

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

B650840321

FACILITY: CLINTON VILLAGE OF		SRN / ID: B6508
LOCATION: 318 RIVER ST, CLINTON		DISTRICT: Jackson
CITY: CLINTON		COUNTY: LENAWEЕ
CONTACT: Gary Allen , Operator		ACTIVITY DATE: 06/14/2017
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled, unannounced inspection of PTI 521-77A for three (3) emergency RICE.		
RESOLVED COMPLAINTS:		

Contact

Gary Allen
Village of Clinton
Plant Operator

Matt Burk
Michigan South Central Power Agency
Director of Environmental Compliance
517-542-2346 ext. 305

Purpose

This was a scheduled, unannounced inspection of the facility located at 318 River Street, Clinton, MI 4923 at about 2:00 pm on 6/14/17. I met with Gary Allen to observe the engines located on site and to determine compliance with Permit to Install (PTI) 521-77A.

Background

The Village of Clinton has three reciprocating internal combustion engines (RICE) that are used to provide backup power to the Michigan South Central power grid during periods when peak load demands additional power. The plant does not come online very often and no longer operates to generate power for profit. These peaking units have only operated for maintenance and capacity testing in the past three years, and will likely be retired in the near future.

These engines are subject to the National Emission Standard for Hazardous Air Pollutants under 40 CFR 63, Subpart ZZZZ for RICE, a.k.a. the RICE MACT. The State of Michigan does not have delegation for area sources of this regulation.

Compliance Evaluation

I arrived at the facility initially at about 11:30, however Gary was not available at that time. I returned at about 2:00 pm and was greeted by Gary near the building the engines are housed in. Adjacent buildings included a maintenance garage for Village of Clinton vehicles and a water department well pump house. Gary and I entered the engine building where the three engines were located, none of which were operating during the time of inspection. The current PTI identifies EU-ENG-6 and FGFACILITY.

The condition in EU-ENG-6 to burn only No. 2 diesel fuel or natural gas is being met. Attached is a record of engine run hours and emission calculations based on each fuel consumed. EU-ENG-6 has run 1 hour on diesel and 2 hours on natural gas in the last 12 months.

FGFACILITY includes emission limits on NO_x and CO of 20 and 6 tons per 12-month rolling time period, respectively. The emission calculations spreadsheet shows NO_x at 0.09 tpy and CO at 0.03 tpy. None of the engines have exceeded their hours limit in Special Condition III.1 or 150 hours/yr for Engines 1 and 2, and 500 hours/yr for Engine 6. Additionally, all engines are equipped with non-resettable hours meters.

Also attached is the oil analysis record for each engine, which is an option the facility chooses to use to comply

with the RICE MACT. According to 63.6625(i) of Subpart ZZZZ engines in item 4 of Table 2d of the subpart are allowed to utilize an oil analysis program as long as they measure the following parameters: Total Base number, Viscosity, and Percent Water Content.

I left the facility at about 2:30. I contacted Matt Burk later that day to request records that he keeps on behalf of the Village of Clinton, which he then provided to me via email.

Compliance Determination

After on-site inspection and review of the required records, I have determined that the Village of Clinton is in substantial compliance with State and Federal air quality rules and regulations and special conditions of PTI 521-77A.

Recommendations

In the event the facility chooses to retire the engines located at the facility, their PTI should be voided and removed from future inspection plans.

NAME Fock Dunham DATE 6/20/17 SUPERVISOR 