

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

P046849083

FACILITY: NEWBERRY CORRECTIONAL FACILITY		SRN / ID: P0468
LOCATION: 13747 EAST COUNTY ROAD 428, NEWBERRY		DISTRICT: Upper Peninsula
CITY: NEWBERRY		COUNTY: LUCE
CONTACT: CRAIG CARRUTHERS , PHYSICAL PLANT SUPERVISOR		ACTIVITY DATE: 05/03/2019
STAFF: Michael Conklin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection to determine compliance with PTI No. 143-13.		
RESOLVED COMPLAINTS:		

Facility: Newberry Correctional Facility (SRN: P0468)
 Location: 13747 East County Road 428, Newberry, MI
 Contacts: Craig Carruthers, Physical Plant Supervisor, 906-293-6307

Regulatory Authority

Under the Authority of Section 5526 of Part 55 of NREPA, The Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

Facility Description

The Newberry Correctional Facility is located in Luce County, Michigan and is a level I security facility that holds approximately 1,108 inmates. The facility includes a physical plant building, located on the south side of the prison, that houses boilers and emergency generators.

Emission Units

The table below summarizes the emission units at this source.

Emission Unit ID	Description
EUB1	Natural gas and fuel oil fired firetube boiler with a maximum heat input capacity of 20.9 MMBtu/hr
EUB4	Natural gas and fuel oil fired firetube boiler with a maximum heat input capacity of 33.5 MMBtu/hr
EUMAIN	650 KW diesel-fueled reciprocating internal combustion emergency engine
EUPOWERHOUSE	209 KW diesel-fueled reciprocating internal combustion emergency engine

Emissions

The facility is a true minor source for criteria pollutants and hazardous air pollutants (HAPs). EUB1 and EUB4 are subject to a federal New Source Performance Standard (NSPS), 40 CFR Part 60 Subpart Dc, and thus the facility has to report its emissions to the Michigan Air Emissions Reporting System (MAERS) each year. The table below shows the facility's emissions for 2018.

Pollutant	Pounds per Year (PPY)	Tons per Year (TPY)
CO	5319.63	2.66
NOx	7288.52	3.64
PM10	548.14	<1
PM2.5	547.77	<1
SO2	51.32	<1
VOC	432.65	<1

Compliance History

The facility was last inspected on 07/15/2015 and found to be in compliance with PTI No. 143-13. No violation notices have been issued to the facility in the last five years.

Inspection

On 5/3/2019, I (Michael Conklin) conducted a self-initiated inspection on the Newberry Correctional Facility. I arrived at the facility at 1:00 PM and met with the Physical Plant Supervisor, Craig Carruthers. I explained to Mr. Carruthers that the purpose of the inspection was to ensure compliance with the facility's Permit to Install (143-13). The inspection consisted of reviewing permitted equipment and reviewing records that are maintained on-site. Emission units that are considered exempt at the source were also reviewed. A follow up email was sent to Mr. Carruthers requesting records not held on-site for the permitted emission units. Mr. Carruthers stated that no changes to the facility have occurred since the last inspection.

Regulatory Analysis

The Newberry Correctional Facility is currently subject to PTI No. 143-13 and is a minor source for all regulations. EUB1 and EUB4 are subject to 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

FGBOILERS

PTI No. 143-13 is for two boilers (EUB1 and EUB4) that can be fired by natural gas or fuel oil. EUB1 is the primary unit and EUB4 is a backup. EUB4 is currently shut down but can be brought back online as needed (SC III.2). The boilers are primarily fired with natural gas but are fired with fuel oil for 16 hours each year for testing of the alternative fuel system. There is a PLC on the wall of the boiler room that monitors the fuel flow (SC IV.2). Mr. Carruthers provided records of annual certification of boiler inspections and boiler control safety checklists (SC IX.2 and 3)

Records for the 12-month period of May 2018 – April 2019 were provided via email. The natural gas throughput was 53.97 MMCF and the fuel oil throughput was 1514 gallons (SC II.1 and 2, SC VI.2). Total NOx emissions for FGBOILERS during this time period were 16.4 tons (SC I.1, SC VI.4). The State of Michigan has a contract for their fuel oil shipments which, are ultra-low-sulfur diesel (ULSD) that contains less than 15 ppm sulfur. An attached SDS sheet from the company that delivers the fuel oil shipments is representative of the oil shipped to the Newberry Correctional Facility (SC II.3).

The following table lists equipment that is considered to be exempt at the source.

Emission Unit	Description	PTI Exemption
EUMAIN	650 KW diesel-fueled reciprocating internal combustion emergency engine	R 336.1285(2)(g)
EUPOWERHOUSE	209 KW diesel-fueled reciprocating internal combustion emergency engine	R 336.1285(2)(g)

Compliance

Based on this inspection, the Newberry Correctional Facility is in compliance with PTI No. 143-13.

NAME Michael Conklin DATE 5/10/2019 SUPERVISOR Carruthers