

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

B205224084

FACILITY: RACER Trust - Willow Run Plant Industrial Land		SRN / ID: B2052
LOCATION: 2930 Ecorse Road, YPSILANTI		DISTRICT: Jackson
CITY: YPSILANTI		COUNTY: WASHTENAW
CONTACT: Tamika Banks , Onsite Environmental Coordinator		ACTIVITY DATE: 01/14/2014
STAFF: Diane Kavanaugh-Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Complete scheduled compliance inspection. Full Compliance Evaluation of a Title V Facility. Category I, FCE/PCE. * REVISED based on RACER corrections/clarifications received on 2/7/14.		
RESOLVED COMPLAINTS:		

Tamika Banks; Tamika.Banks@arcadis-us.com

On January 14, 2014, Michigan Department of Environmental Quality, Air Quality Division conducted a complete scheduled compliance inspection of the above RACER Trust facility location (Former GM Powertrain Willow Run Plant), Ypsilanti, Washtenaw County. I was accompanied by Kevin Lund, Remediation and Redevelopment Division (RRD), DEQ. RRD is involved in the site clean-up operations, organized through the bankruptcy. The industrial site had/has long standing underground water and soil contamination involving potential off site discharges. The inspection was announced a short time prior to gain access to the site and meet with the appropriate RACER on site representatives. The site is currently managed by the RACER Trust as a result of bankruptcy and is no longer an operating production facility. Some buildings are completely emptied of machinery, while others hold equipment that is disconnected/dismantled and still stored on site. The property was finally sold in 2013 and demolition is underway. Portions of the main plant were observed to be demolished. Demolition and Asbestos removal notification was provided to AQD according to RACER contact and site supervisor, Cliff Lewis. He said the asbestos has been removed.

The purpose of the AQD inspection was to determine the facility compliance status with applicable federal and state regulations, particularly Michigan Air Pollution Control Act 451, Part 55, the administrative rules, and conditions of the existing Renewable Operating Permit, MI-ROP-B2052-2013. RACER has a security entrance gate off Airport Road and one parking area. Due to the ongoing demolition RACER's office is in a trailer near this entrance. All visitors must stop at the security entrance to be signed in by security and vehicles are inspected upon leaving. I met with Cliff Lewis, Tamika Banks, and Kevin already on site. We commenced a facility walk through inspection of the remaining operating equipment areas.

The former GM Powertrain facility applied for and operated under the initial ROP. Following bankruptcy reorganization the RACER Trust determined the need to continue operation of the existing natural gas boilers (powerhouse), emergency generators, space heating, limited Waste Water Treatment Operations (WWTP) and Waste Oil operations. The inspection today will provide update to EU/FG equipment status and operations.

Regarding Hazardous Air Pollutant (HAP), the facility is a true minor source of HAP since the last renewal(2013). At that time the federal requirements for the 7 existing emergency generators on site were added to the ROP because the 4 fire pump engines and 3 emergency generators were subject to the Area Source MACT 40 CFR Part 63 Subpart ZZZZ for CI/SI RICE.

The Powerhouse natural gas boilers are the main reason the ROP was renewed and continues. Tamika and Cliff stated the Powerhouse stopped operation in 2013 and the natural gas line has been cut/capped. The Powerhouse was also the primary reason the Facility's Potential to Emit (PTE) of Greenhouse gases (GHG) designated RACER Trust-Willow Run as a Major Source of Greenhouse Gases.

MAERS 2012: RACER reported Facility Totals of: 13 tons CO; 15 tons NOx; 2 tons PM10/PM2.5; 0.8 ton VOC

FACILITY INSPECTION

FG-POWERHOUSE: 4 natural gas boilers EUBOILERS 3, 4, 5, 6:

During the inspection I was accompanied by Cliff, Tamika and Kevin. I conducted a walk through inspection of the Powerhouse and verified the boilers were not operating. I also observed the electrical and natural gas connections to the building have been severed.

I requested the natural gas usage records for the facility for 2013. Following the inspection I obtained natural gas usage and operating records for the boilers from Tamika for 2013. FG-POWERHOUSE contains a usage limit not to exceed 440,000 pounds of steam per hour. RACER records indicate they alternate operation between all boilers except for Boiler 6 which did not operate. Tamika said she continues to do non-certified visible emission observations of the Boiler stacks and all other required stacks.

During the inspection I observed a portable natural gas fired (with oil capability) boiler enclosed in a semi-truck type trailer that was operating on site. It was located outside the BLDG 17 and is being used to supply power to the EU-BLDG17, a records storage building and FG-WWTP now that the FG-POWERHOUSE is offline. According to Cliff they reviewed the permit exemptions and believed it qualifies under Rule 282(b)(i). He said it was brought on site and began operating November 2013 to cover heating over the winter season. They have a contract for about 2 years he recalled. I requested Tamika obtain specific information regarding the boiler and the natural gas use and send this to me.

On January 22, I received all the records requested (Attached to this Report). The powerhouse boilers ceased operation as of March 31, 2013. The first quarter of 2013 usage records are attached. Tamika will be submitting MAERS for 2013 as required and throughput and emissions will be included at that time.

RACER records show the temporary portable natural gas boiler is 300 HP (10,350 lb steam/hr), 764,000 Btu/hr is less than 50mmBtu/hr exemption rated heat input capacity under Rule 282(b)(i). Natural gas boilers are not subject to the federal Area Source Boiler MACT Subpart (6)J however RACER's submittal indicates boiler is also capable of burning fuel oil however they state they do not intend to burn fuel oil. The Boiler MACT allows for natural gas-fired definition to still apply if only use fuel oil in specified circumstances. I also reviewed the possibility of the boiler being considered Temporary and thus not subject, however it will not meet that definition if as stated it remains on site for more than 12 consecutive months. This was communicated to Tamika. AQD does not currently have delegated authority for most Area Source MACTs.

EU-WWTP: waste water treatment with one packed bed fume scrubber:

During the inspection we walked through the WWTP building. The general housekeeping in this building appeared to be very good. The building actually contains two odor control Scrubbers, one on each side of the plant referred to as North and South. At the end of GMs operations water processing in the plant was way down and they had concentrated operations to only one side. RACER's current ROP includes only the one WWTP Scrubber (North) that remains operable. I observed the South Scrubber was not operating and the side of the plant it had controlled was also not operating. I observed the tanks were in the same condition as in the previous inspection with holes cut in their sides and cleaned out. This side of the WWTP has been rendered inoperable.

I observed that the North Scrubber was operating. I observed the required liquid flow indicator device was installed and operating. Roger Lossing is the 1st shift operator (6am - 2pm). Tom Gwaltney is the 2nd shift operator and we met him in the Control Room and he accompanied me to inspect the scrubber. He stated that they run the scrubber every time the WWTP operates. I observed a chemical additive tote used in the scrubber labeled Chemtrec. I requested and obtained a Material Safety Data Sheet, that indicates it is a detergent, attached to this report. The scrubber is scheduled for semi-annual general inspection and preventative maintenance and the ROP Condition VI. 1) requires quarterly checks of the liquid flow indicator device. A written log of results of inspections, maintenance and corrective actions is also required.

Tamika's email to me following the inspection included copies of their 2013 Quarterly PM forms for all scrubbers (ATTACHED TO THIS REPORT).

EU-BLDG17OIL with one packed bed scrubber:

During the inspection we walked through the mostly empty Waste Oil collection building. There were no operations ongoing in this building during the inspection except for minimal remaining oil storage. The

housekeeping inside this building was not good. I observed there was a variety of waste and scrap material inside all over the floor of the building. Kevin and I also observed a significant amount of oil had leaked on the ground around the ASTs and a pump inside the building. The small pump was between two tanks and was surrounded by saturated absorbent material laid on the floor. Per Cliff and Tamika they had a pump break and were in the process of fixing it. They said only one of the above ground storage tanks (AST 139) is still being used for waste oil collection. The other Tank was said to be empty and will be removed during demolition. Tank 139 is staying for now to hold remaining oils.

During the years GM operated, the machining oils and water from the plant would be piped to Bldg17, and oil contamination from the ongoing underground clean up process drained to initial collection stage (weir/pump station). The oil was skimmed off and sent to the Waste Oil storage tanks. The Bldg 17 Scrubber was used when steam was used to remove water from the storage tanks. Today, the WWTP Operator said they have not done this in a very long time. They are collecting oil in AST 139 and decanting off the water to the WWTP. Cliff and Tamika said they have to carry oil over to the building because there is no longer any direct piping to this building from the defunct main plant. The quantity is greatly reduced and RACER stated they haven't shipped any oil off site in the past year. There was less than 1/2 tank full of oil in Tank 139 as of today - we viewed this via the WWTP Control room screens.

I observed the idle BLDG 17 scrubber and it appeared to be in good condition. The ROP contains requirements for the scrubber proper operation and maintenance.

Tamika emailed copies of their 2013 Quarterly PM forms for all scrubbers (ATTACHED TO THIS REPORT).

MISCELLANEOUS: USTS AND ASTS

I observed there are some ASTs still on the property but most have been emptied. Tamika said they still have diesel tanks for Emergency Reciprocating Internal Combustion Engines (RICE).

FIRE PUMP AND EMERGENCY GENERATORS

The RICE are subject to the Area Source MACT Subpart ZZZZ. The 4 Diesel-fired Emergency Fire Pump Generators are still on site but the 3 Natural Gas fired Emergency Generators have been removed. I inspected the two diesel fired units located in the East fire pump house located between the Building 17 Oil and WWTP. They appeared to be in operable condition. Tamika explained the last monthly maintenance check on them was done in August 2013 because there is currently no water to the building. The other Fire pump house is located near the entrance gate. The natural gas ICEs were located inside the main plant and therefore they were removed long ago. Tamika said Fire Protection is currently the demolition Company's responsibility and the remaining emergency generators are to be removed due to the sale of the property.

COMPLIANCE SUMMARY

Following the walk through of the facility Tamika and I reviewed a list of required facility records and she agreed to send them to me within a week. I followed up the inspection with an emailed summary list. As stated above, on January 22, 2014, I received an email from Tamika with the records requested during the inspection.

It is noted that at the time of the previous inspection (2012 during last renewal) my then contact, Brenna Harden, RACER informed me that GM determined they were Major GHG at the time of the GHG Reporting Rule. Therefore, even though there is no production and CO_{2e} emissions are reduced, RACER still had to report until and if, emissions go below Major Source levels and remain there for 3 years, then they will no longer be subject. Brenna showed me the current record keeping process for GHGs and their reports made to EggRT (EPA national database). Tamika and I briefly discussed status of ROP going forward. She indicated she would be reviewing whether or not they will submit a Request to VOID the ROP at this time or in the near future.

AQD has determined that RACER Trust - Willow Run Plant Industrial Land appears to be in substantial compliance with the existing ROP at this time.

NAME Diane G. Veltort

DATE 2/10/14

SUPERVISOR [Signature]