.

Please provide the following information for the vapor intrusion system. For the analytical results, please provide both the unmodified PDF provided by the lab and the excel sheet summarizing results

System information

- VI System Specification & data sheets (include any model ids) – Please see the Sub-Slab Depressurization System Installation Report shared at the above link.
- Drawings of Stack locations on property including stack exhaust height - Please see the Sub-Slab Depressurization System Installation Report shared at the above link.
- When was the system installed and what was the first date of start-up? The system was installed during 2023 and 2024. The system was activated on April 3, 2024.
- What is the flow rate of each stack exhaust and the collective system flow rate? In process of collation. Processing the monitoring data that you have requested into a tabular format will take some additional time.
- Are the stack exhausts' flow rates continuously measured/monitored? Yes. The vacuum at the inlet side of each fan is being continuously monitored. The flow rate can be deduced from the any corresponding vacuum reading as needed.

Due Care Documentation

- Please provide the due care plan, report/ “prove out”. – Please see the Sub-Slab Depressurization System Installation Report shared at the above link.
 - Though not required, please let me know whether your plan was submitted for EGLE RRD review/approval – Yes.
 - Pls provide the analytical results prior to system installation and immediately upon system start up Please see the original laboratory reports from Merit Laboratories shared at the above link. The Excel files have been requested from the laboratory and will be provided if still necessary.
 - Upon system start up, did you test daily for the 4 weeks following the start up? If so, please provide the records of the results. The system was monitored for daily for the first week, weekly for the first month, and is being continued to be monitored regularly on an automated basis using the remote cloud based monitoring system.
 - Please provide records of all analytical testing conducted on the stack exhaust effluent from the date of start up to today. All pre and post system startup analytical reports are shared at the above link under the folder name “VMS Lab.”

290 Air Emission Exemption Calculations

- Please recalculate and provide based on sub-soil sample concentration prior to installation and upon initial system startup. The VIMS calculations can be found in the shared folder named “VMS Emissions Calculations” at the above shared link. Please disregard the PTE emissions estimate pertaining to the VIMS provided earlier.

As a note, the following inconsistencies were discovered during my evaluation. When completing the 290-emission calculation, please double check the values from the analytical results are populated correctly into excel and transferred into the 290-calculation tool.

- Naphthalene detected in Sample V4&V16&V23
- Cyclohexane detected in Samples V23&V26
- 2-Methylnaphthalene detected in Sample V24

Though minor in nature from an air emissions standpoint, please correct the following for record purposes.

VOC Tank calculations

- Tanks observed to be 572 Gallons during inspection (see photo attached).
 - Please confirm correct size and update calculations to reflect that.

The stated size in the above bullet item is confirmed that the as-built tank at the site is 572 gallons, not 451 gallons. The Tanks 4.0.9d model was rerun with the revised input value for the tank data pertaining to the 572-gallon tank. The PTE spreadsheet was revised accordingly.

AC Fire Pump

- Fuel input is 31.5 gal fuel/hr for the updated confirmed size (see spec attached) [PTE calculations have been revised for the 31.5 gal/hr of fuel consumption to reflect the as-built conditions.](#)
 - Please update the emission calculations to reflect this – I believe its just the SO2 emission in this case. [Correct.](#)
- Were you claiming an exemption for the fire pumps or will those be included in the permit with the generators? [Claimed exemptions as listed in the “Facility Inventory” sheet in the attached Excel workbook file named “AMC Emissions Calculations_Revision 5_08302024”.](#)

Generators

- The emission factor for 1,1,2,2-tetrachloroethane is a factor off
 - Please update emission cal. to reflect this [The “typo” for the emission factor for 1,1,2,2-tetrachloroethane has been corrected and the PTE calculations for the TACs have been revised for this compound.](#)

Please submit an electronic response that addresses the items contained in this email at your earliest convenience but no later than next Friday August 30th. If you have any questions regarding the actions necessary to complete this submission, please contact me by phone or email.

Kind regards,
Diana Serban

From: Adam Patton <Adam.Patton@pinchin.com>

Sent: Wednesday, August 14, 2024 5:15 PM

To: Serban, Diana (EGLE) <SerbanD@michigan.gov>; Jogesh Panda <Jogi.Panda@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com; ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Understood.

Please see the attached, which is a consolidated package of the laboratory reports (VOC, PNA, and mercury analysis). A summary table of the analytical results is also attached in PDF format along with a PDF of the 290 PTE summary table.

Adam Patton, CHMM
Vice President

PM Environmental, A Pinchin Company

3340 Ranger Road, Lansing, MI 48906

adam.patton@pinchin.com | P: 517-321-3331 | C: 517-202-4288 | pmenv.com

From: Serban, Diana (EGLE) <SerbanD@michigan.gov>

Sent: Wednesday, August 14, 2024 12:09 PM

To: Adam Patton <Adam.Patton@pinchin.com>; Jogesh Panda <Jogi.Panda@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com; ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Thanks for explaining. Yes, the lab report and all you mentioned should be sufficient and no worries about the table formatting. I apologize for the confusion. I could have worded the initial request better.

Kind regards,
Diana

From: Adam Patton <Adam.Patton@pinchin.com>

Sent: Wednesday, August 14, 2024 12:02 PM

To: Serban, Diana (EGLE) <SerbanD@michigan.gov>; Jogesh Panda <Jogi.Panda@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com; ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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All of our results are reported to us in a proprietary excel-based EDD with macros, custom formatting, coding, and other programming. They do not give us raw EDD. They do give us their lab reports in a PDF format.

If you are just looking for the lab reports with the methods, sample collection/receipt/run, and other documentation, we can have those over to you in short order. Those are not in a tabular format though.

Adam Patton, CHMM

Vice President

PM Environmental, A Pinchin Company

3340 Ranger Road, Lansing, MI 48906

adam.patton@pinchin.com | P: 517-321-3331 | C: 517-202-4288 | pmenv.com

From: Serban, Diana (EGLE) <SerbanD@michigan.gov>

Sent: Wednesday, August 14, 2024 11:48 AM

To: Adam Patton <Adam.Patton@pinchin.com>; Jogesh Panda <Jogi.Panda@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com; ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Adam,

Thank you for the quick update. To clarify further, I'm requesting the unmodified PDF version labs typically send with the results. It typically includes the test method, sampling method, and any other pertinent information.

Can you help me understand what you mean about its storage in your proprietary EDD and the format it was initially delivered in?

Thank you,
Diana Serban

From: Adam Patton <Adam.Patton@pinchin.com>

Sent: Wednesday, August 14, 2024 11:30 AM

To: Serban, Diana (EGLE) <SerbanD@michigan.gov>; Jogesh Panda <Jogi.Panda@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com; ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Kelly Lennon <Kelly.Lennon@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>; Trey Scovill <Trey.Scovill@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Diana,

Our staff are assembling the requested lab results and putting into the format you requested. Currently it is in our proprietary EDD, which we cannot transmit, but I expect that we will have to you in the next day or two.

Adam Patton, CHMM

Vice President

PM Environmental, A Pinchin Company

3340 Ranger Road, Lansing, MI 48906

adam.patton@pinchin.com | P: 517-321-3331 | C: 517-202-4288 | pmenv.com

From: Serban, Diana (EGLE) <SerbanD@michigan.gov>

Sent: Wednesday, August 14, 2024 10:38 AM

To: Jogesh Panda <Jogi.Panda@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com; ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Adam Patton <Adam.Patton@pinchin.com>; Korniski, Jeffrey (EGLE) <KORNISKIJ@michigan.gov>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Adam, Jogi,

Thank you for your submission. I will review and let you know of any questions or comments I have. In the meantime, please provide the PDF of the lab test results for the VI samples at your earliest convenience. Below is an example of what I'm looking for.

@adding Jeff Korniski, Detroit district assistant supervisor.

BASELINE SOIL VAPOR ANALYTICAL RESULTS FROM SELECT VENT RISER LOCATIONS**

Interior Vent Riser Sampling Location:		VM-2	VM-6 ^b	VM-13	VM-20	VM-28 ^c	VM-37
Sample Date:	3/17/2015	3/17/2015	3/17/2015	3/17/2015	3/17/2015	3/17/2015	3/17/2015
Field Sample ID	(ug/m ³) ^a						
Chemicals of Concern (VOCs by...)							
Benzene	2,500	1.2	1.3	1.6	<2.6	<2.6	0.93
1,3-Butadiene	610	<0.44	<0.44	<0.44	<1.8	<1.8	<0.44
Ethylbenzene	7,500	1.7	2.5	3.2	<3.5	<3.5	2
Hexane	550,000	42	12	6.7	<2.8	<2.8	3.9
Naphthalene	550	<3.3	<3.3	<3.3	<13	<13	<3.3
Tetrachloroethene	33,000	4.3	6.4	7.5	<5.4	<5.4	<1.4
Trichloroethene	1,600	<1.1	<1.1	1.2	800	540	<1.1
1,2,4-Trimethylbenzene	5,500	3.2	4.9	5.4	<3.9	<3.9	3
Vinyl Chloride	2,100	<0.51	<0.51	<0.51	<2	<2	<0.51
Xylene	78,000	6.5	9.5	12	9.5	10	7.8
o-Xylene	78,000	2.8	4.2	5.2	3.8	3.9	2.8

Notes:

** Vapor samples were collected from 6 selected vent riser locations. The valves for all 41 vent riser locations were placed in the closed position approximately 48 hrs prior to the start of sample collection; samples were collected over a 24-hour period beginning on March 16, 2015. Note that baseline sampling event was conducted during active indoor construction activities including painting, flooring installation, and

BOLD values indicate a detection above laboratory reporting limits.

All results are presented in ug/m³

Thank you,
Diana Serban

From: Jogesh Panda <Jogi.Panda@pinchin.com>

Sent: Friday, August 9, 2024 4:27 PM

To: Serban, Diana (EGLE) <SerbanD@michigan.gov>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com;

traskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Adam Patton <Adam.Patton@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Hi Kevin and Diana,

The PTE calculations have been further revised per EGLE's comments in the attached spreadsheet. The revised PTE values for the criteria pollutants are listed in tons are summarized below. PTE for each of the criteria pollutant is found to be below the Significant Net Emissions Increase Threshold for Non-Attainment Areas.

CO	NOX	VOC	SO2	Total PM
8.620	6.076	2.434	1.386	0.364

Therefore, the exemptions previously communicated in the email message dated July 26, 2024 should be applicable for the project at the subject facility. Responses to both Kevin's comments in the email message dated July 30, 2024 and Diana's comments in the email messages dated August 5 and August 6, 2024 are provided below in blue font following their comments in black font. This email chain includes the above referenced email messages.

Diana's Comments:

For the fire pumps

- Clarification on the correct parameters for model, BHP, and RPM. There were discrepancies between the model number in the data sheet made available to us and the as-built model number observed by EGLE. The correct model number appears to be C18H0FMAD12-DS as observed by EGLE during the field inspections. The BHP, kW, and RPM values used in the PTE calculations have been revised to reflect 488 BHP, 364 kW, and 2100 rpm respectively. The corresponding data sheet from the manufacturer is attached.
- Update to the emissions calculations that reflects the correct parameters. Completed in the attached spreadsheet.

For the VOC emissions

- VOC emissions data for June/July on the vapor intrusion system
 - all available data for the month of June/July. Pre-carbon or influent emissions samples from the vapor intrusion mitigation system (VIMS) stacks were collected only one time in March 2024, data from which were provided in the July 26, 2024 communication. The maximum concentration value from all 30 stacks for each compound was used for the VOC emissions calculation was used. This likely grossly over-estimates the emissions since many of the stacks had non-detect levels.
- an update to the VOC emissions calculation based on the worst-case scenario for the vapor intrusion system emissions. As shown in the spreadsheet containing the analytical results, which was provided in the July 26, 2024 communication, the maximum concentration reported for each compound was used in the Part 290 emissions calculations to represent the worst-case scenario. See response to the preceding bullet item for further information.
- An update to the 290-exemption screening based on the worst-case scenario for the vapor intrusion system emissions. No update was made to the previously provided Part 290 exemption screening spreadsheet showing VOC emissions since the worst case scenario was already considered. See the responses to the preceding two bullet items.

For the Tank Emissions

- Please use the data from the EPA tanks 4.09 program instead of the Oklahoma DEQ program. One clarification is whether the storage tanks are heated or not. They didn't appear to be from my observations, but I could be wrong. Tank emissions were revised by using the EPA Tanks 4.09 program as suggested. The difference between the originally reported emissions and the revised emissions was found to be 0.13 lbs or 0.000065 tons, which does not appear to be significant in the context of determining if the VOC threshold would be exceeded due to tank emissions.

Kevin's comments:

- The total NOx tons per year emission rate you submitted (54.34 tpy) is above the significance threshold listed in Rule 119(e), making NP Detroit Commerce ineligible for any PTI exemptions, per Rule 278(b). However, I did find some mistakes in the emission factors used and I believe correcting the emission factors would lower the NOx emission rate to be below the threshold, please see next items. Noted and revised in the attached.
- AC Fire Pumps:
 - These engines are subject to (and certified to, according to the spec sheet) the emission standards listed in Table 3 (Tier 3 Emission Standards) to Appendix I to Part 1039 of 40 CFR:

Rated power (kW)	Starting model year	NO _x +NMHC	CO
37 ≤ kW < 75	2008	4.7	5.0
75 ≤ kW < 130	2007	4.0	5.0
130 ≤ kW ≤ 560	2006	4.0	3.5

Because these are federal standards, they should be used to compute the PTE emissions, and not AP-42. Using these standards, please re-compute the emissions of VOC, NO_x, CO, and total PM. Please use the NO_x+NMHC factor for both VOC and NO_x. Please note that factors are in g/Kw-hr. [Noted and revised in the attached spreadsheet.](#) Please note that NO_x+NMHC factor of 4.0 g/kW-hr was proportioned in accordance with the proportion of NO_x and HC emissions present in the emissions test results provided by the manufacturer for the specific engine. Using 4.0 g/kW-hr as the emission factor for both NO_x and VOCs as suggested would significantly overestimate each PTE and may not be justified. The test results for the AC fire pump engine is attached. Please note that the emissions data attached are for the Model No. C18H0-UFAD12 and not for the Model No. C18H0-FMAD12, which is the model number pertaining to the engines at the facility. However, according to the manufacturer, the emissions data are identical for both and therefore apply to C18H0-FMAD12.

- Natural Gas HVAC space heaters and RTU units: Engine emission factors were used to compute the emissions from these units, however this overestimates the emissions. There are no federal/state standards for these units, but the emission factors that are more appropriate are those from boilers used for space heating (SCC 10500106). These factors can be found from EPA's WebFIRE database which I have summarized here, please note they are in lb of pollutant/MMSCF of natural gas. The SO₂ factor already accounts for the 20 grains/100 scf sulfur limit in NG. [Noted and revised in the attached.](#)

Space Heating Emission Factors from WebFire	CO	NO _x	PM	SO ₂	VOC
lb/MMscf	20	100	8.7	60	5.3

I will be on PTO through next week. In the meantime, if you have any questions, please reach out to Adam, who is copied in this chain.

Regards,
Jogi



Jogesh C. Panda, PE | *Senior Engineer*

PM ENVIRONMENTAL, a Pinchin Company

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Environmental & Engineering Services Nationwide



From: Serban, Diana (EGLE) <SerbanD@michigan.gov>

Sent: Tuesday, August 6, 2024 10:00 AM

To: Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>; Jogesh Panda <Jogi.Panda@pinchin.com>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com; ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Adam Patton <Adam.Patton@pinchin.com>
Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Hi Jogi,

I apologize I forgot to include another request regarding the diesel tanks emissions. Please use the data from the EPA tanks 4.09 program instead of the Oklahoma DEQ program. One clarification is whether the storage tanks are heated or not. They didn't appear to be from my observations, but I could be wrong. Please use whichever calculation reflects the correct state. I've attached the emissions of both cases here and you are welcome to use these. If you'd like to run your own report using the software, you can download it at the website below.

[TANKS Emissions Estimation Software, Version 4.09D | US EPA](#)

If you have any questions, please let me know. Thank you.

Kind regards,
Diana Serban

From: Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>
Sent: Monday, August 5, 2024 4:04 PM
To: Jogesh Panda <Jogi.Panda@pinchin.com>; Serban, Diana (EGLE) <SerbanD@michigan.gov>
Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com; ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Adam Patton <Adam.Patton@pinchin.com>
Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

Hi Jogi,

Yes, you can disregard my previous due date. The new due date for the comprehensive response is what Diana wrote: August 9, 2024.

Thank you,

Kevin Villalta, P.E.

Environmental Engineer
Air Quality Division – Permit Section
Michigan Department of Environment, Great Lakes, and Energy
269-400-0921 | villaltak1@michigan.gov
[Connect with us | Michigan.gov/EGLE](#)



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From: Jogesh Panda <Jogi.Panda@pinchin.com>

Sent: Monday, August 5, 2024 1:43 PM

To: Serban, Diana (EGLE) <SerbanD@michigan.gov>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com;
ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Adam Patton <Adam.Patton@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Hi Kevin and Diana,

We have now received both Kevin's as well as your comments on the submitted information request pertaining to PTE calculations. We will be reviewing the comments and if we have any questions, we will be reaching out to both you and Kevin as needed. Please clarify if the expected due date for the comprehensive response to Kevin and your comments is now August 9, 2024, and the expected due date of August 6, 2024 in Kevin's email message dated July 30, 2024 is no longer applicable.

Regards,

Jogi



Jogesh C. Panda, PE | *Senior Engineer*

PM ENVIRONMENTAL, a Pinchin Company

4080 West Eleven Mile Road | Berkley, MI 48072 | www.pmenv.com

P: 248-336-9988 | f: 877-884-6775 | c: 734-837-0503 | jogi.panda@pmenv.com

Environmental & Engineering Services Nationwide



From: Serban, Diana (EGLE) <SerbanD@michigan.gov>

Sent: Monday, August 5, 2024 1:22 PM

To: Jogesh Panda <Jogi.Panda@pinchin.com>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com;

ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Adam Patton <Adam.Patton@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Hi Jogi,

I've reviewed the information and agree with Kevin's assessment on the requested emissions update for the fire pumps and space heaters. In addition, I would like to request further information on the

VOC emission calculation for the vapor intrusion system and clarification on the parameters for the two emergency fire pumps.

For the two fire pumps, I observed an RPM of 2100 and BHP of 488 on both nameplates during the inspection. However, the emissions data provided is for an RPM of 1760 and BHP of 350. While the size H10X8X20F-L matches the data sheet provided, the model ID of the engine differs from what's provided in the data sheet of C13H0-UFAD32-D-PLD vs observed model on nameplate C18H0-FMAD12-DS. We are not looking at a big difference here for emissions purposes but please still clarify which is correct and update the emissions calculations using those parameters.

I noticed the VOC emissions data for the vapor intrusion system included a weeks' worth of data for March 2024. A few questions regarding sampling. How often are samples obtained? Is it on a weekly or monthly basis?

Please also provide the VOC emissions data records for the month of June/July with as much sample data as available and use the worst-case data to calculate the VOC PTE. Please also update the 290-exemption screening with this worse case data.

In summary, please provide the following information

For the fire pumps

- Clarification on the correct parameters for model, BHP, and RPM
- Update to the emissions calculations that reflects the correct parameters

For the VOC emissions

- VOC emissions data for June/July on the vapor intrusion system
 - all available data for the month of June/July.
- an update to the VOC emissions calculation based on the worst-case scenario for the vapor intrusion system emissions.
- An update to the 290-exemption screening based on the worst-case scenario for the vapor intrusion system emissions.

Please submit the revised emission calculations that addresses the above items electronically by next Friday August 9th, 2024. If you have any questions, please let me know.

From: Jogesh Panda <Jogi.Panda@pinchin.com>

Sent: Wednesday, July 31, 2024 2:03 PM

To: Serban, Diana (EGLE) <SerbanD@michigan.gov>; Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com;

ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Adam Patton <Adam.Patton@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Hi Diana,

The TACs spreadsheet used for VIMs emission calculation was downloaded from EGLE. The spreadsheet comes with mostly protected columns with only the input fields unprotected. If you are finding the input fields in the file that I sent you somehow are protected too, please let me know. Otherwise, I am not sure who to contact at EGLE to unprotect the protected fields in the spreadsheet.

Please advise.

Regards,

Jogi



Jogesh C. Panda, PE | *Senior Engineer*

PM ENVIRONMENTAL, a Pinchin Company

4080 West Eleven Mile Road | Berkley, MI 48072 | www.pmenv.com

P: 248-336-9988 | f: 877-884-6775 | c: 734-837-0503 | jogi.panda@pmenv.com

Environmental & Engineering Services Nationwide



From: Serban, Diana (EGLE) <SerbanD@michigan.gov>

Sent: Wednesday, July 31, 2024 12:43 PM

To: Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>; Jogesh Panda <Jogi.Panda@pinchin.com>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com;

ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Adam Patton <Adam.Patton@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Hi Jogi,

I am still reviewing the submission from the district side of things. In the meantime, could you please send me the unprotected version of the Vapor inclusion emissions calculations?

Thank you,
Diana

From: Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Sent: Tuesday, July 30, 2024 4:14 PM

To: Jogesh Panda <Jogi.Panda@pinchin.com>

Cc: Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com;

ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Adam Patton <Adam.Patton@pinchin.com>;

Serban, Diana (EGLE) <SerbanD@michigan.gov>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

Hi Jogi,

Thank you for submitting the requested information. I reviewed the information you submitted and have the following comments, and requests:

- The total NOx tons per year emission rate you submitted (54.34 tpy) is above the significance threshold listed in Rule 119(e), making NP Detroit Commerce ineligible for any PTI exemptions, per Rule 278(b). However, I did find some mistakes in the emission factors used and I believe correcting the emission factors would lower the NOx emission rate to be below the threshold, please see next items.
- AC Fire Pumps:

- These engines are subject to (and certified to, according to the spec sheet) the emission standards listed in Table 3 (Tier 3 Emission Standards) to Appendix I to Part 1039 of 40 CFR:

Rated power (kW)	Starting model year	NO _x +NMHC	CO
37 ≤ kW < 75	2008	4.7	5.0
75 ≤ kW < 130	2007	4.0	5.0
130 ≤ kW ≤ 560	2006	4.0	3.5

Because these are federal standards, they should be used to compute the PTE emissions, and not AP-42. Using these standards, please re-compute the emissions of VOC, NO_x, CO, and total PM. Please use the NO_x+NMHC factor for both VOC and NO_x. Please note that factors are in g/Kw-hr.

- Natural Gas HVAC space heaters and RTU units: Engine emission factors were used to compute the emissions from these units, however this overestimates the emissions. There are no federal/state standards for these units, but the emission factors that are more appropriate are those from boilers used for space heating (SCC 10500106). These factors can be found from EPA's WebFIRE database which I have summarized here, please note they are in lb of pollutant/MMSCF of natural gas. The SO₂ factor already accounts for the 20 grains/100 scf sulfur limit in NG.

Space Heating Emission Factors from WebFire	CO	NO _x	PM	SO ₂	VOC
lb/MMscf	20	100	8.7	60	5.3

Please submit the revised emission calculations that addresses the above items electronically by next Tuesday, August 6, 2024. If you have any questions, please don't hesitate to contact me.

Sincerely,

Kevin Villalta, P.E.

Environmental Engineer
Air Quality Division – Permit Section
Michigan Department of Environment, Great Lakes, and Energy
269-400-0921 | villaltak1@michigan.gov
[Connect with us | Michigan.gov/EGLE](#)

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From: Jogesh Panda <Jogi.Panda@pinchin.com>

Sent: Friday, July 26, 2024 2:15 PM

To: Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>; Serban, Diana (EGLE) <SerbanD@michigan.gov>

Cc: Mitchell, Mark (EGLE) <MITCHELLM7@michigan.gov>; Arduin, Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com; ttraskos@universallogistics.com; Brett Sroka <bsroka@northpointkc.com>; Adam Patton <Adam.Patton@pinchin.com>

Subject: RE: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Hello Kevin and Diana,

This email is in response to Diana's email message dated June 21, 2024 (attached) following the June 20, 2024 inspection of the above referenced facility as well to Kevin's email message dated June 25, 2024. Thanks for allowing an extending the original due date of the information request to July 26, 2024 (Diana's email message dated July 16, 2024).

- *A description of all sources and activities emitting regulated (state or federal) air contaminants at the site (please be sure to include future planned sources/activities that are related to the development of the site because they are part of the "project" being permitted)*

The following sources and activities with potential to emit regulated (state or federal) air contaminants at the facility were identified as part of the above referenced "project." No additional sources are being planned to be included in the future as part of this "project."

Source No.	Emission Source	Description
1	ASKA Generators Model PSI UL NG1050	Natural gas fired emergency generator
2	ASKA Generators Model PSI UL NG1050	Natural gas fired emergency generator
3	AC Fire Pumps C13H0-UFAD32-D 1760 RPM	Fire suppression pump - used for drills and emergency
4	AC Fire Pumps C13H0-UFAD32-D 1760 RPM	Fire suppression pump - used for drills and emergency
5	Diesel Fuel Storage Tanks 5587T	Fuel Above Ground Storage Tank for Fire Suppression System
6	Diesel Fuel Storage Tanks 5587T	Fuel Above Ground Storage Tank for Fire Suppression System
7	Natural Gas Heating Unit - 400 MBH Input Johnson Control Choice Model#AD20N3CH4M1CAP16C2	HVAC - RTU Unit
8	Natural Gas Heating Unit - 220 MBH Input Johnson Control Core Model#ZYG08F4B3AB1C322A4	HVAC Unit
9	Natural Gas Heat - 145 MBH Input Johnson Controls Core Model#ZQG06F4C1AB1C322A5	HVAC Unit
10	Natural Gas Heat - 145 MBH Input Johnson Controls Core Model#ZQG06F4C1AB1C322A5	HVAC Unit
11	Natural Gas Heat - 145 MBH Input Johnson Controls Core Model#ZQG05F4C1AB1C322A4	HVAC Unit
12	Natural Gas Heat - 145 MBH Input Johnson Controls Core Model#ZQG05F4C1AB1C322A4	HVAC Unit
13	Natural Gas Heat - 145 MBH Input Johnson Controls Core Model#ZQG05F4C1AB1C322A4	HVAC Unit

	Natural Gas Heat - 145 MBH Input	
14	Johnson Controls Core Model#ZQG05F4C1AB1C322A4	HVAC Unit
	Natural Gas Heat - 112 MBH Input	
15	Johnson Controls Model#ZQG04E4C1AB1C322A4	HVAC Unit
	Natural Gas Heat - 112 MBH Input	
16	Johnson Controls Model#ZQG04E4C1AB1C322A4	HVAC Unit
	Natural Gas Heat - 112 MBH Input	
17	Johnson Controls Model#ZQG04E4C1AB1C322A4	HVAC Unit
	Natural Gas Heat - 112 MBH Input	
18	Johnson Controls Model#ZQG04E4C1AB1C322A4	HVAC Unit
	Natural Gas Heating Unit - RTU - 600 MBH Input	
19	Daikin MAV-2 Model MP-S050F	Natural Gas Heating - RTU
20	Subslab Depressurization System Fans - 30 stacks	Vapor Intrusion System
21	Painting activities	Building maintenance painting

Equipment specifications or technical data for all equipment except for the emergency generators are attached for your reference. The technical data sheets for the emergency generators were provided with the PTI application dated April 11, 2024.

- The total annual potential to emit (PTE) in tons per year of the criteria pollutants for all the sources/activities (PTE should be based on federal/state standards (e.g. NSPS, Michigan Part 3 Rules, etc), EPA AP-42 factors, manufacturer data, industry-developed factors, or engineering estimates, in that order)*

The total annual PTE (in tons) from the above emission sources is calculated to be as follows:

CO	NOX	VOC	SO2	Total PM
14.380	54.341	4.209	1.404	0.689

The PTE levels for the criteria pollutants do not exceed the threshold for the “major” source. Please refer to the attached spreadsheet for calculation details.

- Any claims for a PTI exemption for any of the sources/activities, pursuant to Air Pollution Control Rules 278 through 291, and an explanation on how the source/activity meets the exemption in the Rules.*

All emission sources found during the EGLE inspections dated June 20, 2024 except for the emergency generator sources identified in the permit application are exempt per the indicated rules below:

Source No.	Emission Source	Description
1	ASKA Generators Model PSI UL NG1050	Natural gas fired emergency generator
2	ASKA Generators Model PSI UL NG1050	Natural gas fired emergency generator
3	AC Fire Pumps C13H0-UFAD32-D 1760 RPM	Fire suppression pump - used for drills and emergency
4	AC Fire Pumps C13H0-UFAD32-D 1760 RPM	Fire suppression pump - used for drills and emergency
5	Diesel Fuel Storage Tanks 5587T	Fuel Above Ground Storage Tank for Fire Suppression System
6	Diesel Fuel Storage Tanks 5587T	Fuel Above Ground Storage Tank for Fire Suppression System
	Natural Gas Heating Unit - 400 MBH Input	
7	Johnson Control Choice Model#AD20N3CH4M1CAP16C2	HVAC - RTU Unit

	Natural Gas Heating Unit - 220 MBH Input	
8	Johnson Control Core Model#ZYG08F4B3AB1C322A4	HVAC Unit
	Natural Gas Heat - 145 MBH Input	
9	Johnson Controls Core Model#ZQG06F4C1AB1C322A5	HVAC Unit
	Natural Gas Heat - 145 MBH Input	
10	Johnson Controls Core Model#ZQG06F4C1AB1C322A5	HVAC Unit
	Natural Gas Heat - 145 MBH Input	
11	Johnson Controls Core Model#ZQG05F4C1AB1C322A4	HVAC Unit
	Natural Gas Heat - 145 MBH Input	
12	Johnson Controls Core Model#ZQG05F4C1AB1C322A4	HVAC Unit
	Natural Gas Heat - 145 MBH Input	
13	Johnson Controls Core Model#ZQG05F4C1AB1C322A4	HVAC Unit
	Natural Gas Heat - 145 MBH Input	
14	Johnson Controls Core Model#ZQG05F4C1AB1C322A4	HVAC Unit
	Natural Gas Heat - 112 MBH Input	
15	Johnson Controls Model#ZQG04E4C1AB1C322A4	HVAC Unit
	Natural Gas Heat - 112 MBH Input	
16	Johnson Controls Model#ZQG04E4C1AB1C322A4	HVAC Unit
	Natural Gas Heat - 112 MBH Input	
17	Johnson Controls Model#ZQG04E4C1AB1C322A4	HVAC Unit
	Natural Gas Heat - 112 MBH Input	
18	Johnson Controls Model#ZQG04E4C1AB1C322A4	HVAC Unit
	Natural Gas Heating Unit - RTU - 600 MBH Input	
19	Daikin MAV-2 Model MP-S050F	Natural Gas Heating - RTU
20	Subslab Depressurization System Fans - 30 stacks	Vapor Intrusion System
21	Painting activities	Building maintenance painting

Also, attached is the Part 290 calculations spreadsheet for the vapor mitigation system (VIMS) including the analytical data used for the calculations.

If you have any questions about the approach or calculations used, please contact me.

Regards,
Jogi



Jogesh C. Panda, PE | *Senior Engineer*

PM ENVIRONMENTAL, a Pinchin Company

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Environmental & Engineering Services Nationwide



From: Villalta, Kevin (EGLE) <VillaltaK1@michigan.gov>

Sent: Tuesday, June 25, 2024 10:34 AM

To: Brett Sroka <bsroka@northpointkc.com>; Adam Patton <Adam.Patton@pinchin.com>; Jogesh Panda <Jogi.Panda@pinchin.com>

Cc: Serban, Diana (EGLE) <SerbanD@michigan.gov>; Mitchell, Mark (EGLE) <MITCHELLM7@michigan.gov>; Arduin,

Megan (EGLE) <ArduinM1@michigan.gov>; Cvenuti@universallogistics.com; ttraskos@universallogistics.com

Subject: NP Detroit Commerce LLC APP 2024 0097 - Information Request regarding unpermitted equipment/activities

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Adam, Brett, Jogi,

AQD district staff has determined that there is additional equipment at the site that was not mentioned in this PTI application. Because this additional equipment might require additional review and may impact the compliance demonstration for the federal NAAQS and/or state screening levels for TACs, I am no longer requesting the TACs compliance demonstration for the two AKSA generators by July 1st. Instead, please be sure to be sure to copy me in your response to Diana's 06/21 email (Attached) requesting the following:

- A description of all sources and activities emitting regulated (state or federal) air contaminants at the site (please be sure to include future planned sources/activities that are related to the development of the site because they are part of the "project" being permitted)
- The total annual potential to emit (PTE) in tons per year of the criteria pollutants for all the sources/activities (PTE should be based on federal/state standards (e.g. NSPS, Michigan Part 3 Rules, etc), EPA AP-42 factors, manufacturer data, industry-developed factors, or engineering estimates, in that order)
- Any claims for a PTI exemption for any of the sources/activities, pursuant to Air Pollution Control Rules 278 through 291, and an explanation on how the source/activity meets the exemption in the Rules.

An email response to us with this information is requested by July 22, 2024. If you have any questions, please feel free to contact me.

Thank you,

Kevin Villalta, P.E.

Environmental Engineer
Air Quality Division – Permit Section
Michigan Department of Environment, Great Lakes, and Energy
269-400-0921 | villaltak1@michigan.gov
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Attachment C



Attachment C Materials Transmitted Electronically via link:

https://pinchinus-my.sharepoint.com/:f/g/personal/adam_patton_pmenv_com/Eh0WGYIjFtpLIDQAiyh_1k8Bjqw9oHkhSjDnSe_Cc_jyaA?e=jPPxhd