

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

U8114632025898

FACILITY: Mitsubishi Motors R & D of America		SRN / ID: U81146320
LOCATION: 3735 Varsity Drive, Ann Arbor		DISTRICT: Jackson
CITY: Ann Arbor		COUNTY: WASHTENAW
CONTACT:		ACTIVITY DATE: 07/10/2014
STAFF: Glen Erickson	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled inspection of engine testing facility.		
RESOLVED COMPLAINTS:		

Scheduled inspection of Mitsubishi Motors R & D of America, an engine testing research facility.

Met with Christine Grysban, Senior Manager Corporate Services, and Dennis Pawlak, Manager Vehicle Verification.

Described to them that this facility was one of the last engine testing facilities which AQD has not yet inspected within Washtenaw County. Briefly explained AQD's responsibility to determine compliance with the state and federal clean air acts.

The facility operates 2 test cells for testing automobiles on dynamometers. The vehicles are all street legal vehicles, equipped with on-board catalytic converters for emission controls. They do not test uncontrolled engines.

They also operate 1 test cell for testing performing the EPA required on-board refueling recovery test which involves placing a vehicle within the test cell, closing the cell, and remotely fueling the vehicle while monitoring the hydrocarbon emissions.

They do not conduct any painting operations, or operate an underground or aboveground gasoline storage tank. They fuel vehicles only through drummed fuel containers. They do not operate any other potential sources of significant air emissions.

I explained how the vehicle test cells would all be rule 201 permit-exempt via Rule 285(g): internal combustion engines less than 10 MMBtu/hr. A typical conversion for reciprocation internal combustion engines would be 10 MMBtu equates to 1500 Hp. The largest engine tested in any of the many engine test facilities that AQD has evaluated in Washtenaw County was an engine at the USEPA Motor Vehicle Test Lab of 600-700 Hp. Therefore, Mitsubishi's engines that are or will be tested are assumed to be below the 10 MMBtu threshold.

I then described how the 1990 CAA amendments required that facilities be evaluated on their potential to emit, and that the 100 tpy PTE for CO was reached, in general, with between 4 and 5 test cells that are testing uncontrolled engines. So even if Mitsubishi did test uncontrolled engines, which they said they don't, the 2 test cells would certainly produce PTE emissions well below the 100 tpy threshold for CO.

This facility does not need to report to MAERS. Facility appears to be in full compliance with all applicable air regulations.

NAME

GLEN ERICKSON

DATE

7-11-14

SUPERVISOR

[Signature]