

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

N085462254

FACILITY: TI GROUP AUTOMOTIVE SYSTEMS LLC - Caro Test Center		SRN / ID: N0854
LOCATION: 628 COLUMBIA ST, CARO		DISTRICT: Bay City
CITY: CARO		COUNTY: TUSCOLA
CONTACT: Seth Gangler , Environmental Health & Safety Representative		ACTIVITY DATE: 02/10/2022
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: On-site inspection.		
RESOLVED COMPLAINTS:		

An onsite inspection was conducted by Air Quality Division (AQD) staff Adam Shaffer (AS) of TI Group Automotive Systems LLC – Caro Test Center (TI) on February 10, 2022, to verify compliance with Renewable Operating Permit (ROP) No. MI-ROP-N0854-2018. Applicable records were obtained at the time of the inspection / following the onsite inspection.

Facility Description

TI is a manufacturing and testing facility of fuel delivery components for several markets (marine, automotive, snowmobile). The facility is a major source of hazardous air pollutants (HAPs) and volatile organic compounds (VOCs). The facility is in operation with ROP No. MI-ROP-N0854-2018.

Offsite Compliance Review

- TI is required to submit semi-annual and annual compliance reports per Part A General Conditions 19-23 of MI-ROP-N0854-2018. Semi-annual and annual compliance reports were reviewed since the previous inspection on September 16, 2020. In the most recent semi-annual and annual compliance reports for 2021, Mr. Seth Gangler, Environmental Health & Safety Representative, was identified as the Responsible Official. The Responsible Official title was discussed with Mr. Gangler, who did not appear to meet the definition. In a follow-up conversation it had appeared that TI intended to replace Mr. Gangler as the next Responsible Official per Rule 336.1118(j). This was ultimately canceled, and Mr. John Macha will remain the Responsible Official. Previous ROP certification reports were resubmitted with the correct Responsible Official signature. No deviations have been reported since the last inspection.
- Based on the timing of the inspection, the 2021 Michigan Air Emissions Reporting System (MAERS) Report was submitted on January 18, 2022, and was reviewed. Upon review, several errors were noted in the 2021 MAERS Report. This was discussed with company staff. The company plans to have their consultant contact AQD staff and discuss the applicable changes that will need to be made.

Compliance Evaluation

An onsite inspection of the facility was completed on February 10, 2022. Applicable records were obtained during and after the onsite inspection. AQD staff AS arrived in the area of the facility at 9:34am. Weather conditions at the time were cloudy skies, temperatures in the low 30's degrees Fahrenheit, and winds from the west / southwest at 10-15mph. While offsite no opacity was observed, and mild odors noted appeared to be from the Michigan Sugar Company site to the southwest. Upon arriving onsite, AS met with Mr. Philip Kuhl,

Senior Manufacturing and Product Engineering Manager, who provided a tour of part of the facility and answered site specific questions. Several company staff including Mr. Seth Gangler, Environmental Management Representative, accompanied AQD staff AS through the remaining portions of the inspection, answered site specific questions and / or provided requested records.

As mentioned above TI is a manufacturing and testing facility of fuel delivery components for several markets (marine, automotive, snowmobile). The various stages of onsite operations were observed and will be discussed further below in this inspection report. The site is split into two sections (production and testing).

ROP No. MI-ROP-N0854-2018

It is noted that the ROP does not contain any specific emission units but that the company utilizes applicable exemptions for all onsite processes.

EULAB1, EULAB2, EULAB3, EULAB4 – These four emission units make up the DLABs that are used for durability testing of equipment. These units were observed during the course of the site inspection. Company staff had mentioned that they planned to update one of the emission units with what appeared to be more efficient equipment. These four emission units appear to be exempt per Rule 283(2)(d).

EUFUELCHMBR(H1), EUFUELCHMBR(H2) – These two emission units are for the holding testing fuels that are used for ongoing tests and were observed during the course of the site inspection. These two emission units appear to be exempt per Rule 283(2)(d).

EUGASRACK – This emission unit is for the gas rack onsite and was observed during the course of the site inspection. This emission unit appears to be exempt per Rule 283(2)(d).

EULABR – This emission unit is for a separate reliability lab and was observed during the course of the site inspection. This emission unit appears to be exempt per Rule 283(2)(d).

Underground Storage Tanks – Previous inspections noted nine underground storage tanks that held various fuels. Speaking with company staff, since the last inspection, all nine tanks were removed in late 2020, and were replaced with three (two - 6,000-gallon compartment, one – 10,000-gallon waste) underground storage tanks. The compartment tanks contained various types of gasoline used for testing. In the most recent ROP renewal, the company had listed the previous underground storage tanks as exempt per Rule 284(2)(g)(i). AQD staff AS inquired as to how TI believes that this exemption can be used for the historical and now current underground storage tanks. Based on the response received by TI, the exemption appears applicable at this time.

EUSPACEHEATERS – In the most recent ROP staff report, 38 natural gas fired, roof mounted space heating units were noted. Speaking with company staff, the approximate number appeared correct. The space heating units would appear to be exempt per Rule 282(2)(b)(i).

EUTESTPROCESSHEATER – This is for a 500,000 Btu/hr process heater that supplies heat to test chambers and was observed during the course of the site inspection. Upon review, the correct size of the process heater is 440,000 Btu/hr and appears exempt per Rule 282(2)(b)(i).

Two small water heaters were observed and appeared to be exempt per Rule 282(2)(b)(i).

EUPRODUCTION BOILER 1 & 2 – This is for two 985,000 Btu/hr boilers that are used for heat production. In prior inspections, the units had been determined to be subject to 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources for Industrial, Commercial, and Institutional Boiler and Process Heaters. However, the boilers were determined by the company to be excluded from this standard under 40 CFR 63.7491(d) for “a hot water heater as defined” with the two boilers appearing to meet the definition of hot water heaters. The location of the two boilers was observed and they appear to be exempt per Rule 282(2)(b)(i).

Two above ground storage tanks were observed during the course of the inspection that are used to store virgin and used solvent. The tanks are each 4,000 gallons in size. Speaking with company staff, the used tank is tested monthly to determine the volatile content. A copy of the safety data sheet (SDS) for the one solvent material (waste and virgin) stored in the tanks was provided. The vapor pressure noted on the SDS was less than 1.5 psia and based on the chemical composition appeared to consist of VOC / non-carcinogenic liquids. After further review the two aboveground storage tanks appear to be exempt per Rule 284 (2)(i).

Five plastic injection mold machines were observed during the course of the inspection that are used to make select plastic parts for onsite processes. It was noted that the remaining materials needed for onsite processes are shipped onsite. The five plastic injection mold machines appear to be exempt per Rule 286(2)(b).

A maintenance area was noted during the inspection. Equipment observed appeared to be exempt per Rule 285(2)(l)(vi)(B) / Rule 285(2)(i).

A refueling station was observed and had been installed since the last inspection. This piece of equipment had been installed in early 2021 and was similar to the gas rack noted above. Additionally, a permeability lab area was noted during the course of the inspection which is primarily used to test vehicle tank hydrocarbon permeability through walls of tanks. Speaking with company staff, TI believes that the two items are also exempt per Rule 283 (2)(d). The two areas were not included in the 2021 MAERS Report. This was discussed with the company and moving forward shall be addressed.

Conclusion

Based on the facility walkthrough, observations made, and records received, TI appears to be in compliance with MI-ROP-N0854-2018 and applicable air quality rules.

NAME Adam Shaffer

DATE 04/04/2022

SUPERVISOR Chris Hare