

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

N572428330

FACILITY: CITY OF ST. LOUIS		SRN / ID: N5724
LOCATION: 412 N. MILL ST., SAINT LOUIS		DISTRICT: Lansing
CITY: SAINT LOUIS		COUNTY: GRATIOT
CONTACT: Keith Risdon , Director of Public Services		ACTIVITY DATE: 01/15/2015
STAFF: Michelle Luplow	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM 208A
SUBJECT: Scheduled compliance inspection as a result of failure to respond to the 208a letters sent out in the summer of 2014, in addition to determining whether actions had been taken to resolve the non-compliance issue with stack heights of permitted engines 1 & 4 (7).		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Kurt Giles (kgiles@stlouismi.com), City Manager

Keith Risdon (krisdon@stlouismi.com), Director of Public Services

Purpose: Conduct an announced, scheduled compliance inspection by determining compliance with City of St. Louis' Permits to Install (PTI) Nos. 546-95 and 546-95A. In addition to determining compliance with the permits, special attention was paid to whether or not the City of St. Louis had taken actions to address the non-compliance issues with the stack heights of permitted engines 1 & 4 from the June 2014 site visit, and also to work with the City of St. Louis to determine the next appropriate steps in response to the rescindment of Rule 208a.

Facility Background/Regulatory Overview: The City of St. Louis is a 208a registered source that has 6 electric generators that are used as backup in instances where the local power plant is not able to generate enough electricity to meet demand (peak shaving), and they are occasionally run to keep them in good working condition.

Equipment located onsite

Engine # (permit engine #)	HP (documented onsite)	Fuel	PTI No.	Federal Regulation
1 (1)	1920	Natural gas & diesel	546-95	NESHAP ZZZZ – area
2 (2)	1000	Diesel only	546-95	NESHAP ZZZZ – area
3 (3)	1400	Diesel only	546-95	NESHAP ZZZZ – area
7 (4)	1600	Natural gas & diesel	546-95	NESHAP ZZZZ – area
8 (8)	1920	Diesel only	546-95A	NESHAP ZZZZ – area
9 (9)	2095	Diesel only	546-95A	NESHAP ZZZZ – area

Inspection: This was an announced compliance inspection. At approximately 1:30 p.m. on January 15, 2015 I met with Kurt Giles and Keith Risdon at St. Louis' City Hall. During the May 2014 inspection I had provided K. Giles with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure.

PTI No. 546-95 and 546-95A – Engine units 1, 2, 3, 7, 8, 9

K. Giles said that since June 2014 none of the engines have been started up or running (i.e. they haven't been put online for power generation, nor have they been started up for exercise).

When engines 1, 7, 8 and 9 were upgraded with DOCs/Silencers (catalytic oxidation controls) for the area source NESHAP ZZZZ, K. Giles said that lubrication oil was reaching the catalyst and rendering the oxidation catalyst ineffective on engine 1. Because of this finding he said that engines 7, 8, and 9 were also inspected to make sure that this problem was not occurring in these as well. K. Giles said that the engines are currently being prepped for maintenance, ascertaining associated costs and determining whether or not it would be financially beneficial to remove the engines all together rather than meet the area source NESHAP. The lubrication oil problem poisoning the catalyst has resulted in the City of St. Louis not operating the engines from June 2014 up through the present time.

K. Giles also said there are definite plans to remove engines 2 & 3 as the cost of upgrading the engines for the NESHAP ZZZZ would outweigh the benefits of operating the engines.

Because the engines have not been operational from June 2014 (last inspection) through the present, there have been no emissions from this source and therefore the City of St. Louis is in compliance with all emission and material use limits in both PTI No's 546-95 and 546-95A at this time. The last inspection (May 2014) verified that the 12-month rolling material usage and emission limits through May 2014 were in compliance with permit conditions.

During the June 2014 site visit K. Giles had measured the heights of the stacks and found them to be in non-compliance with the 39' requirement for engines 1 & 7. During that time I had requested that the City of St. Louis apply for a permit modification to include the new stack heights or to increase the stack heights from 35' to 39'. During the current inspection neither of these options were completed and therefore a violation notice was sent on January 22, 2015 for failure to meet the permitted stack height requirements.

208a Compliance

Rule 208a is likely to be rescinded at some point in calendar year 2015. During the meeting with K. Giles and K. Risdon we discussed how the City of St. Louis would remain in compliance without Rule 208a. We discussed obtaining an opt-out permit as the best solution. City of St. Louis' 2 current permits each limit NOx; however, combining the limits from the two permits resulted in over 100 tons per year of NOx emitted if the City of St. Louis were to operate their engines up to the permitted limits. City of St. Louis would likely exceed major source thresholds if they were to complete a potential to emit demonstration for all 6 engines, based on the permit limits. The City of St. Louis plans to apply for the opt-out permit that will also include the new stack heights associated with engines 1 & 7, consequently resolving the aforementioned violation.

The City of St. Louis is in non-compliance with stack height requirements and will receive a violation notice for this, but is in compliance with all other state and federal regulations at this time.

NAME Michelle J. J. J.

DATE 1-23-15

SUPERVISOR B. M.