

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

H587741686

FACILITY: EASTERN MI UNIVERSITY		SRN / ID: H5877
LOCATION: 812 OAKWOOD, YPSILANTI		DISTRICT: Jackson
CITY: YPSILANTI		COUNTY: WASHTENAW
CONTACT: Mark Monarch , HVAC/ R Foreman, Physical Plant		ACTIVITY DATE: 08/29/2017
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled, announced inspection of EMUs facilities and equipment including MI-ROP-H5877-2012.		
RESOLVED COMPLAINTS:		

Contact

Mark Monarch
Maintenance and Operations Manger
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Purpose

This was a scheduled, announced inspection of the facilities and equipment covered in MI-ROP-H5877-2012. I met with Mark Monarch at about 10am on 8/29/2017. Brian Carley accompanied me on the inspection.

Background

Eastern Michigan University (EMU) was granted a waiver for the installation of a new turbine cogeneration system that is set to begin operations near the beginning of the year in 2018. The installation is currently ongoing and Permit to Install (PTI) 46-17 has recently been approved by permits section. PTI 46-17 includes emission limitations on the new turbine and associated equipment that will reduce the potential to emit (PTE) significantly from equipment that has since been removed.

The last inspection was conducted in 2015, prior to the removal of the previous cogeneration unit and one of the grandfathered boilers.

Compliance Evaluation

EU-BLR4-PT005

This is the emission unit (EU) for the cogeneration system previously located on site. The equipment in this EU has been physically removed from the site.

FG-001

This is the flexible group (FG) for three grandfathered steam boilers installed prior to 8/15/1967, and therefore did not require a permit to install (PTI). Since the last inspection, EU-HP-BLR3-PT001 has been physically removed from the site. EU-HP-BLR1-PT003 and EU-BLR2-PT004 remain on site and will be used in a limited fashion once the new turbine and cogeneration unit is fully operational. The source has not changed fuel oil suppliers or type of fuel since the last inspection, which remains on file and has a sulfur content less than the limit of 0.1%.

FG-GENG/JJJJ and FG-DENG/IIII

These are the FGs for the emergency spark ignition (SI) and compression ignition (CI) internal combustion engines (ICE), respectively. EMU maintains the engines regularly with oil and filter changes along with routine startups. Non-resettable hour meters were observed at the time of inspection, all of which were well below the 100 hour limit per 12-month rolling time period for required maintenance. These engines comply with 40 CFR Part 63, Subpart ZZZZ by complying with the applicable NSPS in either 40 CFR Part 60, Subparts IIII or JJJJ.

FG-COLD CLEANERS

EMU continues to operate a cold cleaner in the maintenance area. Mark indicated that the cold cleaner operation has not changed since the last inspection, which was found to be in compliance at the time. I did not observe the cold cleaner during this inspection.

FG-RULE 287(c)

This is the FG for the small paint touch up area EMU has for routine facility maintenance. This area uses a very small amount of paint for repairs to campus signs and other miscellaneous campus-related grounds upkeep. This work area does not approach the 200 gallon per month limit.

FG-RULE 290

No emission units on campus are currently identified as using the Rule 290 exemption.

PTI 46-17

This is the Permit to Install (PTI) for the recently permitted Solar Turbine cogeneration unit. The equipment is currently being installed, with required testing being scheduled for mid-November 2017 once the unit becomes operational. This PTI contains emission limits below the threshold for requiring an ROP, but will need to be rolled into the ROP if the source does not receive an enforceable Title V opt-out permit.

Summary

After arriving at the Physical Plant, Brian and I signed in and met with Mark Monarch and Bilal Sarsour in the conference room. I briefly discussed the existing ROP and changes being made to it since it is currently in renewal and PTI 46-17 was issued after AQD received the renewal application. Several options were discussed at this time, including rolling the PTI into the new ROP or applying for a Title V opt-out permit. The opt-out appears to be relevant considering PTI 46-17 contains emission limits below Title V thresholds and permitted equipment subject to Title V has been physically removed.

Following the permitting discussion, Mark took Brian and I on a campus facility tour. We observed most of the backup generators, which appeared to be in good working order and maintained on a routine basis. During the tour we stopped by the ongoing installation of the new Solar Turbine permitted under PTI 46-17. I also observed that the previous cogeneration unit (EU-BLR4-PT005) was physically removed as was EU-HP-BLR3-PT001.

Much of the ROP is based on the operation of the heating plant, especially the now physically removed EU-BLR4-PT005, which included a NOx limit of 169.5 tons per year. PTI 46-17 includes a NOx limit of 47.74 tons per year, which is significantly less when compared to the current ROP.

Compliance Determination

After onsite inspection and review of records and required reporting, I have determined that EMU is in compliance with state and federal air quality rules and regulations and MI-ROP-H5877-2012.

Recommendations

Inspection revealed permitting actions that should be acted upon as described in the Summary above. I would recommend that facility begin to address how their facility needs are best met, either proceeding with an opt-out or submitting the necessary application forms to roll PTI 46-17 into their ROP.

NAME Jack Durbin DATE 9/27/17 SUPERVISOR [Signature]