

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility :	General Motors LLC - Milford Proving Ground	SRN :	A5262
Location :	3300 General Motors Rd. Mail Code 483-340-141	District :	Warren
		County :	OAKLAND
City :	MILFORD	State:	MI
Zip Code :	48380	Compliance Status :	Compliance
Source Class :	MAJOR	Staff :	Kerry Kelly
FCE Begin Date :	6/1/2022	FCE Completion Date :	9/27/2023
Comments :	FY 2023 Full Compliance Evaluation		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/27/2023	ROP Semi 1 Cert	Compliance	Semi-annual certification report. Two deviations reported; not keeping weekly dyno fuel use and lb/hour NOx and VOC records between January 2022 and June 2023 and failing to perform maintenance on EU-GEN23 on time according to manufacturer's schedule . Weekly dyno fuel use records were sent via email on 9/22/2023 and indicate compliance with limits. EU-GEN23 maintenance was performed on 6/19/2023 according to the report received. Deviations addressed, as a result, a VN will not be sent.
09/27/2023	CAM Excursions/Exceedances	Compliance	No CAM Excursions/Exceedances reported during this time. Based on records and reports submitted by GM-MPG, EU-REMEDIATION has not been operated since at least 2015.
09/27/2023	Other Non ROP	Compliance	Start-Up Notification for Ground Generator FGDRUP7, commenced on August 28, 2023 and FGDRUP8, commenced on September 23, 2023. Notification received within 30 days of stated start-up as required in PTI 130-22, SC VII.1
08/21/2023	On-site Inspection	Compliance	FY 2023 Targeted Inspection

Activity Date	Activity Type	Compliance Status	Comments
06/12/2023	ROP R215 Notification	Compliance	Responsible Official Delegation Request for Adam Phillips, Operational Group Manager, as authorized representative. Notification is signed by the Vice-President, Sustainable Workforces, General Motors, LLC.
05/10/2023	ROP R215 Notification	Compliance	Notification of change in authorized representative to Adam Phillips, Operations Group Manager, effective 1/1/2023. Notification includes letter signed by vice presidents appointing "Operations Group Manager" position as authorized representative. C-001 form signed by Adam Phillips. AQD notified GM on 3/22/2023, via email, of the procedure for authorized representative changes going forward. See Meeting notes dated 3/2/23.
05/05/2023	MAERS	Compliance	MAERS Report Submission. MAERS cert received. Audit complete. GM used emission factors from their permit when available and mass balance and MAERS emission factors when an emission factor not specified in their permit. GM reported 0 emissions when an emission unit's emissions for a given pollutant was less than 20 lbs for the year as allowed in the 2022 MAERS User Guide. NOx emissions reported to MAERS for EU-BOILER5 and EU-BOILER6 are less than the annual limits in the facility's ROP for these emission units. CO, NOx, and VOC MAERS reported emissions for FG-ENGINEDYNOS are less than the annual limit in the ROP for this flexible group.

Activity Date	Activity Type	Compliance Status	Comments
05/02/2023	ROP Annual Cert	Compliance	Reported deviations: Failure to report change in designated representative at end of 2021, failure to submit CAM report for equipment that hasn't operated, ethylene glycol emissions calculations not acceptable to AQD Warren District Supervisor - resulted in negative ethylene glycol emissions for some 12-month periods. Reason for deviation and description of corrective action provided for each deviation. Corrective actions include; updating procedures for change in auth. rep. and CAM notifications. AQD and GM met on March 26, 2023 and other occasions in 2022 to discuss ethylene glycol emissions factors acceptable to AQD Warren District Supervisor.
05/01/2023	ROP SEMI 2 CERT	Compliance	Reported deviation was for using ethylene glycol emissions calculations not acceptable to AQD Warren District Supervisor. The calcs used resulted in negative ethylene glycol emissions for some 12-month periods. Reason for deviation and description of corrective action were provided. Corrective action included submitting new method of calculating ethylene glycol emissions. AQD and GM met on March 26, 2023 and other occasions in 2022, and exchanged emails, discussing proposed ethylene glycol emissions factors.
05/01/2023	CAM Excursions/Exceedances	Compliance	No CAM Excursions/Exceedances reported for EUREMEDIATION. Based on information in AQD files, process has never operated.
03/02/2023	Meeting Notes		Teams meeting to discuss change in authorized representative requirements.
02/01/2023	ROP R215 Notification	Compliance	Notification that Milford Proving Ground is removing diesel fired EU-GEN8 and installing a new natural gas and propane fueled generator (EU-GEN8a). EU-GEN8a is exempt per Rule 285(2)(g) and subject to NSPS JJJJ according to the notification.

Activity Date	Activity Type	Compliance Status	Comments
12/07/2022	MACT (Part 63)		Notification of Compliance Status and results of Performance Testing for Gasoline Dispensing Facilities (GDP) NESHAP as required by 40 CFR Part 63, Subpart CCCCCC (Sections 63.11110 - 63.11132) and 40 CFR Part 63, Subpart A (section 63.9). Report states GM-MPG is in compliance with all applicable requirements in 40 CFR Part 63, Subpart CCCCCC. GM-MPG is an area source of HAPs. AQD has not accepted delegation to enforce MACT CCCCCC at area sources.
12/07/2022	ROP Semi 1 Cert	Compliance	Semi-annual certification report. Two deviations reported. The deviations were for failure to promptly notify AQD of the change in authorized representative and failure to submit CAM report. The change in authorized rep. form was submitted on July 12, 2022 though the change occurred at the end of 2021. CAM report, for a process never operated at the site but in the ROP, was submitted on Sept. 15, 2022.
12/07/2022	ROP R215 Notification		Notification of Change of Responsible Official to Erica Fultz, Operations Group Manager. The notification was signed by the authorized representative (Erica Fultz), not the Responsible Official. During an AQD Supervisors' meeting in August 2022 it was noted that the Responsible Official, as defined in Rule 118(j), must be the one to sign the appointments or requests for an authorized representative, not the representative. I sent an email to GM requesting re-submittal of the change in responsible official/authorized representative form signed by the Responsible Official. GM responded the request by stating "this interpretation impacts all GM sites in Michigan and I'm waiting for guidance from my corporate offices on how to proceed."
10/13/2022	Telephone Notes		Ethylene glycol emissions calculations
07/13/2022	On-site Inspection	Non Compliance	FY 2022 targeted inspection

Name:

K. Kelly

Date:

9/27/2023

Supervisor:

Joyce