

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

N764628092

FACILITY: SEARS HOLDINGS TECHNOLOGY CENTER		SRN / ID: N7646
LOCATION: 2240 CUNNINGHAM DR, TROY		DISTRICT: Southeast Michigan
CITY: TROY		COUNTY: OAKLAND
CONTACT: Ralph Fraga, Senior Manager of IT&G		ACTIVITY DATE: 12/22/2014
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 FCE Inspection		
RESOLVED COMPLAINTS:		

SRN: N7646

COMPANY: Sears Holdings Technology Center

COMPANY ADDRESS: 2240 Cunningham Dr.; Troy, MI 48084

PURPOSE OF INVESTIGATION: Targeted Inspection

CONTACT PERSON: Mr. Ralph Fraga, Senior Manager of IT&amp;G

COMPANY PHONE NUMBER: 248-463-1759

On December 22, 2014, AQD staff, Erik Gurshaw, conducted a targeted, unannounced inspection at Sears Holdings Technology Center located at 2240 Cunningham Dr. in Troy, Michigan. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Rules; and Permit-To-Install (PTI) Number 235-06 for three (3) diesel emergency engine generators.

Upon arriving at the facility, AQD staff introduced themselves and stated the purpose of the visit to Mr. Ralph B. Fraga, Senior Manager of IT&G (Ph: 248-463-1759; Fax: 248-463-6226; E-mail: rfraga@searshc.com). Mr. Fraga indicated that the facility operates 24 hours, 7 days a week, and employs approximately 125 people. Mr. Fraga assisted AQD staff during the inspection.

Sears Holdings Technology Center is a data processing center for Sears Holdings Corporation. Sears Holdings Corporation includes Sears, Roebuck Company, Kmart, Craftsman, Lands' End, The Great Indoors, Parts Direct, etc. The facility has two (2) floors. The first floor consists of offices and cubicles and the second floor consists of data processing equipment. The three engine generators permitted at the facility are present to provide emergency electricity to the building in the event of short or long term power outages. The emergency engine generators are all "Detroit Diesel" generators with a maximum power output of 2 MWs. PTI # 235-06 is a General Permit for diesel fuel-fired engine generators. The General Permit was issued to the company on August 8, 2006. Mr. Fraga indicated that each generator is run for 20 minutes at 900 kW once a month throughout the year. The company refers to the monthly testing as "Full Load Testing." 900 kW is the most electricity that the building can supply to any one engine during a test. 25 gallons of diesel is combusted by the engines collectively during the monthly test. Monthly testing is conducted in conjunction with monthly Preventative Maintenance (PM) of the engines performed by PM Technologies of Wixom, Michigan. No electricity produced by the engines is sold to the power grid. Other than the engine generators, there are no other processes or process equipment at the facility which emit or have the potential to emit air contaminants.

PTI # 235-06 requires the company to keep 12-month rolling records of the amount of gallons of diesel combusted in the engines and that a monitoring device is installed on the engines to monitor and record diesel usage. The permit also stipulates that the company must comply with a 0.05 by weight sulfur limit in the diesel fuel if the electricity produced by the engines is sold to the power grid. As previously discussed, the electricity produced by the engines at the facility is not sold to the power grid. Therefore, the company does not have to comply with the 0.05 by weight sulfur limit in their diesel fuel. The permit further requires the company to maintain records of the maintenance and malfunction events for the three engines and that the stacks of the engines exhaust vertically unobstructed to the ambient air. PM Technologies of Wixom, Michigan performs monthly routine preventative maintenance on the engines. AQD staff was provided with maintenance records from PM Technologies for the 2014 calendar year. AQD staff also verified that the engines' stacks exhaust vertically unobstructed to the ambient air. The company is maintaining diesel fuel usage records and a monitoring device to monitor and record diesel usage has been installed on each of the engines. Records from January 2013 through December 2014 indicate that a total of 1800 gallons of diesel was combusted in the engines (900 gallons per calendar year). This is well below the company's 12-month rolling time period diesel fuel usage limit of 136,000 gallons. The engines have not been used for emergency purposes over the past few

years.

Based on this inspection, Sears Holdings Technology Center was found to be in compliance the terms and conditions of PTI #235-06 and all other applicable air rules and regulations. PM records from PM Technologies for 2014 and diesel fuel usage records from January 2013 through December 2014 are attached to this report. It should be noted that the engines at the facility are subject to MACT Subpart ZZZZ for Reciprocating Internal Combustion Engines, but the AQD has not accepted delegation for this subpart at area sources of Hazardous Air Pollutant emissions.

NAME Erik Dvorchaw

DATE 12/22/14

SUPERVISOR CTE