

A8651
MAWILK

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

A865133198

FACILITY: FORD MOTOR COMPANY, WOODHAVEN STAMPING PLANT		SRN / ID: A8651
LOCATION: 20900 WEST RD, WOODHAVEN		DISTRICT: Detroit
CITY: WOODHAVEN		COUNTY: WAYNE
CONTACT: Cynthia Reinhart , Environmental Engineer		ACTIVITY DATE: 01/15/2016
STAFF: Usama Amer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Targeted Inspection of an Opt-out Source		
RESOLVED COMPLAINTS:		

On January 15, 2016, I conducted a targeted inspection of Ford Motor Company, Woodhaven Stamping Plant (WSP), located at 20900 West Rd., Woodhaven, Wayne County. The purpose of this inspection was to determine the facility's compliance with the state and federal air quality regulations as well as the conditions of Permit to Install (PTI) No. 77-05. Ms. Cindy Reinhart, WSP Engineer, and Ms. Kim Cole, Ford Environmental Quality Office, represented the facility during the inspection.

FACILITY BACKGROUND & APPLICABLE AIR REGULATIONS

WSP is a steel stamping plant for certain Ford automobiles body parts, such as hoods, fenders, doors, and packaging trays. Steel rolls are received and cut into planks. Before stamping into different auto body parts, planks go through a soap and water cleaning process. The cleaning process removes hydraulic oil films and steel remnants. Next, the clean stamped planks are welded and sealed into final products. MSD sheets for the most used sealants were provided and will be filed in WSP files. The facility is currently operating at about 10% capacity, as most of the steel parts, which used to be formed at this location, have been switched to aluminum parts, which and are formed at other locations to accommodate for the production of Ford's F150 trucks.

Because this facility had the potential to emit (PTE) NOx in excess of major source thresholds, due to the presence of numerous space heating units, it applied and was issued a Synthetic Minor source Permit No. 77-05 in May, 2005. The permit limits NOx emissions to below 100 tons per year. The facility also emits insignificant amounts of VOC's; primarily, due to the use of lubricant oils and sealants, but did not meet the definition of a major source. This facility processing operations are not subject to any NSPS or MACT standards.

WSP has one 300 HP Emergency Diesel ICE – Fire pump. 300 HP converts to approximately 2.3 MMBTU/hour heat input. Attachments C.1 and C.2 are copies of the Stationary Engine Inventory Forms of WSP and the manufacturer, John Deere, respectively. This engine is exempt from permitting, pursuant to the provisions of R 201(1), under the provisions of R 285(g), which exempt internal combustion engines that have less than 10,000,000 Btu/hour maximum heat input. However, the engine is subject to:

- 1) The MACT Subpart ZZZZ (40 CFR Part 63, Subpart ZZZZ) emergency operational and maintenance requirements. Attachment D is a copy of WSP's RICE Operation Tracking Tool.
- 2) The federal Standards of Performance for New Sources (NSPS) for Emergency Internal Combustion Engine (ICE). These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart IIII. WSP did not provide compliance records of these standards; therefore, a Violation Notice (VN) will be issued to WSP to address this noncompliance.

THE INSPECTION

Special Conditions of PTI No. 77-05

FGFACILITY

1.1 Emission Limits

The NOx limit is based on an emission factor of 100 pounds NOx per one million cubic feet of Natural gas used.

- Attachments A & B show the following NOx emission data:

Pollutant	Emission Rate	Time Period
NO _x	9.3 tpy for 1/2014 Attachment A	12-month rolling time period as determined at the end of each calendar month
	8.3 tpy for 3/2015 Attachment B	

1.2 Material Usage Limits

The natural gas use for FGFACILITY shall not exceed 1,500 million cubic feet per 12-month Rolling time period as determined at the end of each calendar month.

- The 12 month rolling usage of 158 MMCF was reported for 11 & 12/2014. Attachment A
- The 12 month rolling usage of 160 MMCF reported for 2/2015. Attachment B

C1.3 Monitoring

WSP shall monitor in a satisfactory manner the natural gas usage rate for FGFACILITY on a monthly basis.

- Attachments A & B show compliance with this condition.

1.4 Recordkeeping/Reporting/Notification

All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.

- Attachments A & B show compliance with this condition.

1.5 WSP shall keep, in a satisfactory manner, monthly and previous 12-month NO_x emission calculation records for FGFACILITY, as required by SC 1.1. All records shall be kept on file for a period of at least five years and made available to the Department upon request.

- Attachments A & B show compliance with this condition.

1.6 WSP shall keep, in a satisfactory manner, monthly fuel use records for FGFACILITY, as required by GC 1.3. All records shall be kept on file for a period of at least five years, and made available to the Department upon request.

- WSP has no stacks, thus stack testing will never be necessary.

CONCLUSION

WSP appears to be in compliance with the conditions of Permit to Install (PTI) No. 77-05. WSP did not provide compliance records of the federal Standards of Performance for New Sources (NSPS) for Emergency Internal Combustion Engine (ICE), 40 CFR Part 60, Subpart IIII; therefore, a VN will be issued to address this noncompliance.

AMENDMENT

On February 22, 2016, a Violation Notice (VN) was issued to WSP for failure to demonstrate compliance with the provisions of 40 CFR Part 60, Subpart IIII, as they were alleged to pertain to WSP's existing fire pump. On

March 4, 2016, WSP submitted a response to the said VN. In the response, WSP asserted, and provided supporting documents, that the said fire pump was manufactured on May 24, 2006. See Attachment c.1.

Therefore, WSP's fire pump was not subject to the provisions of 40 CFR Part 60, Subpart IIII. Pursuant to 40 CFR 60.4200 (a)(2)(ii) , the provisions of 40 CFR Part 60, Subpart IIII, apply to fire pumps which were manufactured after July 1, 2006. Consequently, the VN of February 22, 2016 is considered resolved.

NAME Sam Ames

DATE 3/9/16

SUPERVISOR JK