

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

H587723748

FACILITY: EASTERN MI UNIVERSITY		SRN / ID: H5877
LOCATION: 812 OAKWOOD, YPSILANTI		DISTRICT: Jackson
CITY: YPSILANTI		COUNTY: WASHTENAW
CONTACT:		ACTIVITY DATE: 11/06/2013
STAFF: Glen Erickson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Inspection of Heating plant and meeting with EMU staff concerning upcoming boiler MACT regulation.		
RESOLVED COMPLAINTS:		

Scheduled inspection with new Heating Plant Foreman Mike Douglass, Bill Sarsour, P.E., Director, Facilities Maintenance, and Mark Monarch, HVAC/R Foreperson at Heating Plant.

Gas-fired turbine was operating at full power with T5 temperature = 1250 deg F., indicating full load conditions. Producing 3.96 MW of electricity, consuming 46.67 Mscfh natural gas. Producing additional 25,000 lbs. steam from heat recovery Boiler No. 4. Total campus demand = 6.94 MW. Along with the 3.9 MW coming from the co-generation turbine, they were importing 1.49 MW from DTE through their Feeder A, and 1.08 MW from DTE through their Feeder B.

Boiler No. 1 was also operating today producing 9.42 Kib./hr. of steam.

No VEs from either stack with all equipment firing natural gas. Haven't fired on fuel oil yet this year. Therefore, they have had no new fuel oil drops. Last drop was in 2008 when they received a load of No. 2 fuel oil with a S concentration of 6 ppm, well under their boiler limits in the permit, and well under the 15 ppm for the diesel generators subject to Subject III.

Discussed their concerns about recently promulgated Boiler MACT for Area Sources, 40 C FR Part 63, Subpart JJJJJJ (6J). Appeared that their three (3) old boilers that fire natural gas and fuel oil would be subject to this regulation. It seems that units that fire oil and are >10 MMBTU/hr. heat input have at a minimum a requirement to perform a one time energy assessment.

If so, the specifics of what constitutes an acceptable energy assessment is not clearly identified in the regulation for which the State of Michigan does not have delegated authority from EPA to enforce.

It appears these boilers may be subject to:

1. One time energy assessment.
2. Initial tune-up.
3. Bi-ennial tune-up every 25 months.

Compliance date = March 21, 2014.

I discussed how I had been working with UM on their counterpart regulation for major sources of HAP, which also has an energy assessment requirement. So far UM has not found any consultants within the state that has experience with this energy assessment, although apparently Lori Myott of Nth has begun researching this for another client.

I told EMU that they may want to contact Nth as a possible contact for assistance in meeting the requirements of this regulation.

Facility is in compliance with their ROP.

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11-26-13:

Folow-up meeting with Bilal Sarsour and Mark Monarch at the Physical Plant.

I did more research on this 6J area source boiler MACT regulation and found that their boilers may not be subject to this regulation afterall, as long as they complied with a couple of stipulations.

The 6J regulation does not apply to gas-fire boilers as defined under 40 CFR 63.11237, which defines gas-fired boiler as:

Gas fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

On EPA's website they include a Q & A document from July 2013 which explains the nuances of this regulation.

Sarsour stated that all 3 boilers comply with the definition of gas-fired boilers. Therefore, EMU does not, at this time, have any boilers subject to 6J.

NAME GLEN ERICKSON

DATE 12-3-13

SUPERVISOR 