

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

B286928686

FACILITY: FORD MOTOR COMPANY - ROMEO ENGINE PLANT		SRN / ID: B2869
LOCATION: 701 E. 32 MILE RD., ROMEO		DISTRICT: Southeast Michigan
CITY: ROMEO		COUNTY: MACOMB
CONTACT: Mike Seabright		ACTIVITY DATE: 01/30/2015
STAFF: Joyce Zhu	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Annual Insepection		
RESOLVED COMPLAINTS:		

On 1/30/2015, I conducted an air quality inspection at Ford Motors Company, Romeo Engine Plant. The facility is located on 701 E. 32 Mile Rd., Romeo. I arrived at the facility around 10:230 AM. I met with Mr. Mike Seabright & Mr. Gerald Yarema from Ford. I explained the purpose of the inspection & went over some of the permit conditions & records. Afterwards, we went for the inspection.

Inspection:

ROP #MI-ROP-B2869-2011

COLD CLEANERS

There is only one unit on site which uses solvents. The unit is located in the central maintenance Hi-Lo garage. They used "premium gold" (a solvent provided by Safety Kleen) in the unit. Safety Kleen takes care of replacing the solvents. During the inspection, the cold cleaner was covered by a lid. The units had a draining device. I didn't see any spill near any of the units. I observed a written operating procedure regarding to Rule 611 or Rule 707 posted on the unit. It appeared that the facility operated the unit in compliance with the air quality regulations.

FG-382-94

This flexible group is for two dynamometers on site. The emissions from those units are controlled by a regenerative thermal oxidizer (RTO). According to the company, they haven't operated the test cells since 2011.

FG-RULE287(c)

The flexible group covers ink stations & adhesive applications. In 2015, Mike said they had two active ink stations (green ink & white ink) & three adhesive applicators. They only operate one ink station (the white ink). During the inspection, I observed some spill of white ink left on the table. Mr. Yarema said they would clean it soon. I only inspected two adhesive applications in the plant. In both areas, I didn't observe any spill; nor did I detect any solvent smell. Both areas appeared to be clean. According to the company's usage record, they have used less than 110 gallons of materials per station/application per month since January 2014. It appears that the operation complies with the ROP requirements.

FG-EMERGENCY RICE<500 HP

There are four fire pumps & seven emergency generators under this flexible group. According to the company, the last time they changed oil & filters for the pumps was on 6/19/14; & for the emergency generators, during the first week of July of 2014. At the

same time, they inspected the air cleaners for the pumps & spark plugs for the generators. Also, they inspected the hoses & belts for those units. During the inspection, they did not operate any of the units. I only checked one of the fire pumps (EU-EMERGRICEFP4) & one of the generators (EU-EMERGRICEPH5). The non-resettable hour meter reading for EU-EMERGRICEFP4 was at 188.0; & for EU-EMERGRICEPH5, at 898.7. According to the company, they can start the fire pumps very quickly. The generators can be started in less than 15 minutes. In 2014, they didn't operate any of the unit under emergency situation; nor was there any malfunction of any the equipment. The company keeps records of the operating hours, the maintenance activities, & the fuel usage.

FG-278-99B

This flexible group covers two underground fuel storage tanks, hot stands & flares. According to the company, they haven't operated the hot test stands along with the flares since August 2010. The storage tanks were equipped with vapor balance systems and devices to ensure that the vapor-tight collection lines closed upon disconnection. During the inspection, I didn't smell any gasoline odor in the tank area. The company keeps records regarding the capacity & dimensions of the vessels.

FG-OTHER-MACHINE-LINES & FG-205-87A

These flexible groups cover the machining operation with medium velocity oil mist collection units (MOMs). In this type of operation, coolants & lubricating fluids are used to reduce friction & heat during machining. The oil mist collection unit consists of a mechanical filter (chevron like) followed by a fabric filter system. I inspected EU-HEAD from FG-OTHER-MACHINE-LINES & EUYLHEADBLOCK from FG-205-87A. During the inspection, the pressure drop across EU-HEAD was at 1.4 inches of water (0.8 inches of water at the first stage & 0.6 inches of water at the second stage); & across EUYLHEADBLOCK, at 4.3 inches of water (1.2 inches of water at the first stage & 3.1 inches of water at the second stage). The company keeps the following records: a) ID of each units & manufacturer recommended pressure drop across the mist collection units; b) monthly pressure drop across each of the mist collection units; c) monthly inspection records for the oil mist collectors. The company's record showed that they only operated 10 MOMs unit in January.

FG-DRYCRANK & FGDRYBLOCK5-9

This is for "dry" machining which use little lubricant. Emissions from FG-DRYCRANK are controlled by a baghouse; from FGDRYBLOCK5-9, by the associated baghouses DDC5 through 9. They operate FG-DRYCRANK 24 hours a day & 6 days per week; & FGDRYBLOCK5-9, 16 hours a day & 6 days per week. During the inspection, I recorded the pressure across the baghouse for FG-DRYCRANK was at 2.1 inches of water; they change the filters of the baghouse based on the pressure drop. If the pressure drop exceeds 4 inches of water, they will replace the bags. The pressure drop across DDC5 (a baghouse for dry block5) was at 0.8 inch of water. They replace the bags of the baghouses for FGDRYBLOCK5-9 two to three times a year. The company keeps the following records: a) ID of each units & manufacturer recommended pressure drop across the baghouses; b) monthly pressure drop across each of the controls; c) monthly inspection records for the controls. The company's record showed that the pressure across each of the control was within the corresponding recommended values in January.

FG-GASOLINE-DISPENSING<10,000/MON & FG-GASOLINE-DISPENSING<100,000GAL/MON

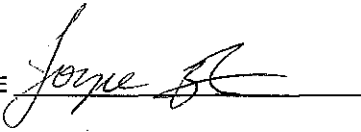
Those flexible group covers the existing & new/reconstructed gasoline dispensing facilities (GFDs) on site. According to the company, they haven't operated those emission groups since 2014.

FG-FACILITY

The flexible group is to set enforceable HAP emission limitations for the whole facility. According to the company's record the total HAPs emissions from the source during a 12-month rolling time period have been less than a ton since January 2014.

In conclusion, company appeared to operate in compliance with the ROP requirements.

NAME



DATE

Feb. 27, 15

SUPERVISOR

CJE

