



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

July 14, 2022

VIA EMAIL AND U.S. MAIL

Brian Jones, Vice President
Martin Technologies
55390 Lyon Industrial Drive
New Hudson, MI 48165

SRN: N7564, Oakland County

Dear Brian Jones:

VIOLATION NOTICE

On June 17, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Martin Technologies located at 55390 Lyon Industrial Drive, New Hudson, Michigan. The purpose of this inspection was to determine Martin Technologies' 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 352-05A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Combustion engine dynamometer test cells.	PTI No. 352-05A FGENGTESTING Special Conditions I.1, I.2, I.3, II.2, II.3, VI.1, VI.3, and VI.4	Martin Technologies did not provide AQD with the required records under PTI No. 352-05A.
Combustion engine dynamometer test cells and facility wide combustion equipment.	PTI No. 352-05A FGFACILITY Special Conditions I.1, II.2, II.3, VI.1, and VI.2	Martin Technologies did not provide AQD with the required records under PTI No. 352-05A.
Hydrogen dynamometer test cell.	Rule 201	Martin Technologies installed and commenced operation of a hydrogen dynamometer cell without obtaining a permit to install.
MAERS (Michigan Air Emissions Reporting System).	Rule 202 of the administrative rules promulgated under Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.	Martin Technologies did not submit a MAERS report for the 2021 calendar year.

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During this inspection, Martin Technologies was unable to produce emission records. This is a violation of the recordkeeping and emission limitations specified in Special Conditions of PTI number 352-05A.

The conditions of PTI number 352-05A require records of fuel use, operating time, and NOx/CO emissions. These records must be made available to the AQD during inspections.

During this inspection, it was noted that Martin Technologies had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised Martin Technologies on June 17, 2022, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the hydrogen dynamometer test cell equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

In January 2022, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), notified Martin Technologies of the requirement to submit a 2021 air pollution report, with the required submittal date of March 15, 2022. In response to the incomplete submittal of this report, a second letter was sent on April 7, 2022, requesting immediate submittal of the Michigan Air Emissions Reporting System (MAERS) forms required pursuant to Rule 202 of the administrative rules promulgated under Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

At this time, we still have not received the complete MAERS submittal and you are hereby notified that this constitutes a violation of the above referenced act and rule. Please submit the MAERS reporting forms by August 4, 2022 (within 21 days of the date of this letter).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 4, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Martin Technologies believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Martin Technologies. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Bogнар", written in a cursive style.

Adam Bogнар
Environmental Engineer
Air Quality Division
586-854-1517; bognarA1@michigan.gov

cc: Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Joyce Zhu, EGLE