



DEPARTMENT OF THE ARMY  
INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON-DETROIT ARSENAL  
6501 E. ELEVEN MILE ROAD  
WARREN MI 48397-5000

REPLY TO  
ATTENTION OF:

April 20, 2016

Mr. Francisco Lim  
Air Quality Division  
Southeast Michigan District Office  
Michigan Department of  
Environmental Quality  
27700 Donald Court  
Warren, MI 48092-2793

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APR 21 2016  
AIR QUALITY DIVISION  
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Dear Mr. Lim:

In response to your letter of March 31, 2016, subject Violation Notice, the U.S. Army Garrison – Detroit Arsenal disagrees with the observation of a Rule 201 Permit-to-Install (PTI) violation regarding the engine test cells. The Garrison agrees the Co-Generator performance test was conducted late.

The building repair work in evidence during your visit is intrinsic to the building infrastructure. The electrical infrastructure was replaced in its entirety as a result of the August 2014 flood. The building was uninhabitable and equipment stored in the basement destroyed. The infrastructure replacement provided an opportunity to relocate critical electrical systems and the potential to reclaim waste heat into facility electricity in the future. The infrastructure repair has no impact to either the test cell process or air emissions.

Concurrent with repair work is the replacement of the Cell 5 dynamometers. The dynamometers were installed circa December 2015. They are currently incapable of trial operation and anticipated to be operational by May or June 2016. You were consulted in July 2014 regarding the Cell 5 dynamometers. It was reasoned there were exemptions that applied and you were asked for a review of the analysis. Email documentation was provided on March 24, 2016 and is enclosed for your convenience.

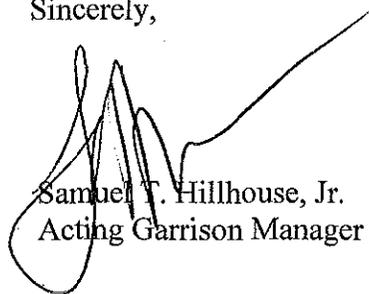
An inventory of various sizes and types of portable dynamometers is kept on site. The specific engine test determines the dynamometer required. It is standard practice to store dynamometers in the basement and move them as needed. The exception will be the Cell 5 dynamometers which are now permanently installed. Flood damage replacement of two each dynamometers is scheduled but has not yet taken place. These two new dynamometers will be more versatile to today's engine technology. However, dynamometers are not emission sources. They are portable equipment which do not change the test protocols, and neither create nor increase air emissions. A dynamometer acts as a brake for an engine being tested. Our conclusion is these replacements are exempt from Part 201 PTI. Please see enclosed table for exemption reasoning and regulatory citations.

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The non-emergency natural gas-fired Co-Generator was installed along with multiple boilers as both an energy saving and a pollution reduction initiative. An analysis of a PTI exemption was conducted and coordinated with your office. The Co-Generator was installed August 17, 2011 with a test start-up on September 13, 2011. The unit was placed in service December 1, 2011. A record search was inconclusive. It is unknown why an emission performance test was not conducted after installation. Personnel involved are no longer available. The error was discovered during an inventory update and an emissions test was conducted in 2015 to correct the omission.

If you require additional information, the point of contact is Ms. Cheryl Neades, Air Quality Manager, (586) 282-8345, e-mail [cheryl.l.neades.civ@mail.mil](mailto:cheryl.l.neades.civ@mail.mil).

Sincerely,



Samuel T. Hillhouse, Jr.  
Acting Garrison Manager

Enclosures

1. Cell 5 Documentation
2. Regulatory Exemption Table
3. MDEQ March 31, 2016 Violation Notice

Copy furnished:

Commander, US Army Tank-Automotive and Armaments Command, ATTN Mr. Steven Whittington (AMSTA-LA), 6501 E. 11 Mile Rd, Warren, MI 48397-5000