

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

M478539984

FACILITY: AT&T		SRN / ID: M4785
LOCATION: 445 STATE ST, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Julianne Barnum , Area Manager EH&S Air Team		ACTIVITY DATE: 05/26/2017
STAFF: Katherine Koster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY2017 Targeted Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection

INSPECTED BY: Katie Koster, AQD

PERSONNEL PRESENT: Tommy Johnson, Field Support – Michigan Market Corporate EH&S (lead)

FACILITY PHONE NUMBER: 313.212.3366

FACILITY BACKGROUND

AT&T has three locations in downtown Detroit where it operates several emergency generators to support network equipment and building services. The locations are 445 State Street, 1365 Cass Street, and 444 Michigan. They are all under one SRN and are treated as a single stationary source.

COMPLAINTS

No complaints have been received against the facility.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING LOVs/COMPLIANCE HISTORY

The prior inspection in 2016 revealed several noncompliance issues and resulted in two violation notices.

The first violation notice was issued on October 20, 2016, and involved failure to maintain fuel supplier certification records or fuel sample test data for each delivery of diesel fuel oil, failure to notify the AQD in writing within 30 days of completion of the installation activity for each engine, and failure to submit a notification to AQD specifying whether each engine will be operated in a certified or non-certified manner within 30 days of initial startup of each engine. Notifications were subsequently submitted.

The facility claimed that they had not received any recent shipments of fuel and could not locate the documentation. As such, AQD explained that sampling needed to occur to ensure the fuel was compliant with the sulfur limits. Sampling of fuel in each of the tanks (8 total) occurred on 2/27/17. AQD was present during a portion of the sampling. I arrived at 9 a.m. and by 1 p.m. only two samples had been obtained. I obtained a split sample of both (from the two tanks at 445 State) and then I left the facility to conduct other activities. Results from AT&T are attached. Results from 445 State indicate a sulfur content of .00074% (7.4 ppm) and .00454% (45.4 ppm). While the .00454% is above the NSPS limit of .0015% (15 ppm) which is also listed in the permit, the facility submitted attached documentation along with the NSPS language itself that fuel received prior to October 1, 2010 can be depleted even if it

is not in compliance with the 15 ppm if no other fuel is received (paraphrased; see 40 CFR 60.4207). Facility claims that based on tank level measurements starting in 2009, they have determined that no fuel has been received. The UARs for the PTI requirement are from the NSPS and Rule 402 (which is a 0.3% by weight limit which the fuel meets).

The remaining 6 tanks all had fuel above the NSPS limit of 15 ppm and the PTI 103-08 limit of 0.05% by weight (500 ppm). Note, the generators covered in PTI 103-08 (Cass Ave. location) are not subject to the NSPS but the generators at 444 Michigan are subject. Fuel sampling results indicated that fuel ranging from 0.06% and 0.13% sulfur by weight is in use. Based on information provided by AT&T, the generators located at 1365 Cass Avenue utilize fuel from any of these six tanks and are therefore, out of compliance with PTI 103-08.

AT&T corporate office in Texas (Ms. Julianne Barnum, 214-741-0270) called AQD and requested a "waiver" to continue to burn the noncompliance fuel. AQD responded that a waiver would not be issued. The company also questioned where the 0.05% was from; I explained the R402 limits which is one of the UAR's and also found a part of the permit application from AT&T where they proposed to use fuel at 0.05% by weight which is the most likely reason it is in the permit (attached).

A violation notice was issued for the sulfur exceedances on April 20, 2017. The response was received on May 11. Facility decided to drain the tank and replace the fuel with "ultra-low sulfur diesel that meet the .05% sulfur by weight requirement." Since the term ULSD means diesel not exceeding 15 ppm by weight, AQD is interpreting this to mean that the sulfur content will not exceed 15 ppm since the engines at 444 Michigan Avenue are subject to the 15-ppm limit with the receipt of more fuel. The target for completion is August.

INSPECTION NARRATIVE

AQD inspector, Katie Koster, arrived at AT&T on May 26, 2017 at 9:30 a.m. and was met by five AT&T employees. The lead contact was Mr. Tommy Johnson, Field Support – Michigan Market Corporate EH&S. I explained the reason for my follow up visit was that noncompliance issues were discovered during the prior inspection last fiscal year and that prompted AT&T's inclusion in the targeted inspection list for this fiscal year. I was accompanied about the site by AT&T staff and viewed the generators, and associated nameplates, run logs, and hour clocks at each of the three locations.

First, we viewed generators at 444 Michigan (a.k.a. the Headquarters Building). Hour readings were:

B1 – 49.9

B2 – 60.1

TP (telephone power - runs network equipment in the building) – 69.6. Run on 4/26/17 for 5 hours due to a power failure

LS (life/safety) – 38.9

All generator logs, except for TP, stated that they had not been run since February 8 (due to sulfur in fuel issue). Log readings matched the reading on the non-resettable hour meter. I checked the nameplates and they were as noted: B1, B2, and TP were all rated at 2250 kW. This matches the information in the permit. The LS generator was 750 kW. 750 kW converts to 2.56 MMBTU/hr output; assuming 30% efficiency converts to 8.5 MMBTU/hr input. Installation dates are 2016 for the LS and 2012 for the other three.

Next, we proceeded to the Cass location where the generators are in the basement. Hour readings were:

Engine 1 – 334.5

Engine 2 – 296.3

Log readings matched the reading on the non-resettable hour meter. All generator logs stated that they had not been run since February 15 (due to sulfur in fuel issue). I checked the nameplates and they were as noted: Both engines were 1250 kW and matched information in the permit.

Finally, we went to 445 State. Generators are on the first floor. Hour readings were:

GA – 136.3

GB – 151.9

The most recent run was 5/10/17. These generators have been run since February as the fuel is compliant for use.

Log readings matched the reading on the non-resettable hour meter. I checked the nameplates and they were as noted: Both engines were 1250 kW and matched information in the permit.

According to personnel, no other generators are on site. Tanks with non-compliant fuel are being completely drained and cleaned. The total amount of fuel to be drained is approximately 60,000 gallons.

APPLICABLE RULES/PERMIT CONDITIONS

The generators are operating under the following permits:

153-10A: Two 1,500kW diesel fired emergency generators manufactured in 2010, EUMI4290A and B. Located at 445 State Street. Subject to NSPS IIII and RICE MACT but the RICE MACT only requires compliance with NSPS.

85-12: Three 2,250 kW diesel fired emergency generators manufactured in 2007 and installed in 2012. Located at 444 Michigan Avenue. Subject to NSPS III. One "exempt" emergency life safety generator is in the process of being installed. It is 750 kW.

103-08: Eight generators (six combustion turbine powered and two RICE powered) that encompasses all three locations (1365 Cass, 444 Michigan, and 445 State Streets). However, based on the other more recent permits above, it appears that only the information for the equipment at the Cass location is correct; two 1250 kW emergency distillate oil fired engines. The 3 combustion turbine powered generators at 444 Michigan were taken out of service in 2015 according to AT&T and this site is operating under PTI 85-12. The other three, at 445 State, are not in use as they were not presented during the inspection. State Street has two generators operating under 153-10A.

I viewed the presence of an hour clock on all of the generators. In the control room, there was a handwritten run log for each engine. The engines are maintained by an outside contractor which was not on site at the time. Reasons for running are documented in the log. None of the engines with the fuel issues have been operated since February. IN COMPLIANCE. PTI 153-10A, S.C. IV.1, VI.3; PTI 85-12, S.C. III.1 and 2, S.C. IV.4, S.C. VI 3; PTI 103-08, EU-DTRMIBH07 and 08, S.C. 7.4, S.C. 7.8, S.C. 7.11 and 8.4, 8.8, 8.11.

Documentation of sulfur content in fuel has been provided based on the February 2017 sampling that was conducted and is attached to this report. IN COMPLIANCE. PTI 153-10A S.C.VI.4; PTI 85-12, S.C. VI.4; PTI 103-08, EU-DTRMIBH07 and 08, S.C. 7.9 and 8.9.

PTI 153-10A, S.C. II.1 IN COMPLIANCE. Fuel is required to be below 15 ppm by weight sulfur at 445 State. One tank is and one tank is not. However, according to facility, fuel was obtained before October 2010

and no additional fuel has been received so the NSPS IIII allows for depletion of the non-compliant fuel provided no additional fuel is accepted. Cetane index and maximum aromatic content were not evaluated.

PTI 85-12, S.C. II.1 IN COMPLIANCE. Fuel is required to be below 15 ppm by weight sulfur at 445 State. All six tanks are not. However, according to facility, fuel was obtained before October 2010 and no additional fuel has been received so the NSPS III allows for depletion of the non-compliant fuel. Cetane index and maximum aromatic content were not evaluated.

As the UAR's for these conditions are from the NSPS and R402, which has not been exceeded (0.3% sulfur), the NSPS exception is allowable at this time.

PTI 103-08, S.C. 1.3 IN COMPLIANCE. Company was cited for burning non-compliant fuel at the Cass location in April 2017. These generators have a fuel sulfur limit of 0.05% by weight and are not subject to the NSPS. No fuel has been burned since February 2017. Corrective action plan to drain tanks and replace fuel has been submitted so at this time, the violation does not appear to be on going and compliance was chosen.

Maintenance records were provided as a result of the October 20, 2016 VN and appear to be sufficient. It appears that maintenance activities are scheduled on a yearly basis. During this follow up inspection, it was stated that no other significant maintenance activities have yet to occur since the prior record that was already provided (attached). IN COMPLIANCE. PTI 153-10A, S.C.III.3; PTI 85-12, S.C. III.3; PTI 103-08, EU-DTRMIBH07 and 08, S.C. 7.10 and 8.10.

Engine emission certification was provided for the generators at 444 Michigan Avenue (750 kW and the three 2,250 kW) and 445 State and is in the facility file. It does not appear that the Cass engines need a certification because they are older and regulated under the RICE MACT as opposed to an NSPS. IN COMPLIANCE. PTI 153-10A, S.C.VI.2; PTI 85-12, S.C. VI.2.

In response to the October 20, 2016 VN, notification of when the engines were installed and/or if they were going to be operated in a certified or non-certified manner were submitted and are in the facility file. IN COMPLIANCE. PTI 153-10A, S.C.VII 1 & 2; PTI 85-12, S.C. VII.1.

NSPS/MACTS/NESHAPS

Engines are subject to the RICE MACT and NSPS IIII. As AQD has not accepted delegation for these regulations, I did not fully/comprehensively assess compliance with them unless the conditions were in the PTIs. Cass Avenue engines are subject to the RICE MACT. All other engines are subject to the NSPS IIII by way of the RICE MACT. The 750 kW LS generator installed in 2016 appears to be exempt from permitting under Rule 285(2)(g). 750 kW converts to 2.56 MMBTU/hr. output; assuming 30% efficiency converts to 8.5 MMBTU/hr. input.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS

N/A. All surfaces around these building are paved.

MAERS REPORT REVIEW

Facility is no longer reporting to MAERS. It was designated as a true minor in 2011. Telephone notes are in the facility file between Ms. Mina McLemore and the facility and their consultant. Also, at this time,

AQD is not requiring Cat II fees or MAERS for NSPS IIII or JJJJ subject equipment or Cat III fees and subsequent MAERS report for RICE MACT subject equipment if that is the sole reason for AQD's interest in the source.

FINAL COMPLIANCE DETERMINATION

Facility has submitted a plan to replace all fuel with compliant fuel by August and has not run the generators in the meantime. See violation notice response dated May 10, 2017. Facility appears to be in compliance with other conditions evaluated in this report. At this time, compliance status was chosen.

NAME Katie [Signature]

DATE 6/9/17

SUPERVISOR W.M.