

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

B155037923

<b>FACILITY:</b> FEDERAL CENTER		<b>SRN / ID:</b> B1550
<b>LOCATION:</b> 74 N WASHINGTON AVE, BATTLE CREEK		<b>DISTRICT:</b> Kalamazoo
<b>CITY:</b> BATTLE CREEK		<b>COUNTY:</b> CALHOUN
<b>CONTACT:</b> Robert Potter, Lead Property Manager		<b>ACTIVITY DATE:</b> 12/06/2016
<b>STAFF:</b> Rex Lane	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b>
<b>SUBJECT:</b> Self Initiated Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On December 6, 2016, MDEQ-AQD staff arrived at the Hart-Dole-Inouye Federal Center (hereafter Facility) building located at 74 N. Washington Avenue, Battle Creek, MI at 1:15 pm to conduct an unannounced air quality inspection. Information about the facility and surrounding campus that was derived from a GSA website is attached to this inspection report. The Facility has a security system that is very similar to TSA security at airports and staff had to remove all metal objects including their safety boots to get through security. Staff informed security of the purpose of their visit and provided their ID credentials and a business card and requested to meet with Mr. Robert Potter, Lead Property Manager, U.S. General Services Administration (GSA). Mr. Potter arrived shortly thereafter and took staff up to his office.

The Facility was last inspected by the AQD on 2/15/2007 and was determined to be in non-compliant at that time. On 2/1/2008, the Facility entered into AQD administrative consent order No. 4-2008 to resolve violations cited following the AQD inspection. Staff informed Mr. Potter that the consent order had a minimum term of five years but does not automatically terminate at the end of this time period. Staff indicated that the Facility could submit a written request to the AQD under the conditions of Paragraph 20 to terminate the order at this time.

The natural gas and fuel oil fired Zura Industries high pressure boilers that were the subject of the consent order were replaced in 2014 with three 12.247 MMBtu/hour natural gas fired low pressure manufactured by Cleaver-Brooks (Model # 4wl-700-300-15). The new boilers underwent initial startup in October 2014. Per MDEQ correspondence dated 12/22/2014, the calculated potential to emit for Nitrogen Oxides (NOx) is 22 tons/year which is below the NOX significance level of 40 tons/year. Therefore, the new boilers are exempt from new source review requirements per Rule 282(b)(i). The new boilers are subject to federal New Source Performance Standards (NSPS) per 40 CFR Part 60, Subpart Dc. MDEQ received the initial NSPS, Subpart Dc notification report from the facility on 1/27/2015. The new boilers are also exempt from regulation under 40 CFR Part 63, Subpart JJJJJ (National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources) per 40 CFR 63.11195(e) based on the units meeting the definition of a gas-fired boiler under 40 CFR 63.11237.

Staff also asked Mr. Potter about the status of replacement of the three existing 950 kW emergency diesel generators with two 850 kW emergency diesel generators per 8/9/2016 correspondence with the facility. Mr. Potter stated that GSA hopes to award the project sometime in early fall 2017. Staff stated that the new diesel fired emergency generators would be subject to NSPS, 40 CFR Part 60 Subpart IIII. Mr. Moises Olsen, Maintenance Supervisor for CMC and Maintenance (GSA's operations and maintenance contractor for this facility) was asked by Mr. Potter to give staff a tour of the boiler powerhouse and emergency generators.

All three Cleaver-Brooks gas fired boilers were in operation at the time of the inspection. There is a clipboard next to each boiler where staff logs any maintenance performed on each unit. Each boiler undergoes an annual efficiency test and safety inspection by Dean Boiler, Inc. and an internal and external inspection by HSB Global Standards. The Dean Boiler, Inc. inspection was last performed on 10/25/2016 and copies of the summary reports for all three units are attached to this inspection report. The average boiler efficiency for the most recent inspection averaged 86%. The HSB Global Standards inspection was last performed on 6/20/2016 and copies of the inspection summary reports are attached to this report.

Mr. Olsen then took staff to see the diesel emergency generators. The diesel generators are Caterpillar Model D399 and were installed in 1976. The generators are exempt from air use permitting requirements per Rule 285 (g). The generators are subject to NESHAP, 40 CFR Part 63 Subpart ZZZZ. MDEQ has not taken delegation from USEPA for this area source NESHAP, therefore staff did not evaluate compliance with this federal regulation. GSA contracts with an outside vendor to perform annual maintenance on the generators. Each generator has a day tank that is replenished by a 5,000 gallon above ground storage tank (AST). The AST is a double walled tank that has interstitial leak monitoring per Mr. Olsen. The AST is exempt from air use permitting requirements per Rule 284(d). Based on attached information provided by Mr. Potter following the inspection, the

Facility uses ultra-low sulfur diesel fuel with a maximum sulfur content of 15 ppm in the generators.

Staff thanked Mr. Olsen for their time and left the facility at 2:30 pm. At the time of the inspection, all currently installed and operating process equipment described above is exempt from air use permitting requirements. -RIL

NAME RIL

DATE 12/13/16

SUPERVISOR MD 12/14/2016