



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

November 6, 2013

Mr. Brad Shantry, Operations Manager
Powertrain Integration
30205 Industrial Drive
Madison Heights, Michigan 48071

SRN: P0412, Oakland County

Dear Mr. Shantry:

VIOLATION NOTICE

On January 8, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Powertrain Integration located at 30205 Industrial Drive, Madison Heights, Michigan. The purpose of this inspection was to determine Powertrain Integration'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); and the administrative rules.

The AQD issued a Violation Notice to Powertrain Integration on January 9, 2013, as a result of your company installing and operating two dynamometer test cells without obtaining a Permit-To-Install. Subsequent potential-to-emit (PTE) calculations performed by the AQD have indicated that potential emissions of carbon monoxide from the dynamometers exceed major source threshold levels (100 tons per year). The PTE from the dynamometers make Powertrain Integration a major source with respect to potential emissions of carbon monoxide. Therefore, Powertrain Integration is being issued this Violation Notice for violating State of Michigan Rule 336.210. The specifics of the violation are listed below.

Process Description	Rule/Permit Condition Violated	Comments
Two dynamometer test cells	Rules 336.1210	Powertrain Integration failed to obtain an ROP and to submit an administratively complete application in a timely manner according to the schedule stated in Rules 336.1210 (4 & 5).

Under the State of Michigan's Air Pollution Control law and the federal Clean Air Act, a Renewable Operating Permit (ROP) program has been developed and implemented in Michigan. This program requires major sources of air emissions to obtain a facility-wide air use permit. This permit serves as a mechanism for consolidating and clarifying all air pollution control requirements which apply to the source. Rule 210(5) of Part 55, Air

Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires major sources to submit an application to the Department of Environmental Quality (DEQ), Air Quality Division (AQD) not more than 12 months after a stationary source commences operation as a major source, as defined by Rule 211(1)(a) of Act 451.

Based on the commencement of operation of Powertrain Integration, located at 32505 Industrial Drive, Madison Heights, Michigan 48071, an application for a ROP should have been submitted according to the schedule stated above. To date, the AQD has not received this application. This constitutes a violation of Rule 210(1) of Act 451 which requires that a source not operate any emission units at a source required to obtain a ROP unless a timely and administratively complete application has been received by the DEQ. As a result of the failure to submit a timely and administratively complete application in accordance with the requirements of Rule 210(5) of Act 451, this facility has failed to obtain an "application shield".

As a result of the Violation Notice dated January 9, 2013, Powertrain Integration submitted an administratively complete permit application for a synthetic minor permit on May 16, 2013. Therefore, it is not necessary to submit an application for a Renewable Operating Permit (ROP) because a synthetic minor permit is already in the process of being issued. The synthetic minor permit will limit emissions from the dynamometers below major threshold levels by instituting fuel usage and daily operational restrictions.

Please initiate actions necessary to correct the cited violation and **submit a written response to this Violation Notice by November 27, 2013** (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates 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.

If Powertrain Integration 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 Powertrain Integration. 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,



Erik Gurshaw
Environmental Quality Analyst
Air Quality Division
586-753-3743

EG:DC

Enclosures: Rules 210 and Potential-To-Emit Calculations

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ