A8645
MAWLA

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

A864534500

FACILITY: FORD MOTOR CO/ LIVONIA TRANSMISSION		**SRN / ID:** A8645
LOCATION: 36200 PLYMOUTH RD, LIVONIA		**DISTRICT:** Detroit
CITY: LIVONIA		**COUNTY:** WAYNE
CONTACT: Claudya Arana , Environmental Engineer		**ACTIVITY DATE:** 05/12/2016
STAFF: Todd Zynda	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: 2016 Scheduled Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Scheduled Inspection
INSPECTED BY: Todd Zynda, AQD
PERSONNEL PRESENT: Claudya Arana, Environmental Engineer, David Russell, Ford Environmental Quality
FACILITY PHONE NUMBER: 734-523-4526
FACILITY FAX NUMBER: 734-266-1199

FACILITY BACKGROUND

Ford Livonia Transmission Plant (LTP) manufactures transmissions and transmission components for Ford vehicles. LTP has been in operation at the location since 1952, is three million square feet in area, and employs more than 1,000 people. The facility operates three shifts, but may be adjusted depending on output demand.

LTP manufactures front wheel and rear wheel drive transmissions for Ford vehicles. The plant receives prefabricated steel, aluminum, and iron parts from various parts suppliers, machines the parts in drill machines, grinders, lathes, boring machines, and CNC machines, and assembles the machined parts into the final product. The facility refers to the parts, as received, as "Greenstock" parts. Machining predominantly occurs on the housing, gears, shafts, and valve bodies of automatic transmissions. The machined parts are assembled into Ford vehicle transmissions.

SOURCE CLASSIFICATION

Ford LTP is considered a major Title V Part 70 source due to the potential to emit of carbon monoxide and nitrogen oxides, each exceeding 100 tons per year. The facility is also considered a major source regarding Prevention of Significant Deterioration (PSD) (Michigan Administrative Code, Air Quality Division: Part 18) regulations due to the potential to emit of nitrogen oxides in excess of 250 tons per year. In the 2007 ROP renewal, the facility chose to incorporate hazardous air pollutant (HAP) opt-out limits to avoid potential applicability of major source Maximum Achievable Control Technology (MACT) standards. The opt-out was obtained prior to the first compliance date for the Industrial Boilers and Process Heaters (40 CFR 63 Subpart DDDDD), Surface Coating of Miscellaneous Metal Parts (40 CFR 63 Subpart MMMM), and Engine Test Cells (40 CFR 63 Subpart PPPP) standards. Note, HAP emissions from Ford Automatic Transmission New Product Center (ATNPC) and LTP are aggregated per the major source definition in the NESHAP regulations. The current ROP (MI-ROP-A8645-2012) was issued on May 23, 2012.

EU-GASDISPENSING and EU-GASUST at the stationary source are subject to the area source MACT Standards for gasoline dispensing facilities promulgated in 40 CFR, Part 63, Subparts A and CCCCCC. Four emergency fire pumps and five emergency generators are subject to the area source MACT Standards for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ. Two emergency generators are subject to 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING VNs

None

INSPECTION NARRATIVE

On May 12, 2016 AQD staff, Todd Zynda conducted an unannounced inspection at Ford LTP located at 36200 Plymouth Road in Livonia, Michigan. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Rules; and the conditions of Renewable Operating Permit (ROP) MI-ROP-A8645-2012, effective since May 23, 2012.

During the inspection, Ms. Claudya Arana, Environmental Engineer, and Mr. David Russell, Ford Environmental Quality Office, provided information and a tour of facility operations.

During the opening meeting, the current status of ROP subject equipment and record keeping requirements were discussed. Ms. Arana provided records or demonstrated that records are maintained via spreadsheet on the computer. Any records not provided at the time of inspection, were provided via email on May 16, 2016.

After discussions with Ms. Arana and review of facility files, the below list identifies equipment, both removed and operating, at the facility.

- Boiler #1(EU-BOILER#1) – Wickes 144 MMBTU/hr, natural gas fired, installed in 1966. Fuel oil has not been fired for years. Currently, the facility does not have fuel tanks or lines installed for the combustion of fuel oil.
- Boiler #2 - Wickes 96 million BTU/hour coal-fired boiler installed in 1952. No modifications to boiler have occurred. No longer in use as all coal handling equipment has been removed.
- Boiler #3 (EU-BOILER#3)– Wickes 97.5 MMBTU/hr heat input, originally coal fired, installed in 1952. Modified in 1995 to allow for the ability to fire No 2 fuel oil and natural gas. Low NOx burners were installed at that time. Fuel oil has not been fired for years. Currently, the facility does not have fuel tanks or lines installed for the combustion of fuel oil.
- Boiler #4 (EU-BOILER#4)– Wickes 97.5 MMBTU/hr heat input, originally coal fired, installed in 1954. Modified in 1995 to allow for the ability to fire No 2 fuel oil and natural gas. Low NOx burners were installed at that time. Fuel oil has not been fired for years. Currently, the facility does not have fuel tanks or lines installed for the combustion of fuel oil.
- Coal handling equipment – Removed
- Heat treat furnaces (FG-HEATTREAT) – Removed
- Tank farm – Fourteen 20,000 to 25,000 gallon capacity above ground storage tanks (automatic transmission fluid) and one 2,000 gallon diesel tank
- Wastewater treatment plant (EU-WWTP) - consisting of a 300,000 gallon equalization tank, one 10,000 gallon capacity tank, one 13,000 gallon capacity tank, three 25,000 gallon tanks and a wet packed bed scrubber. Also includes raw material storage tanks for the polymer, caustic, and acid.
- One anodizing line (EU-ANODIZING) for cleaning and rust proofing – Removed
- Cold cleaners (FG-COLDCLEANERS) - Located throughout the facility
- Inking Stations (EU-INKINGSTATIONS) - Removed
- Paint spray booth
- Transmission machining and assembly equipment
- Four Diesel Engine Fire Pumps (FG-EMERGENCY RICE <500 HP)
- Seven natural gas fired emergency generators

Following discussion of facility operations and records review, a tour of the facility was conducted. The tour began with observation of the observation of the wastewater treatment plant.

EU-WWTP is a wastewater treatment plant the facility uses to treat waste generated at the site and at the Ford ATNPC. The waste consists predominantly of lubricating oils used by the facility's metal working machinery. The wastewater treatment plant separates water from waste oil. The resulting water is discharged into the city sewer system and the oil is sold to and recycled by a third party. In the wastewater treatment process, wastewater is collected by underground piping and pumped to a 300,000 gallon equalization tank where the pH is adjusted. Next, the waste is transferred to an oil separation tank where the oil is skimmed off of the top. Finally, the skimmed oil is sent to one of the "cook" tanks where it is heated to 200 °F using steam and treated with sulfuric acid. There are three 25,000 gallon cook tanks and one 10,000 gallon cook tank. Raw material storage tanks are present for acid, polymer, and caustic (sodium hydroxide) materials. The recovered oil is stored in a 13,000 gallon tank and sold to a third party for further processing. Cook tanks and oil storage tanks are covered and vented to the scrubber. At the time of inspection the scrubber was online and pH of the scrubbing solution was 12.41. According to permit files, these tanks have potential to create odors due to generation of H_2S and other odors associated with bacterial growth in waste.

Following observation of the WWTP, the powerhouse was observed. The power house contains Boiler #1 through #4. Boiler #2 has been permanently shut down, but remains in place. During the inspection, Boiler #1 and #4 were not in operation. Boiler #3 was in operation with a steam load of 7,805 pounds per hour and a boiler efficiency of 60%. According to the boiler operator, fuel oil is not combusted in any boiler, as there are no tanks or associated piping for fuel oil onsite.

Following observation of the power house, a tour of the transmission manufacturing operations was provided. According to Mr. Russel and Ms. Arana, Ford is in the process of a new transmission launch and other facility renovations. The newer equipment was in the process of being installed and was not operational. The transmission manufacturing being replaced, included the removal of the heat treatment furnaces and oil-quench tanks, and the anodizing line (currently included in MI-ROP-A8645-2012). The new transmissions will be manufactured without the previously permitted heat treatment furnaces and oil-quench tanks, and the anodizing line. Within the new installation, a heat treat carburizing system will be installed and will consist of electrically heated units, as well as an electrically heated after burner. According to Ms. Arana, the new carburizing furnaces will not combust fuel to generate heat in the carburizing process and will not use oil quenching. The former inking station that was used to label finished transmissions has been replaced with a laser etching line that cuts an identifier into each transmission. Emissions from metal cutting, grinding, etc. is either released to the general in plant environment or is controlled by various oil-mist collectors. If oil mist collectors vent to the outside ambient air, emissions are controlled by a fabric filter per Rule 285(l)(vi)(C).

During the inspection, a solvent based cold cleaner was observed in the facility garage At the time of inspection, the cold cleaner lid was closed and appeared to meet Rule 707 requirements. A copy of the safety data sheet (SDS) for the material used was provided. An inventory of cold cleaners (both solvent and aqueous) was provided (see attached documentation).

The tour concluded with observation of the facility paint booth. The paint booth was not in operation at the time of inspection. Filters were in place. Records of paint usage demonstrating compliance with Rule 287(c) were provided.

The emergency generators were not observed during the inspection.

APPLICABLE RULES/PERMIT CONDITIONS

ROP MI-ROP-A8645-2012

Permit conditions have been paraphrased for brevity. Please see ROP for conditions in their entirety.

Source Wide Conditions

The definitions of major source are different between Title V/Part 70 and the NESHAP definition. Based on the NESHAP definition, Part 63, Ford ATNPC and LPT would be considered a single stationary source. As such, the HAP emissions must be aggregated to demonstrate that the facility can opt out of MACT.

SC I.1 and 2, SC VI. 1.a and b, SC VI. 1.c. **COMPLIANCE.** Emissions of each HAP less than 9 tons and aggregate HAPs less than 22.5 tons per year. Individual and aggregate HAP records to be maintained. Highest 12 month rolling aggregate HAP emissions from May 2014 through April 2016 occurred during May 2015 at 7.64 tons for both facilities combined. This indicates compliance with both aggregate and individual HAP limits. Records are maintained.

SC II. 1, SC VI. 1.a. **COMPLIANCE**. Natural gas usage not to exceed 3,060,000 MMBTUs on a 12-month rolling basis. The highest 12-month rolling natural gas usage from May 2014 through April 2016 occurred during May 2014 at 563,973 MMBTUs.

SC II. 2. SC VI. 1.b. **COMPLIANCE**. Unleaded gasoline usage not to exceed 9,999 gallons per calendar month. The highest unleaded gasoline usage from May 2014 through April 2016 occurred during April 2016 at 5,405 gallons.

SC IX. 1. **COMPLIANCE**. Shall abide by the Odor Management Plan submitted on March 11, 2011. The facility conducts quarterly inspections of the central coolant system. Records were provided for the first quarter of 2016. There have been no odor complaints since September 20, 2014. Prior to that date the most recent odor complaint was December 1, 2010.

EU-BOILER#1

All conditions under this emission were not evaluated as fuel oil has not been fired for several years. According to the boiler operator, fuel oil is not combusted in any boiler, as there are no tanks or associated piping for fuel oil onsite.

FG-BOILERS #3 & #4

SC I.1.a through d. , SC I. 3. a through c, SC I. 5. a through c, SC II. 1, SC III. 3 and 4, SC V. 1.a and b, SC V. 3.a and b, SC VI. 1.a and g, SC IX. 1. **NOT EVALUATED**. All conditions relating to combustion of fuel oil were not evaluated as fuel oil has not been fired for several years. According to the boiler operator, fuel oil is not combusted in any boiler, as there are no tanks or associated piping for fuel oil onsite.

SC I. 2. a through c, SC V. 1.c, SC V. 2. SC V. 3.c, SC VI. 1. d through f. **COMPLIANCE**. NOx emissions shall not exceed 0.17 lb per MMBTU, 16.6 lb per hour, and 72.7 tons per year on a 12-month rolling basis. During the most recent stack test on February 14, 2012, NOx emissions from Boiler #3 were 0.065 lb/MMBTU and 5.31 lb/hr. NOx emissions from Boiler #4 were 0.045 lb/MMBTU and 3.7 lb/hr. Please see facility file for stack testing report. The facility maintains records of NOx emissions on a tons per year basis. The highest 12-month rolling from May 2014 through April 2016 occurred in November 2014 (2.76 tons) for Boiler #3 and in August 2015 (2.06 tons) for Boiler #4. During the inspection the facility was notified that the next round of testing is required by February 14, 2017.

SC I. 4. a through c, SC V. 1.d, SC V. 2, SC V. 3.d, SC VI. 1. d through f. **COMPLIANCE**. CO emissions shall not exceed 0.15 lb per MMBTU, 14.6 lb per hour, and 64.1 tons per year. During the most recent stack test on February 14, 2012, CO emissions from both Boiler #3 and Boiler #4 were 0 lb/MMBTU and 0 lb/hr. Please see facility file for stack testing report. The facility maintains records of CO emissions on a tons per year basis. Reported CO emission on a 12-month rolling from May 2014 through April 2016 are 0.00 tons per year for all reporting months. During the inspection the facility was notified that the next round of testing is required by February 14, 2017.

SC II. 2 and 3. SC VI. b and c. **COMPLIANCE**. Steam output from Boiler #3 and #4 shall not exceed 80,000 lbs per hour. Heat input into Boiler #3 and #4 shall not exceed 97.5 MMBTU per hour. The facility maintains records demonstrating compliance with the steam output and heat input requirements. Records were provided for April 2016. The highest steam output for Boiler #3 occurred on April 28, 2016 (9,833 lb/hr) and Boiler #4 on April 10, 2016 (12,333 lb/hr). At the time of inspection, Boiler #3 was in operation with a steam output of 7,805 lb/hr. The highest heat input for Boiler #3 occurred on April 25, 27, and 28, 2016 (15 MMBTU/hr). The highest heat input for Boiler #4 occurred on April 4, 5, 9, and 10, 2016 (17 MMBTU/hr).

SC III. 1 and 2. **COMPLIANCE**. Shall only burn natural gas or No. 2 fuel oil. Low NOx burners are installed and operating properly. The facility only burns natural gas in boilers. According to the boiler operator, the low NOx burners are installed. Stack testing indicates that NOx emissions are significantly below permitted limits. Fuel oil is not combusted.

SC VIII. **COMPLIANCE**. Stack shall have a maximum diameter of 135 inches, and minimum height of 139 feet above ground. During the inspection the stack appeared to meet these requirements. Measurements were not collected.

FG-HEATTREAT

All conditions under this flexible group are not applicable as the equipment has been removed. The facility plans to replace the heat treatment equipment with heat treat carburizing furnaces. The furnaces will be electrically heated units that include an electrically heated afterburner. The facility believes that the new units will be exempt under Rule 282(a)(i). At this time the new heat treatment furnaces are not installed or operating.

FG-WWTP

SC II. 1. SC VI. 4. **COMPLIANCE**. Waste oil processed shall not exceed 4.0 million gallons per year on a 12-month rolling basis. The highest 12-month rolling waste oil processed from May 2014 through April 2016 occurred in May 2014 at 284,672 gallons.

SC III. 1. **COMPLIANCE**. Heat process tanks and the oil storage tanks shall be closed and exhausted through the wet scrubber control system. During the inspection, heat process tanks and oil storage tanks appeared to meet this requirement.

SC III. 2. SC V. 1. **COMPLIANCE**. Scrubber shall be equipped with a system that automatically maintains a pH of 11 to 13 through the addition of sodium hydroxide. If the pH system malfunctions, sodium hydroxide shall be manually added. The facility provided scrubber inspection logs for June 2015 through April 2016. Based on the records provided, the system is usually on "auto" mode and has maintained a pH between 11 and 13. Records indicate that the system was on manual mode once on February 17, 2016 during the second shift. At that time the pH was 12.04.

SC VI. 1. 2. 3, SC XI. 2. **COMPLIANCE**. Shall conduct regular inspections to determine operational condition of the scrubber. Scrubber shall only process waste oil and is installed and operating properly. According to Ms. Arana, the scrubber only accepts waste from Ford LPT. Inspections and preventative maintenance are regularly performed to maintain good operation. Scrubber maintenance and preventative maintenance records were provided.

SC VII. **COMPLIANCE**. The exhaust of the scrubber shall have a minimum height of 30 feet above ground. During the inspection the stack appeared to meet this requirement. Measurements were not collected.

SC XI. 1. **COMPLIANCE**. Shall not accept waste oil for treatment from an offsite source. The WWTP does not accept waste oil from an offsite source.

FG-GASOLINE DISPENSING <10,000 GALLONS/MONTH

EU-GASUST and EU-GASDISPENSING appear to be subject to the area source MACT Subpart CCCCCC. Equipment subject to this area source MACT were not evaluated during the inspection as the AQD has not accepted delegation for this area source standard.

FG-EMERGENCY RICE <500 HP

EU-EMERGRICEFP1 through EU-EMERGRICEFP4 are listed in ROP MI-ROP-A8645-2012 as subject to Subpart ZZZZ. It also appears that 5 of the natural gas emergency generators (generator A, B, C, D, and E) are subject to Subpart ZZZZ as existing RICEs. Equipment subject to this area source MACT were not evaluated during the inspection as the AQD has not accepted delegation for this area source standard. During the renewal of the ROP, equipment subject to Subpart ZZZZ should be updated.

FG-COLD CLEANERS

SC II. 1. **COMPLIANCE**. Based on a review of safety data sheet (SDS) submitted, solvents do not contain prohibited chemicals listed in this condition above 5 percent.

SC III. 1, 2. SC IV. 1, 2, 3, 4, 5. **COMPLIANCE**. (1) Each cold cleaner must either have an air/vapor interface of

10 square feet or less or the cold cleaner must vent to the in-plant environment; (2) be equipped with a device for draining cleaned parts; (3) be equipped with a cover and cover is closed when not in use; (4) the cover mechanically assisted if the solvent's Reid vapor pressure exceeds 0.3 pounds per square inch absolute (psia) or the solvent is heated or the solvent is agitated; (5) for new cold cleaners; special conditions that apply to Reid vapor pressure greater than 0.6 psia.

According to records provided, the facility operates 4 solvent based cold cleaners that are not heated. The largest air/vapor interface area is 8.44 square feet.

Observation of the cold cleaner in the garage area indicates that the cold cleaner vents to the in-plant environment and is equipped with a cover. The cover was closed at the time of the inspection. Parts are left in the tanks to drain. The solvent is neither heated nor agitated during cleaning. The SDS provided indicates the vapor pressure is 0.2 mmHg (0.0039 psia) at 68 °F.

SC VI. 1,2,3,& 4. **COMPLIANCE**. (1) if solvent is heated, solvent temperature shall be monitored; (2) Recordkeeping on the make/model, size, description, date of installation, air/vapor surface area, type of solvent for each cold cleaner; (3) written procedures posted; (4) waste solvent stored in closed containers unless a safety hazard. Information provided indicates the solvent based cold cleaners are not heated. Records provided indicate that the facility is maintaining the required information.

FG-RULE 287(c)

Previously the inking stations and paint booth record keeping requirement were required under this flexible group. The inking stations have been removed. Conditions apply to the paint booth as listed below.

SC II. 1, SC VI. 1. **COMPLIANCE**. Coatings shall not exceed 200 gallons per month, minus water. Records provided indicate that the paint booth is used on a limited basis, with most months reporting zero usage. The highest paint usage from January 2015 through April 2016 occurred during March 2016 at 4.98 gallons.

SC VI. 1. **COMPLIANCE**. Exhaust system shall be equipped with a properly installed and operating particulate control system. At the time of inspection filters were in place.

FG-RULE290

The facility currently does not operate any Rule 290 exempt equipment. Previously the anodizing line emissions were reported under this flexible group. The anodizing line (EU-ANODIZING) has been removed. Conditions under this flexible group were not evaluated.

NEW SOURCE PERFORMANCE STANDARDS (NSPS)

40 CFR Part 60, Subpart Db – Standard of Performance for Industrial, Commercial, Institutional Steam Generating Units

Boiler #1 was evaluated for Subpart Db due to its size of above 100 MMBTU/hr. However, as described above, Boiler #1 has not been modified (as defined in §60.2) since its original installation date of 1967. As the regulation only applies to boilers constructed, modified, or reconstructed after June 19, 1984, this boiler is exempt from the regulation.

40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units

Boilers#3 and #4 are were evaluated for Subpart Dc due to their size individually between 10 and 100 MMBTU/hr. Boilers#3 and #4 were originally installed as coal fired boilers in 1952 and 1954. They were altered in 1995 to allow for the combustion of natural gas and #2 fuel oil. However, the burning of these fuels would result in a decrease in emissions of all pollutants previously emitted except for VOC's. The change to low NOx burners does not constitute a "modification" as defined in §60.2. Therefore, Subpart Dc is not applicable.

40 CFR Part 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

On May 25, 2016, the facility provided an inventory of tanks (size, material, and location). Tanks at the facility do

not appear to be subject to Subpart Kb either based on tank capacity or installation date. The largest tanks (20,000 gallons or 25,000 gallons) at the facility store automatic transmission fluid (ATF). According to Ms. Arana, the ATF tanks were constructed in 1970. Ford maintains original drawings of these tanks on file. Tanks at the ATF tank farm were installed prior to July 23, 1984 (§60.110b(a)) and are therefore not subject to Subpart Kb.

The remaining tanks at the facility are less than 75 cubic meters (19,812.9 gallons) are used to store oil, gasoline, and other materials. These smaller tanks are not subject to Subpart Kb as their size is less than 75 cubic meters or 19,812.9 gallons, per §60.110b(a).

40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

The diesel fired emergency generators for fire pumps #1 through #4 are not subject to Subpart IIII as they were installed (constructed) prior to July 11, 2005 (§60.4200(a)(2)). The latest installation date for the diesel fire pumps is 1995 (Fire Pump #4).

40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Natural gas fired emergency generators A, B, C, D, and E are not subject to Subpart JJJJ as they were installed (constructed) prior to June 12, 2006 (§60.4230(a)(4)).

According to facility records, emergency generator H and J are identical models, operate using natural gas, are rated at 194 HP, have a model year of May 20, 2014 with a purchase date of September 1, 2015. Both emergency generator H and J appear to be subject to Subpart JJJJ. During the inspection, emergency generators were not observed.

40 CFR 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1 – **COMPLIANCE** - Emissions shall not exceed the following: NOx - 2.0 grams per horsepower-hour (g/HP-hr), CO – 4.0 g/HP-hr, VOC – 1.0 g/HP-hr. The facility provided exhaust emission data that was provided by the manufacturer. Emission data indicates the following: NOx = 0.07 g/HP-hr, CO = 0.06 g/HP-hr, and VOCs = 0.294 g/HP-hr.

40 CFR 60.4234 and 60.4243(a)(2)(ii) – **COMPLIANCE** – The facility appears to maintain engines and maintains appropriate records indicating as such.

40 CFR 60.4243(d) and 60.4243(e) – **COMPLIANCE** – emergency engine hour restrictions (please see the 40 CFR Part 60, Subpart JJJJ regarding language). The facility tracks engine hours as provided in "Livonia_Complex_Air_Calcs.xls" tab "LTP Nat Gas Engines". Since October 2015 Generator H has operated 5.7 hours and Generator J has operated 7.5 hours.

40 CFR 60.4237(b) – **UNKNOWN** – Shall be equipped with a non-resettable hour meter. This was not verified during the inspection. However, records provided indicate the facility tracks hour of operation for each generator.

40 CFR 60.4243(a)(2)(ii) and 60.4245(a) – **COMPLIANCE** – Shall keep maintenance plan and records of maintenance conducted, emissions data, etc. The facility appears to be maintaining the required information.

NESHAP/MACT

40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

EU-EMERGRICEFP1 through EU-EMERGRICEFP4 are listed in ROP MI-ROP-A8645-2012 as subject to Subpart ZZZZ. It also appears that 5 of the natural gas emergency generators (generators A, B, C, D, and E) are subject to Subpart ZZZZ as existing RICEs. Equipment subject to this area source MACT were not evaluated during the inspection as the AQD has not accepted delegation for this area source standard. During the renewal of the ROP, equipment subject to Subpart ZZZZ should be updated.

40 CFR Part 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for

Source Category: Gasoline Dispensing Facilities

EU-GASUST and EU-GASDISPENSING appear to be subject to the area source MACT Subpart CCCCCC. Equipment subject to this area source MACT were not evaluated during the inspection as the AQD has not accepted delegation for this area source standard.

40 CFR Part 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning

According to 40 CFR 63.460(a), this standard applies to units that use solvents with concentrations of 5% or more by weight of halogenated compounds. In the current ROP (FG-COLDCLEANERS), there is a condition limiting the halogenated compound concentrations to 5% or less by weight. Therefore, this standard does not apply.

40 CFR Part 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

The facility is not one of the "Nine Metal Fabrication and Finishing Sources Categories" identified in 40 CFR 63.11514 of Subpart XXXXXX as listed in Table 1 of the preamble (see Federal Register, Vol. 73, No. 142, July 23, 2008, p. 42979).

40 CFR Part 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources

Subpart JJJJJ applies to boilers not classified at "gas-fired boilers" at area sources. The boilers at the facility are permitted as natural gas boilers with fuel oil backup. Fuel oil backup does not reclassify the boilers from "gas-fired boilers" and, therefore, Subpart JJJJJ is not applicable. Should fuel oil usage in the boilers exceed Subpart JJJJJ thresholds, Subpart JJJJJ would be applicable.

40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

The paint booth at the facility does not appear to be subject to Subpart HHHHHH, as no paint stripping is performed using methylene chloride and no production coatings are spray-applied manually. The facility primarily uses aerosol spray cans which are excluded by definition per 40 CFR 63.1180. Additionally, spray coating application defined as facility maintenance painting is excluded per 40 CFR 11170(a)(2).

WAYNE COUNTY INSTALLATION VOIDS

During review of facility files, the below Wayne County Installation Permits were identified for voiding. The below permits were identified as still active.

Permit ID	Description	Approval Date
C-3526	New Air Operated Soot Blowers	7/28/1977
C-6792 through 6794	Two Vapor Degreasers, Debur, Anodizer	5/16/1985
C-6897	MIG Welders	4/2/1985
C-6898 through 6900	Resistance Welder, 2 MIG Welders	4/2/1985
C-6901/6902	Thermal Deburring Unit and Post Cleaning System	5/16/1985
C-6952	Ultraseal Impregnator	7/12/1985
C-8062	MIG Welder, Plasma Welder, Projection Welder	unknown

On May 31, 2016, Ms. Arana confirmed that the above listed equipment has been removed from the facility. Therefore, the above listed Wayne County Installation Permits will be voided.

EXEMPT EQUIPMENT

Transmission manufacturing equipment are exempt from permit to install requirements per Rule 285(l)(vi)(B) or (C). Emissions are either released to the general in-plant environment, or if released to outside ambient air are controlled by an appropriately designed fabric filter.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS

Not applicable . All lots are paved.

MAERS REPORT REVIEW

Reporting year 2015 MAERS was submitted in a timely manner and was reviewed by AQD staff. See facility file.

FINAL COMPLIANCE DETERMINATION

At this time, Ford LTP appears to be in compliance with applicable permit conditions as well as state and federal rules.

NAME _____ DATE 6/1/16 SUPERVISOR JK