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

FACILITY: Chippewa Valley Schools-High School East		SRN / ID: M3297
LOCATION: 42755 Romeo Plank, MOUNT CLEMENS		DISTRICT: Southeast Michigan
CITY: MOUNT CLEMENS		COUNTY: MACOMB
CONTACT:		ACTIVITY DATE: 02/28/2017
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Evaluation of PTI-97	8-80, PTI-59-76 and PTI-486-77.	
RESOLVED COMPLAINTS:		

Background

Chippewa Valley Schools located at 42755 Romeo Plank, Charter township of Clinton, Michigan 48047. Chippewa Valley Schools currently has multiple permits. The permit numbers are PTI-978-80, PTI-59-76 and PTI-486-77. The facility was inspected on 2/28/2017 by Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division. The intent of the inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, Michigan's Air Pollution Control Rules, PTI-978-80, PTI-59-76 and PTI-486-77.

Inspection

Site arrival was at approximately 10:00 am on 2/28/17. I met with Maintenance and Grounds Supervisor, Kenneth Hauer. We met in his office to discuss the facility's permits. I informed Ken that they have PTI-59-76 which permits two 200 HP no. 6 oil firing boilers, PTI-486-77 that permits two 15,000 gal underground heavy oil storage tanks, and PTI-978-80 that permits a baghouse dust collector for wood working. Ken informed me that the two oil fired boilers and the two associated 15,000 gallon tanks were removed in 1992. The oil firing boilers were replaced with two natural gas boilers. The school still has the baghouse permitted by PTI-978-80. After discussing the permits, Ken drove me to see the baghouse. The baghouse was located at 48301 Romeo Plank, Charter township of Clinton, Michigan. The equipment is vented into the in plant environment. I went outside and inspected the area around the baghouse. The area outside of the baghouse was relatively clean and I did not observe fugitive wood dust. After inspecting the baghouse, Ken took me to 19120 Cass Street to see the replacement boilers (natural gas). Ken first took me to the see the area where the tanks used to be located. The area is now a parking lot. I did not observe any tank filling ports in the parking lot. It appeared that the tanks had been removed. Ken indicated that the facility's oil fueled boilers were formerly located adjacent to the parking lot. This area has since been repurposed and no longer had the boilers. I informed Ken that since the equipment from PTI-59-76 and PTI-486-77 has been removed, the PTIs will be voided. The new natural gas boilers were located on the other side of the building. Ken took me inside and I inspected the new boilers. The facility has twin Model CB 700-250 10,461,000 BTU/hour natural gas boilers. The boiler plates were dated for 12-11-1992. It appears that the natural gas boilers are subject to 40 CFR Part 60 Subpart Dc, the Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Compliance with subpart Dc is demonstrated with material limits and record keeping. Subpart Dc §60.48c(g)(2) requires the facility to maintain monthly records of the fuel usage. I did not request these records but it would seem reasonable that Ken could obtain copies from the gas provider. Subpart Dc also requires the facility use pipeline quality natural gas. Chippewa Valley appears to use pipeline quality natural gas. The two boilers are exempt from R 336,1201(1) pursuant to R 336.1282(2)(b)(i). The boilers are under the 50,000,000 BTU limit of R 336.1282(2)(b)(i).

PTI-978-80

Special condition 10 of PTI-978-80 requires the facility to not exceed 0.10 pounds of particulate per 1000 pounds of exhaust gas. Special condition 11 requires that the facility emissions not exceed 20% opacity. A properly operated baghouse could meet both of these conditions. Chippewa Valley's baghouse appeared to be in good working condition.

Conclusion

It appears that Chippewa Valley Schools is in compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, Michigan's Air Pollution Control Rules, PTI-978-80, PTI-59-76 and PTI-486-77. The equipment permitted by PTI-59-76 and PTI-486-77 had been removed in 1992. These permits will be voided.

NAME _____

DATE $\frac{3/7/17}{2}$ SUPERVISOR