

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

P037623568

FACILITY: BANK OF AMERICA NATIONAL ASSOCIATION		SRN / ID: P0376
LOCATION: 2600 WEST BIG BEAVER ROAD, TROY		DISTRICT: Southeast Michigan
CITY: TROY		COUNTY: OAKLAND
CONTACT: Robert Deacon , Chief Engineer		ACTIVITY DATE: 11/01/2013
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2014 FCE Inspection		
RESOLVED COMPLAINTS:		

SRN: P0376

COMPANY: Bank of America National Association

COMPANY ADDRESS: 2600 W. Big Beaver Road; Troy, MI 48084

PURPOSE OF INVESTIGATION: Targeted Inspection

CONTACT PERSON: Mr. Robert Deacon, Chief Engineer with Jones Lang LaSalle

COMPANY PHONE NUMBER: 248-631-0362

On November 1, 2013, AQD staff, Erik Gurshaw, conducted a targeted, unannounced inspection at Bank of America National Association located at 2600 W. Big Beaver Rd. 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 139-12 for three (3) 1750 kW diesel emergency generators.

Upon arriving at the facility, AQD staff introduced themselves and stated the purpose of the visit to Mr. Robert Deacon, Chief Engineer with Jones Lang LaSalle (Ph: 248-631-0362; Fax: 248-643-0552; E-mail: robert.deacon@am.jll.com). Mr. William Gruzowski, General Manager with Jones Lang LaSalle (Ph: 248-631-0582; Fax: 312-260-2731; william.gruzowski@am.jll.com), joined AQD staff and Mr. Deacon halfway through the inspection. Jones Lang LaSalle has been hired by Bank of America to manage the office building housing the 3 emergency generators. The office building has the following tenants: Bank of America; Driggers; Dart; Condenast; Dickerson Wright; Caretech; United Way; Sundry (Marimax); and AT&T. Approximately 900 people are employed by these 8 companies at the location. The building is open from 8:00 AM until 6:00 PM Monday through Friday. Mr. Deacon and Mr. Gruzowski assisted AQD staff on the inspection.

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 generators are all Caterpillar Model SR-4 diesel-fueled generators with a maximum power output of 1750 kW. Mr. Deacon indicated that one hour readiness checks are conducted on each engine on a monthly basis. No electricity produced by the engines is sold to the power grid. Other than the engine generators, the facility has 6 natural gas-fired hot water boilers and 2 natural gas-fired hot water heaters. 4 of the 6 hot water boilers are Patterson-Kelly Thermific Boiler with maximum heat outputs of 1.9 MBTU/hour. The remaining 2 hot water boilers are Lochinvar Intelli-Fin boilers with maximum heat outputs of 1.5 MBTU/hour. The 2 hot water heaters are Lochinvar heaters with a maximum heat output of 190,000 BTU/hour. The 6 boilers and the 2 hot water heater boilers are exempt from Permit-To-Install (PTI) requirements pursuant Rule 282(b)(i). The facility does not have any other processes or process equipment which would produce air emissions.

PTI #139-12 sets 18.2 g/kW-hour and 3.65 g/kW-hour emission limits for NOx and CO, respectively. These limits were based on manufacturer specifications and were not required to be evaluated via stack testing. The PTI requires that diesel fuel containing less than 15 ppm (0.0015), by weight, sulfur should be burned in the generators. The facility is using #2 diesel fuel in the generators and #2 diesel fuel has a maximum sulfur content of 15 ppm. Corrigan Oil is the facility's fuel supplier, but a fuel shipment has not been received by the facility for more than 3 years. Mr. Deacon said that a fuel shipment is scheduled to be received soon and that he would make sure that this shipment meets the sulfur limits established in the PTI. The PTI sets an operational usage limit of 500 hours for each engine per 12-month rolling time period for emergency purposes. The PTI also states that each engine shall only be run for 100 hours per 12-month rolling time period for readiness testing and/or maintenance. These 100 hours count toward the 500 hours of total operational time per 12-month rolling time period. Records provided by the company indicated that the engines have not been used for emergency purposes in 2011, 2012, and 2013. Each engine has been used for times ranging from 12 hours to 26 hours for maintenance and readiness checks between 2011 and 2013. The company is maintaining 12-month rolling

usage records which show that the engines have been used less than the operational limits established in the PTI. The engines are being maintained and operated per manufacturer specifications and the facility is conducting monthly maintenance in conjunction with the monthly readiness checks performed on each engine. Each engine is equipped with a non-resettable hour meter. At the time of the inspection, Engine #1, Engine #2, and Engine #3 have been run for 492 hours, 551 hours, and 256 hours, respectively, in their lifetimes. The nameplate on each engine indicated that the capacity of each generator was 1750 kW which is below the maximum 2000 kW design capacity limit established in the PTI. AQD staff verified that the stacks for the 3 engines were approximately 16" in diameter and more than 13 feet above ground level. The stacks discharge horizontally along the southern wall of the building, but the PTI does not specify that the stacks need to discharge vertically unobstructed to the ambient air.

Based on this inspection, Bank of America was found to be in compliance the terms and conditions of PTI #139-12 and all other applicable air rules and regulations. Yearly, monthly, 12-month rolling hourly usage records are on the CD attached to this report.

NAME Erik A. Burshaw

DATE 11/5/13

SUPERVISOR CJE