



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



LIESL EICHLER CLARK
DIRECTOR

January 24, 2019

Mr. Deepak Bhalla
Director of Purchasing and Facilities
Sakthi Automotive Group USA, Inc.
6401 West Fort Street
Detroit, Michigan 48209

SRN: P0380, Wayne County

Dear Mr. Bhalla:

VIOLATION NOTICE

This Notice is in reference to a Caterpillar engine that was installed at the Sakthi Automotive Group USA, Inc. facility (hereinafter “Sakthi”) located at 6401 West Fort Street, Detroit. The engine in question, a Caterpillar Model 3512B, was installed outside of the casting building on Waterman Street to provide back-up power to the aluminum casting process. This activity has been reviewed for 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); and the Air Pollution Control Rules.

The following air pollution violation relates to the installation and operation of the engine:

Process Description	Rule/Permit Condition Violated	Comments
Caterpillar Model 3512B engine, located outside of the casting building on Waterman Street.	Michigan Administrative Rule 201(1) (R 336.1201(1))	The engine was installed without first obtaining a Department of Environmental Quality – Air Quality Division (DEQ-AQD) Permit to Install, as required in Rule 201(1).

Michigan Administrative Rule 201(1) requires that a Permit to Install (PTI) 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, unless otherwise authorized within the Michigan Administrative Rules. Per Michigan Administrative Rule 285(2)(g), internal combustion engines having a maximum heat input of less than 10,000,000 BTU per hour are exempt from the requirements of Michigan Administrative Rule 201(1).

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Based on information specific to the engine that was installed at your facility, the Caterpillar engine has an estimated maximum heat input capacity of 15,721,135 BTU per hour. As the maximum heat input of the Caterpillar engine at your facility exceeds the 10,000,000 BTU per hour threshold, the engine is required to have a DEQ-AQD PTI. Even if the engine is seldom used, due to its size, a permit is still required.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 14, 2019. The written response should include: the dates that the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

In the case of the Sakthi facility, it is possible that the engine could be added to your existing permit for the aluminum casting process, PTI No. 92-16. If you have any questions regarding the process for permitting the engine, please contact C.J. Asselin of the DEQ-AQD Permit Unit. She can be reached at (517) 284-6786, or via e-mail at asselinc@michigan.gov.

If Sakthi believes that the above observations or statements are inaccurate or do not constitute a violation 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. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Stephen Weis
Senior Environmental Engineer
Air Quality Division
313-456-4688

cc: Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ