

*File
Man**P0423*DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Other*FY2018 - Other*

P042342101

| | | |
|--|-----------------------------------|------------------------------|
| FACILITY: STERLING PERFORMANCE, INC. | | SRN / ID: P0423 |
| LOCATION: 54420 PONTIAC TRAIL, MILFORD | | DISTRICT: Southeast Michigan |
| CITY: MILFORD | | COUNTY: OAKLAND |
| CONTACT: Mr. Michael J. D'Anniballe, President | | ACTIVITY DATE: 10/18/2017 |
| STAFF: Iranna Konanahalli | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: Consent Order AQD No. 38-2014 termination | | |
| RESOLVED COMPLAINTS: | | |

Sterling Performance, Inc. (P0423)
54420 Pontiac Trail
Milford, Michigan 48381-4344

Subject: Consent Order AQD No. 38-2014 termination.

Contact: Mr. Michael J. D'Anniballe (Phone: 248-684-5040; Fax: 248-684-0080; E-mail: mDanniballe@SterlingPerformance.org), President.

NAICS Code: 336399; SIC Code: 3519

VNs: Violation Notices dated February 13, 2013 (Rules 201 PTI & 707 Cold-cleaner) and October 24, 2013 (Rule 210 ROP).

Synthetic Minor (ROP, area MACT) PTI No. 43-13 dated July 17, 2013 (Rule 702 BACT – cost analysis \$39,000 per ton VOC controlled). Prior to the permit, Sterling was subject to Major MACT, PSD (above threshold levels for CO and above significant level for VOC); PSD review was not performed. Potential lead (Pb) emissions were also high due to leaded gasoline use. One of two test cells is permanently shut down.

Subject to: MAERS – annual reporting required due to synthetic minor permit.

Consent Order: AQD No. 38-2014 effective June 4, 2014, executed by G. Vinson Hellwig, AQD Chief. \$10,000 settlement.

Not Subject to: NESHAP/ MACT T, area source National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; NESHAP/ MACT T); Correction; 29484 Federal Register / Vol. 60, No. 107 / Monday, June 5, 1995 / Rules and Regulations; amended National Air Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T); Final Rule; Page 25138 Federal Register / Vol. 72, No. 85 / Thursday, May 3, 2007 / Rules and Regulations.

Not subject to NSPS (none for test cells / dynamometers)

Not Subject to: NESHAP/ MACT 5P, , Page 28774, Federal Register / Vol. 68, No. 101 / Tuesday, May 27, 2003 / Rules and Regulations / Final rule.

Prior to obtaining the synthetic minor permit PTI No. 43-13, Sterling was a major source for ROP, PSD, HAP (all). Although Sterling was a major MACT source (prior to PTI No. 43-13), the dynamometer / test cell, in spite of once-in-always-in policy, is not subject to MACT 5P because it was constructed before May 14, 2002 (built about 1991). Sterling is now an Area MACT source based upon legally, federally and practically enforceable limits of the permit.

Based upon Wednesday, October 18, 2017, records review inspection, Sterling Performance, Inc. ("Sterling"), as always, is not keeping the records and not performing the required calculations, as well, according to PTI No. 43-13, EU-TESTCELL1, VI and FG-FACILITY, VI:

EU-TESTCELL1, VI.1: the required calculations by the 15th day of the calendar month

EU-TESTCELL1, VI.2.f & g: carbon monoxide (CO) emissions calculations by the 15th day of the calendar month

EU-TESTCELL1, VI.2.p & q: benzene emissions calculations by the 15th day of the calendar month

EU-TESTCELL1, VI.3: lead content record using, for example, product spec sheet by the vendor. Mr. D'Anniballe stated that the lead (Pb) content was 2.3 grams per gallon.

FG-FACILITY, VI. HAPs records and calculations

Conclusion

Sterling Performance, Inc. is not in compliance with recordkeeping and calculations requirements. By e-mail to Mr. Rathbun, Jeff (DEQ)

Sterling Performance, Inc. (P0423): AQD No. 38-2014: Rathbun, Jeff (DEQ)
RATHBUNJ1@michigan.gov Friday 10/20/2017 12:50 PM

NAME J. S. Kernerhall DATE 10/20/2017 SUPERVISOR James B.