

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

P042030359

FACILITY: WOODWORTH INC PONTIAC		SRN / ID: P0420
LOCATION: 500 CENTERPOINT PARKWAY N, PONTIAC		DISTRICT: Southeast Michigan
CITY: PONTIAC		COUNTY: OAKLAND
CONTACT: Dennis Deciechi , Vice President		ACTIVITY DATE: 03/30/2015
STAFF: Francis Lim	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

On March 30, 2015 Kerry Kelly and I conducted a compliance inspection at Woodworth Inc. located at 500 Centerpoint Parkway, Pontiac, Michigan. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Administrative Rules; and Permit-to-Install (PTI) Nos. 17-13 and 55-13. Mr. Dennis Deciechi, Vice President and Dan Woodworth, General Manager assisted during the inspection.

This Woodworth facility primarily conducts heat treating operations called gaseous ferritic nitrocarburizing, annealing and stress relieving. Ferritic nitrocarburizing is a case hardening Stress relieving is similar to annealing in that it softens the metal. It consists of heating up the metal to a certain temperature, holding it at that temperature and then cooling the metal part at a low rate. Annealing usually is done at a higher temperature than stress relieving.

The facility is a supplier for the automotive, oil/gas, and wind power industry. Typical parts include brake rotors, engine cradles, clutch plates, and spring retainers.

There are four natural gas-fired furnaces for nitrocarburizing and two natural gas-fired furnaces for stress relieving/annealing. Since there is no quenching involved, the furnaces are exempt under Rule 282(a).

The facility has an emergency generator, a 2001 Model Year Caterpillar Model 3412. Engine is rated at 1186 HP. This is subject to the RICE MACT but not subject to NSPS Subpart IIII. Since this is an existing emergency generator more than 500 HP, there are no emission limits or work practice standards requirements. An hour meter is installed. The emergency engine generator is exempt under Rule 285(g), engine less than 10 MM Btu/hr.

This facility has a permit for two ammonia storage tanks. PTI No 17-13 for a 8,000 gallon storage tank and PTI 55-13 for a 9200 gallon storage tank. Both permits are general permits. The ammonia storage tanks are heated to vaporize the ammonia. The ammonia goes to the top of the tank where it is delivered to the heat treating furnace. Since this is a general permit, not all permit conditions are applicable.

SC1.1. A copy of Part 78, Storage and Handling of Anhydrous Ammonia is kept on site.

SC1.2. An inspection and maintenance program is implemented and maintained. See attached.

SC1.3. An emergency response plan has been approved by the local fire department.

SC1.4. Transfer operations and transport deliveries are handled by properly trained personnel.

SC1.5. NA

SC1.6. NA

SC1.7. NA

SC1.8. Vapor return lines are employed during ammonia transfer operations.

SC1.9. Nitrogen stabilizer is not added to the ammonia storage tanks.

SC1.10. The ammonia storage tanks are fitted with safety relief valves.

SC1.11. Ammonia storage tank is equipped with a remotely operated positive shut-off valve.

SC1.12. Bulkhead installation could not be verified.

SC1.13. Check valves are installed.

SC1.14. Hoses has not been replaced yet since the facility has operated less than 5 years.

SC1.15. There is no water trap installed.

SC1.16. There is a sign for the phone numbers of responsible officials.

SC1.17. Ammonia storage tanks are located more than 50 feet from property line, more than 300 feet from a residential area, more than 500 feet from a school, and more than 1000 feet from a hospital.

SC1.18. Facility will notify AQD if there is an abnormal release of ammonia.

SC1.19. Facility keeps a record of malfunction in the ammonia storage tanks.

SC1.20. Facility met with Waterford Fire Department in 2013, 2014, and 2015 in connection with the annual approval of QP208 Emergency Action and Response Plan. The Plan was approved. See attached.

NAME

J. A. Z.

DATE

08-26-15

SUPERVISOR

CTE