

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

N535250295

FACILITY: City of Portland Light and Power		SRN / ID: N5352
LOCATION: 723 East Grand River Avenue, PORTLAND		DISTRICT: Grand Rapids
CITY: PORTLAND		COUNTY: IONIA
CONTACT: John Hyland ,		ACTIVITY DATE: 08/29/2019
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: The purpose of this inspection was to determine compliance with Permit to Install Number (PTI) 353-94A and other applicable Air Quality Rules and Regulations.		
RESOLVED COMPLAINTS:		

On Thursday August 29, 2019 Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) staff Kaitlyn DeVries (KD) and Scott Evans (SE) conducted an unannounced, scheduled inspection of the City of Portland Board of Light and Power. The purpose of this inspection was to determine compliance with Permit to Install Number (PTI) 353-94A and other applicable Air Quality Rules and Regulations.

KD and SE arrived on site shortly before 11:00 am and met with Mr. Jon "Mike" Hyland who accompanied them on a tour of the facility.

Facility Description:

The City of Portland Board of Light and Power (Portland) is an electric generating facility comprised of three (3) engines, two (2) of which are dual fuel and one (1) is natural gas only. The facility is a peaking station but does not regularly run. None of the engines were operating at the time of the inspection.

Regulatory Analysis

The facility is a Synthetic Minor source of Nitrogen Oxides and is currently operating under Opt-Out PTI No. 353-94A. The engines are also subject to the provision of the area source requirements for the National Emissions Standards for Hazardous Air Pollutants 40 CFR Part 63 Subpart ZZZZ for Reciprocating Internal Combustion Engines.

Compliance Evaluation

PTI No. 353-94A is for three (3) engines:

EUENGINE3 – a 1000 kW dual fuel engine

EUENGINE4 – a 820 kW diesel engine

EUENGINE5 – a 2000 kW dual fuel engine.

All three (3) engines are permitted under FGENGINES.

The nitrogen oxides (NO_x) emissions from FGENGINES is limited to 80 tons per year (tpy) based upon a 12-month rolling time period. While Mr. Hyland did not have the current 12-month rolling emissions available, he had the 2018 Michigan Air Emissions Reporting (MAERS) data available. He also indicated that the engines were last ran on July 11, 2019 for one (1) hour for MISO and had not ran prior to that since the compliance testing in 2018. KD told Mr. Hyland that while the engines are not running, he should still keep the records in accordance with the requirements of the permit. MAERS emission data shows NO_x emissions for 2018 were 27505.60 pounds (13.75 tons). The engines were tested on June 29, 2018 to demonstrate compliance with the NO_x emission limits, establishing emission factors to be utilized for EUENGINE4 and EUENGINE5, as per the footnote for PTI No. 353-94A FGENGINES Special Condition 1.1a.

Mr. Hyland provided records (reviewed on site) for the sulfur content of the diesel fuel used, and the records indicated the it is ultra-low sulfur diesel (ULSD), which has a sulfur content of below the allowed 0.5 percent by weight. Diesel fuel usage is limited to 159,390 gallons per 12-month rolling time period. MAERS records show a total of 400 gallons used during calendar year 2018, and as previously indicated, Mr. Hyland noted the engine have only ran for one (1) hour thus far in 2019. MAERS records indicate calendar year 2018 natural gas usage at 9.6 MMSCF, which is below the allowed 47.085 MMSCF, per 12-month rolling time period.

Stack dimensions were not explicitly measured during this inspection.

Also, during the 2018 testing, the engines were tested to demonstrate compliance with the emissions requirements of 40 CFR Part 63 Subpart ZZZZ. The results indicated a CO reduction ranging from 82.91%-95.52%; Portland has also successfully been submitting the Subpart ZZZZ Compliance reports.

Portland also has one (1) cold cleaner that is exempt from rule 201 permitting under Rule 281(2)(h).

Compliance Determination

Based on the observations made during the inspection and a subsequent review of the records it appears as if the City of Portland Board of Light and Power is in compliance with PTI No. 353-94A.

NAME Kaelyn DeWitt DATE 9/10/19 SUPERVISOR [Signature]