



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

November 6, 2017

CERTIFIED MAIL – 7010 0290 0000 3734 2569
RETURN RECEIPT REQUESTED

Mr. Patrick Sickon, Environmental Manager
Toyota Motor North America R & D
1555 Woodridge Road
Ann Arbor, MI 48105

SRN: N2915, Washtenaw County

Dear Mr. Sickon:

VIOLATION NOTICE

On September 13, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a ROP Semiannual Certification and Deviation Report from Toyota Motor North America R&D facility (hereinafter TMNA) located at 1555 Woodridge Road, Ann Arbor, Michigan. Rule 213(3)(c)(i) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires the responsible official to submit a report at least once every six months of any required monitoring and all instances of deviations from permit requirements.

The AQD reviews the ROP report 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); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N2915-2012a.

The AQD identified the following violations from the reported deviation:

Process Description	Rule/Permit Condition Violated	Comments
EU-EG6: CAT Aging test cell	ROP EU-EG6 Condition I.1	TMNA reported potential exceedance of the Carbon Monoxide (CO) emission limit of 1.87 pounds per hour during periods of fuel-rich high air intake testing conditions (Test Pattern).
EU-EG6: CAT Aging test cell	ROP EU-EG6 Condition IV.1	During the identified Test Pattern, the catalytic converter may not meet ULEV standards.

TMNA reported an **intermittent potential** deviation of the short term CO emission limit during the operating period of January 1, 2017 to May 23, 2017. During fuel-rich high air intake conditions, the catalyst (CO control) may not operate as effectively, potentially resulting in higher emissions. The AQD and TMNA met on October 5, 2017 to discuss the detail of the operations and the limited potential of the reported exceedance was explained. On October 30, 2017 TMNA submitted additional information demonstrating compliance with the tons per year CO emission limit since EU-EG6 commenced operation in April 2016.

The submittal also indicated that TMNA began operating the Test Pattern in EU-EG6 in April 2016. Therefore, the potential violation occurred over the period of **April 2016** to May 2017.

This letter acknowledges that TMNA took immediate action to correct the violation situation once it was identified. TMNA ceased operation of the Test Pattern as of May 23, 2017. TMNA submitted a Permit to Install application in July 2017 to revise the permit to include this Test Pattern. The Permit has been determined to be approvable as proposed.

It is required that TMNA now revise and resubmit their 2016 ROP Semiannual and Annual Certification and Deviation Report to include the identified deviation. Please submit a written response to this Violation Notice by November 30, 2017. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations, whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If TMNA 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 violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Diane Kavanaugh Vetort
Senior Environmental Quality Analyst
Air Quality Division
517-780-7864

cc: Mr. Scott Miller, DEQ

cc/via e-mail: Ms. Stephanie A. Jarrett, PE, Fishbeck Thompson Carr & Huber

Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Mr. Chris Ethridge DEQ

Mr. Thomas Hess, DEQ