

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

B148651643

CITY: BAY CITY WASTEWATER TREATMENT PLANT		SRN / ID: B1486
LOCATION: 2905 N WATER ST, BAY CITY		DISTRICT: Saginaw Bay
CITY: BAY CITY		COUNTY: BAY
CONTACT: Paul Goergen , Maintenance Supervisor		ACTIVITY DATE: 12/09/2019
STAFF: Kathy Brewer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: inspection to determine compliance with PTI # 424-88A.		
RESOLVED COMPLAINTS:		

I conducted a scheduled inspection at the City of Bay City WWTP. The WWTP has one active air permit # 424-88A for a dual fuel 3,000 kW/4200 HP backup power generator. The site is no longer used as a peaking plant to supplement the Bay City electric power supply.

PTI 424-88A was issued on October 27, 2004 and is a Title V Opt-Out permit to limit NOx emissions. The facility is also subject to the area source RICE MACT

I met with Mr. Paul Goergen, Maintenance Supervisor for the Bay City WWTP. We viewed the emergency power generator, which was not in operation.

At the time of my inspection BC WWTP was in compliance with the requirements in the opt-out permit and air quality regulations.

Compliance Determination

PTI 424-88A-EUGENERATOR and FGFACILITY


The engine was not operating during the site visit. The generator is required to burn low sulfur diesel fuel (0.5% sulfur content). The diesel oil supplier certifies maximum sulfur content of 15 ppm. Mr. Goergen provided the certification for the last diesel delivery received on 6/29/2016, see attached. Since the generator is used in cases of emergency, they only order diesel fuel every couple of years.

We viewed the engine operating hours, diesel fuel flow, and natural gas fuel meters. The facility has a fuel oil day tank that is filled as needed from a large outside fuel oil storage tank. The diesel fuel meter is located on the day tank. The meters are the source of readings taken for required reporting parameters. Mr. Goergen transfers the daily operating information onto a spreadsheet which performs required calculations for a 12-month rolling time frame.

The site has not used natural gas fuel for over 3 years. Between January 2018 and October 2019, it has only run the generator on 5 occasions during 4 months.

Date	Engine operating hours	Natural gas usage cubic ft.	Distillate oil usage gallons	FGFACILITY 12 month rolling average NOx lbs/year (limit = 90 Ton/yr)	NOx lb/hr Limit
July 2018	3	0	18	0.70	80
September, 2018	2	0	16	1.329	80
July 2019	0.9	0	9	1.32	80
October 2019	1.7	0	18	1.05	80

The facility reports to MAERS annually and the NOx emissions for 2018 were initially reported as >20,000 lbs but have been clarified to be 21 lbs. The error was due to application of an incorrect exponent.

NAME 

DATE 12-12-2019

SUPERVISOR 