

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

M478536841

FACILITY: AT&T		SRN / ID: M4785
LOCATION: 445 STATE ST, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Jim Skalny , Operations Manager		ACTIVITY DATE: 09/12/2016
STAFF: Katherine Koster	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY2016 Targeted Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection
INSPECTED BY: Katie Koster, AQD
PERSO NNEL PRESENT: Jim Skalny, Operations Manager
FACILITY PHONE NUMBER: 313-223-9737

FACILITY BACKGROUND

AT&T has three locations in downtown Detroit where it operates several emergency generators. These locations are 445 State Street, 1365 Cass Street, 444 Michigan.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received against the facility.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING LOVs

None

INSPECTION NARRATIVE

AQD inspector, Katie Koster, arrived at AT&T on August 12 around 10 a.m. I was met by the Operations Manager, Mr. Jim Skalny. He accompanied me about the facility. I viewed the generators at each location. I took pictures of the name plates and the operational logs.

I explained to Mr. Skalny that these generators had associated MDEQ air quality permits. He was unaware of this. I sent a follow up request for records as well as electronic copies of the permit to Mr. Skalny on September 20, 2016. See attached.

APPLICABLE RULES/PERMIT CONDITIONS

The generators are operating under the following permits:

153-10A: Two 1,500kW diesel fired emergency generators manufactured in 2010, EUMI4290A and B. Located at 445 State Street. Subject to NSPS IIII and RICE MACT but the RICE MACT only requires compliance with NSPS.

85-12: Three 2,250 kW diesel fired emergency generators manufactured in 2007 and installed in 2012. Located at 444 Michigan Avenue. Subject to NSPS III. One "exempt" life safety generator is in the process of being installed. It is 750 kW.

103-08: Eight generators (six combustion turbine powered and two RICE powered) that encompasses all three locations (1365 Cass, 444 Michigan, and 445 State Streets). However, based on the other more recent permits above, it appears that only the information for the equipment at the Cass location is correct; two 1250 kW emergency distillate oil fired engines. The 3 combustion turbine powered generators at 444 Michigan were taken out of service in 2015 according to AT&T and this site is operating under PTI 85-12. The other 3, at 445 State, are not in use as they were not presented during the inspection. State Street has two generators operating under 153-10A.

I viewed the presence of an hour clock on all of the generators. In the control room, there appeared to be a hand written run log for each engine. The engines are maintained by an outside contractor which was not on site at the time. A spreadsheet of the run logs for all engines were provided and are attached. Reasons for running are documented in the log. None of the engines operated more than 50 hours on a 12 month rolling time period. IN COMPLIANCE. PTI 153-10A, S.C. IV.1, VI.3; PTI 85-12, S.C. III.1 and 2, S.C. IV.4, S.C. VI 3; PTI 103-08, EU-DTRMIBH07 and 08, S.C. 7.4, S.C. 7.8, S.C. 7.11 and 8.4, 8.8, 8.11.

Documentation of sulfur content in fuel was not available neither were sample results. NOT IN COMPLIANCE. PTI 153-10A S.C.VI.4; PTI 85-12, S.C. VI.4; PTI 103-08, EU-DTRMIBH07 and 08, S.C. 7.9 and 8.9.

Maintenance records. Facility claims no maintenance has been performed from January 2015- present. Also, it seems that the manufacturer written instructions would require some sort of yearly maintenance and the facility is required to follow those instructions in order to maintain the engine certification. AQD has requested records since start up and is awaiting further information. PENDING. PTI 153-10A, S.C.III.3; PTI 85-12, S.C. III.3; PTI 103-08, EU-DTRMIBH07 and 08, S.C. 7.10 and 8.10.

Engine emission certification was provided for the generators at 444 Michigan Avenue (750 kW and the three 2,250 kW). No certifications were provided by the deadline for the remaining generators. NOT IN COMPLIANCE. PTI 153-10A, S.C.VI.2; PTI 85-12, S.C. VI.2.

Based on a review of the facility file, notification of when the engines were installed and/or if they were going to be operated in a certified or non-certified manner was not submitted to the AQD as required. NOT IN COMPLIANCE. PTI 153-10A, S.C.VII 1 & 2; PTI 85-12, S.C. VII.1.

NSPS/MACTS

Engines are subject to the RICE MACT and NSPS IIII.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS

N/A.

MAERS REPORT REVIEW

Facility is no longer reporting to MAERS. It was designated as a true minor in 2011. Telephone notes are in the facility file between Ms. Mina McLemore and the facility and their consultant.

FINAL COMPLIANCE DETERMINATION

Facility does not appear to be in compliance with some of the recordkeeping and reporting requirements in the permits and subsequently the RICE MACT and/or NSPS IIII. A violation notice will be issued.

NAME Kateyob

DATE 9/28/16

SUPERVISOR W.M.