## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Scheduled Inspection** 

N143032019

FACILITY: Upper Peninsula Power Company - Gladstone		SRN / ID: N1430
LOCATION: East Delta Avenue, GLADSTONE		DISTRICT: Upper Peninsula
CITY: GLADSTONE		COUNTY: DELTA
CONTACT: Jarrod Nelson , Environmental Consultant		ACTIVITY DATE: 11/02/2015
STAFF: Ed Lancaster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Syn Minor Opt Out
SUBJECT: Conducted schedu	uled compliance inspection.	
RESOLVED COMPLAINTS:		

Directions: The facility is located in Delta County, in the City of Gladstone. From State Highway-35 continue across US 41/2 and turn right on N. 9th Street, continue to Delta Avenue and turn left. Continue on East Delta to near its end, UPPCO Gladstone is on the right.

Safety Equipment: Hard hat, safety glasses, and hearing protection.

This is a synthetic minor facility with a permit to operate an emergency fuel oil fired generator/turbine set, PTI No. 601-86.

The facility's "black-start" diesel engine is subject to 40 CFR Part 63, Subpart ZZZZ, the RICE MACT. The company has chosen the O & M method to demonstrate compliance.

I arrived at the facility and was met by Jarrod Nelson, Bob Meyers and Gerry Pirkola. Mr. Meyers explained that this generator is the "twin sister" to the UPPCO-Portage Station generator, except that it is only operated for emergency use only. It is plumbed to only burn fuel oil which it consumes at 2,600 gallons per hour (Special Condition (SC) No. 15).

Fuel oil is stored in a 100,000 gallon tank, and is not required to obtain a permit to install per the exemption in Rule 284(d).

Mr. Nelson provided me with fuel oil analysis for the last three shipments of fuel oil and the 2014 and 2015 operating recap spreadsheets.

The highest fuel oil sulfur was 0.0007% (7 ppm) with a heat value content of 19,561.4 Btu/pound (compliant with SC No. 10 of PTI No. 601-86).

To date in 2015 the generator has operated for 1.3 hours and consumed 2,094.3 gallons of fuel. In 2014, the generator operated for 12.8 hours and consumed 29,049 gallons of fuel oil. Mr. Meyer explained that MISO notifies UPPCO when they plan to start the generator for emergency use (SC No. 16).

The calculated emissions of sulfur are 0.13 pounds to date in 2015 and 1.9 pounds in 2014, well below the limits established in SC No. 11 of 31.12 tons per year.

The plant was not operating during the inspection, therefore, I could not evaluate the visible emissions per SC No. 12.

The AQD has not required the verification of SO2 emission rates by testing per SC No. 13, nor did I measure the stack dimensions while on site (SC No. 14).

At the time of my inspection the company appears to be in compliance with the Air Pollution Control Rules, their permit, and the RICE MACT.