

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

N505338292

FACILITY: HAECO Americas Engine Services		SRN / ID: N5053
LOCATION: 3921 Arrow Street, OSCODA		DISTRICT: Saginaw Bay
CITY: OSCODA		COUNTY: IOSCO
CONTACT: Edward Meltz , Environmental Health & Safety		ACTIVITY DATE: 01/06/2017
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: scheduled site inspection for minor source.		
RESOLVED COMPLAINTS:		

On Friday, January 6, 2017, AQD District Staff conducted a scheduled site inspection at the HAECO Americas Engine Services (aka HAECO) (SRN N5053) located at 3921 Arrow Street, Oscoda, Michigan (former Wurtsmith Air Force Base). The site inspection was conducted to confirm compliance of the facility with the existing permit and appropriate regulations. Mr. Edward Meltz (Environmental Health and Safety Officer of HAECO) provided a tour information regarding general operational practices.

The last site inspection was conducted on February 15, 2013. At the time of the previous inspection, the facility was operating as Timco Aviation Services, Inc. Engine Center. The facility reported a change in ownership and a name change in September 2014.

#### Facility Description

The HAECO facility is located on the southern side of the air strip at the former Wurtsmith Air Force Base. The facility occupies multiple buildings, and provides jet engine repair/rebuilding services.

It is bounded on all sides by buildings/property formerly part of the air force base. Adjacent buildings are occupied principally by Kalitta Air which provides retrofit and engine repair services for airliners.

#### Permits

One active Permit to Install (PTI 316-96) is associated with the referenced facility and was issued on March 24, 1997. The referenced permit was issued for an aircraft engine test cell and powered aerospace ground support equipment, and replaced PTI 239-92 which was for a jet engine test cell installed in 1985. The permit was issued to American International Airways, Inc., and was later purchased by Aviation Sales Company, which became Timco-Oscoda, a division of Aviation Sales.

In addition to the above permit, the facility is also of record for PTI 203-03, voided on 10/24/2003, which was for a stripping and cleaning process consisting of stainless-steel dip tanks-cold cleaners, water rinse tanks, alkaline cleaner tanks, aqueous degreaser tank and a water evaporator tank. The VOCs associated with the cold cleaning processes were determined to be exempt from permitting under Rule 290 in 2003.

In addition, the building housing the cold cleaning processes also housed three, self-contained parts cleaning units, and two electric fired drying ovens for parts. The referenced units are believed to be exempt from permitting under Rule 281 and/or 282 exemptions.

#### Compliance History

The most recent Full Compliance Evaluation (FCE) for the facility was conducted by District Staff on February 15, 2013. No compliance issues were noted at the time of the inspection.

No complaints are of record since the last FCE for the facility.

Annual emissions reporting is received in a timely manner, the most recent submittal at the time of report preparation being for the 2015 calendar year. Emission units reported for the facility included EUCleanShop, EUEngineTestCell, EUHeaters and EUPenetrants.

#### Regulatory Summary

The facility is listed as a synthetic minor opt-out. Based on a previous review of potential emissions, it was determined that the opt-out was for NOx. Recent discussions with Facility Personnel indicated that the facility may also be subject Title 40 CFR, Part 63, Subpart HHHHHH (NESHAP Surface Coating of Motor Vehicles and Mobile Equipment at Area Sources) based on use of limited quantities of paint containing hexavalent chromium used for engine cowlings.

#### Potential Sources

Potential source of contaminants identified onsite consist of emissions associated with the combustion of jet fuel in the permitted process; fugitive volatiles associated with the cold cleaner activities; limited surface coatings; NDT penetrant and carrier products used in the parts inspection program; minor quantities of cleaning products used for hand/spot cleaning of equipment and parts ; as well as NG in the space/comfort heater(s) used onsite.

Emission controls for the permitted process (jet engine test cell) are based on limits for total hours of operation and fuel type/content. Air emissions associated with the jet engine test cell are limited by permit to less than 800 hours per year (Special Condition (SC)17). No emission controls exist for the cold cleaning processes or the fluorescent part inspection processes.

The parts inspection program and associated products appear to be exempt from permitting based on Rule 285(r)(i), treatment of metal surfaces, in a process where process emissions are only released into the general in-plant environment. Minor quantities of VOCs have historically been reported for this process under the MAERS program. However, as indicated in previous reports the facility has switched to VOC-Free products in their parts inspection program.

Surface coating activities onsite are based on client needs but have historically included a chromium phosphate coating, a lead based solid film lubricant, molybdenum based solid film lubricant and an aluminized coating.

#### Compliance Evaluation

Operational Status – The facility was operating at the time of the inspection.

Material Usage Rates – This facility is an engine maintenance and repair facility. Material of interest is jet fuel utilized with the engine test cell.

Material use records are not required to be kept under PTI 316-96, however, the records are maintained for the purposes of preparing and submitting the annual emission report forms. Copies of the appropriate records are reported to be kept in the respective work areas, as well as with the appropriate staff. Copies and annual totals were reviewed at the time of the site inspection.

Operational Parameters – PTI 316-96 limits operation of the jet engine test cell to less than 800 hours per year. Facility records show that the total hours for the past two calendar years have been well below the permitted limit. Special condition 14, limits the content of fuel used by the permitted process to a sulfur content not to exceed 0.2%. The most recent delivery records show that the sulfur content was 0.015 % by weight sulfur.

Emission Point – The engine test cell was not operating during the January 6, 2017, site visit. So visible emission compliance could not be confirmed.

Emissions associated with the cold cleaning process and the equipment inspection lines were reviewed as part of the inspection and were confirmed to be well below Rule 290 limits.

Special condition 15 limits PM10, CO and NOx to 4 lb/hour, 6 lb/hr and 25.6 lb/hr respectively. A not to exceed limit of 25.3 lb/hr and 10.1 tons of SO2 are specified under special condition 13. Based on the reported maximum sulfur content of the jet fuel, and a review of permit calculations, emissions appear to be in compliance with permit limits.

Monitoring and Testing – No formal monitoring or testing requirements were required as part of PTI 316-96.

**Record Keeping and Reporting** - No specific record keeping or reporting requirements were identified in PTI 316-96. Material usage rates for the permitted process were previously presented.

**Summary**

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NAME Sharon W. Blane

DATE 1/25/17

SUPERVISOR C. Hone