

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

D143132679

FACILITY: Potterville High School		SRN / ID: D1431
LOCATION: 420 North High Street, POTTERVILLE		DISTRICT: Lansing
CITY: POTTERVILLE		COUNTY: EATON
CONTACT: Ken Kleinfelt , Director of Buildings and Grounds		ACTIVITY DATE: 11/18/2015
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-initiated, unannounced inspection primarily conducted to verify if a permitted incinerator was still present at the site.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Ken Kleinfelt, Director of Buildings and Grounds (kleinfkk@pps.k12.mi.us)

Julie Klomp, High School Principal (jklomp@pps.k12.mi.us)

**Purpose:** Conduct an unannounced, self-initiated compliance inspection by determining compliance with Potterville High School's Permit to Install (PTI) No. 182-68I for an incinerator. There are no records on file that the Air Quality Division (AQD) has ever inspected this source in the past.

**Facility Background/Regulatory Overview:** Potterville High School has been located at 420 High Street since the issuance of PTI No 182-68I. The incinerator was permitted to be used for burning "rubbish" and "garbage."

Potterville High School currently has 9 boilers (5 boilers located in the older part of the high school, 4 in the newer part of the high school) onsite and 1 emergency generator. The two boilers are exempt from the Boiler MACT JJJJJ because they meet the exemption definition of a "gas-fired boiler" and exempt from NSPS Subpart Dc because they are rated at less than 10 MMBTU/hr.

The emergency generator is subject to the area source RICE MACT ZZZZ and the NSPS Subpart JJJJ.

**Equipment located onsite**

Table 1. Emergency Generators

Engine	Serial #	HP	MMBTU/hr	Fuel	PTI Exemption	Installation Date	Manufacture Date	Federal Regulation
Generac	9493495	54 (standby)	0.14	Natural gas	R 285(g)	2015	2014	RICE MACT ZZZZ (area source); NSPS JJJJ

Table 2. Cleaver-Brooks boilers

Boiler	MMBTU/hr	Fuel	Exemption	Installation Date	Federal Regulation
Lochinvar PBN 1000 Serial #D957592	1	Natural gas	R 282(b)(i)	1995	Exempt from Boiler MACT JJJJJ; Exempt from NSPS Subpart Dc
Lochinvar PBN 1000 Serial #D955959	1	Natural gas	R 282(b)(i)	1995	Exempt from Boiler MACT JJJJJ; Exempt from NSPS Subpart Dc
Lochinvar PBN 1000 Serial #F957953	1	Natural gas	R 282(b)(i)	1995	Exempt from Boiler MACT JJJJJ; Exempt from NSPS Subpart Dc
Lochinvar PBN 1000 Serial #F957670	1	Natural gas	R 282(b)(i)	1995	Exempt from Boiler MACT JJJJJ; Exempt from NSPS Subpart Dc
Lochinvar PBN 1000 Serial #C933924	1	Natural gas	R 282(b)(i)	1995	Exempt from Boiler MACT JJJJJ; Exempt from NSPS Subpart Dc
Lochinvar PBN 1000	1	Natural gas	R 282(b)(i)	2000	

Serial #J014945					Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc
Lochinvar PBN 1000 Serial #J014947	1	Natural gas	R 282(b)(i)	2000	Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc
Lochinvar PBN 1000 Serial #J014946	1	Natural gas	R 282(b)(i)	2000	Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc
Lochinvar PBN 1000 Serial #J014944	1	Natural gas	R 282(b)(i)	2000	Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc

**Inspection:** This was an unannounced self-initiated compliance inspection. At approximately 12:00 p.m. on November 18, 2015 I met with Julie Klomp, the high school principal, who got me in touch with the Director of Buildings and Grounds, Ken Kleinfelt, who accompanied me during the inspection. I explained that I was there to verify the presence (or absence) of the permitted incinerator, as well as collect data on any boilers and emergency generators which might also be located on the school grounds. I provided K. Kleinfelt with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure, a July 2014 Permit to Install Exemption Handbook, and the new Boiler NESHAP outreach brochure for the new boiler navigation tool.

#### PTI No. 182-68I for an IPC Incinerator

K. Kleinfelt took me to the boiler room where the incinerator used to be located. He showed me where the stack to the incinerator used to exit the building.

I will request that PTI No. 182-68I be voided because the incinerator has been removed from the site.

#### Boiler MACT NESHAP JJJJJJ for area sources of HAPs (40 CFR 63 Subpart JJJJJJ)

The 9 Lochinvar boilers are exempt from the Boiler MACT NESHAP Subpart JJJJJJ because they are classified as "gas-fired boilers" as defined in 40 CFR 63.11237. To be considered a gas-fired boiler, the boiler must burn gaseous fuels not combined with any solid fuels and burn liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. The periodic testing of liquid fuel should not exceed a combined total of 48 hours during any calendar year. None of the boilers burn fuel oil #2. Eight of the 9 boilers are used to heat the school, the 9<sup>th</sup> boiler is used to provide domestic hot water.

#### Boiler NSPS (New Source Performance Standard) Subpart Dc (40 CFR 60 Subpart Dc)

None of the boilers located at Pottsville High School are subject to the NSPS Dc because they are rated at less than 10 MMBTU/hr.

#### NSPS JJJJ (Emergency Spark-ignition Engines)

The emergency engine is only used during power outages and is subject to NSPS Subpart JJJJ, as it is an emergency, spark-ignition engine that was constructed after 6/12/2006, manufactured after January 1, 2009 and is greater than 25 HP (19 KW). K. Kleinfelt does not have any documentation that this engine has been certified; therefore, its certification status will be determined at a later date once K. Kleinfelt verifies that the engine is either certified or uncertified (the NSPS Subpart JJJJ has different emission and maintenance requirements depending on an engine's certification status).

To maintain the engine's status as an "emergency engine" any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. There is no time limit on the use of emergency engines in emergency situations.

Emergency engines can be operated for any combination of the following purposes up to 100 hours per calendar year:

- o Maintenance checks and readiness testing (if required by federal or manufacturer only)
- o Emergency demand response for periods under NERC
- o Deviation of voltage or frequency of 5% or greater below standard voltage frequency

The 50 hours per year non-emergency operation counts toward the 100 hours per calendar year for maintenance and readiness testing and emergency demand response. The 50 hours cannot be used for peak shaving or non-emergency demand response, or to generate income via electric grid.

At this time it is necessary that Pottsville High School submit the following documents to both AQD and to the U.S. EPA Region V office as soon as possible:

- o Notification of the date of construction of the engine
- o Actual date of initial start-up of the engine

**RICE MACT ZZZZ Emergency Engines**

Potterville High School's emergency engine is also subject to the RICE MACT ZZZZ for area sources of hazardous air pollutants (HAP), based on the EPA's Stationary Reciprocating Internal Combustion Engines (RICE) regulatory navigation quiz (<http://www.epa.gov/ttn/atw/rice/output/quiz.html>), Potterville High School's engine is determined to be a "New and Reconstructed stationary engine less than or equal to 500 HP at an Area Source of HAP – Emergency engine on or after 6/12/2006."

Michigan currently does not have the delegated authority to enforce the area source RICE MACT ZZZZ.

**Compliance Statement:** Potterville High School is in compliance with all state and federal regulations at this time.

NAME Michael M Lytle

DATE 12-22-15

SUPERVISOR B. M. M.

