

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

B301125198

FACILITY: DETROIT THERMAL WILLIS HEATING PLANT		SRN / ID: B3011
LOCATION: 42 WILLIS ST W, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Duane Jones , Owner		ACTIVITY DATE: 05/22/2014
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM 208A
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

INSPECTED BY : Terseer Hemben, MDEQ
 PERSONNEL PRESENT :
 FACILITY PHONE NUMBER : (313)-596-0954
 FACILITY FAX :
 DATES OF INSPECTION : 5/22/2014

FACILITY BACKGROUND: DETROIT THERMAL-WILLIS HEATING PLANT

I arrived at the site of the Detroit Thermal-Willis Plant on May 22, 2014 at 0820 hours. The facility was located in the New Center area of Detroit. The plant was one of the two (2) heating plants known as the Central Heating System. This plant distributed steam to areas from downtown Detroit to the New Center Area. I observed the plant was not active. There was no activity at the site. There was no firing of boilers at the facility.

COMPLAINT/COMPLIANCE HISTORY:

Detroit Thermal-Willis Plant was never a source of citizen air quality complaints.

OUTSTANDING CONSENT ORDERS:

None

OUTSTANDING LOV'S:

The Detroit Thermal-Willis Plant was sent a violation for failing to submit a 208a registration in May 2014. The facility lost the 208a registration status for failing to register at the beginning of the year. However, the Company provided the information the plant had no plans to operate. Hence the operating status defaulted to "shut down". Communication regarding details of status is appended (Appendix A).

OPERATING SCHEDULE/PRODUCTION RATE:

The facility operated only when the temperature dropped to 10 degrees F.

PROCESS DESCRIPTION:

The Willis Heating Plant served as one of Detroit Edison's two (2) heating plants known as the Central Heating system until ownership of the property changed in 2003. The plant provided steam to the area from Downtown to the New Center area. The Willis Heating plant had seven (7) boilers: five (5) was coal fired stokers and two (2) were fired by No. 2 fuel oil.

Out of the seven (7) boilers, #4 was configured multiple cyclones as emission controls. The following boilers exhaust through the following three stacks:

Stack #1 - Boilers #1 and #2
 Stack #2 - Boilers #3, #4, and #7
 Stack #3 - Boilers #5 and #6

The Willis Heating Plant had been a standby plant, operating only when the temperature dropped down to 10 degrees F. The plant had three storage tanks for #2 fuels. The two (2) 30,220 gallon steel tanks

were empty. The main concrete tank was capable of holding 35,000 gallons. The number of customers served was at approximately 400. Detroit Thermal-Willis steam was very competitive with Michigan Consolidated Gas Company. The plant was closed down but regularly maintained.

EQUIPMENT AND PROCESS CONTROLS:

The Detroit Thermal Willis Heating plant operated only one boiler, which used multiple cyclones for emission controls.

APPLICABLE RULES/PERMIT CONDITIONS:

The Willis Heating plant was grandfathered. Boilers at this site were not operated under permits. Should the plant be re-commissioned, the AQD shall verify the conditions under which the plant will be operated.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

This facility had an ongoing fugitive dust plan. However, the fugitive dust plan was set up to curb pollution from coal processing in the plant. Coal was used to fuel the plant operation, but had been discontinued. All coal presence on the plant site had been removed since 1992. Coal bins and conveyor feeding systems were left intact and operable. The Willis heating plant had no need for fugitive dust plan.

POLLUTANT EMISSIONS:

The last emissions data received from the plant since 2002 had remained the same in MAERS report.

Pollutants	Emissions
CO	0
NOx	0
SO2	0
Ammonia	0
PM	0

EMISSIONS CALCULATIONS:

There was no basis or data to perform Emissions calculations.

FINAL COMPLIANCE DETERMINATION:

Since the Detroit Thermal – Willis Heating Plant had not been operated for the many years there was no concern for compliance associated with the facility. The ADQ would seek to evaluate its compliance status when the facility is re-commissioned. Meanwhile, the facility is determined closed and no longer conducts business at the location. The facility is in compliance with emissions requirements.

NAME *th*

DATE *5/22/14*

SUPERVISOR *W.M.*