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MANILA

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

M477435376

FACILITY: WAYNE CO COMM COLLEGE EASTERN		SRN / ID: M4774
LOCATION: 5901 CONNERS, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Sammie Rice, Environmental Coordinator		ACTIVITY DATE: 06/14/2016
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: VOC and Criteria pollutants		
RESOLVED COMPLAINTS:		

INSPECTED BY : Terseer Hemben, MDEQ  
 PERSONNEL PRESENT : Chad J. Dillard (Ass. Dir.Gen. Maint)  
 FACILITY PHONE NUMBER : (313)-922-3311  
 Fax: (313)-922-0485  
 DATES OF INSPECTION : June 14, 2016  
 SRN: M4774  
 Wayne County Community College -Eastern  
 5901 Connors, Detroit, MI 48213

**FACILITY BACKGROUND:**

Wayne County Community College-Eastern District (WCCCE) is an educational institution facility. The facility is located on the Eastside of Detroit at the southern part of Interstate 94-E. WCCCE operates two Bryan Flexible Tube boilers with output duty 12,000,000 BTU/HR, and maximum heat input per combustion chamber 15,000,000 BTU/Hr. The boilers are used as backup power supply source for emergency operations. WCCCE submits MAERS report yearly and timely. The MAERS contact for the facility is Mr. Mike Farah (313-943-4013). The facility location stands isolated from residential community.

**INSPECTION NARRATIVE**

I arrived at WCCCE on June 14, 2016 at 1110 hours. The purpose of my visit was to conduct a scheduled annual compliance inspection. Temperature at the hour was 66 F and wind speed 9.2 mph coming from the ESE. Humidity was 56%. I was admitted onto the site by the District Chief Facilities Officer, Mr. Mike Farah. We exchanged introductory information and settled down for a pre-inspection conference session. I learned during the pre-inspection conference the facility does not operate the Bryan generators regularly. The generators were down at the time of inspection. The Bryan generators are fired using natural gas as fuel. The facility carries out combustion analysis calibration regularly as per schedule. The facility switched from steam generation process to use of hot water generation, thus fuel consumption threshold for the winter decreased. The generators stay idle during spring and summer. .

**OUTSTANDING VIOLATION/COMPLAINTS**

There has been no record of complaint attributed to WCCCE operations at the Connors location.

**OUTSTANDING CONSENT ORDERS:**

None

**OUTSTANDING LOV'S:**

None

**OPERATING SCHEDULE/PRODUCTION RATE:**

The boilers are operated only in the winter and serviced in the summer.

**EQUIPMENT AND PROCESS CONTROL:**

The WCCCE operates 2 boilers for generating hot water for space heating in the winter. The boilers are fired with natural gas. The boiler systems are controlled using Honeywell controllers. Details of the equipment and controllers are attached.

**APPLICABLE RULES: Wayne County Department of Environmental Quality or/and DEQ-AQD Permit Conditions:**

Based on Rules 40 CFR 60.0C or Subpart Dc (Small Industrial Steam Generation Units) the rule did not apply because the installation date for the two boilers was June 6, 1980 (pre-June, 1989). Hence the Exempt Rule 282(b)(i) was applied for compliance determination as follows:

In compliance – WCCCE stated there had been downward modification of the Boilers process operating pattern. The system had been re-configured to produce hot water and steam. Hence the amount of natural gas used for heating has been reduced.

**Discussion:**

**Operations-**The boilers were shut down during the inspection.

**Recordkeeping-**The emission data for the criteria pollutants was evaluated. WCCCE kept records and maintained the documents in both hard copy and electronic formats.

**Rule 201(1) -**The name plates on the Boiler#1 and Boiler#2 were verified. The facility qualifies for exempt status based on R 336.282 (b)(i). The exempt rule supports fuel-burning equipment used for service water heating that burns sweet natural gas, and utilizes heat input not exceeding 50,000,000 BTU/HR. The boilers are designed to use maximum heat input 15,000,000 BTU/HR each.

In practice, the boilers would be delegated for regulation under Federal Rule 40 CFR 60 Subpart Dc for monitoring of operating standards and performance of institutional steam generating units having maximum heat input capacity greater than 10 MMBTU/HR and equal or less than 100 MMBTU/HR. The rule allows steam generating units that meet this requirement not to be subject to the SO<sub>2</sub> or PM emission limits, performance testing requirements or monitoring requirements. However, the equipment is not subject to the subpart because they were installed in 1980 before the rule enactment.

**Rule 901-**There was no unusual odor emission at the time of inspection.

**Rule 301-** There was no opacity from the stacks at the time of this inspection.

The boilers were located on the second floor in the HVAC room of the facility. The 2 boilers produce less than 50 MMBTU/HR and are fired using natural gas fuel. The boilers are cleaned and maintained each summer as part of the annual maintenance.

**APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS**

This facility was not in need of fugitive dust management plan.

**MAERS REPORT REVIEW:**

The WCCCE submitted 2015 MAERS report timely. Emissions report was in compliance with MAERS requirements for VOC and criteria pollutants.

**List of Permits Associated with WCCCE**

The facility is regulated under the exempt rule R 282(b)(i) for space heating generation.

**FINAL COMPLIANCE DETERMINATION**

This inspection determined the WCCCE facility operated in compliance with federal rule relating to small heat generating equipment fueled with natural gas. Visible emissions, particulate matter emission limits, and criteria pollutants emissions were in compliance. The facility was determined to be in compliance with State exempt rule 282 (b)(i).

NAME fh

DATE 8/18/16 SUPERVISOR JK