

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

N756448114

FACILITY: MARTIN TECHNOLOGIES		SRN / ID: N7564
LOCATION: 55390 LYON INDUSTRIAL DR., NEW HUDSON		DISTRICT: Southeast Michigan
CITY: NEW HUDSON		COUNTY: OAKLAND
CONTACT: Brian Jones, Vice President		ACTIVITY DATE: 03/13/2019
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced Level 2 Target Inspection		
RESOLVED COMPLAINTS:		

On 3/13/2019, I conducted a level 2 unannounced target inspection at Martin Tech located at 55390 Lyon Industrial Drive, New Hudson, Michigan 48165. 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 Permit to Install No. 352-05. During the pre-inspection meeting, I met with Mr. Brian Jones, Vice President and facility contact person. I, initially, showed my credentials and stated the purpose of my visit.

Per Mr. Jones, the facility builds, tests, and evaluates original equipment manufacturing (OEM) engines such as race car engines, and more recently, portable engine testing equipment. The job includes design, engineering, machining of design parts, assembly, and testing/validation of engines. During inspection, I observed the facility building and testing portable engine testing equipment in a cart, known as "outside test cart validation", for marketing to companies in the engine manufacturing business. The parts are machined, hand/brush painted, assembled, and tested at the facility.

PTI No. 352-05 was issued to Martin Tech for 4 engine dynamometer test cells. This permit was also issued as a synthetic minor permit to opt the facility out of the Clean Air Act of 1990, Title V, Renewable Operating Permit (ROP) requirements for Carbon Monoxide (CO), since the potential to emit for CO for the 4 test cells exceeds 100 tons per year (tpy). To demonstrate continued compliance as a CO synthetic minor facility, the facility is restricted to a CO limit of 89.5 tpy supported by monthly 12-month rolling total/s recordkeeping requirements and a CO emission rate of 3.12 lb./gallon. The test cells are allowed to test leaded and unleaded gasoline and diesel fired engines but restricted to 200 gallons of leaded gasoline usage per 12-month rolling time period as determined on a monthly basis. Additionally, the gasoline usage is restricted to 56,000 gallons per 12-month rolling time period as determined on a monthly basis.

During the walk-through inspection, I observed 4 engine test cells per PTI No. 352-05. None of the test cells were running at that time. Per Mr. Jones and based on my observations, the facility is building more of the portable outside test cart validation equipment at this facility. Test cell 4 is utilized to test engines running on leaded gasoline (infrequently) and to test the portable outside test cart validation equipment. It was being set up to test the portable test cart equipment during my

walk-through inspection. I observed one race car engine being built in one corner. I observed machining equipment as follows: bridgeport machining, 2-lathes, 1-mill machine, 1-boring bar, portable sandblast equipment, other machining and metal fabrication equipment. Emissions from these processes were discharged internally and exempt from permit to install requirements per AQD Rule 285(2)(l)(vi)(B). The rest of the facility are for assembly and finishing of the product. I observed and inquired about the blue coating on the carts. Mr. Jones informed me that the carts were painted using hand brush and the facility consumes less than 3 gallons of coating a month. I requested for coating use records from the facility. I observed welding equipment exempt from permit to install requirements per AQD Rule 285(2)(i). I observed 2 cold cleaners with air/vapor interface of not more than 10 square feet and exempt from permit to install requirements per AQD Rule 281(2)(h). The covers were closed and safety instructions were posted inside the covers.

During the post inspection meeting, I discussed with Mr. Jones the recordkeeping requirements to show compliance with PTI No. 352-05. The facility was sent a first and second Violation Notices by AQD staff Lauren Magirl dated 8/08/2018 and 10/16/2018 for not keeping records. Mr. Jones informed me that the facility staff tasked to maintain the recordkeeping left the company. Mr. Jones requested to email me the records as required by PTI No. 352-05. I explained to Mr. Jones on how to set up in a spreadsheet, the individual recordkeeping requirements in the permit.

On 03/13/2019, I received the spreadsheet as attachment to an email from Mr. Jones. During my records review process and per PTI No. 352-05 special condition EUTESTCELLS (1.1a), the facility utilizes 3.12 lb./gallon as gasoline emission factor to calculate for CO emission rate. I discussed with Mr. Jones on revising the spreadsheet to address some issues. On 04/11/2019, I received a revised spreadsheet. Per PTI No. 352-05 special condition EUTESTCELLS (1.1b), the facility submitted records showing the highest monthly 12-month rolling total CO emission rate in March 2018 at 274.21 lb./12-months for the period March 2018 through March 2019. This is less than the 89.5 tpy permit limit. The monthly 12-month rolling total CO emission rate for end of December 2018 was 182.00 lb./12 months. Per PTI No. 352-05 special condition EUTESTCELLS (1.2), the monthly 12-month rolling total fuel usage rate from March 2018 through March 2019 was highest in March 2018 at 87.89 gallons and less than the gasoline fuel usage rate permit limit of 56,000 gallons. Per PTI No. 352-05 special condition EUTESTCELLS (1.3), the monthly 12-month rolling total leaded gasoline fuel usage rate from March 2018 through February 2019, was highest in January and February 2019 at 0.67 gallon and less than the 20 gallons permit limit. The facility only fired leaded gasoline in December 2018, January 2019, and March 2019.

Overall, I did not find any non-compliance issues during the inspection. I am going to recommend resolving VNs issued in 2018.

NAME K. M. G.

DATE 4/12/2019

SUPERVISOR Joyce S.

