

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

N161132351

<b>FACILITY:</b> Alive	<b>SRN / ID:</b> N1611
<b>LOCATION:</b> 800 W. Lawrence, CHARLOTTE	<b>DISTRICT:</b> Lansing
<b>CITY:</b> CHARLOTTE	<b>COUNTY:</b> EATON
<b>CONTACT:</b> Randy Owens , Support Services Director	<b>ACTIVITY DATE:</b> 11/18/2015
<b>STAFF:</b> Michelle Luplow	<b>COMPLIANCE STATUS:</b> Compliance
<b>SUBJECT:</b> Unannounced, self-initiated inspection to determine compliance with PTI No. 10-871 for an O-Mac incinerator.	
<b>RESOLVED COMPLAINTS:</b>	

Inspected by: Michelle Luplow

Personnel Present: Kelly Vorce, Facility Engineer ([kvorce@hgbhealth.com](mailto:kvorce@hgbhealth.com))

Other Relevant Personnel: Randy Owens, Support Services Director ([rowens@hgbhealth.com](mailto:rowens@hgbhealth.com))

**Purpose:** Conduct an unannounced, self-initiated compliance inspection by determining compliance with Felpausch's Permit to Install (PTI) No. 10-871 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:** Felpausch grocery store used to be located at 800 W. Lawrence in Charlotte. Felpausch is no longer in business at this location. "ALIVE" (Alive), a health and well-being facility, is now located at this address. The incinerator was permitted for burning "rubbish" and "garbage." Kelly Vorce, the facility engineer, said that Alive does not have an incinerator: there was no incinerator present when Alive took possession of the building. PTI No 10-871 was requested be voided on 11/30/2015 because the incinerator is no longer present.

Alive currently has 1 boiler and 1 emergency generator onsite. The boiler is exempt from the Boiler MACT JJJJJ because it meets the exemption definition of a "gas-fired boiler."

The emergency generator is subject to both the area source Reciprocating Internal Combustion Engine (RICE) Maximum Achievable Control Technology (MACT) Subpart ZZZZ for "New and Reconstructed Stationary Engines less than or equal to 500 HP at an Area Source of HAP, Emergency Engine on or after 6/12/2006" and the New Source Performance Standard (NSPS) Subpart JJJJ for "Emergency Spark-Ignition Internal Combustion Engines greater than or equal to 100 HP (except gasoline or rich burn liquefied petroleum gas) that commenced construction after 6/12/2006 and manufactured on or after January 1, 2009."

**Equipment located onsite**

Table 1. Emergency Generator

Engine	Serial #	HP	MMBTU/hr	Fuel	PTI Exemption	Installation Date	Manufacture Date	Federal Regulation
Cummins WSG-1068	362924	112.2	1.01	Natural gas	R 285(g)	2012	Jan 2011	RICE MACT ZZZZ (area source); NSPS JJJJ

Table 2. Boiler

Boiler	MMBTU/hr	Fuel	PTI Exemption	Manufacture Date	Installation Date	Federal Regulation
LAARS Model # MT2H2000NACK1CJX Serial# C11228952	1.9	Natural gas	R 282(b)(i)	1/6/2011	Sometime between 2011 and 2012	Exempt from Boiler MACT JJJJJ; Exempt from NSPS Subpart Dc

**Inspection:** This was an unannounced self-initiated compliance inspection. At approximately 3:00 p.m. on November 18, 2015 I met with front desk staff that got me into contact with Kelly Vorce, the Facility Engineer. I explained that I was there to verify the presence (or absence) of the permitted incinerator, as well as collect data on any boilers and emergency generators which might also be located at the facility. I provided K. Vorce with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure, a July 2014 Permit to Install Exemption Handbook, and the new Boiler NESHAP outreach brochure for the new boiler navigation tool.

K. Vorce showed me both the boiler and the emergency generator, which are located upstairs in the old Felpausch side of the building.

#### Boiler MACT NESHAP JJJJJJ for area sources of HAPs (40 CFR 63 Subpart JJJJJJ)

The LAARS boiler is exempt from the Boiler MACT NESHAP Subpart JJJJJJ because it is classified as a "gas-fired boiler" 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. This boiler is fueled on natural gas only.

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

The boiler located at Alive is also not subject to the Boiler NSPS Subpart Dc because it is rated at less than 10 MMBTU/hr.

#### NSPS JJJJ (Emergency Spark-ignition Engines)

The emergency engine is only used during power outages and is subject to NSPS Subpart JJJJ, as it is an emergency, spark-ignition engine that was constructed after 6/12/2006, manufactured after January 1, 2009 and is greater than 25 HP (19 KW). The engine is certified, based on the attached document that R. Owens sent via email (certificate number CEX-NRSI-10-02), and is certified to meet both the NOx and CO emission limits that are listed in the NSPS JJJJ as discussed below. I will provide this information to R. Owens and compliance with these requirements will then need to be determined during future inspections.

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

Alive is required per the NSPS JJJJ to install a non-resettable hours meter on their engine.

To maintain the engine as a certified engine, Alive must operate and maintain the engine according to the manufacturer's emission-related instructions and keep records of conducted maintenance to demonstrate compliance (60.4243).

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 for any combination of the following purposes up to 100 hours per calendar year:

- o Maintenance checks and readiness testing (if required by federal or manufacturer only)
- o Emergency demand response for periods under NERC
- o Deviation of voltage or frequency of 5% or greater below standard voltage frequency

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.

Alive is allowed to use propane up to a max of 100 hours per calendar year, but must keep records of use. If propane is used more than 100 hours, the engine is considered not certified.

At this time it is necessary that Alive 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

In the future, Alive must also send notifications of physical or operational change of the engine that would increase the emission rate of NOx, CO, or VOC.

#### RICE MACT ZZZZ Emergency Engines

Alive's emergency engine is also subject to the RICE MACT ZZZZ for area sources of hazardous air pollutants (HAP), based on the EPA's Stationary Reciprocating Internal Combustion Engines (RICE) regulatory navigation quiz (<http://www.epa.gov/ttn/atw/rice/output/quiz.html>), Alive's engine is determined to be a "New and

Reconstructed stationary engine less than or equal to 500 HP at an Area Source of HAP – Emergency engine on or after 6/12/2006.”

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

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

NAME Mullen Spivey

DATE 12-3-15

SUPERVISOR B M

