

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

N600035253

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: 06/29/2016
STAFF: Steve Lachance	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Self-initiated FCE for FY '016. See CA_N600035253. (SLachance, 6/29/16)		
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 and CR of this office presented themselves to the Board at the James DeYoung Plant at about 9:00 AM, June 29, 2016. Ms. Judy Visscher represented the facility. Following the conclusion of an inspection for B2357 (DeYoung Power and WWTP plants), SL outlined his intent to complete an inspection of this facility. Note, SL had previously presented and discussed 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. (The facility has not been observed in operation since that date.)

The only current operations are tests for readiness, and it would likely take a true regional emergency situation for this equipment to see productive use.

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.

EI2015 MAERS

MAERS data for 2015 indicates only a couple hours of operation (for testing availability, not for production), use of 0.0036% Sulfur oil (conservative; relic typo?), 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. These appear to be consistent with the EI2015 MAERS report for this facility (See Facility Site-wide Emissions Report in Attachment A.)

Opt-Out Permit (NOx and GHG) No. 133-74A

The facility sought and received an Opt-Out Permit (No. 133-74A; in response to rescission of Rule 208a availability) to legally restrict the facility's PTE for Green-House Gases (GHGs) and for NOx (the other pollutant with PTE > applicable Title V thresholds.) This is accomplished through a restriction in fuel use; monthly records of fuel use and associated calculations of GHGs and NOx 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.

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.

ATTACHMENTS:

A: EI2015 MAERS Attachments

B: On-site Monthly Records per PTI No. 133-74A

NAME



DATE

7/6/16

SUPERVISOR

