

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

N557326596

FACILITY: CONSUMERS ENERGY COMPANY- WHITE PIGEON CO		SRN / ID: N5573
LOCATION: 68536 A ROAD, ROUTE 1, WHITE PIGEON		DISTRICT: Kalamazoo
CITY: WHITE PIGEON		COUNTY: SAINT JOSEPH
CONTACT: Tim Wolf , Field Leader		ACTIVITY DATE: 08/26/2014
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection. Consent Order has not been issued yet.		
RESOLVED COMPLAINTS:		

This was not an announced inspection. Tim Wolf is the contact person. The inspection brochure was given to James. A stack test on EUENGINE2 was also underway.

EUEMERGEN- This engine was tested on April 2, 2014 for CO, NOx, and VOC for 40 CFR Part 60 Subpart JJJJ. The engine was in compliance with the emission limits. The hours of operation records are being kept. The engine is located at Plant 3. It was not operating at the time of the inspection.

EUHEATER- This is the Plant 3 heater/boiler. Natural gas usage records are being kept.

FGAUXGENS- These are emergency generators associated with Buildings 1 and 2. They are subject to the MACT ZZZZ. The hour meter on EUAUXGEN2 read 216.9; on EUAUXGEN1 it read 200.8. The compliance date for the engines is October 19, 2013. These engines are subject to an annual engine oil analysis, spark plug inspection, and hose and belt inspection. It appears that these inspections were not done yet and this was pointed out. Hours for each generator are recorded monthly. In each auxiliary building there was a 2.5 MMBtu/hr boiler. These are exempt.

FGENGINES- This consists of four natural gas-fired, 4-stroke, lean burn, spark ignited reciprocating engines. They have a catalyst for CO control. These engines are subject to 40 CFR Part 60 Subpart JJJJ and 40 CFR Part 63 Subpart ZZZZ. The engines were tested on March 11-16, 2014. At that time the catalyst was replaced on Engines 2 and 4, thus, they were scheduled to be re-tested on August 26. Engine 2 was being tested for CO destruction efficiency at the time of the test. During run 1 the catalyst inlet temp. was reading 776 degrees and the differential pressure was reading 3.19. On run 2 Engine 2 failed the post calibration for CO and Run 2 was repeated at 12:48 PM. Engine 4 had a mechanical problem with the compressor and testing was delayed until the week of Sept. 1.

A print out was obtained for Engines 1-4 to show inlet catalyst temp. and differential pressure readings during June and July, 2014. The records appear to show compliance with Subpart ZZZZ.

These engines have a CO emission limit of 0.2 g/hp-hr which is more stringent than the 4.0 g/hp-hr from JJJJ. Because this is a separate emission limit that does not come from a MACT and because there is a catalyst control device, these engines would be subject to the Compliance Assurance Monitoring Rule (CAM) if potential pre-control annual emissions for CO for each engine exceeds 100 tons. However, the facility is monitoring the catalyst according to ZZZZ and this satisfies presumptively acceptable monitoring for CAM. A separate monitoring plan does not need to be submitted. The staff report for the ROP should reflect this at the next renewal.

FGDEGREASERS- There is a degreasing machine in the auxiliary buildings 1, 2, and 3. In each case the lids were closed and rules posted.

Building 1 has four grandfathered compressor engines that are cooled with glycol. Building 2 has four exempt engines.

Other exempt equipment seen at the facility include: Tank 9, 5000 gallon glycol; Tank 8, 5000 gallon new oil; Tank 7, 5000 gallon new oil; Tank 6, 2000 gallon used oil; Tank 5, 550 gallon valve oil for compressor; Tank 4, 2000 gallon oil; Tank 3, 2000 gallon used oil; Tank 2, 5000 gallon new oil; Tank 1, 5000 gallon new oil; a gasoline tank and diesel tank for vehicles. The facility does not have glycol dehydrators to treat the natural gas. It does have scrubbers.

NAME Dennis Dunlap

DATE 9/2/14

SUPERVISOR NA 9/2/2014