

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

P051442319

FACILITY: CONSUMERS ENERGY		SRN / ID: P0514
LOCATION: 4000 CLAY AVENUE SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Kathryn R. Ross, Environmental Planner		ACTIVITY DATE: 11/07/2017
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Chris Walters, Building Maintenance. Mr. Walters provided me with contact information for Todd Stites who was familiar with the maintenance aspect of the unit. I also made contact with Kate Ross, who is environmental staff for Consumers Energy.

#### FACILITY DESCRIPTION

This is the Consumers Energy Customer Service Center facility that operates one 2000 KW diesel fired emergency generator manufactured in 1999. The reciprocating internal combustion engine (RICE) operates pursuant to Opt-out Permit to Install No. 50-14. The permit contains limitations on hours of operation and on NO<sub>x</sub> and CO limits to maintain the emergency and synthetic minor status. This RICE is subject to the National Emissions Standards for Hazardous Air Pollutants in 40 CFR Part 63 Subpart ZZZZ. Due to the age of this engine, and the determination that moving it from one geographical location to another does not constitute reconstruction, it is not subject to the New Source Performance Standard located in 40 CFR Part 60 Subpart IIII. The Air Quality Division has not taken delegation of 40 CFR Subpart ZZZZ area sources and as such compliance was not evaluated as part of this inspection.

#### COMPLIANCE EVALUATION

The permit limits NO<sub>x</sub> to 12 tons per 12-month rolling time period and CO to 2 tons per 12-month rolling time period as determined at the end of each month. The emission limits are assured by the utilization of low sulfur diesel fuel and documentation from the manufacturer that the unit meets the emission limitations. This information was provided by Ms. Ross and is attached.

The permit contains limits on sulfur content limitations of 15 ppm. Ms. Ross provided a data sheet and fuel delivery certification identifying that the sulfur content is less than 15 ppm. In fact, all diesel fuel in the United States is required by the EPA to be 15 ppm sulfur or less. See attached for additional communication on the fuel sulfur content.

Mr. Walters showed me the log that is maintained for the unit, and the maintenance procedures were discussed. The facility utilizes Michigan CAT to perform necessary maintenance. The hours log was being maintained and the non-resettable hours meter indicated total unit hours were 482 hours. A review of the log sheet indicated that upon start up at this location the unit had 194 total hours.

Observation of the nameplate capacity, which per the permit is limited to 2000 kW led to a discussion about the size of this unit. The nameplate kW rating of this RICE reads: 2179 kW at 1800 rpm. Following a review of the permit application information and documents provided by Ms. Ross it is clear that the RICE onsite is the unit permitted. It appears as though the AQD put the rated electrical generator output in the permit, not the gross engine power output (faceplate) rating in the permit. While onsite I checked the model number and identification information that matched what was provided in the permit application. At this time, it is considered an AQD administrative oversight. Consumers can modify the permit to correct this if they choose to do so.


At this time, the AQD is not requiring stack testing for this emergency RICE.

The recordkeeping required by the permit was provided by Consumers and reviewed. It was found to meet the requirements. See attached for information from the manufacturer, including the emission factors that are used to demonstrate compliance with the emission limits.

During the permit application process, Consumers Energy clearly identified in the application that the RICE has two stacks. However, in the final permit, AQD only listed one stack. Upon inspection, it was found that the engine does have two identical stacks. I informed Ms. Ross of this error. At this time, it is considered an AQD administrative oversight. Consumers can modify the permit to correct this if they choose to do so.

**COMPLIANCE SUMMARY**

The Consumers Energy Customer Service Center was in compliance at the time of the inspection.

NAME 

DATE 11-16-17

SUPERVISOR 