

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

A262024495

FACILITY: GM Components Holdings, LLC	SRN / ID: A2620
LOCATION: 2100 BURLINGAME AVE SW, WYOMING	DISTRICT: Grand Rapids
CITY: WYOMING	COUNTY: KENT
CONTACT: Annette Wendland , Environmental Engineer	ACTIVITY DATE: 03/11/2014
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance
SUBJECT: Unannounced, scheduled inspection.	SOURCE CLASS: SM OPT OUT
RESOLVED COMPLAINTS:	

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection. After signing in at the guard shack, staff met with Annette Wendland, Environmental Engineer. We proceeded to a conference room where the DEQ Environmental Inspections: Rights and Responsibilities Brochure was presented and discussed.

FACILITY DESCRIPTION

This facility is an auto parts engine components manufacturer with a main product consisting of lifters for fuel systems. This facility is a wholly owned subsidiary of General Motors, but does manufacture parts for other vehicle brands. A total of 11 active permits apply to this facility: 438-73, 509-81, 817-84, 731-85, 789-89, 1121-91, 422-94, 246-95, 317-96, 307-97A and 179-98. Opt-out limits for NO_x and SO₂ are contained in 317-96 for two boilers which will be further discussed below. The majority of the permits do not contain recordkeeping requirements but have basic rule citations which are being met. Those that do contain specific recordkeeping requirements will be detailed below.

COMPLIANCE EVALUATION

During the opening conference, staff presented data requests to Ms. Wendland who was able to immediately retrieve them for discussion. This included the facility Greenhouse Gas (GHG) evaluation, Reciprocating Internal Combustion Engine Maximum Achievable Control Technology (RICE MACT) applicability documentation; the facilities Potential to Emit (PTE) documentation as well as all permit required recordkeeping.

GHG calculations for the facility were reviewed, and AQD requested Ms. Wendland add the natural gas fired air and water heaters to the data. The facility has natural gas throughput limits on the boilers that are used in the GHG calculations and limit the PTE of GHG. The GHG emissions from the added equipment were not at a level to increase the totals over the 100,000 ton threshold limit. As such this facility appears to be a minor source of GHG's.

The facility maintains three 578 HP diesel fired compression ignition emergency generators that are minimally subject to the RICE MACT. The installation dates are: 1966, 1971 and 1973. Additionally, there is a 115 HP diesel fired fire pump that is also minimally subject installed in 1978. Each is equipped with a non-resettable hour meter and each is maintained per a specific program of maintenance.

Ms. Wendland was working on fine tuning the facility PTE documentation so while it was readily available, she didn't feel comfortable with the VOC numbers and will provide it to me when her evaluation is complete. No set date was discussed for this, but I would expect it to take place in the next month or two. Furthermore, we discussed possible voiding of permits and using exemptions. Staff stated that using Rule 290 for an emission unit automatically gives that unit a legally enforceable PTE of 6 tons of emissions, no matter what the actual emissions are. This should be considered in the facility PTE documentation.

PTI No. 317-96

This Opt-out permit was intended to limit the PTE of the facility of NO_x and SO₂ from the burning of natural gas and fuel oil. Boiler #2 had previously been permitted to burn solely natural gas but at the time, boiler #1 still had the capacity for fuel oil firing and PTE was at major source levels. The facility applied to limit their PTE. The permit has emission limits and natural gas throughput limits which is enforceable. However, there are no limits on fuel oil use and therefore does not technically limit PTE per the requirements of Rule 336.1205. Staff was able to confirm on-site that while the original burners are in the boilers, the fuel oil delivery lines as well as the above ground storage tanks that used to contain fuel oil for the boilers have been removed. At this time, staff considers this an acceptable physical limit to PTE since significant activity would need to take place in order to burn fuel oil in the boiler. Staff informed GMCH of this detail, and at this time it does not appear necessary to modify the current Opt-out permit.

Fuel usage records are maintained and the current total throughput of natural gas is reported at 191,206,300 ft³ which is well below the limit of 930,000,000 ft³. NO_x and SO₂ emissions are reported at 0.9394 tons and 0.00564 tons respectively. This is well below the permit limit of 65 tons of each per year. According to GMCH staff, no stack changes or reconstruction has taken place on either boiler.

PTI No. 307-97A

This permit covers four injector calibration processes that are internally vented and minimally used. The area was observed and was not in operation at the time of the inspection. Reported VOC emissions are currently at 2.63 tons. This is below the permit limit of 15.0 tons per year.

PTI No. 731-85

This permit covers ammonia emissions from a carbonitriding furnace system. While there is no actual recordkeeping condition of this permit, there is a limit of 178.8 mg/m³ corrected emission limit. The facility is utilizing a factor that has been approved by previous AQD inspector which is acceptable and indicates compliance.

Rule 301 applicability

Many of the permits at this facility have basic references to Rule 336.1301 and 20% opacity limitations. While there is no recordkeeping component to this requirement in the permits, the facility demonstrates compliance by taking monthly non-certified visible emission surveys from the roof. This method is acceptable for demonstrating compliance at the GMCH facility.

The maintenance paint booth was observed to be well maintained. A daily log sheet is kept for tracking usage which Ms. Wendland indicated is well below 200 gallons per month. Staff also observed the postings that are used on the many cold cleaners around the facility. The posted information meets the requirements of Rule 336.1611.

SUMMARY

The facility was in compliance at the time of the inspection.

NAME



DATE

3-13-14

SUPERVISOR

PAB