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**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

M476471699

FACILITY: FORD MOTOR CO ELM STREET BOILERHOUSE	SRN / ID: M4764
LOCATION: 1200 ELM ST, DEARBORN	DISTRICT: Detroit
CITY: DEARBORN	COUNTY: WAYNE
CONTACT: Timothy Pokoyoway , Environmental Control Engineer	ACTIVITY DATE: 10/27/2023
STAFF: Samuel Liveson	COMPLIANCE STATUS: Compliance
SUBJECT: Scheduled inspection.	SOURCE CLASS: MAJOR
RESOLVED COMPLAINTS:	

Introduction

On Friday October 27, 2023, I (AQD staff Sam Liveson) conducted an announced, scheduled inspection of Ford Motor Co. Elm Street Boilerhouse (Ford ESBH), located at 1200 Elm Street in Dearborn, Michigan.

The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act; Part 55, Air Pollution Control, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Michigan Air Pollution Control Rules (Rules); and Renewable Operating Permit (ROP) No. ROP MI-ROP-M4764-2014.

Pre-Inspection Meeting and Facility Overview

ROP Void Request

On October 9, 2023, AQD received a letter from Ford ESBH requesting that EGLE AQD void the Elm Street Boiler House ROP MI-ROP-B4764-2014. The letter provided the following dates of decommissioning of each EUBOIL1-5:

Emission Unit ID	Description	Permanent Out-of-Service Date
EUBOIL1	Boiler 1, WT-Wickes, 108 MMBTU	08-07-2023
EUBOIL2	Boiler 2, WT-Wickes, 108 MMBTU	08-07-2023
EUBOIL3	Boiler 3, WT-Wickes, 158 MMBTU	01-26-2021
EUBOIL4	Boiler 4, Cleaver Brooks, 99.8 MMBTU	08-16-2023
EUBOIL5	Boiler 5, Cleaver Brooks, 99.8 MMBTU	08-07-2023

The letter also explained that the decommissioning steps taken include physical isolation of all fuel sources (natural gas, fuel oil) and disconnect of primary electrical feeds.

Arrival

The inspection was announced. I called Tim Pokoyoway, Environmental Control Engineer, about visiting the facility that Friday. Tim advised me that the address to use for navigation is 21500 Oakwood Blvd. Dearborn, MI 48124. From there, I turned left before the 21500 Oakwood building and then right to the boiler house parking area.

On October 27, 2023, I arrived at the facility at about 9:02 AM. Weather was mostly cloudy and 65 °F. I met with Tim Pokoyoway, Environmental Control Engineer; Carmela Franco, Senior Environmental Compliance Engineer; and Nate Ampunan, Chief Boilerhouse Engineer. I provided by state-issued identification and stated the purpose of my visit.

General Facility Overview

Before its boilers were decommissioned, Ford ESBH provided steam and hot water for Greenfield Village and some ancillary Ford-owned buildings. The facility comprised five natural gas-fired boilers identified as EUBOIL1 through 5. There are no cold cleaners, other boilers, or emergency generators on site. It appears that there are natural gas-fired heaters at the facility for building heat.

Staff explained that Greenfield Village and ancillary Ford buildings are now provided heat, steam, and hot water as needed from DTE Central Energy Plant.

Compliance Background

Ford ESBH has no outstanding consent orders or violation notices.

Facility Walkthrough**Boilers 1, 2, and 3 (MI-ROP-M4764-2014, FGBOILER 1, 2, & 3)**

I visited boilers 1, 2, and 3.

On boiler 1, staff showed me the physical air gap separation in what appeared to be the natural gas line. Additionally, I observed two line blanks on what appeared to be the feed water line leading to boiler #1. The electrical panel was blank. Staff explained that there is no longer power to the electrical panel. Four burners for each boiler are still in place.

On boiler 2, I observed the physical air gap separation in what appeared to be the natural gas line. I also observed that two line blanks were inserted. The electrical panel was shut off. Staff explained there is no longer power to the electrical panel.

On boiler 3, I observed the physical air gap separation in what appeared to be the natural gas line. I observed that there were no screens on the electrical panel. Additionally I observed a square hole cut into the combustion box, so that combustion could not take place, as well as a large line blank inserted.

Boilers 4 and 5 (MI-ROP-M4764-2014, FGBOILER4 & 5)

I visited boilers 4 and 5.

On boiler 4, I observed what appeared to be physical air gap separations in the water line, natural gas, and fuel oil lines. The one burner for boiler 4 was still in place. I observed a blank screen for the electrical panel, which staff explained was turned off.

On boiler 5, I observed a line blank on the boiler feed water line, as well as physical air gap separations in the fuel oil and natural gas lines. The one burner for boiler 5 was still in place. I observed a blank electrical panel for boiler 5.

Staff explained that the stack SVB-1 used for all five boilers was covered for preservation of the facility. They provided a picture of the metal paneling laid over the stack. Staff explained that the bypass stack EUBOILER5Bypass was covered as well.

Process Heaters (Rule 282(2)(b)(i))

Staff explained that there are natural gas-fired building heaters being installed at the facility for building heat. Heaters appear to be exempt from obtaining a Permit to Install per Rule 282(2)(b)(i) for natural gas-fired space heating with a heat input capacity less than 50 million BTU per hour.

Follow-up

It appears that boilers have been permanently shut down per Rule 201(5). AQD voided the facility ROP MI-ROP-M4764-2014 on December 8, 2023 and provided a Void Permit Letter to the facility on December 8, 2023. The facility appears to be a true minor source.

As such, a copy of fuel usage records and fuel supplier certification for boiler 4 and 5 was not required to be submitted to the AQD for the fourth quarter of 2023, because the ROP with this requirement was void.

Because of mail timing, an annual air quality fee invoice was still mailed to Ford ESBH in January 2024. Ford ESBH submitted a fee challenge because the ROP was voided prior to January 2024, and AQD provided a fee challenge response that the original fee invoice was cancelled and no payment is required.

AQD received the facility emissions report for the facility's 2023 air emissions on March 15, 2024. AQD plans to no longer require the facility to submit annual air quality emissions reports for future years.

Conclusion

Based on the AQD inspection and follow-up, Ford ESBH appears to be in compliance with the federal Clean Air Act, Michigan NREPA, and the Michigan Air Pollution Control Rules. The facility ROP is void.

NAME DATE 4/26/24SUPERVISOR JK