

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

N600052142

FACILITY: HOLLAND BOARD OF PUBLIC WORKS		SRN / ID: N6000
LOCATION: 85 E SIXTH ST, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Trista Gregorski, Environmental Regulatory Specialist		ACTIVITY DATE: 01/09/2020
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 (PTI) Numbers 133-74 and 133-74A.		
RESOLVED COMPLAINTS:		

On Thursday January 9, 2020 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 Holland Board of Public Works' Sixth Street facility, located at 85 E. Sixth Street, Holland Michigan. The purpose of this inspection was to determine compliance with permit to install (PTI) Numbers 133-74 and 133-74A.

KD and SE had met with Ms. Trista Gregorski, Environmental Regulatory Specialist, and the Holland Board of Public Works Holland Energy Park facility prior to going over to this facility to conduct an inspection.

### Facility Description

This location Holland Board of Public Works (HBPW) is composed of one (1) 20 MW oil-fired combustion turbine. The facility had historically been used for a black start for the now decommissioned James DeYoung Coal fired power plant. The facility itself is comprised of the turbine, and two (2) 95,000-gallon fuel storage tanks. Only one of the tanks is still in use, the other one is labeled empty, and is no longer in use.

The unit was not in operation at the time of the inspection, and according to records, and Ms. Gregorski, the unit is only operating for readiness testing purposes. Ms. Gregorski also indicated that HBPW is considering decommissioning this unit entirely, however, no formal decision has been made.

### Regulatory Analysis

The facility is currently operating under two (2) PTI's; PTI No's 133-74 and 133-74A. The source was formerly registered as a Rule 208a source, but upon recession of that rule it obtained opt-out limits and an opt-out PTI. The turbine is also subject to the 40 CFR Part 63 Subpart ZZZZ for Reciprocating Internal Combustion Engines for area sources.

### Compliance Evaluation

The special conditions located in PTI No. 133-74 are only no visible emissions, operating at noise levels that are satisfactory, and no changes to the National Ambient Air Quality Standards (NAAQS) as a result of the operation of the unit. Ottawa county is considered in attainment for all NAAQS, therefore, there is no indication of any deterioration of the air quality as a result of the operation of this unit.

The issuance of PTI No 133-74A, in 2014 was due to the changes in the rules rescinding Rule 208a and the facility then obtaining an Opt-out PTI for Nitrogen Oxides and Green House Gases (GHG's). It should be noted that the issuance of PTI No. 133-74A stated that PTI No. 133-74 remained active.

Emissions from the facility are limited to 16,000 tons per year (tpy) for CO<sub>2</sub>e and 50 tpy for NO<sub>x</sub>, both based upon a 12-month rolling time period. Based upon the records, the 12-month rolling CO<sub>2</sub>e emissions as of December 2019 were 51.74 tons and the 12-month rolling NO<sub>x</sub> emissions were 0.257 tons. The reported emissions are consistent with what has been reported to MAERS.

Number 2 Fuel usage at the facility is limited to 1,217,518 gallons per year, based upon a 12-month rolling time period. Records indicate a 12-month rolling usage of 6,251 gallons. The tanks that store the fuel are exempt from Rule 201 permitting under Rule 284(2)(d).

While the turbine is subject to 40 CFR Part 63 Subpart ZZZZ, AQD does not currently have delegation for this area source MACT.

**Compliance Determination**

Based on the observations made during the inspection and a subsequent review of the records it appears as if Holland Board of Public Works is in compliance with PTI No. 133-74 and 133-74A.

NAME Kaitlyn Dubois

DATE 4/15/2020

SUPERVISOR 