



Powertrain Technology
Axle Drives

ZF Axle Drives Marysville, LLC · 2900 Busha Highway
Marysville, MI 48040

Mr. Robert Elmouchi
Senior Environmental Quality Analyst
Air Quality Division, Warren District Office
Michigan Dept of Environment, Great Lakes
and Energy (EGLE)
27700 Donald Court
Warren, MI 48092-2793

Dept. Facilities
From Brian Miller
Phone 810-292-4132
Fax
E-mail brian.miller@zf.com
Your Ref.
Our Ref.
Date 10/22/2020

RE: N7795 ZF Axle Drives Marysville, PTI No. 147-07C; VN 9/16/2020,

Dear Mr. Elmouchi,

We received the EGLE violation notice dated 9/16/2020 in response to the inspection that you performed at the ZF Marysville facility on 7/30/2020. Please note that we did not receive the electronic version until 9/23/2020 and the hard copy until 9/29/2020. In summary you noted the following issue:

During this inspection, it was determined that the permittee failed to install water traps of 55 gallons minimum size on the ammonia storage tank vent, and on the vent lines of five ammonia regulators. This appears to be a violation of EU-AMMONIA Special Condition IV.3, which states, "Any vapor or liquid line, exclusive of couplings, requiring venting after ammonia transfer shall be vented through a water trap of 55 gallons minimum size. Safety water shall not be used for this purpose."

In a follow up discussion on October 9, 2020 with yourself, myself, Andrew Drury, EGLE Senior Engineer Specialist AQD Permit Section, and Liz Carson and Patrick Moquin from Arcadis, it was determined that Special Condition No. IV.3 was derived from requirements that apply to ammonia-related agricultural operations and does not accurately represent the operations at ZF. In addition, it was determined that the ammonia regulators (and associated diaphragm vents) are only for safety purposes in the event of a malfunction and are not considered to be emissions from normal operations subject to requirements of Special Condition No. IV.3. In order to better represent the ammonia operations at ZF and to clarify the application of these requirements to the equipment at ZF, ZF is proposing to clarify the language in Special Condition No. IV.3 via a new Permit to Install application.



The proposed change in the language in Special Condition No. IV.3 has been agreed upon by ZF Marysville and Andrew Drury. We will be submitting the PTI application no later than October 30, 2020. The proposed change is as follows:

Any vapor or liquid line **equipped with a mechanical connector**, exclusive of couplings, requiring venting after ammonia transfer to the ammonia storage tank shall be purged into the storage tank or returned to the supplying vessel, or vented through a control device **appropriately designed** to minimize the release of ammonia emissions to the atmosphere. ~~vented through a water trap of 55 gallons minimum size. Safety water shall not be used for this purpose.~~

We believe that this action will adequately address the concerns outlined in your letter of 9/16/2020. If you have questions or need additional information, please let us know and we will be happy to provide you with whatever is required.

Thank you very much,

Sincerely,

A handwritten signature in blue ink, appearing to read 'B. V. Miller', with a long horizontal flourish extending to the right.

Brian V Miller
ZF Marysville Environmental Specialist

cc. Ms. Jenine Camilleri,
Enforcement Unit Supervisor at EGLE, AQD,
P.O. Box 30260, Lansing, Michigan 48909-7760