

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

N652426593

FACILITY: Diesel Plant		SRN / ID: N6524
LOCATION: 518 S. Harbor Dr., GRAND HAVEN		DISTRICT: Grand Rapids
CITY: GRAND HAVEN		COUNTY: OTTAWA
CONTACT: Paul Cederquist, Environmental Compliance Specialist		ACTIVITY DATE: 08/26/2014
STAFF: Steve Lachance	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM 208A
SUBJECT: Scheduled Inspection for FY '014		
RESOLVED COMPLAINTS:		

This was an unannounced inspection. Given weather conditions, SL had anticipated possible operations this day. SL called Mr. Paul Cederquist of the facility en-route and announced his intention to complete an inspection this day. Mr. Cederquist confirmed "no" operating plans for the day, and met SL at the JB Sims Plant at about 10 AM. The inspection of the Diesel Plant itself occurred concurrently with the JB Sims inspection, concluding with a review of equipment and pertinent on-site records.

Prior to meeting Mr. Cederquist at Sims, SL arrived in the facility vicinity and confirmed no visible emissions or operations. Weather conditions were cloudy, about 75 - 80 degrees F, humid with SW winds at about 10+ mph.

The inspections commenced with a formal entrance interview; and SL shared DEQ's "Environmental Inspections: Rights and Responsibilities" brochure with Mr. Cederquist. SL outlined the following "Areas of Interest" for the inspection of the Diesel Plant:

- Current Operations;
- Records of Fuel and Operations, in support of 2013 MAERS and Rule 208a;
- Sulfur-in-fuel documentation;
- Any changes to equipment or process; and
- RICE MACT Compliance

Mr. Cederquist confirmed that no engines were operating on this date. Only engine No. 1 (7.9 MW) is currently operational and compliant with the RICE MACT. This appears to be a Minor (Area) Source of HAPs, especially as limited by Rule 208a Registration.

Monthly reports are compiled at the management level from the logs prepared by the operators. These monthly reports also include fuel usage estimates. These records were readily available. See attached "2014 {to date} Operating Hours" summaries. These reports are the basis for MAERS reporting.

Operations have been limited to only Engine No. 1 this year (again.) Moreover, all reported operations were attributed to testing/attempted testing; the engine had not yet operated in 2014 for economic reasons.

The old "heavy" distillate tank has been dismantled and only Ultra Low Sulfur Diesel (ULSD; defined as 15 ppm S maximum, i.e., 0.0015% Sulfur by weight) has been received/used on site since. Given the applicable sulfur restriction per Rule 402(1) of 1.7 pounds SO₂ per million Btu heat input, compliance is assured with the use of ULSD..

SL confirmed that concurrent opacity records are taken at the time of operation. Operations may be limited to maintain opacity values of 20% or less.

SL had previously confirmed the installation of catalyst and differential pressure/inlet temperature monitors for Engine No. 1. Mr. Cederquist provided the results of compliance testing for this engine. The results indicate compliance with the RICE MACT, at about 98% CO reduction and less than 4 ppmc CO.

FINAL SUMMARY; At this time, SL considers the source to be in compliance with applicable air use rules and regulations. The RICE MACT has been addressed only for Engine 1 and so other engines are now unavailable for any use other than emergencies. With the pending rescission of Rule 208a, the facility is working with AQD-Permit Unit staff to obtain an "opt-out" permit for this facility.

NAME



DATE

9-2-14

SUPERVISOR

