

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

N085473745

FACILITY: TI GROUP AUTOMOTIVE SYSTEMS LLC - Caro Test Center		SRN / ID: N0854
LOCATION: 628 COLUMBIA ST, CARO		DISTRICT: Bay City
CITY: CARO		COUNTY: TUSCOLA
CONTACT: John Macha , Plant Manager		ACTIVITY DATE: 09/11/2024
STAFF: Haley Willman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

An onsite inspection was conducted by Air Quality Division (AQD) staff Gina McCann (GM) and Haley Willman (HW) of TI Group Automotive Systems LLC – Caro Test Center (TI) to verify compliance with Renewable Operating Permit (ROP) No. MI-ROP-N0854-2018.

### **Facility Description**

The site is comprised of two separate buildings: one for testing and one for manufacturing. While TI is primarily a testing facility of fuel delivery components (tanks, pumps, and modules), this site houses a manufacturing facility next door. The facility is a major source of hazardous air pollutants (HAPs) and volatile organic compounds (VOCs) and is in operation under ROP No. MI-ROP-N0854-2018.

### **Offsite Compliance Review**

TI is required to submit semi-annual and annual compliance reports per Part A General Conditions 19-23 of MI-ROP-N0854-2018. Semi-annual and annual compliance reports were reviewed since the previous inspection on February 10, 2022.

Based on the timing of the inspection, TI had submitted their State and Local Emissions Inventory System (SLEIS) Report for 2023 and appeared acceptable.

### **Compliance Evaluation**

An onsite inspection of the facility was completed on September 11, 2024. AQD staff HW and GM arrived in the area of the facility at 11:15am. Weather conditions at the time were sunny skies, temperatures in the high 70's degrees Fahrenheit, and 5-10mph winds. While offsite, mild odors noted appeared to be from the Michigan Sugar Company site to the southwest. Upon arriving onsite, HW and GM met with Jeff Williamson (JW), Mike Sattelberg (MS), Test Center Lab Manager, and John Macha (JM), Plant Manager for the manufacturing facility. JW and MS provided a tour of the testing portion of the site and answered site specific questions. JM accompanied staff through the manufacturing portion of the inspection. As mentioned above TI is a manufacturing and testing facility of fuel delivery components for several markets. The various stages of onsite operations were observed and will be discussed further below in this inspection report.

### **ROP No. MI-ROP-N0854-2018**

It is noted that the ROP does not contain any specific emission units but that the company utilizes applicable exemptions for all onsite processes.

There are seven total labs present at the testing facility and are separated into the following categories: performance, durability (four labs), reliability, and permeation.

#### ***Performance Lab***

- The performance lab tests the performance of fuel pumps under various conditions such as fuel types, temperature, etc.

#### ***Durability Lab***

- EUDLAB1, EUDLAB2, EUDLAB3, EUDLAB4 – These four emission units make up the durability labs and are used for durability testing of equipment. According to JW, this lab is the largest contributor to total emissions. These units were observed during the inspection and appear to be exempt per Rule 283(2)(d).

#### ***Reliability Lab***

- EULABR – This emission unit is for the reliability lab chambers and was observed during the inspection. This emission unit appears to be exempt per Rule 283(2)(d).

#### ***Permeation Lab***

- EUPERMLAB, EUSOAK – The permeation lab tests the hydrocarbon permeability from fuel tanks. These emission units appear to be exempt per Rule 283(2)(d).
- EUTESTPROCESSHEATER – This is for a 440,000 Btu/hr process heater that supplies heat to test chambers as part of the permeation lab and appears exempt per Rule 282(2)(b)(i).

**EUSPACEHEATERS** – Natural gas fired, roof mounted space heating units were discussed during the onsite inspection. According to the previous inspection report, a total of 38 appear to be on site and appear to be exempt per Rule 282(2)(b)(i).

**EUUSTS** – Three (two - 6,000-gallon compartment, one – 10,000-gallon waste) underground storage tanks, which are never at full capacity according to TI staff, contain various fuel types used for testing and were observed during the inspection and appear to be exempt per Rule 284(2)(g)(i).

On the manufacturing side there are two above ground storage tanks used to store virgin and used solvent. These were observed during the inspection and appear to be exempt per Rule 284 (2)(i).

**EUPRODUCTION-BOILER1, EUPRODUCTION-BOILER2** – These 985,000 Btu/hr boilers provide heat to the manufacturing area and appear to be exempt per Rule 282 (2)(b)(i).

Plastic injection mold machines were observed during the course of the inspection that are used to manufacture select plastic parts and appear to be exempt per Rule 286(2)(b).

#### **Conclusion**

Based on the facility walkthrough and observations made while onsite, TI appears to be in compliance with MI-ROP-N0854-2018 and applicable air quality rules.

NAME Harvey Willman

DATE 9/24/24

SUPERVISOR Shirley R. McCann