

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

B206439162

FACILITY: FORD MOTOR CO/RAWSONVILLE PLANT		SRN / ID: B2064
LOCATION: 10300 TEXTILE RD, YPSILANTI		DISTRICT: Jackson
CITY: YPSILANTI		COUNTY: WASHTENAW
CONTACT: Kim Gamble , Plant Environmental Compliance Engineer (PECE)		ACTIVITY DATE: 03/17/2017
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled, announced inspection of PTI 141-16, which includes source-wide opt-out limits for HAPs and NOx. Issuance of PTI 141-16 has allowed this facility to request their ROP be void.		
RESOLVED COMPLAINTS:		

Contact

Kim Gamble
Plant Environmental Compliance Engineer
(734)484-9258
Kgamble3@ford.com

Robert Streight
Permit Manager
(313)845-8364
rstreigh@ford.com

Purpose

This was a scheduled, announced inspection of Permit to Install (PTI) 141-16 with opt-out limits effectively eliminating the requirement of the facility to have a Title V Renewable Operating Permit (ROP). The purpose of this inspection was to determine compliance with the PTI and verify opt-out conditions are being met. Scott Miller and I arrived at the facility on 3/17/2017 at about 9:10am. We were greeted by Kim Gamble. We also met with Robert Streight during the visit.

Background

Ford Rawsonville was issued PTI 141-16 on October 25, 2016. This PTI effectively limits the source-wide Potential to Emit (PTE) of Nitrogen Oxides (NOx) to below major source thresholds. This was achieved by physically removing the backup fuel oil firing capability of the on-site boilers, which now only are capable of firing natural gas. These boilers have previously been determined to be subject to the New Source Performance Standard (NSPS) in 40 CFR Part 60, Subpart Dc for small industrial-commercial-institutional steam generating units. This facility has continued to keep opt-out limits for Hazardous Air Pollutants (HAP) under their source-wide conditions. Emergency backup engines and fire pumps subject to 40 CFR Part 63, Subpart ZZZZ remain onsite. Permit exempt equipment previously identified in the ROP still remains onsite.

The facility currently employs about 800 people and operates between 1 and 2 shifts per day.

Review of the most recent MAERS was conducted during this inspection.

The last inspection was on 5/7/2015 by Diane Kavanaugh Vetort.

Compliance Evaluation

FGBOILERS-1,2,4,5

This is the flexible group (FG) for four natural gas-fired boilers. An emission limit of 60 tons per year (tpy) on NOx has been set per 12-month rolling time period. The 12-month rolling emissions of NOx for this FG during 2016 were 8.62 tpy (see attached Emissions Summary Table and MAERS data). The physical disconnection of these boilers from firing fuel oil as backup is in line with the requirement that they burn only pipeline quality natural gas.

During the inspection I observed the boilers and had the following notes:

- Boiler 1 and 2 were not operating
- Boiler 3 has been decommissioned and is no longer included in the permit (though physically remains on site)
- Boiler 4 was online with a firing rate of 48.4% at 23,384 scf/hr of natural gas.
- Boiler 5 was on standby

Also attached to this report is a recent maintenance work order on Boiler 4.

FGFACILITY

This is the FG that includes source-wide emission limits for individual and aggregate HAP as well as NOx. In the attached emission spreadsheets, aggregate HAP for the facility is reported as 3.5 tons during reporting year 2016. This is in compliance for both individual and aggregate HAP limits of 10 tpy and 25 tpy, respectively. NOx emissions, as discussed above, are included in the Emissions Summary spreadsheet. During reporting year 2016 the company used 182 MMCF of natural gas, which is below their material limit of 1,200 MMCF per year.

Other

The facility also provided me with records for emission units exempt from requiring a PTI via Rule 287(2)(c) and Rule 290. These records appear to demonstrate compliance with their respective exemption rule (see attached documents Rule 290 Sources, Rule 287(c) Sources, and Rule 287(c) Maintenance Paint Booth Usage Minus Water). I observed the emergency engines and fire pumps, which appear to be maintained regularly with oil changes and filter replacement. The non-resettable hour meters are installed and tracked according to ZZZZ. All cold cleaners were closed at the time of inspection.

Summary

Upon arrival at the facility Scott and I were greeted by Kim and shown the safety video near the security booth at Gate 1 before proceeding. From there we continued on through the plant area and to the conference room where Rob was waiting. We discussed PTI 141-16 briefly and the void letter for MI-ROP-B2064-2012 that was recently mailed. We then conducted the facility tour, which consisted of an entire plant walk through, inspection of the boiler room, roof-top inspection, and collection of onsite record keeping and observation of data recording devices. I observed all boilers listed in the permit as well as emergency engines, fire pumps, and miscellaneous exempt equipment. I also observed the plant-wide natural gas meter, which read 03050798 ccf at the time of inspection.

Compliance Determination and Recommendations

After onsite inspection, review of provided documents and audit of MAERS, I have determined that this facility is in compliance with PTI 141-16.

I recommend the facility update record keeping documents for exempt equipment to reflect the updated PTI exemption rules (i.e. Rule 287(c) to Rule 287(2)(c)).

NAME

Fack Durham

DATE

4/6/17

SUPERVISOR

[Signature]