

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

A262044947

FACILITY: GM Components Holdings, LLC	SRN / ID: A2620
LOCATION: 2100 BURLINGAME AVE SW, WYOMING	DISTRICT: Grand Rapids
CITY: WYOMING	COUNTY: KENT
CONTACT: Annette Wendland , Environmental Engineer	ACTIVITY DATE: 06/28/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance
SUBJECT: Scheduled unannounced inspection.	SOURCE CLASS: SM OPT OUT
RESOLVED COMPLAINTS:	

Air Quality Division (AQD) staff Adam Shaffer (AS) and Tyler Salamasick (TS) arrived at the facility at 9:00 am on June 28, 2018 to complete a scheduled unannounced inspection. The weather conditions were fair skies, variable winds 0-5mph and low 70's°F. Prior to entering the site, offsite visible emission and odor evaluations were completed in several locations surrounding the site. No emissions were observed, and no traceable odors were identified.

Facility Description

GM Components Holdings, LLC (GM) located in Wyoming, MI is an auto parts manufacturing company mainly of truck axles and lifters. The site is an opt-out source for NO_x and SO_x and is in operation with eight active permits, which are permit to install (PTI) No. 246-95, 317-96, 179-98, 422-94, 1121-91, 731-85, 789-89, and 438-73. The company has approximately 850 employees and depending on the process line, works up to three shifts a day.

Compliance Evaluation

Upon entering the site, AQD staff checked in at the guard station and reviewed the appropriate safety videos. AQD staff then met with Ms. Annette Wendland, Environmental Engineer, who provided a tour of the facility, answered site specific questions and provided requested records. Partially through the inspection, Ms. Karen Carlson, representative of GM, arrived on site to assist in the inspection. An initial discussion was completed between AQD staff and GM staff where the purpose of the inspection was stated and recent changes to the site were discussed. An updated copy of the layout of the site as well as a current list of exemptions that GM uses for various equipment on site were provided to AQD staff. Reviewing the exemptions used by GM for various onsite equipment and processes, the exemptions appeared to be applicable with appropriate records requested for recordkeeping exemptions.

PTI No. 179-98, 246-95, 422-94, 1121-91, 789-89

Most of the active permits reference Rule 301 opacity limitations. To demonstrate compliance with opacity limitations GM completes monthly visible emission readings. Records were reviewed back to April 2016 and were concluded to be acceptable. Additionally, PTI No. 789-89 and PTI No. 1121-91 have a particulate matter (PM) emission limit of 0.10 lbs per 1,000 lbs of exhaust gases. Records were requested and provided on how GM is meeting these emission limits. For PTI No. 789-89 and PTI No. 1121-91, GM calculated particulate emissions to be 0.0009 and 0.0007 lbs PM / 1,000 lbs exhaust gas respectively, which are well within the permitted limits.

PTI No. 438-73

This permit is for venting of acid tanks on the tin bronze plating line. During the initial discussion with GM staff it was concluded that the equipment was decommissioned in 2017; however, is still located on site. GM now outsources that part of the process. After further discussion, it was concluded that GM does not wish to void the permit at this time.

PTI No. 731-85

This permit is for a Holcroft carbonitriding furnace system. At the time of the inspection, the system was not used and had not been used for some time. However, it did not appear that GM wished to void the permit at this time.

PTI No. 317-96

This permit is for the two natural gas fired boilers (Boiler #1 with a steam flow of 60,000 pounds per hour and Boiler #2 with a steam flow of 90,000 pounds per hour). GM identifies in their recordkeeping for Boiler #1 to be the East Boiler and for Boiler #2 to be the West Boiler. In the initial discussion between AQD staff and Ms. Wendland, it was concluded that the West boiler had been dismantled in 2017. This was verified during the inspection of the power house portion of the site. AQD staff suggested GM submit a permit modification application to remove the West Boiler from the permit.

During the permitting process of the two boilers the potential to emit of nitrogen oxides and sulfur dioxides for the two boilers was 92.8 tons per year (tpy). The potential to emit of nitrogen oxides and sulfur dioxides for the heat treat ovens was approximately 11 tpy, which barely put them over major source thresholds. It was agreed at the time that GM would limit natural gas consumption for the two boilers to an equivalent emission rate of 65 tpy for each criteria pollutant which equates to 930 million cubic feet per year.

Records were requested from May 2017 through May 2018 and reviewed for the East Boiler. This boiler is subject to a nitrogen oxide emission rate that shall not exceed 8.5 pounds per hour. For May 2018, the hourly nitrogen oxide emission rate was 1.7360 pounds per hour, which is well within the permitted limit. Previous monthly emission rates reviewed were also less than 8.5 pounds per hour. The sulfur dioxide emission rate shall not exceed 63 pounds per hour. For May 2018, the sulfur dioxide emission rate was 0.0104 pounds per hour, which is well within the permitted limit. Previous monthly emission rates reviewed were also less than 63 pounds per hour. The combined usages from the two boilers are limited to 65 tpy of sulfur dioxide emissions. As of May 2018, the emissions were 0.0511 tons, which is within the permitted limit. Previous 12-month rolling totals were also within the 65 tpy limit. The combined usages from the two boilers are also limited to 65 tpy of nitrogen oxide emissions. As of May 2018, the emissions were 8.5229 tons, which is well within the permitted limit. Previous 12-month rolling totals were also within the permitted limit. Both boilers are limited to a combined natural gas usage of 930 million cubic feet per year. As of May 2018, the 12-month rolling gas usage total was 170.4585 million cubic feet. This is within the permitted limit and reviewing previous 12-month totals, the natural gas usages were also within the required limits. Though the exact dimensions of the stack associated with the East Boiler were not measured during the roof inspection, they appeared to be consistent with PTI No. 317-96.

Additional Observations

- Two 578 horsepower diesel fuel emergency generators and one 115 horsepower diesel fuel fired fire pump were observed during the site inspection. During the initial discussion it was concluded that the third emergency generator previously on site had since the last inspection been removed.
 - Emergency Generator #1 – At the time of the inspection the non-resettable engine hours meter read 1,474.73 hours.
 - Emergency Generator #2 – At the time of the inspection the non-resettable engine hours meter read 1,244.0 hours.
 - Fire Pump – At the time of the inspection the non-resettable engine hours meter read 1,161.98 hours.

Emergency Generator # 1 and Emergency Generator # 2 were installed in 1971 and 1973 respectively. The fire pump was installed in 1978. The emergency generators and fire pump are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE). However, the MDEQ-AQD has not been delegated enforcement of this NESHAP by EPA. This was stated to GM staff during the inspection. GM believes the two generators and fire pump are exempt per Rule 285(2)(g), which appears to be acceptable.

- A new boiler is in storage on site that is approximately 48 MMBtu/hr in size. The boiler upon installation will be subject to New Source Performance Standards (NSPS) Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. GM staff are aware of this and plan to submit the initial notification upon installation. The boiler would appear to be exempt per Rule 282(2)(b)(i).
- Approximately seventy-two naphtha cold cleaners are located throughout the facility. Ms. Wendland stated that yearly audits consisting of spot checks of cold cleaners to verify compliance are completed. GM believes the cold cleaners are exempt per Rule 285(2)(r)(iv), which appears to be acceptable.
- Two natural gas fired emergency generators were observed during the site inspection.
 - Kohler North – This emergency generator was installed in January 2017 and is 4.06 MMBtu/hr in size. A non-resettable meter to record the engine hours was observed for this emergency generator. At the time of the inspection, the non-resettable engine hours meter read 2.1 hours.
 - Kohler South – This emergency generator was installed in March 2017 and is 4.06 MMBtu/hr in size. A non-resettable meter to record the engine hours was observed for this emergency generator. At the time of the inspection, the non-resettable engine hours meter read 28.9 hours.

The two natural gas fired emergency generators are potentially subject to the NESHAP RICE; however, the MDEQ-AQD has not been delegated enforcement of this NESHAP by EPA. The two emergency generators are subject to the NSPS for Spark Ignition Internal Combustion Engines. GM staff stated that since the emergency generators have been in operation for less than 50 hours, no maintenance is required at this time per manufacturers specifications. Certificates of conformity were requested and provided by GM staff. The certificates demonstrated that both emergency generators are within the emission standards for table one of NSPS Subpart JJJJ. Based on the observations made, the two emergency generators appear to be in compliance with NSPS Subpart JJJJ regulations. The two emergency generators are considered by GM to be exempt per Rule 285(2)(g), which appears to be acceptable.

- During the inspection the rooftop was accessed. Stacks were observed in the areas of the power room and the heat treat furnaces.

- One carburizing heat-treating line for metal parts was observed during the inspection. The line is electrically heated with no quench oil used in the process. GM believes that the line is exempt per Rule 282 (2)(a)(i), which appears to be acceptable.
- An oil reclaim room was observed during the inspection. Here oil is reclaimed from items such as towels and clothing. Approximately twelve tanks are used in the process. GM uses the Rule 284(2)(i) exemption, which appears to be acceptable.
- A tank farm was observed along the eastern portions of the site. Tanks located in this area are used to store materials such as hydraulic oil and quench oils. GM uses the Rule 284(2)(c) & (i) exemptions for this unit, which appear to be acceptable.
- A phosphate metal treatment line was observed during the inspection. Nine stations were observed which included rinse, oiling, activation and phosphate areas. The process is internally vented. GM believes that the Rule 285(2)(r) exemption is applicable, which appears to be acceptable.
- GM utilizes the Rule 291(2) exemption for the sealer, adhesive and RTV sealant application in assembly area. Records were requested and reviewed. Based on the records reviewed, the Rule 291(2) exemption appears to be applicable.
- GM utilizes the Rule 287(2)(c) exemption for the ink marking area. Records were requested and reviewed. Based on the records reviewed, the exemption appears applicable.
- GM utilizes the Rule 290 exemption for EUGAMMA, which is the pre-production assembly of front and rear axles. This area ceased operation in September 2017. Monthly emission records were requested and reviewed from May 2017 through September 2017. Based on the records reviewed, the exemption appears applicable.

Conclusion

A final discussion was held between AQD staff and GM staff. Based on the facility walkthrough, observations made, and records received, GM appears to be in compliance with the eight active permits and applicable air quality rules.

NAME Adam F. Smith DATE 08/17/18 SUPERVISOR [Signature]

