

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

D142832984

FACILITY: Charlotte High School		SRN / ID: D1428
LOCATION: 378 State Street, CHARLOTTE		DISTRICT: Lansing
CITY: CHARLOTTE		COUNTY: EATON
CONTACT: Andy Czaika , Building and Grounds Supervisor		ACTIVITY DATE: 11/18/2015
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Self-initiated inspection to determine if a permitted incinerator was still located on the school's grounds.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Andy Czaika, Building and Grounds Supervisor (czaikaa@charlottenet.org)

**Purpose:** Conduct an unannounced, self-initiated compliance inspection by determining compliance with Charlotte High School's Permit to Install (PTI) No. 19-88I for an incinerator. There are no records on file that the Air Quality Division (AQD) has ever inspected this source in the past.

**Facility Background/Regulatory Overview:** Charlotte High School has been located at the 378 State Rd address since the issuance of PTI No 19-88I. The incinerator was permitted to be used for burning "rubbish" and "garbage." Andy Czaika is the Building and Grounds Supervisor for all Charlotte District Schools. A. Czaika showed me where the incinerator used to be located and its closed stack. PTI No. 19-88I will be voided because the equipment has been removed.

Charlotte High School currently has 5 boilers onsite (4 boilers located in the older section of the high school, and 2 in the Performing Arts Center (PAC), which services the PAC with heat) and 1 emergency generator.

**Equipment located onsite**

Table 1. Emergency Generators

Engine	HP	BTU/hr	kW	Fuel	PTI Exemption	Installation Date	Manufacture Date	Federal Regulation
Kohler	33.5	85,257	25	Diesel	R 285(g)	~2004	7/2003	RICE MACT ZZZZ

Table 2. Boilers

Boiler	MMBTU/hr	Fuel	PTI Exemption	Installation Date	Federal Regulation
LES Inc (Boiler 1) Model#F3350 Serial#03F-0806	4.035	Natural gas only used, but has capacity to burn fuel oil no. 2	R 282(b)(i)	2003	Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc
LES Inc (Boiler 2) Model#HF3350 Serial#03F-0831	4.035	Natural gas only used, but has capacity to burn fuel oil no. 2	R 282(b)(i)	2003	Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc
LES Inc (Boiler 3) Model#HF3350 Serial#03F0833	4.035	Natural gas only used, but has capacity to burn fuel oil no. 2	R 282(b)(i)	2003	Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc
LES Inc (hot water heater) Model#VWE-100H Serial#02E-9926	0.9	Natural gas only used, but has capacity to burn fuel oil no. 2	R 282(b)(i)	2003	Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc
Benchmark 2.0	2.0	Natural gas	R 282(b)(i)	2004	

					Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc
Benchmark 2.0	2.0	Natural gas	R 282(b)(i)	2004	Exempt from Boiler MACT JJJJJJ; Exempt from NSPS Subpart Dc

**Inspection:** This was an unannounced self-initiated compliance inspection. At approximately 1:40 p.m. on November 18, 2015 I met with Andy Czaika, Building and Grounds Supervisor, who accompanied me during the inspection. I explained that I was there to verify the presence (or absence) of the permitted incinerator, as well as collect data on any boilers and emergency generators which might also be located on the school grounds. I provided A. Czaika with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure, a July 2014 Permit to Install Exemption Handbook, and the Boiler NESHAP outreach brochure for the new Boiler MACT navigation tool.

PTI No. 19-88I for an IPC H-200 Incinerator

A. Czaika took me to the room where the incinerator used to be located. He showed me where the stack to the incinerator used to exit the building.

I requested on 11/30/15 that PTI No. 19-88I be voided because the incinerator has been removed from the site.

Boiler MACT NESHAP JJJJJJ for area sources of HAPs

The 4 LES Inc boilers and 2 Benchmark 2.0 boilers are exempt from the Boiler MACT NESHAP Subpart JJJJJJ because they are classified as "gas-fired boilers" as defined in 40 CFR 63.11237. To be considered a gas-fired boiler, the boiler must burn gaseous fuels not combined with any solid fuels and burn liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. The periodic testing of liquid fuel should not exceed a combined total of 48 hours during any calendar year. None of the boilers burn fuel oil #2, although there is a gallon per hour rating for oil on the nameplate for the LES Inc boilers.

Boiler NSPS (New Source Performance Standard) Subpart Dc (40 CFR 60 Subpart Dc)

None of the boilers located at Charlotte High School are subject to the NSPS because they are rated at less than 10 MMBTU/hr.

RICE MACT ZZZZ Emergency Engines

Charlotte High School has 1 emergency generator.

Using the EPA's Stationary Reciprocating Internal Combustion Engines (RICE) regulatory navigation quiz (<http://www.epa.gov/ttn/atw/rice/output/quiz.html>), the Kohler engine is determined to be an existing emergency compression ignition engines less than 500 HP at an area source of HAP, constructed before June 12, 2006.

Michigan currently does not have the delegated authority to enforce the area source RICE MACT ZZZZ at this time. I have encouraged A. Czaika to also verify this determination and informed him that while the State of Michigan does not have the authority to enforce this regulation, Charlotte High School's engine is subject to it and they are responsible for compliance.

Charlotte High School is in compliance at this time.

NAME M. Kelly Kaptos

DATE 1-15-16

SUPERVISOR D. M.