



## LANSING DELTA TOWNSHIP ASSEMBLY (LDT)

### OPERATION & MAINTENANCE PLAN – SEALERS & ADHESIVES

**Version Date: January 2, 2019**

GM LDT is required to develop, maintain and implement an Operation and Maintenance Plan (O & M Plan) for EU-Sealers and Adhesives-S1. The details of this requirement are described in MI-ROP-N6950-2014a, EU-Sealers and Adhesives-S1, S.C. III.2 and in Appendix 4-S1:

2. By July 19, 2016, the permittee shall develop, maintain and implement an Operation and Maintenance Plan (O & M Plan) for EU-Sealers and Adhesives. The O & M Plan shall contain the minimum requirements as outlined in Appendix 4-S1. The O & M Plan shall be updated as necessary to reflect changes in equipment and monitoring, to implement corrective actions and to address malfunctions. Changes in the O & M Plan as outlined in Appendix 4-S1 shall be submitted to the AQD District Supervisor for review and approval. All records and activities associated with the O & M Plan shall be made available to the Department upon request.<sup>2</sup> (R 336.1224, R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21 (c) and (d))

#### **Appendix 4-S1. Recordkeeping**

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in EU-Sealers and Adhesives. Alternative formats must be approved by the AQD District Supervisor.

**General** – Keep records of maintenance inspections which include the dates, results of the inspections and the dates and reasons for repairs if made. The following items shall be inspected for each respective add-on control device used to demonstrate compliance with applicable particulate emission limits.

#### **Regenerative Thermal Oxidizers**

- Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
- Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months.\*
- Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months.\*

\* The requirement to address this issue is satisfied if a performance test (*i.e.*, stack test) has been performed on the control device within the prior 18 month period.

In order to comply with the O & M Plan requirement, GM LDT utilizes the plant's MAXIMO asset management software solution to schedule and manage the scheduled preventive maintenance (PM) tasks to be performed on the Prime RTO that controls the particulate emissions produced from the guidecoat curing oven. Table 1 lists the MAXIMO PM tasks that are scheduled to be performed on the Prime RTO.

**Table 1**

| MAXIMO PM # | MAXIMO Job Plan # | PM Task Description  | Frequency      |
|-------------|-------------------|--|----------------|
| PM1016      | JP0104            | RTO PRIME TOWER DAMPER SWITCHING TIME INTERVAL             | Every 26 weeks |
| PM10859     | JP0117            | RTO PRIME THERMOCOUPLE ANNUAL VALIDATION                   | Every 52 weeks |
| PM10860     | JP0095            | RTO PRIME COMBUSTION CHAMBER VISUAL INSPECTION SEMI ANNUAL | Every 26 weeks |
| PM10861     | JP3112            | RTO PRIME GAS TRAIN INSPECTION                             | Every 26 weeks |
| PM10862     | JP3083            | RTO PRIME INSPECT & LUBE                                   | Every 13 weeks |

Additionally, the GM LDT Environmental Engineer maintains a log of Prime RTO maintenance activities that have been completed. The log is updated on a monthly basis.

Abatement system malfunctions are recorded in GM's Reliance computer-based information management system. Corrective actions associated with Prime RTO malfunctions are also managed in the Reliance system.