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

P109956143		
FACILITY: NGK Spark Plugs (U.S.A.), Inc.		SRN / ID: P1099
LOCATION: 46929 Magellan Drive, WIXOM		DISTRICT: Warren
CITY: WIXOM		COUNTY: OAKLAND
CONTACT: Jennifer McAllister, Administration Manager		ACTIVITY DATE: 11/17/2020
STAFF: Rem Pinga	<b>COMPLIANCE STATUS:</b> Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site Inspection		
RESOLVED COMPLAINTS:		

On November 17, 2020, I conducted an on-site inspection at NGK Spark Plugs (U.S.A.), Inc. (NGK) located at 26929 Magellan Drive, Wixom, Michigan 48393. The purpose of the inspection was to determine the facility'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 Administrative Rules, and the facility's Permit to Install (PTI) No. 70-20.

To comply with the COVID-19 Emergency AQD Field Inspection Guidance Update (June 2020), the inspection was announced and scheduled. I set up the inspection via telephone call to Ms. Jennifer McAllister, Administration Manager, who agreed to meet me at the main entrance. Prior to the site visit, I filled out an electronic version of the facility's Visitor Health Screening Form sent via email by Ms. McAllister. At the main entrance, my temperature was checked via a remote temperature scanner. I entered the facility wearing a face mask, face shield, safety glasses, hard hat, and safety shoes. Ms. Jennifer McAllister and Mr. Weston Patch, Technical Center Test Manager, accompanied me during the walk-through inspection.

At the engine testing area, I was informed that the test cells were shutdown since November 2019. Ms. McAllister and Mr. Patch informed me that the test cells will not commence operation until the air fans are upgraded to meet the requirements in the recently issued permit to install, PTI No. 70-20, for proper operation of the test cells and as discussed with AQD permit engineer, Ms. Ambrosia Brown. The facility is projecting project completion and re-start of operations in January 2021. During the site inspection, I observed the three engine dynamometer test cells and two chassis dynamometer test cells and no additional test cells were installed.

During the post-inspection meeting, I discussed with Ms. McAllister and Mr. Patch the recordkeeping requirements in the permit. In particular, I discussed the monthly 12-month rolling total recordkeeping for Carbon Monoxide (CO) tons per year emission rate, and the gasoline plus diesel fuel usage rate. I also mentioned the hourly Wide Open Throttle recordkeeping for spark ignition engine to show compliance with the 20 minutes per hour operational restriction. I also mentioned that, per PTI No. 70-20, the emission factor that will be used to calculate the CO emission rate, needs to be acceptable by AQD District Supervisor. I informed everyone that the issuance of PTI No. 70-20 as an Opt-out permit appeared to satisfy the non-compliance issues per the Violation Notice (VN) sent to NGK Spark Plugs dated 01/22/2020. As such, I will recommend to resolving the VN to my supervisor and our AQD Enforcement Section. Ms. McAllister requested if she could obtain a copy of the resolution to the VN. I informed her that, usually, the resolution to a VN or escalation of a violation is done internally by our AQD Enforcement Section after evaluating the AQD District's recommendation. I informed Ms. McAllister that I will let her know any outcome from AQD Enforcement Section's evaluation. Due to Covid-19, I took discretion not to conduct a walk-through at the rest of the facility as Ms. McAllister informed me that the remaining sections of the facility are for R & D work, warehousing, and office spaces which I already inspected last December 2019.

Overall, I did not find any non-compliance issues during the on-site inspection.

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DATE <u>Novembe 20, 20</u>20

SUPERVISOR