

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

N600025233

FACILITY: HOLLAND BOARD OF PUBLIC WORKS		SRN / ID: N6000
LOCATION: 85 E SIXTH ST, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Judy Visscher, Environmental Regulatory Specialist		ACTIVITY DATE: 05/22/2014
STAFF: Steve Lachance	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FCE for FY'014		
RESOLVED COMPLAINTS:		

This was an unannounced inspection of the Holland Board of Public Works' 20 MW oil-fired combustion turbine. The facility was not operating at the time of site visit; SL confirmed this by observation prior to arrival at the DeYoung Plant. SL presented himself to the Board at the James DeYoung Plant at about 13:30 AM, May 22, 2014. Ms. Judy Visscher represented the facility. Following the conclusion of an ROP development meeting for B2357, SL outlined his intent to inspect and presented a copy of DEQ's "Environmental Inspections: Rights and Responsibilities" brochure. SL outlined the following areas of interest for this facility:

#### Permit to Install No. 133-74

Special Conditions to this permit include an opacity limit; Rule 901 nuisance prohibition; and NAAQS maintenance requirements. No complaints have been received against this equipment. Ottawa County is currently in attainment with all NAAQS. There has been no indication in the past that the equipment emits excessive opacity, including during Visible Emissions Method 9 Readings during operations on August 5, 2011.

#### 208a

This site registers yearly under Rule 208a to restrict potential emissions of Criteria Pollutants and HAPs below Title V thresholds by voluntarily keeping actual emissions below 50% of these thresholds. This is accomplished through low utilization of the equipment. The only current operations are tests for readiness, and it would take a true regional emergency situation for this equipment to see productive use. MAERS data for 2013 indicates only a few hours of operation (for testing availability, not for production), use of 0.0015% Sulfur oil, and actual emissions of all criteria pollutants << 1 tpy. SL requested current 12-month rolling time period records, as required by this rule, and received current and appropriate calculations based on fuel use and a worst-case emission factor for NOx (the highest emitting pollutant) from a 2000 stack test. See Attachment A.

Note, with the planned rescission of Rule 208a, the source will likely be seeking an opt-out permit for criteria pollutants and HAPs; facilities have been asked (per letter) to indicate their chosen path for Rule 210 compliance in the next 60 days or so.

#### Sulfur in fuel

The on-site storage was emptied and cleaned in 2007, and all oil received to date since that time is Ultra Low Sulfur Diesel (ULSD), guaranteed to contain no more than 15 ppm Sulfur. This corresponds to  $15/1E6 = 0.0015\%$  Sulfur-in-fuel.

Documentation of oil shipments to the site since the 2007 cleaning indicates delivery of ULSD; ULSD provides for compliance with any applicable restriction on sulfur-in-fuel for this facility.

The source has implemented use of 0.015% S content in MAERS, which seems appropriate given the "clean slate" established in 2007.

#### GHG Opt-Out Permit No. 92-12


The facility sought and received an Opt-Out Permit (No. 92-12) to legally restrict the facility's PTE for Green-House Gases (GHGs). This is accomplished through a restriction in fuel use; Monthly records of fuel use and associated calculations of GHGs are maintained to demonstrate compliance with the permit. The calculations use the same emission factor as was used in the permit application. See Attachment B. Emissions are low based on low source utilization.

#### RICE MACT

The facility has submitted an initial notification of applicability for the the RICE MACT (40 CFR 63, Subpart ZZZZ) for the backup oil-fired engine located at this source. As an existing source, and at the stated capacity of 500 hp, this emergency, compression ignition engine will be subject to area source MACT regulation on May 3, 2013. The rule will require Work Practice/Maintenance standards for the engine, and installation of a non-resettable hour meter.

#### SUMMARY

As shared with Ms. Visscher at the conclusion of inspection activities, SL considers the facility to be in compliance with applicable air use rules and regulations at the time of the inspection.

NAME 

DATE 6/30/14

SUPERVISOR 