

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

N812645992

FACILITY: LOWE'S HOME CENTERS, INC		SRN / ID: N8126
LOCATION: 600 EDELWEISS VILLAGE PARKWAY, GAYLORD		DISTRICT: Gaylord
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT:		ACTIVITY DATE: 08/28/2018
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled minor source inspection		
RESOLVED COMPLAINTS:		

On August 28, 2018, I inspected Lowe's in Gaylord for compliance with their minor source permit for an emergency generator. The assistant manager, Kelli Smigelski, showed me the generator. The manager, Angie Nagi, sent me some information I needed to complete the inspection.

Permit 261=08 lists the generator as a 350 KW unit manufactured by Kohler, Model 350REOZD. I saw this generator in a previous inspection in 2009. It appears unchanged from that earlier inspection.

The generator is located in a fenced area workers call "The Bullpen," behind the store just outside its walls. The generator appears to be integral with its fuel tank, built with the tank underneath the engine. The stack is closed with a flapper valve but when operating exhaust would blow this open, allowing exhaust to go unobstructed vertically upward. Height looked like about 15-20 feet with a diameter of perhaps 4 inches.

I was not able to check all permit conditions, but was able to check into the following:

Condition 1.2 limits fuel to only diesel fuel. The engine is mounted atop a fuel tank which is labeled as diesel fuel only. There are no other fuel tanks around. The only other fuel theoretically available would be natural gas, but that can't be used for two reasons: First, I couldn't see any gas line connection, and second, natural gas would require a spark ignition engine and this one is compression ignition. I conclude the engine complies with the permit condition.

Condition 1.3 sets fuel sulfur content limits if the engine sells power into the regular electric power distribution grid. Ms. Smigelski told me they don't do this, so this condition is not applicable. In my opinion I can take their word on this as selling power from a small generator like this would not be practical.

Condition 1.4 limits fuel to no more than 136,000 gallons per 12 month rolling time period. According to an email from Ms. Nagi, fuel purchases in the last 12 months have been 493 gallons on January 29, 2018, and 176 gallons on September 7, 2018, for a total of 669 gallons for the most recent 12 months. This complies with the permit condition.

Condition 1.6 limits total power to 5 MW. The generator is rated as 350 KW. This complies with the permit condition.

Condition 1.8 requires a device to record fuel use monthly. The engine does not have one. In 2009 we sent a Violation Notice for this, but decided not to pursue it. In my opinion, with fuel use as low as it is, purchase records are sufficient to show that the generator does not violate the condition limiting fuel use to 136,000 gallons per year. Therefore I will use enforcement discretion and allow the lack of a fuel measuring device to pass.

Condition 1.11 requires monthly and 12 month fuel use records. Since fuel use is so small, the existing purchase records are sufficient to satisfy this condition, in my opinion.

Condition 1.12 requires exhaust to discharge unobstructed vertically upward. The stack does have a flapper cover on its top, as is common for diesel engines. When the engine runs exhaust pressure will push this out of the way. In my opinion this arrangement does not violate the permit condition.

The engine appeared to be in good condition. Ms. Smigelski said they only use it during power failures, so the amount of wear on the engine should be low.

NAME William J. Rogers Jr

DATE 9/11/18

SUPERVISOR 