

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

U23161174737343

FACILITY: Woodbridge		SRN / ID: U231611747
LOCATION: 5640 Pierson Highway, Lansing		DISTRICT: Lansing
CITY: Lansing		COUNTY: EATON
CONTACT: Scott Wolbers , Plant Manager		ACTIVITY DATE: 10/20/2016
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-initiated inspection conducted as part of a facility survey in the Canal Rd, Creyts Rd, and Lansing Rd areas.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Connie Brown-Hilliker, Quality Engineer
(brown-hilliker_connie@woodbridgegroup.com)
Scott Wolbers, Plant Manager (scott_wolbers@woodbridgegroup.com)
Mark Howey, Plant Engineer

Purpose: Conduct an unannounced, self-initiated compliance inspection. This activity was conducted as part of a Canal Rd/Creyts Rd/Lansing Rd facilities survey to address a letter received May 11, 2016 from the residents of Old Lansing Road concerning air quality in the area. This inspection allowed AQD to get a better picture of what is in the area in order to address their concerns.

Facility Background/Regulatory Overview: Woodbridge is a parts supplier to General Motors (GM) Lansing Grand River; specifically, they assemble the engine/transmission units. Their entire operations consist of sequencing and assembling these units and then warehousing them to ship out to GM. Connie Brown-Hilliker, Quality Engineer, said that Woodbridge operates 24 hours per day, 5 days per week, with the occasional shift on Saturdays.

Assembly of the engine-transmission units is predominantly conducted using bolts and nuts to join the 2 parts.

The only equipment onsite that I determined to have air emissions were 2 generators. Table 1 contains a list of PTI-exempt equipment located onsite.

Table 1. Exempt equipment

Emission Unit	PTI Exemption	Compliance Notes
Generac Gemini Generator, Model #6575260600, Serial # 2089529; 503 HP	Rule 336.1285(g)	Subject to the RICE MACT Subpart ZZZZ for compression ignition emergency engines greater than 500 HP.
Olympian D20P1 Generator, Serial# GABL001013; 33 HP	Rule 336.1285(g)	Subject to the RICE MACT Subpart ZZZZ for compression ignition emergency engines less than 500 HP

Inspection: This was an unannounced, self-initiated compliance inspection. At approximately 1:50 pm on October 20, 2016, I met with Connie Brown-Hilliker, Quality Engineer, and provided her with a July 2014 PTI exemptions handbook. Later in the inspection I also met Plant Manager, Scott Wolbers.

C. Brown-Hilliker provided me with a tour of the facility. She showed me the assembly line areas where the transmissions and engines are manually assembled (hoses, starters, wiring, etc) and then manually merged via bolts and nuts to connect them as one unit. This is the predominant activity at this facility.

Woodbridge has two emergency generators that C. Brown-Hilliker also showed me. Mr. Mark Howey provided me with the engine specifications for each of these. C. Brown-Hilliker said that GM, per their contract, requires weekly and quarterly testing of the engines to ensure they are in proper working order in the event Woodbridge

lost grid power. She said the engines were not tested from July to September 2016, but other than these dates, they have been tested according to GM's schedule. While inspecting the generators we detected paint odors, presumably from Magna DexSys, as DexSys' RTO is adjacent to Woodbridge's property.

The larger engine is a 750 kW, 503 HP, dual-fueled Generac Gemini emergency generator which M. Howey said was manufactured in 2006 and installed 6/2006. It is exempt from a PTI per exemption Rule 285(g) because the maximum heat input of the engine is 2,559,106 Btu/hr, which is less than the 10 MMBtu/hr limit in 285(g). This engine is subject to the Area Source MACT NESHAP (40 CFR 63) Subpart ZZZZ. Attached are the MACT NESHAP Subpart ZZZZ requirements for this engine. In order for this engine to be considered an emergency engine and only be subject to emergency generator requirements, Woodbridge is limited to 50 hours of operation a year for non-emergency situations (i.e., operating the engines to meet obligations required by GM).

The smaller engine is a 25 kW, 33 HP, diesel-fueled Olympian emergency generator which M. Howey said was manufactured in 2001 and installed 9/2001. It is exempt from a PTI per exemption Rule 285(g) because the maximum heat input of the engine is 85,303 Btu/hr, which is less than the 10 MMBtu/hr limit in 285(g). This engine is subject to the Area Source MACT NESHAP (40 CFR 63) Subpart ZZZZ. Attached are the MACT NESHAP Subpart ZZZZ requirements for this engine. In order for this engine to be considered an emergency engine and only be subject to emergency generator requirements, Woodbridge is limited to 50 hours of operation a year for non-emergency situations (i.e., operating the engines to meet obligations required by GM).

Compliance Statement: Woodbridge appears to be in compliance with Michigan Air Pollution Control Rules at this time.

NAME M. Howey

DATE 11/2/16

SUPERVISOR B.M.