

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

N158951071

FACILITY: LUCE COUNTY ROAD COMMISSION		SRN / ID: N1589
LOCATION: 401 W HARRIE, NEWBERRY		DISTRICT: Upper Peninsula
CITY: NEWBERRY		COUNTY: LUCE
CONTACT:		ACTIVITY DATE: 10/18/2019
STAFF: Michael Conklin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Targeted inspection for FY 20.		
RESOLVED COMPLAINTS:		

Facility: Luce County Road Commission (SRN: N1589)
Location: 423 W. McMillan Avenue, Newberry, MI

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

Luce County Road Commission (LCRC), located in Newberry, MI, operates year-round maintaining roads in Luce County. The facility operates a used oil heater to provide heat to their shop garage during winter months.

Emissions

Used oil is any oil refined from crude oil or any synthetic oil that has been used and as a result of such use is contaminated by physical or chemical impurities. Used oils include spent automotive lubricating oils, spent industrial oils, and spent industrial process oils. The definition of used oil includes oil used for the purpose of lubrication that becomes contaminated as a result of such use and residues and sludges derived from used oil.

Pollutants emitted from the combustion process of used oil include carbon monoxide (CO), sulfur oxides (SOx), nitrogen oxides (NOx), particulate matter (PM), toxic metals, organic compounds, hydrogen chloride, and global warming gases. Ash levels are higher in used oils and can cause higher emission levels of PM and trace metals than virgin fuel oils. Sulfur oxide emissions are related to the sulfur content of the fuel. Higher levels of halogenated solvents are found in used oil as well. Emissions of the organic compounds are related to the efficiency of the combustor.

Emissions Reporting

The facility is a minor source for all regulated air pollutants and is not subject to any federal New Source Performance Standards (NSPS), and thus does not have to report its annual emissions to MAERS.

Compliance History

The facility was last inspected in 2016 and was found to be in compliance with the waste oil heater. As noted from the previous inspection, the facility reports burning only waste oil that is generated on-site. Each prior laboratory test showed that waste oil was within the parameters outlined in 40 CFR Part 279 - Standards for the Management of Used Oil.

Regulatory Analysis

Luce County Road Commission is not currently subject to any Permit To Install (PTI). The facility was previously subject to PTI No. 340-87 for a dry kiln boiler and fuel supply system, but this was voided on August 17, 2010. The waste oil heater on-site is considered exempt from the requirements of a PTI per R 336.1282(2)(iv).

Inspection

On October 18, 2019, I conducted an unannounced inspection at Luce County Road Commission in Newberry, MI. I arrived at the facility and explained that the purpose of the inspection was to ensure compliance with state air quality rules and federal regulations.

Personnel in the office of the road commission stated that the waste oil heater was scrapped in the spring and is no longer in use by LCRC. The facility built a new garage that is heated with a natural gas-fired boiler rated at 800,000 Btu/hr. Waste oil is no longer being burned on-site. The natural gas-fired boiler is considered exempt per R 336.1282(2)(b)(i).

Compliance

Based on this inspection, Luce County Road Commission is in compliance with all state air quality rules and federal regulations.

NAME Michael Holm DATE 10/22/2019 SUPERVISOR EJH