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

N75005049Z			
FACILITY: MICHIGAN TECHNOLOGICAL UNIVERSITY		SRN / ID: N7350	
LOCATION: 1400 TOWNSEND DR., HOUGHTON		DISTRICT: Upper Peninsula	
CITY: HOUGHTON		COUNTY: HOUGHTON	
CONTACT: Clifton Brusso, Energy Management Shift Operator		ACTIVITY DATE: 07/17/2015	
STAFF: Joe Scanlan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR	
SUBJECT: Unannounced insp communication w/D.Taivalkosk	ection to determine compliance with PTI#s: 238-76, 426- i for specific emissions info.	-77,39-81, and 91-04. Will need follow-up	
RESOLVED COMPLAINTS:	· · · · · · · · · · · · · · · · · · ·		

FACILITY: Michigan Technological University (MTU)

INSPECTION DATE: 7/17/2015

MDEQ-AQD STAFF

NIZ26020402

• Joseph Scanlan, EQA

FACILITY REPRESENTATIVES

- Gregg Richards, Director of Engineering Services
- Clifton Brusso, Energy Management Shift Operator
- David Taivalkoski, Director of Energy Management & Sustainability

LOCATION

The central energy plant and associated facilities and accessory structures for Michigan Technological University are located on the north side of campus, along the Portage Canal, in Houghton. Facilities Management offices are located the Facilities Building adjacent to the central energy plant.

SOURCE DESCRIPTION

Michigan Technological University's central energy plant, steam distribution system and campus building energy management system functions to provide heat and steam for buildings on campus. The central energy plant houses four large bollers which operate on natural gas with #2 fuel oil as a standby fuel. There are also four (4) 2250 kilowatt Caterpillar diesel generator sets which supply power in the event of a power outage and to supply the local area with additional power during times of peak electricity demand. Adjacent and to the east of the central energy plant is a 1,000,000 gallon fuel oil tank, which is slated to be dismantled and replaced by seven (7) 30,000 gallon tanks in late 2015. Another 1,000,000 gallon fuel oil tank and two (2) smaller 100,000 gallon fuel oil tanks were removed during the construction of MTU's Great Lakes Research Center in late 2010 and early 2011. Until this inspection, this facility has never been visited by AQD staff in regards to PTI# 91-04A or any previously issued PTIs.

INSPECTION

On 7/17/2015 I conducted an unscheduled visit to the central energy plant at MTU. PPE worn during this inspection included steel-toed boots, safety vest, safety glasses and hardhat. I met with Energy Management Shift Operator Mr. Clifton Brusso in the boiler operator's control room. Due to his scheduled retirement from employment at MTU, Mr. Taivalkoski is often not available and was out of the office during the time of my inspection. Mr. Brusso is very knowledgeable of the boiler and diesel generator operations and maintenance and guided me through the facility.

EMISSION UNIT DETAILS

Emission Unit ID	Description of Emission Unit	PTI#	Installation/ Modification Date	Compliance Status
EUBOILER1R	156 mmBtu/hr boiler fired w/nat. gas and #2 fuel oil	PTI# 91-04A	1971	С

EUBOILER2	39.4 mmBtu/hr boiler fired w/nat. gas and #2 fuel oil	PTI# 91-04A	1950	с
EUBOILER3	39.4 mmBtu/hr boiler fired w/nat. gas and #2 fuel oil	PTI# 91-04A	1957	с
EUBOILER4	96 mmBtu/hr boiler fired w/nat. gas and #2 fuel oil	PTI# 91-04A	1964	c _
EUGENERATOR1	Caterpillar model 3516B 2250 kilowatt diesel generator set	PTI# 91-04A	10/01/2006	С
EUGENERATOR2	Caterpillar model 3516B 2250 kilowatt diesel generator set	PTI# 91-04A	10/01/2006	С
EUGENERATOR3	Caterpillar model 3516B 2250 kilowatt diesel generator set	PTI# 91-04A	10/01/2006	С
EUGENERATOR4	Caterpillar model 3516B 2250 kilowatt diesel generator set	PTI# 91-04A	10/01/2006	С

FGBOILERS

I. EMISSION LIMIT(S) – See PTI# 91-04A for complete limits

II. MATERIAL LIMIT(S) – Natural gas usage shall not exceed 390 million cubic feet per 12-month rolling time period. No 2 fuel oil usage shall not exceed 390,000 gallons per 12-month rolling time period.

• Staff did not have access to fuel usage records at the time of inspection

III. PROCESS/OPERATIONAL RESTRICTION(S) – Sulfer content limited to 0.5% by weight. Only natural gas and/or No. fuel oil shall be combusted.

• Staff did not have access to fuel supplier certification at the time of inspection

IV. RECORDKEEPING/REPORTING – Permittee shall maintain records of No. 2 fuel supplier certification which include name, statement stating that the specifications of the oil comply with ASTM D396-98 (or latest version) and sulfur content of oil.

• Staff did not have access to fuel supplier certification at the time of inspection

VI. STACK/VENT RESTRICTIONS

Stack & Vent ID	Maximum Diameter (ft)	Minimum Height Above Ground Level (ft)	Applicable Requirements
SVBOILER1R	5.0'	55.5'	40 CFR 52.21
SVBOILER2	3.6'	55.6'	40 CFR 52.21
SVBOILER3	3.6'	55.6'	40 CFR 52.21
SVBOILER4	4.5'	58.0'	40 CFR 52.21

The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.

FGGENERATORS

I. EMISSION LIMIT(S) – See PTI# 91-04A for complete limits

II. MATERIAL LIMIT(S) – No. 2 fuel oil usage shall not exceed 329,918 gallons per 12-month rolling time period. Biodiesel fuel usage shall not exceed 319,400 gallons per 12-month rolling time period.

• Staff did not have access to fuel usage records at the time of inspection

III. PROCESS/OPERATIONAL RESTRICTION(S) – Sulfer content limited to 0.5% by weight. Only No. 2 fuel oil and/or biodiesel fuel shall be combusted.

• Staff did not have access to fuel supplier certification at the time of inspection

IV. RECORDKEEPING/REPORTING – Permittee shall maintain records of No. 2 fuel and/or biodiesel supplier certification which includes name, statement stating that the specifications of the oil comply with ASTM D396-98 for fL

oil or D 6751 for biodiesel (or latest version of either standard) and sulfur content of oil.

• Staff did not have access to fuel supplier certification at the time of inspection

VI. STACK/VENT RESTRICTIONS

Stack & Vent ID	Maximum Diameter (in)	Minimum Height Above Ground Level (ft)	Applicable Requirements
SVGENERATOR1	12"	40'	40 CFR 52.21
SVGENERATOR2	12"	40'	40 CFR 52.21
SVGENERATOR3	12"	40'	40 CFR 52.21
SVGENERATOR4	12"	40'	40 CFR 52.21

The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.

SUMMARY

No violations of PTI# 91-04A were observed at the time of this inspection and the facility appears to be in compliance with the permit, however AQD staff need to establish a better relationship with MTU facility operators for faster access to fuel data and records.



Image 1(MTU1) : Boilers



Image 2(MTU2) : Boiler



Image 3(MTU3) : Boiler ID plates



Image 4(MTU4) : Boiler ID Plates



Image 5(MTU5) : Cat diesel/biodiesel generator units



Image 6(MTU6) : Cat generator set info



Image 7(MTU7) : Cat diesel/biodiesel generator set

NAME_

DATE 11 13 15

SUPERVISOR