

B3625
MANILA

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

B362533034

FACILITY: AUTOMOTIVE COMPONENTS HOLDINGS, LLC SHELDON RD		SRN / ID: B3625
LOCATION: 14425 SHELDON RD, PLYMOUTH		DISTRICT: Detroit
CITY: PLYMOUTH		COUNTY: WAYNE
CONTACT: David Russell ,		ACTIVITY DATE: 10/30/2015
STAFF: Usama Amer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Targeted Inspection of an Opt-out Source		
RESOLVED COMPLAINTS:		

On October 30, 2015, I conducted a targeted inspection of Automotive Components Holdings LLC (ACH), located at 14425 Sheldon Rd., Plymouth, 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. 8-99 and PTI No. 324-01A. Mr. David Russell, Ford Environmental Quality Office, Mr. Jay Diadinn, Ford Land, and Mr. Brian Nagy, Troy Design Mfg., represented the facility during the inspection.

FACILITY BACKGROUND

ACH, formerly known as the Visteon Sheldon Road Plant and the Ford Motor Company Sheldon Road Plant, used to manufacture and assemble climate control systems. On the manufacturing side, aluminum radiator cores and heater cores were produced as well as plastic housing. All other parts needed to assemble the control system were manufactured at other locations and shipped to the Sheldon Road Plant. In March, 2015 the facility has changed ownership and was taken over by Ford Motor Co. (FMC). The facility is currently idle with no manufacturing of any product. All the process equipment has been dismantled and removed off site. The aluminum radiator cores and heater cores manufacturing has been purchased by Detroit Thermal Systems of Romulus in December, 2014.

Because this facility had the potential to emit (PTE) NO_x 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. 8-99. The permit limited NO_x emissions through natural gas usage limits. The facility also used to emit VOC's, but did not meet the definition of a major source. This facility was not subject to any NSPS or MACT standards.

FMC and Troy Design Manufacturing are in negotiations for turning over the building to the latter. Upon the takeover, Troy Design Manufacturing plans to start up a prototype auto engines business. Attachment A shows that the facility had several air permits, which were voided. The only active permit is Permit No. 8-99. Furthermore, PTI No. 324-01A was issued to ACH for natural gas fired degreasers on 9/16/2008 and voided on 2/18/2015.

THE INSPECTION

1. Conditions of PTI No. 8-99

- 1) N/A. Obsolete requirement that directs ACH to submit correspondence to Wayne County AQD.
- 2) NO_x emissions, from the natural gas fired unit heaters, are limited to 18.8 lb/hr and 14.5 tons per year, based on a 12-month rolling time period.

- Attachment C shows a list of the Natural Gas Combustion Equipment

- The highest lb/hr NO_x emission rates of 0.5 lb/hr for 1/2014, and 0.35 lb/hr for 2/2015 were reported.
Attachment B

- The highest tpy NO_x emission rates of 0.64 tpy for 12/2014, and 0.57 tpy for 1, 2, 4/2015 were reported.
Attachment B

- 3) In compliance. All heaters are natural gas fired. Attachment C

- 4) The maximum heat input to any single heater within the EU shall not exceed 7.5 MMBTU/hr, nor shall the maximum heat input to the EU exceed 189 MMBTU/hr.
 - The maximum heat input to any single heater within the EU does not exceed 6,500 MMBTU/hr. Attachment D
 - The maximum heat input to the EU does not exceed 159.113 MMBTU/hr. Attachment D
- 5) The natural gas usage in the EU combined shall not exceed 290 MMCF per year, based on a 12-month rolling time period. A written record of the amount of natural gas used shall be kept on file on a monthly basis.
 - The 12 month rolling usage of 128 MMCF was reported for 12/2014. Attachment B
 - The 12 month rolling usage of 115 MMCF reported for 2/2015. Attachment B

Note: natural gas usage log is for the entire plant and therefore is an overestimate of usage and emissions from the EU

6) In compliance. Inventory of heaters is maintained. Attachment C

II. Conditions of PTI No. 324-01A (Voided as of 2/18/2015)

FGDRYER

DISCRIPTION: Radiator core Dry-Off Ovens 3 & 4 and the Heater core Dry-Off Oven

EMISSION UNITS: EUHCDRYER, EURADDRYER3, EURADDRYER4

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS:

Pollutant	Limit	Time Period/ Operating Scenario	Equipment
1. VOCs	24.5 tpy	12-month rolling time period as determined at the end of each calendar month.	FGRADDRYER
2. VOCs	0.000278 Lb Per square foot of radiator core processed.	Test Protocol	FGRADDRYER
3. VOCs	23.4 tpy	12-month rolling time period as determined at the end of each calendar month.	EUHCDRYER
4. VOCs	0.000331 Lb Per square foot of heater core processed.	Test Protocol	EUHCDRYER

- Attachment shows the following data:

Pollutant	Emission Rate	Time Period/ Operating Scenario	Equipment

1. VOCs	0.92 tpy Attachment D	12-month rolling time period as determined at the end of each calendar month.	FGRADDRYER - Ceased operations in June, 2014
2. VOCs	0.000278 Lb/ft ² of radiator core processed Attachment D	Test Protocol	FGRADDRYER- Ceased operations in June, 2014
3. VOCs	2.76 tpy Attachment E	12-month rolling time period as determined at the end of each calendar month.	EUHCDRYER- Ceased operations in November, 2014
4. VOCs	0.000331 Lb/ft ² of heater core processed Attachment E	Test Protocol	EUHCDRYER- Ceased operations in November, 2014

III. PROCESS/OPERATIONAL RESTRICTIONS

1. ACH shall not exceed a maximum processing rate of 173,127,000 square foot of radiator core surface area per 12-month rolling time period for FGRADDRYER.

- ACH processed a total of 6,648,901 square foot of radiator core surface area per 12-month rolling time period for FGRADDRYER. Attachment D

2. ACH shall not exceed a maximum processing rate of 114,000,000 square foot of heater core surface area per 12-month rolling time period for EUHCDRYER.

- ACH processed a total of 18,833,501 square foot of radiator core surface area per 12-month rolling time period for EUHCDRYER. Attachment E

3. ACH shall capture all waste thermal degreasing oils and shall store them in closed containers. The permittee shall dispose of all waste thermal degreasing oils in an acceptable manner in compliance with all applicable state rules and federal regulations.

- ACH staff confirmed to me that all waste thermal degreasing oils used to be captured, stored in closed containers, and disposed of in compliance with all applicable state rules and federal regulations.

V. TESTING/SAMPLING

1. ACH shall determine the VOC content, water content and density of any thermal degreasing oil, as applied and as received, using federal Reference Test Method 24 modified to utilize the actual operating temperature of FGDRYER. Upon prior written approval by the AQD District Supervisor, ACH may determine the VOC content from manufacturer's formulation data. If the modified Method 24 and the formulation values should differ, ACH shall use the modified Method 24 results to determine compliance.

- Attachment J is a statement from Mr. David Russell, Ford Environmental Quality Office, confirming compliance with this condition.

VI. MONITORING/RECORDKEEPING:

1. ACH shall complete all required calculations in a format acceptable to the AQD District Supervisor.

- In compliance Attachments A - E

2. ACH shall maintain a current listing from the manufacturer of the chemical composition of each thermal degreasing oil, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor.

- Attachments F & G are copies of the MSDS for 2 types of lubricating oils used.

3. ACH shall install, calibrate, maintain and operate in a satisfactory manner dry-off oven temperature interlock systems that will not allow radiator cores and heater cores to be fed to the respective dry-off ovens until the minimum temperature needed to remove oil from the cores has been reached. Each interlock system will also automatically shut down the associated dryer, including the parts conveyor, when a maximum temperature of 525° F is exceeded. Each temperature interlock system shall be calibrated on a yearly basis.

- Attachment H is a statement from Mr. David Russell, Ford Environmental Quality Office, confirming compliance with this condition.

4. ACH shall keep the following information on a monthly basis for FGDRYER:

a) The number of each model radiator core and heater core processed through EUHCDRYER and FGRADDRYER, respectively.

- In compliance Attachments D & E

b) VOC mass emission calculations separately for EUHCDRYER and FGRADDRYER determining the monthly emission rate in tons per calendar month for each. These calculations shall be done using the thermal degreasing oil loading VOC limits listed in Special Condition Nos. I.2 and I.4 for FGRADDRYER and EUHCDRYER, respectively.

- In compliance Attachments D & E

c) VOC mass emission calculations separately for EUHCDRYER and FGRADDRYER determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month for each.

- In compliance Attachments D & E

d) The total amount in square foot surface area of radiator cores and heater cores, respectively, for EUHCDRYER and FGRADDRYER processed on a 12-month rolling time period.

- In compliance Attachments D & E

e) A record of the temperature interlock system calibration results, the date, time and duration of each Interlock activation which ceases production separately for EUHCDRYER and FGRADDRYER.

- Attachment I is a statement from Mr. David Russell, Ford Environmental Quality Office, confirming compliance with this condition.

MAERS REPORT REVIEW:

MAERS report for CY 2014 was submitted on time but no audit was conducted.

FINAL COMPLIANCE DETERMINATION:

ACH appears to be in compliance with all applicable permits conditions as well as state and federal rules at the time of the inspection.

NAME Sam Amer

DATE 1/21/16

SUPERVISOR JK