N7569
MAWIA

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

N756936564

FACILITY: ISUZU MOTORS AMERICA INC.		**SRN / ID:** N7569
LOCATION: 46401 COMMERCE CENTER DR, PLYMOUTH		**DISTRICT:** Detroit
CITY: PLYMOUTH		**COUNTY:** WAYNE
CONTACT: Gerry Plocharczyk , Senior Manager - Test Facilities		**ACTIVITY DATE:** 08/30/2016
STAFF: C. Nazaret Sandoval	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: 2016 Targeted Inspection		
RESOLVED COMPLAINTS:		

Source: SRN N7569 – Isuzu Technical Center of America, Inc.

Location: 46401 Commerce Center Drive, Plymouth, MI 48170

Date of Inspection: August 30, 2016

Date of Report: September 28, 2016

Reason for Inspection: Targeted Inspection

Inspector: Nazaret Sandoval, AQD

Personnel Present: Gerry Plocharczyk, Sr. Manager, Test Facilities

Facility Phone Number: (734) 582-9290

FACILITY BACKGROUND AND COMPLIANCE HISTORY

Isuzu Technical Center of America, Inc. (ITCA) was originally established in California in 1985 to conduct local vehicle engineering, emission testing, planning, design and local sourcing. To consolidate and expand Isuzu Research and Development activities in the Americas a technical center was erected in Plymouth, Michigan in 1991.

In 1994, ITCA became Isuzu Motors America, Inc. after the merge with Isuzu Motors. That year, the capability of the Plymouth technical center was expanded to encompass development and performance testing in addition to ongoing durability and quality validation.

The company recently changed its name again, this time from Isuzu Manufacturing Services of America, Inc. to Isuzu Technical Center of America, Inc. (hereafter Isuzu). Isuzu, at the Plymouth location, serves as the headquarters of Isuzu's Research & Development arm in North America, providing expertise in planning, engineering, testing, validation, and compliance of commercial vehicles and diesel engines.
Over the years the engine testing facilities at Plymouth have been modified and expanded, with variations in the type of fuel used, fuel throughput, as well as the number and type of testing operations conducted at the center.

AQD records indicate that the first two internal combustion engine test cells and associated dynamometers were permitted by the Wayne County Department of Environment, Air Quality Management (Wayne County) in 1996 under permits C-10644 and C-10645. The Wayne

County permit included: cell No. 1, a diesel engine test cell housing a dynamometer rated at 500 hp and cell No. 2, a gasoline engine test cell with a dynamometer rated at 300 hp. The records also show that there was a previous permit to install (PTI) issued by AQD with similar conditions to those listed on the Wayne County permit.

On October 14, 2005 AQD inspected the facility and learned that cell No. 2 had been modified and converted to a diesel engine cell. The gasoline underground storage tank had also been changed to a diesel fuel tank. As a result of these observations, AQD issued a letter of violation to Isuzu on November 2, 2005 alleging non-compliance with the Wayne County Permit conditions. In response to AQD notice of violation Isuzu claimed that the facility could operate the dynamometers using PTI exemption Rule 285(g) to test the diesel engines in cells No. 1 and No. 2. This rule exemption allows internal combustion engines that have maximum heat input less than 10,000,000 BTU/hrs. to operate without a PTI if the Potential to Emit (PTE) is below the major source thresholds and the actual emissions are below significance levels in R278(b). After numerous discussions between Isuzu and AQD, the 2005 violation was resolved. AQD concurred with Isuzu and allowed them to use PTI exemption Rule 285 (g). A letter dated February 23, 2006 from AQD to Isuzu voided both the Wayne County permit and the AQD PTI. The letter also specified that the qualification for the exemption was dependent upon compliance with all requirements, including the recordkeeping requirements contained in the exemption. For a certain period of time the facility was considered a "true minor" and operated with only two test cells. It appears as if between 2006 and 2008 Isuzu continued to meet the criteria for PTI exemption under Rule 285(g).

A proposed expansion to install 2 to 4 diesel engine test cells was submitted to AQD in July 27, 2007. The project proposal was evaluated and AQD recommended Isuzu to apply for a permit to install. However, it seems like the two additional cells were installed in 2008 using PTI exemption Rule 285(g).

An AQD inspection record dated February 4, 2011 stated that two more engine dynamometer testing cells had been installed at the facility in cells 5 and 6. The rationale of the emission factors (EF) used by Isuzu to estimate the PTE from the facility after the installation of these two additional cells was re-evaluated and it was questioned by the AQD inspector during an inspection conducted on September 29, 2011. The AQD inspector estimated the potential NOx emissions for the overall facility using and emission factor supported by similar testing facilities. The estimated values showed that the total NOx emissions could be above 100 tons per year (Title V major source threshold limit). As a result of that inspection the facility was found to be in non-compliance. To resolve the non-compliance issue Isuzu submitted a permit application to obtain an Opt-out permit. PTI 4-12 was issued to cover the two dynamometers that had been installed in cells 5 and 6, and two additional dynamometers that would be installed later in cells 3 and 4. Each cell would be equipped with one dynamometer for diesel engine testing. PTI 4-12 regulated the operations of six emission units EU-TEST CELL1 to 6. The permit also contained two chassis dynamometers EU-CHASSISCELL1 and EU-CHASSISCELL2.

More recently, in June 2016, PTI 4-12 was modified to increase the annual fuel restriction and to allow the installation of the two dynamometers that were never installed in Cells 3 and 4. The chassis dynamometers were also removed from the permit because (per EPA consensus) by definition they are considered mobile sources. New daily fuel restrictions were also added to the permit for toxic air contaminants (TAC) screening purposes. The permitting action increased the NOx emissions and in minor degree the emissions of all the other pollutants. The fuel restrictions continue to prevent the facility-wide emissions from exceeding

the significant emission rate for all pollutants.

As of the date of this inspection report the active permit is the Opt-out permit PTI 4-12A issued on June 14, 2016. However, in this report, compliance with permit limit and permit conditions will be evaluated using PTI 4-12 because the facility has not started the operations of the two new Dynamometers in cells 3 and 4.

Records show that after the resolution of the permitting issue found in 2011, the facility has maintained compliance with the Air Quality permit requirements and applicable regulations. Since the last inspection there have been no complaints associated with the operations at this facility, no pending administrative consent orders, and no violation notices have been issued.

EQUIPMENT/PROCESS DESCRIPTION:
The general Site Plan of the facility (see attached) includes the following main areas:

1) Engineering Office.
2) Test Lab Area.
3) Outside Test Track & Soak Area and Parking Area.

Isuzu is permitted to test diesel fired engines in six dynamometer test cells. There are also two chassis dynamometer test cells at this facility. All the emission units are located in the Test Lab Building.

The location of the test cells is shown on the attached Laboratory Floor Plant. Cells 1 and 2 are on the south end of the lab building. Cells 3 to 6 are on the north side.
The chassis dyno test cells are located adjacent to cells 1 and 2 towards the center of the lab building.

The internal combustion diesel engines varying in sizes, can be tested on the various dynamometers ranging from 318 kW to 370 kW. An engine dynamometer is a device designed to create a load to duplicate various speed (RPM) and torque (Nm or lb-ft) requirements. From this data, power (HP or kW) can be calculated. This in turn provides a snapshot of the engine performance for comparison to the manufacturer's specifications. Typically, a dynamometer gives the operator the ability to vary the load applied to the unit under test to mimic specific requirements.

The dynos are supported by accessories and ancillary equipment such as: fuel measurement system, sampling probes, room exhaust system, cooling tower, remote instrumentation and control, to name a few.

There are three diesel underground storage tanks (USTs) located outside, northwest of the test cell building. The pumping system feeds fuel into each cell based on demand. According to the UST registration certificate issued by the Michigan Licensing and Regulatory Affairs (LARA) handed out during the inspection, there are two diesel USTs with capacities of 2,385 gallons and one tank with 2,500 gallons.

Diesel engines and trucks are tested at the facility to meet EPA emissions standards. The emission testing procedures are those cited in the Code of Federal Regulations 40 CFR – Part 86. A simplified version follows: Exhaust air is diluted (8:1) to cool it down before entering the sampling unit, sampled, analyzed and vented to the atmosphere through a stack. Parameters that are tracked during testing are: temperature, humidity and pressure. In

general, one sampling run takes approximately 40 minutes to 2 hours to complete. Pollutants measured are CO, CO2, NOx, hydrocarbons(HC) and PM.

The engines tested at the facility are not dedicated to a specific test cell and are changed out in a regular basis. The emissions are controlled and typically the emission control devices stay with the engine. The main component of emissions reduction on the outlet of diesel engines is known as "after treatment'. After treatment or emission control includes: high pressure common rail injection, exhaust gas recirculation (EGR), systems diesel oxidation catalyst (DOC), diesel particulate filter (DPF), selective catalytic reduction (SCR), and particle oxidation catalyst (POC) which are used together with a computer controlled engine management systems.

Each cell has its own control consoles located outside of the testing cell. All the automation/data acquisition and control system consoles are located along the hallway that leads to the entrance of each cell.

The operations that are subject to AQD air regulations are those occurring at the test laboratory. The outside test area (Test Track) is for testing of mobile sources after been in the Soak Area.

In addition to the test cells, the facility has the following exempt equipment: a) two emergency generators, b) two part washers maintained by "Safety Clean" (one located at the garage and the other one at the engine built area), c) a series of space heaters located in different areas of the building.

The rule exemptions and more specific information about rated capacities and sizes for the exempt equipment are evaluated later in this report.

Additional operations in the building do not appear to generate air pollutant that vent to the outside air and therefore are not regulated by AQD.

Isuzu currently operates Monday through Friday in two eight-hour shifts. The day shift runs from 7:00 A.M. to 3:30 PM and the late shift from 3:00 PM to 11:00 PM. Most tests run during the day shift, but there are others conducted during the night shift.

INSPECTION NARRATIVE:

The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451 and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) rules.

On August 30, 2016 I arrived at the facility at 1:15 PM and met with Mr. Gerry Plocharczyk, Isuzu's Test Facilities Senior Manager. During the opening meeting I indicated the purpose of my visit and discussed the main sections of permit PTI 4-12.
I also asked for the status of the installation of the two new dynamometers that had been recently permitted in cells 3 and 4. Mr. Plocharczyk said that the dynamometers were installed but they were still working on the installation of the supporting equipment and accessories. He believed the dynos should be ready for engine testing within the next two months.

During the permit modification of June 2016, Isuzu had agreed to modify the horizontal stack

in cell #1 (SV-E1-2), which has a 90 degree angle, to make it vertical. He thought the work would be completed within a day or two. No other changes were reported by Mr. Plocharczyk. In a recent follow-up visit on 9/21/2016 I corroborated that the work on the stack had been completed. Mr. Plocharczyck said that it was finalized on 8/31/16, a day after my inspection.

After the initial meeting we conducted a walk-thru of the facility. We stopped to take a look at one of the parts cleaner they have in the garage area. The cleaner, Safety Clean Model 90.1 had the lid open. I told Mr. Plocharczyck that the lid is supposed to be closed when the equipment was not in-use. He replied that the solvent utilized in that specific cold cleaner was water-based with a very small percentage of volatile organic compounds on its composition. The other cold-cleaner was located at the engine-built area. The lid was properly closed and operation instructions were posted outside on a visible area. I asked for the dimensions of both equipment, the Safety Data Sheet (SDS) for the solvents, and the records of solvent usage. The SDSs for both solvents were received via email on 9/27/2016 and they are attached to this report.

The dimensions of the Safety Clean part washers were taken by Mr. Plocharczyk during the follow-up visit of 9/21/2016. The sizes are as follow:

Model 90.1 – Aqueous Part Washer in Garage Area = 22 inches X 34 inches (area 5.19 sq. ft.)
Model 34.1 – Solvent Part Washer in the Engine Built Area = 21 inches x 45 inches (area 6.56 sq. ft.)

We continued our walk to the test laboratory starting with the test cells at the north side. The cells are numbered sequentially from 3 to 6, from east to west. Then, on the south end of the lab building cell 2 is located to the west side adjacent to cell 1.
I took note of the power rating specified on the dynamometer's nameplates to identify the dynamometer maximum rated power to compare them with the permitted ratings. I found out that there were a few discrepancies; the cited figures were different from those in the permit. I asked Plocharczyck to verify the data and get back to me with an explanation. For details about the resolution of this issue, refer to the follow-up communications and the updates listed on the summary table that describes the emission units.

I observed the dynos and the various supporting equipment in the test cells. Each cell has its own exhaust stack; however, some cells have an additional stack that is shared by two cells. Cell 1 shared the emission sampling and measurements with cell 2 and cell 5 and 6 also share a stack. Mr. Plocharczyck explained the reasoning for the sharing. To save costs, the expensive equipment known as Dilution Tunnels, which is used to conduct a specific particulate matter test, is shared. There is one located in cells 2 and another one in cell 6. I took note of the location of the stacks in each cell and I noticed that the Emission Summary Table in the PTI 4-12 listed the shared stacks in the wrong cell location. The shared stacks are located in the same location of the Dilution Tunnel. This should be addressed in the future by a permit modification.

The following table provides a description of the emission units regulated by PTI 4-12 as they were permitted on April 3, 2012:

Emission Unit ID	Emission Unit Description	Comments and Updates
EU-TESTCELL1	A 370 kW engine dynamometer test cell firing diesel fuel Stack ID: SV-E1 and SV-E1-2(*)	Meiden EC dyno; 700 to 8000 RPM (*)Stack SV E1-2 is located in Cell 2 Emission & sampling shared with cell 2
EU-TESTCELL2	A 318 kW engine dynamometer test cell firing diesel fuel Stack ID: SV-E2	Shenck dyno; 1700 to 4000 RPM A Dilution Tunnel is located in this cell Emission & sampling shared with cell 1
EU-TESTCELL3	Up to 370 kW engine dynamometer test cell firing diesel fuel Stack ID: SV-E3	Meiden Dyno installed in June 2016 Absorbing Power rated at 300 kW (Power rating modified per PTI 4 – 12A) Not operating as of 9/13/16
EU-TESTCELL4	Up to 370 kW engine dynamometer test cell firing diesel fuel Stack ID: SV-E4	Meiden Dyno installed in June 2016 Absorbing Power rated at 450 kW (Power rating modified per PTI 4 – 12A) Not operating as of 9/13/16
EU-TESTCELL5	Up to 330 kW engine dynamometer test cell firing diesel fuel Stack ID: SV-E5 and SV-E5-2(*)	AVL Dyno / 0 to 4000 RPM Absorbing Power rated at 330 kW (*)Stack SV-E5-2 is located in Cell 6. Emission & sampling shared with cell 6
EU-TESTCELL6	Up to 370 kW engine dynamometer test cell firing diesel fuel Stack ID: SV-E6	AVL Dyno – 0 to 6000 RPM Max rated power stamped on the name plate is 315 kW but it can get to 370 kW A Dilution Tunnel is located in this cell Emission & sampling shared with cell 5
EU-CHASSISCELL1	Up to 370 kW chassis dynamometer test cell firing diesel fuel Stack ID: SV-C1	This cells has not been used since 2002 All equipment has been removed and it is currently a storage room.
EU-CHASSISCELL2	A 150 kW chassis dynamometer test cell firing diesel fuel Stack ID: SV-C2 and SVC2-2	48" Single Rolls Burke Porter Dyno A Dilution Tunnel is located in this cell

During the closure meeting I summarized the point of our discussions. I requested monthly and the 12-month rolling diesel usage and emissions records from January 2015 through December 2015, and for year 2016 (from January to June). I also requested the test cell layout.

At the end of our meeting I explained that I would examine the data to prepare an inspection report with the results of the compliance evaluation. I added that additional questions or concern might come out during the preparation of the report and I might need to contact Isuzu for answers and/or clarifications to better evaluate compliance with the special conditions cited on the permit.

I left the facility at about 5:00 PM.

Update:
I received the first set of requested records via email on 8/31/2016. During the following two weeks after the inspection I requested additional information. Isuzu provided it promptly at various dates (from 9/1/2016 to 9/19/2016).
On 9/21/2016 I decided to go back to Isuzu to clarify the discrepancies related to the maximum power rating of the dynamometers after receiving conflicting information from Isuzu via email on 9/19/2016. For details, please refer to the attached communications.
In addition, during this visit I checked the status of the chassis dynamometers test cells. Chassis test cell number 1 was used as a storage room. The last time it was used was in 2002. Chassis test cell 2 has been active since its installation in 2007 and the emissions from the tests have been accounted for in the records provided during the inspection.

REGULATORY APPLICABILITY / PERMIT UPDATES

The facility is subject to the following rules and regulations:

The facility accepted fuel restriction to opt-out from Title V for NOx emissions, which would be the main pollutant from diesel combustion.

Rule 224 T-BACT: Rule 224 deals with the best available control technology for toxics (T-BACT). During the recent permit modification it was determined that the total annual non-VOC TAC emissions are less than 1 tpy and it would not be economically feasible to add additional controls at this level of emissions.

Rule 225 for Air Toxic Contaminants (TACs): During permit evaluation of Rule 225 which deals with health-based screening levels for TACs, Isuzu agreed to modify the horizontal stack in cell No. 1 and make it vertical to improve dispersion.

Federal NSPS Regulations: There are no emission units subject to a NSPS in this permit.

Rule 301 Opacity: Rule 301 covers visual emissions with opacity limits. The permit specifies a general 20 percent opacity limit in GC 11.

Federal NESHAP Regulations: The emergency generators are subject

Rule 702 VOC Emissions: Rule 702 covers BACT for VOC emissions. The total annual VOC emissions are less than 3 tpy. During permit review it was determined that it would not be economically feasible to add additional controls at this level of emissions.

Rule 201 exemptions:
Please refer to the attached table which includes the equipment capacities and the rule exemption details

- The Safety-Clean part washers are exempt from permitting via Rule 281 (h). The company, "Safety Clean", does the maintenance of the cold cleaners and keeps records of solvent usage and solvent losses for the facility.
- Isuzu has space heaters burning natural gas which are exempt from permitting via Rule 282 (b) (i). I requested the monthly records of the natural gas usage but the records were not available at the time of the visit. I told Mr. Plocharczyck he has to start

collecting monthly records of natural gas usage to calculate MMBTU per year.

APPLICABLE RULES/ PERMIT CONDITIONS:

As it was indicated earlier, the current permit is PTI 4-12A issued on June 14, 2016. However, for the purposes of determining compliance, this evaluation will refer to the permit limits and condition stated in permit PTI 4-12 because the operations of the two new dynamometers in cells 3 and 4,permitted under PTI 4-12A, have not started yet.

Fuel usage and emission records for from January 2015 through December 2015 were reviewed and evaluated. When determining compliance with 12-month rolling time period limits, the most recent month with the highest fuel usage/emissions is cited for compliance determination. A summary of fuel usage and pollutant emissions are attached.

For simplicity, the permit conditions cited on PTI 4 -12 are paraphrased below. The special conditions III, IV, V and IX are not listed because they are not applicable (listed as NA in the permit)

The following conditions apply to FG-TESTCELLS

Description: 6 engine dynamometer test cells and 2 chassis dynamometers test cells

Emission Units: EU-TESTCELL1to EU-TESTCELL6, EU-CHASSISCELL1 and EU-CHASSISCELL2

Pollution Control Equipment: NA

SC I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Testing / Monitoring Method	Compliance Determination
SC I.1 NO_x	12.8 tpy	12-month rolling time period as determined at the end of each calendar month.	SC VI.2	**In Compliance** -The maximum value for the period evaluated was 9.28 tpy at the end of December 2015
SC I.2 1,3-Butadiene (see note below)	0.00984 pph	Test Protocol	GC 13 (AQD may require to conduct performance test)	**Undetermined** - Performance test has not been requested by AQD district office
SC I.3 1,3-Butadiene	1.89 lb/day	Calendar Day	SC VI.3	**In Compliance** - The maximum value for the period evaluated was 0.146 lb / day, reported on July 27, 2015
SC I.4 Formaldehyde	0.132 tpy	12-month rolling time period as determined at the end of each calendar month.	SC VI.2	**In Compliance** - Maximum value for the evaluated period was 0.10 tpy (Isuzu must include three significate figures- will be addressed in the future)

SC II. MATERIAL LIMITS

1. The fuel usage for FG-TESTCELLS shall not exceed 40,000 gallons per 12-month rolling time period as determined at the end of each calendar month.

In Compliance: The maximum 12-month rolling for the evaluated period was 28,988 gallons reports at the end of December 2015.

2. The permittee shall only burn diesel fuel in FG-TESTCELLS.
In Compliance: Records show that Isuzu only burns diesel at their testing facilities.

SC VI. MONITORING/RECORDKEEPING
In Compliance - As required, the facility maintains records for a period of five years and all the monitoring and recording conditions specified under SC VI are in compliance. Please refer to the attached records for the evaluation of the specific conditions.
The following table summarizes the record keeping requirements as cited in the permit:

Special Condition	Requirement	Compliance Determination
SC VI.1	The permittee shall complete all required calculations in a format acceptable to the AQD by the 15th day of the calendar month, for the previous calendar month.	**In Compliance** – Calculations are acceptable. Refer to the attached records.
SC VI.2	a) A record of the days of operation. b) Gallons of diesel fuel used per month and 12-month rolling time period. c) Diesel fuel usage calculations determining the annual usage rate in gallons per 12-month rolling time period as determined at the end of each calendar month. d) NOx and formaldehyde emission calculations determining the monthly emission rate in tons per calendar month. e) NOx, and formaldehyde emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.	**In Compliance -** The permittee maintains records of the days of operation, monthly diesel throughput, and the 12-moth rolling records. The records were available for review. See attached records. The permittee keeps in a satisfactory manner, monthly and previous 12-month NOx, and Formaldehyde emission calculation records for FG-ALLCELLS. – Refer to attached records.
SC VI.3	a) Records of hour of operation b) Diesel fuel usage on a daily basis. c) 1, 3 -Butadiene emission calculations determining the daily emission rate in pounds per calendar day.	**In Compliance** Refer to the attached records.
SC VI.4	The permittee shall keep, in a	**In Compliance**

	satisfactory manner, records of the maximum sulfur content in the fuel for each delivery. The permittee shall keep all records on file and make them available to AQD upon request.	Records are maintained and were available for review – Refer to attached Sulfur Certificate of Analysis.

SC VII.1 REPORTING

At the closure meeting for the inspection conducted on 8/30/2016 I reminded Isuzu to notify AQD of the completion of the installation of the dynamometers in Cells 3 and 4 and the modifications of the exhaust stack SVE5-6. These changes were authorized by a recent PTI modification. A written notification shall be submitted to AQD within 30 days after the cited activities are fully completed.

SC VIII STACK/VENT RESTRICTIONS

The exhaust gases from the stacks installed at each testing cell (SV-E1 to SV-E6) and at the chassis cells (SV-CI, SV-C2 and SV-C2-2) discharge unobstructed vertically upwards to the ambient air. I did not climb to the roof to verify the dimensions of the stacks but I observed them from the parking lot. They seem to be the same size permitted by PTI 4-12. Isuzu indicated that except for SVE5-6, which was modified to discharge vertically on 8/31/2016, all the other stacks have not been modified since its initial installation.

MAERS REPORTS

The AQD internal policy and procedure number AQD – 013 establishes the criteria pollutant thresholds levels for the emission inventory. According to the policy, all sources that have active Opt-out Permit are required to report their emissions to MAERS.

According to a letter dated March 14, 2006 from Isuzu to AQD / Detroit Office one of our inspectors requested MAERS submittal for the 2005 Emission Inventory (EI). The facility was added to the 2005 MAER list. The 2005 MAERS report was received by AQD on March 15, 2006 together with the cited letter. However, according to Isuzu, the MAERS report confirmed the facility was a "true minor source". At that time (2005 to 2007) the facility only operated with two test cells and after numerous discussions between AQD and Isuzu, it was concluded that the facility could operate the (2) test cells under the Rule 285(g) exemption because the PTE appeared to be below the major source thresholds and the actual emissions were below significance levels in R278(b). AQD advised that no further MAERS report would be required unless the facility were to expand, in which case the PTE needed to be reevaluated.

I assume that the facility was taken off the list of MAERS sources sometime around 2006, when AQD accepted that Isuzu was operating as a true-minor source. However, because the facility is now an opt-out source, MAERS reporting is required.

I an email dated 9/13/2016 I informed Mr. Gerry Plocharczyk that MAERS reports are to be submitted starting with the 2016 emission inventory. Mr. Plocharczyk received the email and he has agreed to submit MAERS for the 2016 reporting year.

FINAL COMPLIANCE DETERMINATION

Isuzu appears to be in compliance with the evaluated requirements and the applicable state and federal air emissions standards, rules and regulations.

NAME Mendoza DATE 9/28/16 SUPERVISOR JK