

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

U-63-16-10743
FY 2016 Insp

U63161074336570

FACILITY: Cummins Bridgeway		SRN / ID: U631610743
LOCATION: 54250 Grand River Avenue		DISTRICT: Southeast Michigan
CITY: New Hudson		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 09/13/2016
STAFF: Irunna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2016 initiated inspection of Cummins Bridgeway New Hudson Service Center ("Cummins")		
RESOLVED COMPLAINTS:		

U6316 10743 - SAR - 2016 0913

Cummins Bridgeway (U-63-16-10743)
New Hudson Service Center
54250 Grand River Avenue (aka 21810 Clessie Court)
New Hudson, Michigan 48165-9716

Cummins' one diesel emergency generator (15-liter, 0.5 MW, manufactured in 2001 < April 2006) is NOT subject to: NSPS IIII or 4I, New Source Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 39154 Federal Register / Vol. 71, No. 132 / Tuesday, July 11, 2006 / Rules and Regulations / Final Rule; Page 48072 Federal Register / Vol. 79, No. 158 / Friday, August 15, 2014 / Rules and Regulations / Notice of final decision on reconsideration.

Cummins' one diesel emergency generator (15-liter, 0.5 MW, manufactured in 2001 < April 2006) may be subject to: CI RICE MACT 4Z, Area Source NESHAP / MACT ZZZZ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines / Final rule (Page 3568, Federal Register / Vol. 73, No. 13 / Friday, January 18, 2008 / Rules and Regulations / Final rule). AQD has decided not to take delegation of these standards and therefore no attempt has been made to evaluate the Cummins' compliance with NESHAP / MACT 4Z.

On September 13, 2016, I conducted a level-2 self-initiated inspection of Cummins Bridgeway New Hudson Service Center ("Cummins"), a sales and service center for diesel engines, located at 54250 Grand River Avenue, New Hudson, Michigan 48165-9716. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451 and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Curtis Lunsford (Phone: 248-308-7746-Cell; Fax: NA; Cell: 248-308-7746; E-mail: Curtis.Lunsford@Cummins.com), SHE Manager, and Ms. Jennifer Pierce (Phone: 248-573-1583-Cell; Fax: NA; Cell: 248-573-1583; E-mail: Jennifer.Pierce@Cummins.com), East Region SHE leader, assisted me.

New Hudson facility is Cummins' warehouse and uplift center. Cummins receives fully assembled diesel engines and prefinished parts to assemble engines and boxes that surround the engines together per customer specifications. Assembling takes place in a large assembly area. As all parts are prefinished at other facilities, neither painting nor manufacturing of parts is involved. Assembled products are shipped to the customers.

Diesel emergency generator

One diesel emergency generator is present:

Generator Model No. DFEK 5004894

Generator Serial No. L010311693

Manufactured in 2001 (L010311693)

Generator Output power 500 kW (0.5 MW, DFEK 5004894), 625 kVA (0.8 power factor → $625 * 0.8 = 500$)

Engine Model No. QSX15 Cummins with 15-liter (912 cu. Inch) displacement (QSX15), 4-Cycle, 6-Cylinder, 500-675 HP
Engine Serial No. 14025604

As stated above, the CI RICE (Compression Ignition Reciprocating Internal Combustion Engine) is not subject NSPS 4I (15-liter engine displacement with generator, power output of 0.5 MW power, manufactured in 2001 < April 2006) but is subject to CI RICE MACT 4Z. AQD has decided not to take delegation of these Area MACT standards and therefore no attempt has been made to evaluate the Cummins' compliance with NESHAP / MACT 4Z. I advised Cummins to comply with this CI RICE MACT regulation.

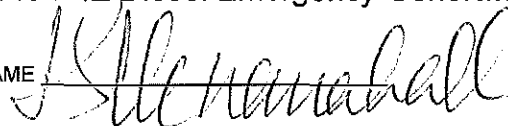
As a part of compliance with NESHAP / MACT 4Z, I asked Cummins to maintain records of maintenance such as oil change (1/500 hours or annual), air filter inspection (1/1,000 hours or annual) and belts / hoses inspection or replacement as necessary (1/500 hours or annual), etc.

No painting. No parts cleaner.

Conclusion

The diesel engine and box assembly activities are exempt from Rule 336.1201 (Permit-to-Install) per Rule 336.1285 as there are practically nil emissions. One Area NESHAP / CI RICE MACT 4Z Diesel Emergency Generator is present.

NAME



DATE

09/15/2016

SUPERVISOR

