

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N351762124

FACILITY: THUMB ELECTRIC COOPERATIVE		SRN / ID: N3517
LOCATION: 4151 UBLY RD, UBLY		DISTRICT: Bay City
CITY: UBLY		COUNTY: HURON
CONTACT: Dallas Braun , General Manager		ACTIVITY DATE: 01/18/2022
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site inspection.		
RESOLVED COMPLAINTS:		

An onsite inspection and records review was conducted by Air Quality Division (AQD) staff Adam Shaffer (AS) of the Thumb Electric Cooperative (TEC) site located at 4159 Uby Road Uby, MI. Applicable records were requested and provided on January 18, 2022, to verify compliance with Permit to Install (PTI) No. 90-12. An in-person inspection to verify onsite compliance was completed on January 19, 2022.

Facility Description

TEC is an electric utility company. This site is in operation with PTI No. 90-12. The facility took opt-out limits for nitric oxides (NO_x), sulfur dioxides (SO₂), carbon monoxide (CO) and volatile organic compounds (VOCs).

Offsite Compliance Review

Based on the timing of the inspection, the 2021 Michigan Air Emissions Reporting System (MAERS) Report submitted on January 13, 2022, was reviewed. Upon review of the 2021 MAERS Report, it was verified the natural gas usages for the limited hours of operation were correct. After further review, the 2021 MAERS Report appears acceptable.

Compliance Evaluation

A records request was sent to TEC staff for various records required by PTI No. 90-12 with records provided on January 18, 2022. An onsite inspection of the site was completed on January 19, 2022. AQD staff AS arrived onsite at 9:51am on January 19, 2022. Weather conditions at the time were cloudy skies, temperatures in the middle 30's degrees Fahrenheit and winds from the east at 15-20mph. Upon arriving onsite, AS met with Mr. Russell Lemanski, representative of TEC, who provided a tour of the site and answered site specific questions. Requested records were provided by Mr. Dallas Braun, General Manager.

As mentioned above TEC is an electric utility company. The engines and the remaining items onsite were reviewed during the inspection and will be discussed further below.

PTI No. 544-95B

It had been determined that the engines had been run in August 2021 for maintenance purposes. Speaking with staff and reviewing of documents for the site, the engines appeared to have not been run in 2020.

FG-ENGINES

This flexible group is for nine (9) engines (EU-UNIT1-9) of varying sizes that were installed / modified between 1938 – 2000. The nine engines were observed during the course of the site inspection.

Per Special Condition (SC) III.1, the permittee shall not operate each emission unit in FG-ENGINES for more than 16 hours per calendar day. Records were requested and provided for select time periods. As mentioned above the units were last run in August 2021. The highest daily hours of operation noted in August 2021, was 2 hours which is well within the permitted limit. Based on the records reviewed, this condition appeared to be being met. It was noted while reviewing the records provided at the time of the inspection and electronic records there were errors between the two sets of hours. Upon review, there appeared to be no hours of operation exceedance for FG-ENGINES. Speaking with company staff on the discrepancies it was determined this was when the engines were attempted to be started but were not. No electricity was generated, and minimal amounts of fuel were used. These attempts to start were not counted towards the hours of operation. After further review this appears acceptable.

Per SC III.2, the permittee shall not operate each engine in FG-ENGINES for more than 1,100 hours per year on a 12-month rolling time period. As mentioned above, the last time TEC has run the engines was in August 2021. Records were requested and reviewed for select time periods. As of August 2021, the engines have been run 11.5 hours per a 12-month rolling time period which is well within the permitted limit. TEC appears to be meeting this permitted condition. As stated above, potential errors were noted in the records electronically provided and the onsite records showing the hours of operation for FG-ENGINES. No hours of operation limits appear to have been exceeded. As mentioned above the discrepancies were when the engines were attempted to but did not start. The attempts to start the engines were not counted towards the hours of operation.

Per SC VI.2-3, the permittee shall maintain records of the hours of operation for each emission unit of FG-ENGINES on a daily / monthly / 12-month rolling time period. Records were requested and provided for select time periods. Based on the records reviewed, this condition appears to be being met.

Per SC VI.4, the permittee shall keep records of NO_x calculations for FG-ENGINES on a monthly and 12-month rolling time period. Records were requested and provided for select time periods. Based on the records provided, TEC appear to be keeping track of monthly / 12-month rolling time period emissions.

Per SC VI.5, the permittee shall perform a non-certified visible emissions check on each emission unit during operation, per operating day. A record shall be maintained of all checks, and abnormal conditions shall trigger abatement/repair actions. Copies of records were provided at the time of the inspection. Upon review, the records appear acceptable.

Nine stacks are listed with this flexible group and were observed during the course of the site inspection. Though the dimensions of each stack were not measured, they appeared acceptable at this time.

FG-FACILITY

This flexible group is for all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

This flexible group is subject to a NOx emission limit of 89.9 tons per year (tpy) per a 12-month rolling time period. Records were requested and reviewed for select time periods. As of December 2021, 0.30 tpy of NOx emissions were reported emitted which is well within the permitted limit. As stated previously in this report, the engines were not run in 2020. Based on the records reviewed, TEC appears to be meeting this emission limit. It was noted above that minimal amounts of fuel were used to attempt to start the engines, however, the units were not actually run. The minimal amounts of fuel were on counted towards the totals used for calculating the NOx emissions. After further review, the discrepancies would appear to be minor, and TE is well within the emission limit.

Per SC VI.2, the permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period NOx emission calculation records for FG-FACILITY, in accordance with SC I.1. Records were requested and reviewed for select time periods. After further review, it appears that TEC is keeping track of applicable items per this condition.

Additional Observations

One parts washer was observed during the course of the inspection that has an air/vapor interface of less than 10 square feet and appears to be exempt per Rule 281(2)(h).

Conclusion

Based on the record reviewed and observations made at the time of the inspection, TEC appears to be in compliance with PTI No. 90-12 and applicable air pollution control rules.

NAME Adam Shaffer

DATE 03/14/2022

SUPERVISOR Chris Hare