

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

C572867049

FACILITY: ANDREWS UNIVERSITY		SRN / ID: C5728
LOCATION: 4150 Administration Dr. Suite 102, BERRIEN SPRGS		DISTRICT: Kalamazoo
CITY: BERRIEN SPRGS		COUNTY: BERRIEN
CONTACT: Steve Nash , Assistant V.P. of Facilities		ACTIVITY DATE: 04/11/2023
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On April 11, 2023 AQD staff (Matt Deskins) went to conduct an unannounced scheduled inspection of Andrews University (SRN: C5728) located in Berrien Springs, Berrien County. The facility has a permit (PTI No. 81-92) that was issued to them by the AQD for three natural gas/propane fired boilers. Also, according to file information, historically they had two paint booths that they were operating under the AQD Rule 287(c) permit exemption, although one had been removed prior to staff's previous inspection back in 2010. The purpose of the inspection was to determine the facilities compliance with their permit as well as any other state or federal air regulations. Staff departed for the facility after conducting another inspection at a facility in Buchanan and having lunch.

Staff arrived at the university at approximately 1:20 p.m. Staff thought they knew where to go but ended up having to ask someone where the Administration Building was. Once at the Administration Building, staff ran into a student and/or employee and told them that they were looking for Steven Nash. Steve is the Assistant V.P. for Facilities and who is the contact person listed in the annual MAERS report. They led staff up to the 3<sup>rd</sup> floor and to another employee. Staff again introduced them self and mentioned that they were looking for Steve Nash. That employee took staff downstairs and they happen to meet Steve just as he was departing his office. Staff then introduced them self to Steve and stated the purpose of the visit. Steve mentioned that he was just on his way out to a meeting with another employee but would try to help staff out the best that they could. He then asked what staff needed to see. Staff mentioned that they would like to check out the three permitted boilers and also any paint booths that they still had. Steve said that would be fine and that he was heading over to the boiler plant building anyway. He asked that staff follow him over there in their vehicle.

Once at the boiler plant building, the following is a summary of staff's discussions with Steve, staff's observations of the boilers, followed by the permit's special conditions and their compliance status with them.

According to Steve, the boiler plant building still has the three boilers that they installed back in 1992. The boilers were manufactured by Johnston Boiler Company and one is rated at 12.5 million btu/hr and the other two are 33 million btu/hr. Staff verified this on their name plates. They are all fired on natural gas and they no longer use propane for back-up and they have removed the 30,000 gallon propane tank. Staff then looked at the permit special conditions and they are as follows.

SC 14) There shall be no visible emissions from the three natural gas/propane fired boilers.

**AQD Comment: Appears to be in COMPLIANCE. Staff did not observe any visible emissions during the inspection.**

**SC 15) Applicant shall not operate the boilers unless all provisions of 40 CFR parts 60, Subparts A and Dc are complied with.**

**AQD Comment: Appears to be in COMPLIANCE. There aren't any requirements for boilers under this New Source Performance Standard (NSPS) if they are only natural gas fired.**

**SC 16) The exhaust gases from the boilers shall be discharged unobstructed vertically upwards to the ambient air from stacks with an exit point not less than 35 feet above ground level.**

**AQD Comment: Appears to be in COMPLIANCE. The stacks appear to meet this requirement.**

**SC 17) Applicant shall not substitute any fuels other than those described in the permit application which would alter the quality and nature, or increase the quantity, of the emission of an air contaminant beyond the level which has been described in the application and allowed by the permit, without prior notification to and approval by the AQD.**

**AQD Comment: Appears to be in COMPLIANCE. The university is only firing natural gas now and don't have any back-up fuels since they removed the propane tank.**

**Staff then asked Steve about the paint booths that the university had. According to Steve, they have one spray booth and it is located in the Plant Services Building and a portable spray booth that they keep in the maintenance building. He asked if staff needed to see them to which staff replied that they did. Once at the Plant Services Building, Steve and an employee that happened to be there showed staff the paint booth. The booth wasn't being used and it looked pretty well kept and the filters appeared clean. Staff then asked the employee how much coating they use on a monthly basis and if they track it. The employee stated that the booth is hardly used and they haven't been tracking usage. They said that at most maybe 2 gallons a month was used. Staff then proceeded with Steve over to the maintenance area of the Plant Services Building to view the portable paint booth. Once in the maintenance area, staff viewed this booth as well and it wasn't in use. It has sides that are made of a heavy duty plastic and the back was solid (metal) and was equipped with lights and a filter system. The filters appeared to be clean in this booth also. Steve then led staff to an office area where he asked an employee (Martin?) when the booth was last used and if they knew how much coating is used on a monthly basis. Martin said that it was last used in November of 2022 which was the 1<sup>st</sup> time in about 4 years. He said that they didn't track coating usage but it might have been 2 quarts when it was used last. Staff then mentioned although they don't appear to be used very often, the AQD 287(c) permit exemption requires that monthly coating usage be kept. Staff said that they need to start doing that either by actual usage records or by purchase records. Steve stated he understood and will have them include a spreadsheet on the sides of the booths so that usage can be tracked.**

**Staff then proceeded with Steve back over to the boiler plant building. Staff thanked him for his time and departed the university at approximately 2:20 p.m.**

**INSPECTION CONCLUSION:** Staff will consider the facility to be in Compliance with PTI No. 81-92, the NSPS Dc, and the AQD Rule 287(c) Permit Exemption at the present time. If when inspected again they are still not tracking monthly coating usage in the spray booths, a Violation Notice should probably be issued.

NAME Matt Deak

DATE 4-13-23

SUPERVISOR RIL 4/13/23