

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

E419137620

FACILITY: KALAMAZOO VALLEY COMMUNITY COLLEGE		SRN / ID: E4191
LOCATION: 6767 WEST O AVENUE, OSHTEMO		DISTRICT: Kalamazoo
CITY: OSHTEMO		COUNTY: KALAMAZOO
CONTACT: Michael Olivitt , Plant Operations Supervisor		ACTIVITY DATE: 11/02/2016
STAFF: Monica Brothers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

This was an unannounced scheduled inspection. I arrived at the facility at 10:30am and gave Michael Olivitt, the Operations Manager, a call so that we could decide on a meeting place on campus for the inspection. I met him by one of the maintenance doors near the Automotive Department building, and we first sat down in his office to discuss some questions before going on the inspection tour. Mr. Olivitt told me that the college has five boilers that are used to heat the buildings on campus, three emergency generators, and two parts washers. Two of the boilers and two of the emergency generators are new since the last inspection on February 2, 2011. They are currently operating under PTI#770-80 for their three Johnston boilers that were installed in 1970. I asked Mr. Olivitt if he knows of any other air-related changes or additions that have been made since the last inspection, and he said that he didn't think so.

Boilers:

We then began the tour of the facility in the boiler room. As previously stated, they still have the same three natural gas-fired Johnston boilers, each rated at 22.5 MMBTU/hr and 17,250 lbs steam/hr. The serial numbers for the units are H2645, H2646, and H2647. The two new boilers are both high efficiency, natural gas-fired Fulton boilers that are rated at 2 MMBTU/hr each. They were manufactured in 2013 and installed in 2014. The model number for both units is EDR-2000, and the serial numbers are 115532 and 115374. The Fulton boilers are considered exempt under Rule 282(b). There is also a small Lochinvar natural gas-fired hot water boiler in the same room. The model is CWN2620 and the serial number is 0992301. It was built and installed in 1999 and is rated at 2.6 MMBtu/hr. It is also exempt under Rule 282 (b). Mr. Olivitt said that they now use the two high efficiency Fulton boilers as their primaries in the summer, and they assist the Johnston boilers in the winter. The Johnston boilers sit idle during the summer months.

Emergency Generators:

Next we looked at the generators. During the previous inspection, they only had one emergency generator, which is a 125Kw Cummins that was manufactured in 2000. This is not subject to NSPS JJJJ because of its installation date. For the MACT Subpart ZZZZ, it is considered an existing unit at an institutional area source and, therefore, has no requirements under 63.6590(b)(3)(viii). I asked Mr. Olivitt if all of the generators on campus had non-resettable hour meter that we could take an hour reading from, and he said that he thought that they did. We found the display, but Mr. Olivitt did not know how to get the hour readings to come up, so he said that he could give me a reading from the most recent Cummins maintenance inspection back in April. The hours that were recorded on April 19, 2016 were 280.8 hours for this unit. According to Mr. Olivitt, all of the generators are run for testing purposes once per week for 30 minutes.

They also have two new Cummins emergency generators that were both installed in 2013. One is a 100Kw and the other is a 20Kw. Their last maintenance inspection was on April 21, 2016, and their non-resettable hour meters read 146.6 and 92.7, respectively. I found that both units also had the EPA certification sticker. Because these two units are considered new, they are subject to the MACT and NSPS. Per 63.6590(c)(1), they can comply with the MACT by complying with the appropriate NSPS. These two new generator units have both a non-resettable hour meter and an EPA certification, and therefore, are in compliance with both MACT and NSPS requirements.

Parts-Washers:

For this part of the tour, we met with Jeff Roseboom, the Safety Officer on campus. He showed us the two parts-washers in the automotive department. The lids were closed, but there were no rules posted on the outside of the unit. I explained Rule 707 to Mr. Olivitt and Mr. Roseboom and gave them stickers to

put on the two units. I saw a third parts-washer in the same room, but it had items piled up on it, and Mr. Roseboom said that that unit was not being used. The units are maintained by Vesco, which switches out the solvent when needed and also takes care of the used oil from the automotive department. Mr. Roseboom then made me a copy of the MSDS for the parts-washer solution, which contains 100% VOC but is below the Reid vapor pressure level for needing a mechanically assisted lid.

I thanked both Mr. Olivitt and Mr. Roseboom for their time and left the campus at about 12:15pm. The facility seemed to be in compliance at the time of inspection.

NAME 

DATE 11/16/16

SUPERVISOR MA 11/17/2016