

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
A8217

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-A8217-2012

McLaren Performance Technologies

SRN: A8217

Located at

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

Permit Number: MI-ROP-A8217-2012

Staff Report Date: January 16, 2012

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) requires that the Michigan Department of Environmental Quality (MDEQ), 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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Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to 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 report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit 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 Livonia, Michigan 48152
Source Registration Number (SRN):	A8217A8217
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:	201100030
Responsible Official:	Phillip Guys, President 248-477-6240
AQD Contact:	Lee Varner, Senior Environmental Engineer 313-456-4684
Date Permit Application Received:	April 12, 2011
Date Application Was Administratively Complete:	April 20, 2011
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	January 16, 2012
Deadline for Public Comment:	February 15, 2012

Source Description

McLaren Performance Technologies is located in the City of Livonia, County of Wayne on the south side of Eight Mile Road, west of Farmington Road and east of Gill Road. It is situated in a mainly commercial and industrial setting. The nearest residential area is adjacent and south, on the south side of Eight Mile Road.

McLaren Performance Technologies is an engine testing facility that tests a wide variety of internal combustion engines. Testing is conducted per customer specifications. The customer may require that testing be conducted with either uncontrolled or controlled emissions. McLaren has six uncontrolled test cells and ten controlled test cells. The heart of each test cell is the dynamometer. The 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. Any emissions are the result of combustion of gasoline in the engines. 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. Other equipment at McLaren Performance Technologies includes a spray aeration vacuum extraction system for soil and ground water remediation, a spray paint area and three cold cleaners.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2010** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	0.66
Nitrogen Oxides (NO _x)	0.02
Particulate Matter (PM)	
Sulfur Dioxide (SO ₂)	0.002
Volatile Organic Compounds (VOCs)	1.59
Individual Hazardous Air Pollutants (HAPs) **	
Total Hazardous Air Pollutants (HAPs)	

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

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

In addition to the pollutants listed above that have been reported in MAERS, the potential to emit of Greenhouse Gases (GHG) in tons per year of CO₂ equivalents is less than 100,000. The actual GHG emissions calculation was 16.8 tons.

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 Wayne County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants except for the following:

As of June 15, 2004, Wayne County has been designated by the U.S. Environmental Protection Agency (USEPA) as a marginal non-attainment area with respect to the 8-hour ozone standard.

In addition, on December 17, 2004, the EPA designated Wayne County as non-attainment for PM_{2.5}.

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

The stationary source is not considered a major source of Hazardous Air Pollutant (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/or the potential to emit of all HAPs combined is less than 25 tons per year.

No emissions units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit of carbon monoxide was less than 250 tons per year.

The stationary source is not subject to the New Source Performance Standards (NSPS).

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 units EU-Test Cells CC2, CC3, CC6, CC8, CC9, CC11, CC12, CC14, CC15 and CC16 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. The monitoring for the control device is the Catalytic Thermal Oxidizer's catalyst bed temperature which must be maintained above 230°C. This parameter was chosen because it is reported as the required catalyst activation temperature.

The emission limitation(s) or standard(s) for carbon monoxide from EU-Test Cell1, 4, 5, 7, 10 and 13 at the stationary source are exempt from the federal Compliance Assurance Monitoring (CAM) regulation under 40 CFR, Part 64, because these emission units have no control devices.

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. There are no PTIs being incorporated through this current permit action into the source-wide PTI.

Streamlined/Subsumed Requirements

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

Non-applicable Requirements

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

Processes in Application Not Identified in Draft ROP

There were no processes listed in the ROP application as exempt devices under Rule 212(4). Exempt devices are not subject to any process-specific emission limits or standards in any applicable requirement.

Draft ROP Terms/Conditions Not Agreed to by Applicant

This permit 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 the DEQ

The AQD proposes to approve this permit. 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 U.S. Environmental Protection Agency (USEPA) is allowed up to 45 days to review the draft permit 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 Teresa Seidel, Field Operations Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit 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.

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**FEBRUARY 28, 2012 STAFF REPORT
ADDENDUM**

Purpose

A Staff Report dated January 16, 2012, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). 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 R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Phillip Guys, President 248-477-6240
AQD Contact:	Lee Varner, Senior Environmental Engineer 313-456-4684

Summary of Pertinent Comments

No pertinent comments were received during the 30-day public comment period and no changes were made to the draft ROP.