

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B724836243

FACILITY: FCA US LLC Sterling Heights Assembly plant		SRN / ID: B7248
LOCATION: 38111 Van Dyke, STERLING HTS		DISTRICT: Southeast Michigan
CITY: STERLING HTS		COUNTY: MACOMB
CONTACT: Adekunle Sanni , Paint Operations Environmental Specialist		ACTIVITY DATE: 08/10/2016
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Level 2 Scheduled Inspection		
RESOLVED COMPLAINTS:		

On August 10, 2016, AQD staff Samuel Liveson and I conducted a scheduled level 2 inspection at FCA US LLC, Sterling Heights Assembly Plant (FCA-SHAP). The facility is located at 38111 Van Dyke Ave., Sterling Heights, Michigan 48312. 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 Renewable Operating Permit (ROP) No. MI-ROP-B7248-2014a. During the inspection, I was accompanied by Mr. Sanni Adekunle, Environmental Specialist and facility contact person. Prior to conducting the walk through inspection, we initially showed our credentials, stated the purpose of the inspection, and gave a copy of the pamphlet "Environmental Inspections: Rights and Responsibilities" to Mr. Adekunle. On September 16 & 20, 2016, AQD staff Sam Liveson and I conducted follow-up inspections to discuss compliance with emission limits, monitoring, recordkeeping, and miscellaneous applicable requirements as contained in ROP No. MI-ROP-B7248-2014a.

Fiat Chrysler Automobiles (FCA) owns and operates the Sterling Heights Assembly Plant (SHAP). FCA-SHAP currently manufactures various versions of the Chrysler 200 sedan vehicles. Due to low demand for the Chrysler 200 vehicles, the facility is operating intermittently. In our August and September inspections, the facility was in shutdown mode. FCA-SHAP has a current NSR permit application (PTI No. 227-10D) in process for an additional paint line to paint truck boxes in preparation for the proposed shift of production at the facility from sedan to full size pickup trucks in 2017. AQD staff was informed that the current date to officially stop production of Chrysler 200 sedan is December 2016.

During the August 10, 2016 inspection, Mr. Adekunle accompanied us to conduct a walk through in the body shop area, the current paint shop, and the old paint shop building. AQD staff observed no manufacturing activity being conducted during inspection. The old paint shop building is being emptied/cleared of old equipment in preparation for the installation of the new paint line after PTI Applic. No. 227-10D, currently in process, is issued. AQD staff verified no equipment installed or activity conducted related to the proposed paint line. The September 16 & 20, 2016 follow-up inspections were mostly records review, verification on some emission units, and random walk through on the boilers/generators.

The facility is considered a major source under the Clean Air Act of 1990, and operates under a Title V permit, ROP No. MI-ROP-B7248-2014a, initially issued in November 2014 and revised on January 15, 2015. The current ROP has 19 emission units and 15 flexible groups.

EU-WWASH&GASFIL – this emission unit (EU) is located in the body shop building and part of assembly operations. Mr. Sanni took us to the fuel fill area for assembled vehicles and showed us the on board vapor recovery system during fuel fill per ROP No. MI-ROP-B7248-2014a special condition (C)(EU-WWASH&GASFIL)(III.1). He mentioned 100% reclaim for this process.

EU-DINACLEAN - this emission unit is shutdown since 2014. During the September 20 walk through inspection, AQD staff verified that the equipment, although installed, appeared to have been unused for a while.

EU-SANDING – this emission unit is for color prep and re-process spot repair operations. Color prep is for powder paint repair and re-process spot repair is for repairs made after topcoat. The VOC for very minimal spraying that may take place under this EU to repair the coating would be recorded under EU-FLASHPRIME, per Mr. Sanni. Very light buffing compounds are used to remove any mars or blemishes from the clear coating. AQD staff verified filters in place for the booths and no gaps observed per ROP No. MI-ROP-B7248-2014a special condition (C)(EU-SANDING)(IV.1).

EU-SEALERS & ADHESIVES-FBP - this emission unit covers sealers applied in the Frame, Body and Paint (FBP) shop area of the facility. The sealers are all applied after the ecoat system and prior to the powder booths in the paint shop area. In the paint shop, sealer application system is split up into north and south manual (hand application) sealer decks followed by the respective robotic application booths before converging into another sealer booth and into a single sealer oven. Also in the paint shop, under body seam sealer is applied with the car flipped up. Some of the sealers are applied in the body shop. All VOC emissions are released in-plant or uncontrolled.

EU-ECOAT – this emission unit consists of a 7 stage system with a 75 anode e-coat tank. Auto bodies are primed in the enclosed electrocoat dip tank system. Both the tank and the cure oven are controlled by the RTO. From the ecoat line, the coated part goes to either the north or south oven then to a sealer patch deck before going to either the north or south sealer deck. Both the dip tanks and the ovens VOC emissions are controlled by the regenerative thermal oxidizer (RTO).

During inspection, the ecoat coating materials remain in the dip tanks. Per ROP No. MI-ROP-B7248-2014a special condition (C)(EU-ECOAT)(IV.1), the facility kept the RTO temperature at 263°F during shutdown because of the material remaining in the line.

EU-FLASH PRIMER - this emission unit fixes spots on the e-coat prior to entering the anti-chip powder coating and the topcoat system. The flash prime is controlled

by dry filter particulate control. Per ROP No. MI-ROP-B7248-2014a special condition (C)(EU-FLASH PRIMER)(IV.1), AQD staff observed the filter system in place.

EU-TOPCOAT 1, 2, & 3 - these emission units consist of 3 parallel lines (Topcoat Lines 1, 2, & 3). Topcoat Lines 2 & 3 are similar while line Topcoat Line 1 is a little longer line to accommodate the tri-coat materials. Each topcoat line consists of interior basecoat, exterior basecoat, heated flash, interior clearcoat, exterior clearcoat, and color oven zones except for Topcoat Line which has an extra color 1 zone prior to the clearcoat zones to accommodate for tri-color coating.

The topcoat spray booths have a water wash system to control particulate overspray. Per ROP No. MI-ROP-B7248-2014a special condition (C)(EU-TOPCOAT 1, 2, & 3)(IV.1), AQD staff observed water in the waterwash system but not operational during the inspection. The wastewater from the waterwash system cascades over a weir in the booth and goes to the sludge pit area for solids removal and then re-used in the booth.

VOC emissions from the coating booths, the heated flash zones, and the cure ovens are ducted into the RTO. Per ROP No. MI-ROP-B7248-2014a special condition (C)(EU-TOPCOAT 1, 2, & 3)(IV.2 & IV.3) and during the inspection, the facility kept the RTO temperature at 263°F during shutdown because of the material remaining in the EU-ECOAT line.

EU-TOUCH UP – this emission unit pertains to manual repairs and touch up painting on blemishes performed in the paint shop area (Finesse Deck) and VOC emissions are vented into the in-plant environment.

EU-BLACKOUT – this emission unit pertains to coating of wheel well (water base coating) operations which has not been conducted since the CY 2000 as per Mr. Sanni.

EU-PAINT SPOT REPAIR - consist of stalls for either re-routing damaged vehicles back to the topcoat spray booth or for repair of small paint defects or parts which may be routed to a spot repair stall. Minor paint repair does not include full application of paint coating on the vehicles, only the impacted panels. Stacks are used for exhaust. During inspection, AQD staff missed verifying the filters in place.

EU-WIPE – this emission unit refers to auto bodies being manually wiped with solvents wipes during different phases of painting and assembly operations. The VOC emissions are vented into the plant. During inspection, AQD staff observed the area where rag wipes are being conducted on vehicles when the facility is in operation. This area is next to the sealer system.

EU-PURGE CLEAN - this emission unit refers to purge, cleanup solvents, and non-production solvents used throughout the facility. Per ROP No. MI-ROP-B7248-2014a special condition (C)(EU-PURGE CLEAN)(I.1), records showed 73.25 tpy in December 2015 and 69.71 tpy in June 2016 for the monthly 12-month

rolling total VOC emissions and less than the 223.2 tpy permit limit. Per Mr. Sanni, the emissions are low due to intermittent operations resulting from low demand of the vehicles in the market.

EU-AST 13, EU-NPS4, EU-NPS5 – these are storage tanks AQD staff did not conduct an inspection during the facility walk through.

EU-DEADNER - this emission unit refers to sound deadening and foam application processes in various locations of the vehicle.

EU-BODY SHOP – this emission unit pertains to natural gas-combustion (i.e. air make-up units, heaters, etc.) for space or process heating, tooling and equipment to assemble and hem vehicle panels including resistance spot welding, adhesive/sealer application, grinding and other related operations. Per ROP No. MI-ROP-B7248-2014a special condition (C)(EU-BODY SHOP)(II.1), the facility reported 6.55 MMCF for December 2015 and 3.66 MMCF for June 2016 of monthly 12-month rolling total natural gas usage rates and less than the 718 MMCF/12 month usage rate permit limit.

FG-FACILITY - this flexible group covers all equipment used for automotive assembly and painting operations for the Sterling Heights Assembly Plant. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-FACILITY)(I.1), FCA-SHAP reported 200.94 tpy for December 2015 and 131.57 tpy for June 2016 monthly 12-month rolling total VOC emission rates and less than the 673.2 tpy emission rate limit. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-FACILITY)(I.2), FCA-SHAP reported 1.42 #/job for December 2015 and 1.16 #/job for June 2016 monthly 12-month rolling total VOC emission rates and less than the 4.5 #/job emission rate limit. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-FACILITY)(I.3), FCA-SHAP reported 10.36 tpy for December 2015 and 7.8 tpy for June 2016 monthly 12-month rolling total PM10 emission rates and less than the 55.8 tpy emission rate limit. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-FACILITY)(I.4), FCA-SHAP reported 8.65 tpy for December 2015 and 6.44 tpy for June 2016 monthly 12-month rolling total PM2.5 emission rates and less than the 55.3 tpy emission rate limit. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-FACILITY)(I.5), FCA-SHAP reported 24.87 tpy for December 2015 and 17.54 tpy for June 2016 monthly 12-month rolling total NOx emission rates and less than the 72.0 tpy emission rate limit. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-FACILITY)(II.1), FCA-SHAP reported 1118.87 MMCF for December 2015 and 786.13 MMCF for June 2016 monthly 12-month rolling total natural gas usage rates and less than the 1914.0 MMCF/12 month usage rate limit. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-FACILITY)(IV.1), the spray coating booths have waterwash particulate control system while the sanding booths have fabric filter particulate control system. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-FACILITY)(VI.2), FCA-SHAP conducts weekly visual inspections on the waterwash and fabric filter particulate control systems.

FG-CONTROL – this flexible group refers to the regenerative thermal oxidizer used for control of VOC emissions from the ecoat, paint spray booths, and curing ovens. This equipment was in minimal operating mode during walk through inspection since the facility was in shutdown mode. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-CONTROL)(III.1), AQD staff obtained a copy of the MAP. As part of MAP, AQD staff obtained a copy of maintenance record conducted by Durr Company on the RTO including inspection of temperature thermocouple and replacement. Records indicated that an inspection was conducted last June 20-28, 2016.

FG-BOILERS – this flexible group pertains to three natural gas fired boilers (EU-Boiler 1, 2, & 3) used to generate hot water for in-plant use. One has a heat input capacity of 85 MMBtu/hour and the other two each have a heat input capacity of 118 MMBtu/hour. Per Mr. Sanni, Boilers 2 and 3 are equipped with low NOx burner technology in compliance with ROP No. MI-ROP-B7248-2014a special condition (D)(FG-BOILERS)(III.1). These can be confirmed from the January 9-10, 2013 stack test results wherein data showed 0.069, 0.075, and 0.064 lb./MMBTU emission rates for NOx. In addition, this flexible group also includes EU-HWG 1, 2 & 3, each rated at 31.5 MMBtu/hr. natural gas fired hot water generator. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-BOILERS)(III.2 & III.3), the boilers and hot water generators only fire natural gas as verified during the AQD staff walk through inspection on September 20, 2016. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-BOILERS)(III.5), I obtained copy of filled Initial Notification Form to USEPA Region 5 dated May 13, 2013. The report showed, type of boiler (Cleaver Brooks), manufacture date (2012), design capacity (31.5 MMBTU/hr.), type of fuel burned (natural gas), date of construction, (March/April 2013) and date of start-up (May/June 2013). I also obtained natural gas usage records for Boilers 1, 2, & 3.

FG-CAM – refers to compliance assurance monitoring requirements for EU-ECOAT, EU-Topcoat 1, EU-Topcoat 2, EU-Topcoat 3 per 40 CFR Part 64 Federal Standard. These emission units are major for VOC emissions and are controlled by an RTO. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-CAM)(III.1), AQD staff verified that the VOC emissions from the above emission units are ducted to the RTO. AQD staff cannot verify compliance on the temperature requirements since the assembly operations are shutdown but FCA-SHAP facility contact, Mr. Sanni showed AQD staff the electronic temperature data recording system that shows instantaneous temperature monitoring and recording where a 3-hour average can be calculated. A sample copy of the record is attached. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-CAM)(VI.1), I obtained a sample recordkeeping of dates and times when the damper is opened. In an emergency, an alarm system is set off for any incidental event that may occur related to the RTO. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-CAM)(VI.2), a continuous temperature monitoring is installed and data recording showed at least 15 minute intervals. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-CAM)(IX), Mr. Sanni mentioned that the RTO has an interlock

system to shutdown the coating booths if the RTO temperature falls below the set point of 1450°F.

FG-AUTO MACT – this flexible group refers to each new, reconstructed, or existing affected source as defined in 40 CFR 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts, and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAPs) except as provided in 63.3081(c) is subject to the requirements of 40 CFR 63 Subpart IIII. This includes equipment covered by other permits, grandfathered equipment, and exempt equipment. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-AUTO MACT)(I.1), FCA-SHAP submitted records that showed the organic HAP emission rate for the facility is 0.137 #/GACS and less than the 0.30 #/GACS permit limit. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-AUTO MACT)(I.3), the same FCA-SHAP records showed the organic HAP emission rate of 0.00002 lb./lb. coating for Sealers and Adhesives is lower than the 0.01 lb./lb. coating permit limit. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-AUTO MACT)(III)(1 & 3), FCA-SHAP submitted a Work Practice Plan and I obtained a sample copy of a recordkeeping for a Work Practice Plan inspection/implementation. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-AUTO MACT)(III)(4, 5, 6, & 7), (V) (1, 2, & 3), FCA-SHAP does not take credit for a control device in the calculation for Organic HAP emissions, per Mr. Sanni, and the additional requirements do not apply to FCA-SHAP.

FG-OLD MACT – this flexible group refers to new, reconstructed, or existing Organic Liquid Distribution (OLD) (non-gasoline) operation that is located at, or is part of a major source of hazardous air pollutant (HAP) emissions. The affected sources comprise of storage tanks, transfer racks, equipment leak components associated with storage tanks, transfer racks and pipelines, transport vehicles, and all containers while loading or unloading at transfer racks subject to this subpart. Equipment that is part of an affected source under another NESHAP is excluded from the affected source per 40 CFR 63.2338(c)). These conditions specifically cover existing (construction pre dates April 2, 2002) liquid storage tanks which hold more than 5,000 gallons but less than 50,000 gallons and/or new liquid storage tanks which hold more than 5,000 gallons but less than 10,000 gallons of methanol/windshield washer fill solvents that are dispensed to newly assembled vehicles. FCA-SHAP has a 8,000 gallon and 4,000 gallon tanks subject to this standard. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-OLD MACT)(VI.1), FCA-SHAP keeps records of vapor pressure for methanol and diethylene glycol monobutyl ether.

FG-BOILER MACT – this flexible group refers to the collection of industrial, commercial and institutional boilers and process heaters within a subcategory as defined in 63.7575 that is subject to the National Emission Standards for Hazardous Air Pollutants for Major Sources, Subpart DDDDD. FCA-SHAP has three natural gas fired boilers used to generate hot water for in-plant use. One has

a heat input capacity of 85 MMBtu/hour and the other two each have a heat input capacity of 118 MMBtu/hour. Boilers 2 and 3 are equipped with low NOx burner technology. Also, FCA-SHAP has three hot water generators, EU-HWG 1, 2 & 3, each rated at 31.5 MMBtu/hr., that have continuous oxygen trim systems. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-BOILER MACT)(III.1 & III.2), FCA-SHAP submitted documentation (attached) of initial tune-up and testing conducted by Grayton Control Services on December 14, 2015 which is less than 61 months from July 31, 2013 on Boilers 1, 2, & 3. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-BOILER MACT)(III.3), Mr. Sanni mentioned that the facility is ISO 50001 compliant and did not have to conduct this initial energy assessment requirement (facility conducts yearly energy assessment as part of ISO 50001 compliance requirement). Mr. Sanni also submitted documentation of initial notification report submitted to USAEPA Region 5, dated June 13, 2013, pertaining to the 3 Hot Water Generators (natural gas fired and rated at 31.5 MMBTU/hr.).

FG – MACT ZZZZ – EXISTING EMERGENCY CI < 500 HP - this flexible group refers to the North and South Fire Pumps (diesel). Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG – MACT ZZZZ – EXISTING EMERGENCY CI < 500 HP)(III.4, III.5, & III.6), FCA-SHAP submitted documentation showing 51.6 hours of total operating hours for North Fire Pump and 29.6 hours for South Fire Pump in CY 2015 which are less than the allowable 100 hours. Data submitted for July 2016 showed 36.9 hours for North Fire Pump and 14.4 hours for South Fire Pump. I also obtained recordkeeping of July 2016 weekly reading on North Fire Pump non-resettable hour meter at 1252.4 hours for week 4. Similarly, the recordkeeping data for South Fire Pump non-resettable hour meter showed 128.5 hours for week 4 of July 2016.

FG – MACT ZZZZ – NEW EMERGENCY CI > 500 HP - this flexible group refers to EU-ENG-DATACTR emergency generator. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG – MACT ZZZZ – NEW EMERGENCY CI > 500 HP)(III.1 & III.2), FCA-SHAP submitted documentation showing 5.6 total operating hours for CY 2015 and 1.3 hours through July 2016 and less than the allowable 100 hours. The recordkeeping data for EU-ENG-DATACTR compression ignition (CI) emergency generator non-resettable hour meter showed 72.4 hours for week 4 of July 2016.

FG – MACT ZZZZ – EXISTING EMERGENCY CI > 500 HP - this flexible group refers to EU-ENG-PAINTSHOP emergency generator. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG – MACT ZZZZ – EXISTING EMERGENCY CI > 500 HP)(III.1 & III.2), FCA-SHAP submitted documentation showing 1.0 total operating hour for CY 2015 and 0.5 hour through July 2016 and less than the allowable 100 hours. Per Mr. Sanni, this unit was shut down in 2014. The hour of operation is due to 30 minutes of twice a year maintenance run. The weekly recordkeeping for non-resettable hour meter as reported for July 2016 showed consistent 184 hours.

FG-NSPS IIII EMERGENCY PRE-2007<10 I/CYL - this flexible group refers to EU-ENG-DATACTR emergency generator. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS IIII EMERGENCY PRE-2007<10 I/CYL)(I.1), FCA-SHAP submitted documentation showing NO_x emissions at 8.1 g/kW-hr and less than the permit limit of 9.2 g/kW-hr. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS IIII EMERGENCY PRE-2007<10 I/CYL)(I.2), FCA-SHAP submitted documentation showing HC emissions at 0.7 g/kW-hr and less than the permit limit of 1.3 g/kW-hr. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS IIII EMERGENCY PRE-2007<10 I/CYL)(I.3), FCA-SHAP submitted documentation showing CO emissions at 0.7 g/kW-hr and less than the permit limit of 11.4 g/kW-hr. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS IIII EMERGENCY PRE-2007<10 I/CYL)(I.4), FCA-SHAP submitted documentation showing PM emissions at 0.19 g/kW-hr and less than the permit limit of 0.54 g/kW-hr.

FG-NSPS JJJJ EMERGENCY>100 BUT<500 HP - this flexible group refers to EU-ENG-NEW PSHOP1 and EU-ENG-NEW BSHOP emergency generators. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>100 BUT<500 HP)(III.1), FCA-SHAP submitted documentation showing 20 actual operating hours for EU-PSHOP1 and 17.5 hours for EU-ENG-NEW BSHOP for CY 2015 and less than the allowable 100 hours. These 2 spark ignition (SI) engines have EPA Certificate of Conformity with approved manufacturer test emissions. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>100 BUT<500 HP)(I.1), FCA-SHAP submitted documentation showing EU-ENG-NEW PSHOP1 NO_x emissions at 2 g/Hp-hr and meets the permit limit of 2 g/Hp-hr. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>100 BUT<500 HP)(I.2), FCA-SHAP submitted documentation showing EU-ENG-NEW PSHOP1 CO emissions at 4 g/Hp-hr and meets the permit limit of 4 g/Hp-hr. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>100 BUT<500 HP)(I.3), FCA-SHAP submitted documentation showing EU-ENG-NEW PSHOP1 VOC emissions at 1 g/Hp-hr and meets the permit limit of 1 g/Hp-hr. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>100 BUT<500 HP)(I.1), FCA-SHAP submitted documentation showing EU-ENG-NEW BSHOP NO_x emissions at 2.0 g/Hp-hr and meets the permit limit of 2 g/Hp-hr. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>100 BUT<500 HP)(I.2), FCA-SHAP submitted documentation showing EU-ENG-NEW BSHOP CO emissions at 4.0 g/Hp-hr and meets the permit limit of 4 g/Hp-hr. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>100 BUT<500 HP)(I.3), FCA-SHAP submitted documentation showing EU-ENG-NEW BSHOP VOC emissions at 0.47 g/Hp-hr and meets the permit limit of 1 g/Hp-hr. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>100 BUT<500 HP)(IV.1), FCA-SHAP submitted documentation showing EU-ENG-NEW BSHOP non-resettable hour meter reading for July 2016 week 4 at 85.2 hours and EU-ENG-

NEW PSHOP1 non-resettable hour meter reading for July 2016 week 4 at 167.6 hours.

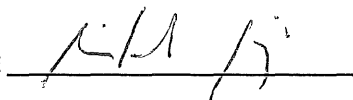
FG-NSPS JJJJ EMERGENCY>500 HP - this flexible group refers to EU-ENG-NEW PSHOP2 spark ignition emergency generator. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>500 HP)(III.1), FCA-SHAP submitted documentation showing 18.5 actual operating hours for CY 2015 and less than the allowable 100 hours. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>500 HP)(IV.1), FCA-SHAP submitted documentation showing EU-ENG-NEW PSHOP2 non-resettable hour meter reading for July 2016 week 4 at 210.5 hours. This SI engine has to test for emissions due to uncertified engine. The most recent data were from the tests conducted on 11/27/2013. The engine is scheduled for testing first week of October 2016. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>500 HP)(I.1), FCA-SHAP submitted documentation showing EU-ENG-NEW PSHOP2 November 2013 test results of NOx emissions at 0.28 g/Hp-hr. and less than the 2 g/Hp-hr. emission limit. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>500 HP)(I.2), FCA-SHAP submitted documentation showing EU-ENG-NEW PSHOP2 November 2013 test results of CO emissions at 1.51 g/Hp-hr. and less than the 4 g/Hp-hr. emission limit. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-NSPS JJJJ EMERGENCY>500 HP)(I.3), FCA-SHAP submitted documentation showing EU-ENG-NEW PSHOP2 November 2013 test results of VOC emissions at 0.28 g/Hp-hr. and less than the 1 g/Hp-hr. emission limit.

FG-RULE 290 - this flexible group refers to EU-ENG PAINTSHOP and EU-ENG-DATACTR emergency generators. FCA-SHAP submitted documentation showing 5.44 lb. total VOC emissions for CY 2015 for EU-ENG-DATACTR and 0.05 lb. VOC emission for EU-ENG PAINTSHOP (30 minutes of operation for June and December 2015).

FG-RULE 287(c) – this flexible group refers to EU-FINAL REPAIR. Per ROP No. MI-ROP-B7248-2014a special condition (D)(FG-RULE 287(c))(II.1), FCA-SHAP submitted documentation showing a monthly coating usage rate of less than 11 gallons per month in CY 2015 and less than the 200 gallons per month permit limit.

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

NAME



DATE

9/30/2016

SUPERVISOR

