

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

P109951957

FACILITY: NGK Spark Plugs (U.S.A.), Inc.		SRN / ID: P1099
LOCATION: 46929 Magellan Drive, WIXOM		DISTRICT: Southeast Michigan
CITY: WIXOM		COUNTY: OAKLAND
CONTACT: Jennifer McAllister, Administration Manager		ACTIVITY DATE: 12/13/2019
STAFF: Rem Pinga	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Major
SUBJECT: Level 2 Unannounced Self-initiated Inspection		
RESOLVED COMPLAINTS:		

On December 13, 2019, I conducted an unannounced level 2 self-initiated inspection at NGK Spark Plugs (U.S.A.), Inc. (NGK) located at 26929 Magellan Drive, Wixom, Michigan 48393. The purpose of the inspection was to determine the facility'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. I met and stated the purpose of my visit to Weston Patch, Technical Center Test Manager.

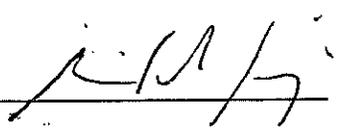
The inspection was conducted as a result of a permit to install exemption inquiry referral from Ms. Ambrosia Brown, Environmental Engineer at AQD Permit Section. AQD staff needed to verify whether NGK's test cells needed a permit to install.

Mr. Patch accompanied me during the walk-through inspection at the engine testing area. During the walk-through inspection, I observed three engine dynamometer test cells and two chassis dynamometer test cells. These processes are not exempt from permit to install requirements per AQD Administrative Rule R 336.1278. Mr. Patch mentioned that the facility runs the engines (varying horsepower (Hp) engines) at different time frames just to test the spark plugs, thus no exhaust emissions are being monitored or recorded. Using AP 42 emission factors for gasoline engines of 1.63 lb./MMBTU/hr. for NOx and at 10 MMBTU fuel input per AQD Rule 285(2)(g) exemption and 8760 total yearly hours, the potential NOx emission per engine is about 71.4 tons/year. The NOx potential to emit for the facility is greater than 250 tons/year. Therefore, the installation of the test cells may violate Rule 210 and Part 19 of the AQD Administrative Rules.

During the post-inspection meeting, Jennifer McAllister, Administration Manager, and Steve Wands, Facilities Supervisor, joined us for discussion. I informed everyone that the test cells needed a permit to install (PTI) and potentially, a renewable operating permit (ROP), unless the facility is willing to take enforceable emissions restrictions in the PTI to opt out from the ROP. I found out from Ms. McAllister that the equipment were installed and operated for several years. The date of installation/operation of the equipment were unknown at the time of the inspection as the current managers were recent hires. Ms. McAllister informed me that she initiated the inquiries and requested Mr. Patch to contact AQD Permit Section to inquire about the dynos. I informed everyone that currently, the facility is in violation of AQD Administrative Rule R 336.1201 (Rule 201) for installing and operating the dynos without first obtaining a PTI. Also, the facility is non-compliant of AQD Administrative

Rule 210 for operating the dynos without an ROP and potentially, in violation of Part 19 of AQD Administrative Rules on New Source Review for Major Sources Impacting Nonattainment Areas. I explained to everyone the concept of PTI, ROP, and Opt-out PTI as it relates to non-compliance, resolution to the non-compliance issues, and the Consent Order process. Ms. McAllister informed me that the company will work with AQD to address and resolve the non-compliance issues. Ms. McAllister and Mr. Patch accompanied me for a walk-through at the rest of the facility. I observed R & D work, warehousing, and office spaces.

As a result of the inspection, I am sending NGK a violation notice.

NAME 

DATE 01/10/2020

SUPERVISOR 