

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

K306132971

FACILITY: Parkview Elementary School		SRN / ID: K3061
LOCATION: 301 E. Kalamo, CHARLOTTE		DISTRICT: Lansing
CITY: CHARLOTTE		COUNTY: EATON
CONTACT: Andy Czaika, Building and Grounds Supervisor		ACTIVITY DATE: 11/18/2015
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-initiated inspection to determine if a permitted incinerator was still present at the site.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Andy Czaika, Building and Grounds Supervisor (czaikaa@charlottenet.org)

Purpose: Conduct an unannounced, self-initiated compliance inspection by determining compliance with Parkview School's Permit to Install (PTI) No. 18-88I 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: Parkview is an elementary school located on the south side of Charlotte. PTI No 18-88I for the incinerator, permitted the burning of "rubbish" and "garbage." Andy Czaika is the Building and Grounds Supervisor for all Charlotte District Schools. A. Czaika showed me where the incinerator used to be located and the closed hole where the stack used to be. PTI No. 18-88I was requested to be voided on 11/30/15 because the equipment has been removed.

Parkview currently has 2 boilers and 1 emergency generator onsite. A. Czaika said the emergency generator is used to power up the boilers and run the phone systems when the power goes out.

Equipment located onsite

Table 1. Emergency Generators

Engine	Serial #	HP	BTU/hr	Fuel	Exemption	Installation Date	Manufacture Date	Federal Regulation
Generac	7740170	47	119,615	Natural gas	R 285(g)	2013	2012	RICE MACT Subpart ZZZZ; NSPS Subpart JJJJ

Table 2. Boilers

Boiler	MMBTU/hr	Fuel	PTI Exemption	Installation Date	Manufacture Date	Federal Regulation
LES Inc (Boiler 1) Model#VW-180H Serial #99E-7986	1.635	Natural gas only used, but has capacity to burn fuel oil no. 2	R 282(b)(i)	2004	2000	Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc
LES Inc (Boiler 2) Model#VW-18H Serial#00E-8634	1.635	Natural gas only used, but has capacity to burn fuel oil no. 2	R 282(b)(i)	2004	2000	Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc

Inspection: This was an unannounced self-initiated compliance inspection. On November 18, 2015, after completing the inspection at Charlotte High School, A. Czaika and I drove to Parkview. At the previous Charlotte High School

inspection I had given him a DEQ "Environmental Inspections: Rights and Responsibilities" brochure, a July 2014 Permit to Install Exemption Handbook, and the Boiler NESHAP outreach brochure for the new Boiler MACT navigation tool. I explained to him that I needed to verify the absence or presence of the incinerator and also to document whether generators and/or boilers were located on Parkview's property.

PTI No. 18-88I for an IPC H-200 Incinerator

A. Czaika took me to the room where the incinerator used to be located. He showed me where the stack to the incinerator used to exit the building.

I requested on 11/30/15 that PTI No. 18-88I be voided because the incinerator has been removed from the site.

Boiler MACT NESHAP JJJJJ for area sources of HAPs

The 2 LES Inc boilers are exempt from the Boiler MACT NESHAP Subpart JJJJJ 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. Although the boilers have a rated fuel oil no. 2 usage rate on the name plate, A. Czaika said they've never burned fuel oil in the boilers.

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

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

NSPS JJJJ (Emergency Spark-Ignition Engine)

The engine is subject to the 40 CFR Part 60 NSPS Subpart JJJJ for emergency spark ignition internal combustion engines between 25 and 100 hp that commenced construction after June 12, 2006 and were manufactured on or after January 1, 2009. The emergency engine is only used during power outages.

Parkview's engine must meet the NOx and CO emission standards: 10 g/bhp-hr for NOx and 387 g/bhp-hr for CO (40 CFR 60.4233).

A. Czaika provided me with a photograph of the plate on the engine, which appears to indicate that the engine is EPA-certified. Based on this information, compliance with NSPS Subpart JJJJ emission standards should be according to 40 CFR 60.4243(a).

Parkview is required per the NSPS JJJJ to install a non-resettable hours meter on their engine upon initial startup of the engine and is also required to keep records of the hours of operation of the engine, recorded through the non-resettable hours meter. Records should include the number of hours spent for emergency operation, indicating what classified the operation as emergency, and how many hours were spent for non-emergency operation.

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 up to 100 hours per calendar year for maintenance checks and readiness testing (if the testing is required by the manufacturer).

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 Parkview 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 engine)

Using the EPA's Stationary Reciprocating Internal Combustion Engines (RICE) regulatory navigation quiz (<http://www.epa.gov/ttn/atw/rice/output/quiz.html>), the Parkview engine is determined to be subject to the RICE MACT ZZZZ for New and Reconstructed stationary emergency engines less than or equal to 500 hp located at an area source of HAP.

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

Parkview is in compliance with all state and federal regulations at this time.

NAME M. Michelle Lupton

DATE 1-14-16

SUPERVISOR B.M.