

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

U23151315432834

FACILITY: Eyde Commercial Building		SRN / ID: U231513154
LOCATION: 4300 W. Saginaw, Lansing		DISTRICT: Lansing
CITY: Lansing		COUNTY: EATON
CONTACT: Robert Rose , Building Supervisor		ACTIVITY DATE: 11/20/2015
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-initiated compliance inspection to determine regulatory applicability for emergency engines and boilers.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author, LDO), Nathan Hude (LDO)
Personnel Present: Robert Rose, Building Supervisor (bob.rose@eyde.com)

Purpose: Conduct an unannounced, self-initiated compliance inspection by determining which federal regulations apply to Eyde's boilers and engines. There are no records on file that the Air Quality Division (AQD) has ever inspected this source in the past.

Facility Background/Regulatory Overview: Robert Rose, Building Supervisor, said the building currently owned by Eyde used to be a bank, but now sections of the building are being rented out for use as an unemployment office. N. Hude and I had decided to conduct an inspection here because N. Hude had spotted stacks, which we learned were associated with 3 generators.

Eyde currently has 3 emergency CAT 3512 generators and 2 natural gas-fired boilers.

The emergency generators are subject to the area source RICE MACT ZZZZ.

Equipment located onsite

Table 1. Emergency Generators

Engine	Hours	HP	MMBTU/hr	Fuel	PTI Exemption	Installation Date	Manufacture Date	Federal Regulation
CAT 3512 Serial #24Z00674	1463	~1522	3.8	Diesel	Rule 285(g)	~1983	7-1-1982	Area Source MACT Subpart ZZZZ
CAT 3512 Serial #24Z00675	1580	~1522	3.8	Diesel	Rule 285(g)	~1983	7-1-1982	Area Source MACT Subpart ZZZZ
CAT 3512 Serial #24Z00676	1569	~1522	3.8	Diesel	Rule 285(g)	~1983	7-1-1982	Area Source MACT Subpart ZZZZ

Table 2. Boilers

Boiler	MMBTU/hr	Fuel	Exemption.	Installation Date	Manufacture Date	Federal Regulation
Weil-Mclain CR2-6-15 Serial #088843019	1.63	Natural gas	R 282(b)(i)	unknown	1988	Exempt from Boiler MACT JJJJJ; Exempt from NSPS Subpart Dc
Weil-Mclain 6R2-G-15 Serial # 088843018	1.63	Natural gas	R 282(b)(i)	unknown	1988	Exempt from Boiler MACT JJJJJ; Exempt from NSPS Subpart Dc

Inspection: This was an unannounced self-initiated compliance inspection. At approximately 2:00 p.m. on November 20, 2015 N. Hude and I met with Bob Rose, Building Supervisor. I explained that we were there to conduct an inspection of any generators or boilers located on the property. I provided B. Rose with a DEQ "Environmental

Inspections: Rights and Responsibilities" brochure. Via email I supplied him with the new Boiler NESHAP outreach brochure for the new boiler navigation tool.

B. Rose was not able to find HP or MMBTU/hr for the 3 CAT 3512 engines. I used an online CAT 3512 generator operations manual's data to get a rough estimate on the kW, which I used to calculate HP and MMBTU/hr, as displayed in Table 1. It was determined, based on the calculated MMBTU/hr that the engines are exempt from a permit to install per Rule 285(g) for internal combustions engines that have less than 10 MMBTU/hr maximum heat input.

RICE MACT ZZZZ Emergency Engines

Eyde's 3 generators are emergency engines, as they have not operated more than 100 hours per year for maintenance checks and readiness testing. B. Rose said that each engine has only operated approximately 10 hours out of the year through November 2015 for maintenance and readiness testing. These engines are subject to the RICE MACT ZZZZ for area sources of hazardous air pollutants (HAP), based on the EPA's Stationary Reciprocating Internal Combustion Engines (RICE) regulatory navigation quiz (<http://www.epa.gov/ttn/atw/rice/output/quiz.html>); Eyde's engines are determined to be compression ignition existing stationary engines greater than 500 hp located at an area source of HAP.

Michigan currently does not have the delegated authority to enforce the area source RICE MACT ZZZZ. I have encouraged B. Eyde to also verify this determination and informed him that while the State of Michigan does not have the authority to enforce this regulation, Eyde's engines are subject to the RICE MACT and they are responsible for compliance if EPA were to ever do an inspection.

NSPS Subpart IIII

The emergency engines are not subject to this regulation because of the manufacture and construction dates.

PTI Exemption: Boilers

The two boilers are exempt from needing a Permit to Install (PTI) per Rule 282(b)(i). These units only burn sweet natural gas and are less than 50 MMBTU/hr.

Boiler MACT NESHAP JJJJJJ for area sources of HAPs (40 CFR 63 Subpart JJJJJJ)

The 2 Weil-Mclain boilers are exempt from the Boiler MACT NESHAP Subpart JJJJJJ because they are classified as "gas-fired boilers" as defined in 40 CFR 63.11237. To be considered a gas-fired boiler, the boiler must burn gaseous fuels not combined with any solid fuels and burn liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. The periodic testing of liquid fuel should not exceed a combined total of 48 hours during any calendar year. None of the boilers burn fuel oil #2.

Boiler NSPS (New Source Performance Standard) Subpart Dc (40 CFR 60 Subpart Dc)

None of the boilers located at Eyde's property are subject to the NSPS Dc because they are rated at less than 10 MMBTU/hr.

Eyde is in compliance at this time.

NAME

Michelle M. Saper

DATE

1-5-16

SUPERVISOR

B.M.