

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

B195047721

FACILITY: Clinton River WRRF		SRN / ID: B1950
LOCATION: 155 N OPDYKE ROAD, PONTIAC		DISTRICT: Southeast Michigan
CITY: PONTIAC		COUNTY: OAKLAND
CONTACT: Kenneth Burch , Industrial Pretreatment Program Supervisor		ACTIVITY DATE: 02/05/2019
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Tuesday, February 5, 2019, I, Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) staff Sebastian Kallumkal conducted an annual scheduled inspection at the Pontiac Waste Treatment Plant located at 155 North Opdyke Road, Pontiac, Michigan. The purpose of the inspection was to verify facility's compliance with requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994, and the requirements of the Opt-out Permit to Install (PTI) No. 195-15A.

PTI 195-9A is an opt-out permit to limit facility's Oxides of Nitrogen (NOx) emissions to 89 tons per year (TPY). The facility has a few natural gas-fired reciprocating internal combustion engines (RICE) used as back up emergency power generators, couple of WAUKESHA RICEs, providing auxiliary power to air blowers, fueled by either digester gas (methane) or natural gas, natural gas or digester gas fired boilers, and a flare to burn off excess digester gas.

I arrived at the facility at about 1:30 PM. At the facility I met Mr. Kenneth Burch, Industrial Pretreatment Supervisor. Facility's AQD Contact, Mr. Michael Daniels, Chief, WRC Wastewater Treatment, was not available. I identified myself, provided credentials and stated the purpose of my inspection. During the pre-inspection meeting we discussed the plant operations and changes at the plant. The facility tested the emergency engines EUENGINE5 and EUENGINE6 on September 27, 2018, to verify compliance with the 40 CFR 60, Subpart JJJJ (NSPS) requirements. The facility previously submitted information to show that the two Waukesha engines, which runs the compressors for the aeration units at the East Blvd. plant and at the Auburn Plant, were not reconstructed or modified, as defined in 40 CFR 60, Subpart A.

He told me that the "Biosolids Handling and Septage Receiving Facility Project" will start in April. The digester gas flare and the digester are off for a while as part of the new project. We went through the permit requirements. He showed me the emission calculations and the fuel gas monitoring records. The emissions were miscalculated because of the error in reading the fuel meters. Kenney told me he will fix and send the records.

Pontiac Wastewater Treatment Plant is a non-industrial; publicly owned treatment works (POTW). It receives waste water from Pontiac and Sylvan Lake communities. It has two plants: Auburn Plant located at 155 N. Opdyke Road and the East Blvd. Plant located at 274 Martin Luther King, Jr. Blvd. Part of the influent (2-9 MGD) goes to the East Blvd. Plant while the 15-17 MGD goes to the Auburn Plant. The facility also has a retention basin to absorb increase in sewage flow. The waste water undergoes various treatment processes. The sludge from the wastewater is conveyed to dump truck which transfers the sludge to the aboveground drying area. The sludge (Class B Biosolids) is trucked out and farmland applied 3-4 times a year. Any run off from the sludge area is collected in the WWTP's grit tank via storm drains.

This facility has a sewage sludge incinerator which has been decommissioned (disconnected gas supply line and incinerator feed line) since May 2015. He told me that the incinerator has not been removed from the facility yet because of the cost of dismantling and relocating.

He also indicated that as part of the new digester project, the facility will be installing a couple of digester gas fueled boilers.

After the pre-inspection meeting, Mr. Brian Welch, Water Resources Recovery Supervisor II, accompanied me for an inspection of the facility. He told me that two boilers in the digester room has been dismantled and removed. We also visited the boiler in the basement. We visited the Waukesha engine which runs the compressor for the aeration unit and all the emergency engines at the Auburn Plant. The Waukesha engine is run mainly on digester gas. The compressor is mainly run by electric motors. Since the digester is shut down, the Waukesha engine is run for testing purpose only using natural gas.

Next, he took me to the East Blvd. Plant. I visited the Waukesha Engine which runs the compressors for the aeration units at this plant and the emergency engines. He told me that the Waukesha engines are not currently used except for testing. The primary motors for the aeration units are electric powered. They had installed fuel gauges for the boilers, engines and the flare. The flare is not currently being operated because they are not producing digester gas.

The emergency generators at these plants are subject to RICE MACT for area sources (40 CFR 63, Subpart ZZZZ-National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) and New Source Performance Standards (40 CFR 60, Subpart JJJJ-Standards of Performance for Stationary Spark Ignition Internal Combustion Engines).

MDEQ/AQD does not have delegated authority to verify compliance with the area source RICE MACT requirements. Therefore, the facility should direct any questions or reports related to the area source RICE MACT to EPA Region 5 office in Chicago, Illinois. In its website MDEQ/AQD has provided guidelines regarding the applicability of area source RICE MACT to various facilities. Please refer to these guidelines to verify facility's RICE MACT applicability at:

<http://www.michigan.gov/deq>, click on "Clean Air Assistance", click on "Reciprocating Internal Combustion Engines (RICE)" under "Federal Regulations" tab.

PTI No. 195-15A

FGENGINES

Any existing stationary emergency RICE located at an area source should comply with 40 CFR 63, Subpart ZZZZ and new or reconstructed stationary emergency RICE located at an area source should comply with 40 CFR 60, Subpart JJJJ.

The facility is keeping records of the hours of operation for each engine that is recorded through the non-resettable hour meter.

Compliance with 40 CFR 63, Subpart ZZZZ was not verified as MDEQ-AQD does not have delegated authority for this area source MACT.

The new emergency RICEs were tested in September 27, 2018 to verify comply with the NSPS requirements.

FGFACILITY

This flexible group includes 5 boilers, FGENGINES and the flare. Gas-fired boilers, which burn gaseous fuel not combined with any solid fuels and only burn liquid fuel during periods of gas curtailment, gas supply interruption and periodic testing up to 48 hours per year, are not covered under 40 CFR 63, Subpart JJJJJJ (6J)- Area Source Boiler NESHAP. So, these boilers are not subject to 40 CFR 63, Subpart JJJJJJ requirements.

The NOx emissions from FGFACILITY is limited to 89 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. The facility submitted records of hours operated, natural gas/digester gas usage, NOx emission calculations. The total NOx emissions for February 2018 to January 2019 were 24.3 Tons.

Conclusion:

Facility appears to be in compliance with the requirements of PTI No. 195-15A and federal standards 40 CFR 60, Subpart JJJJ for the two new emergency generators. Facility needs to verify compliance with 40 CFR 63, Subpart ZZZZ for the RICEs.

NAME Sebastiany Hallenka

DATE 2/28/2019

SUPERVISOR Joyce St