

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

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| FACILITY: MICHIGAN BELL TELEPHONE COMPANY, DBA AT&T MICHIGAN | | SRN / ID: N8013 |
| LOCATION: 54 N MILL ST, PONTIAC | | DISTRICT: Warren |
| CITY: PONTIAC | | COUNTY: OAKLAND |
| CONTACT: Antone Boyer , Manger Network Services | | ACTIVITY DATE: 08/30/2023 |
| STAFF: Robert Joseph | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Scheduled inspection of engine generator operating facility | | |
| RESOLVED COMPLAINTS: | | |

On August 30, 2023, I, Michigan Department Environment, Great Lakes, and Energy-Air Quality Division staff, Robert Joseph, conducted a scheduled inspection of Michigan Bell Telephone Company, d/b/a AT&T Michigan (SRN: N8013) also referred to as "the facility," located at 54 North Mill Street, Pontiac, Michigan. The purpose of the inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; and the Michigan Department Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, and conditions of the facility's Permit to Install (PTI 171-19).

General Facility Information

The facility is classified as a minor source and currently operates three small exempt boilers for space heating, and two diesel fuel-fired engine generators for backup power during electrical outages. Both generators are exempt from 40 CFR 60 Subpart IIII – NSPS Compression Ignition Internal Combustion Engines since they were manufactured prior to April 2006 (manufactured in 2004), and from 40 CFR 63 Subpart ZZZZ since the facility is a minor source for HAPs. Both engines meet the purpose of emergency engines as defined in 49 CFR 63.6640(f), however, since one of the engine generators was relocated to this facility it triggered a PTI per Rule 201.

Background Information

The facility received a violation notice (VN) on September 19, 2022, after an AQD site inspection revealed unsatisfactory recordkeeping of the facility's permit and the failure of the facility to notify the AQD in writing of the relocation of the generator (PNTCMIMN03) as required. The facility failed to provide a satisfactory response regarding the VN and was issued a 2nd VN on October 19, 2022. The facility ultimately provided the satisfactory requested records on October 19, 2022, as well as a satisfactory response to the VNs on November 3, 2022, via Liz Welch, AT&T Regional Manager, in the Dallas, TX office.

The permit was issued to Richard Martin, Network Operations Manager, however, in my correspondence exchange with Mr. Martin prior to this scheduled inspection he stated his division no longer has oversight of the generator. Mr. Martin was not very cooperative, therefore, I informed him that a VN would be issued if access to the facility was not granted on the day of the unannounced inspection given that staff may not be at the site. After speaking with several AT&T staff members nationwide, I was introduced to Antone Boyer, Manager Network Power Services. He stated that he would assist me upon arrival that afternoon. I contacted him prior to my arrival on the unannounced day.

Facility Tour

I arrived onsite shortly after 1 p.m. and met with Isaac, Power Operations Technician. I introduced myself, presented my credentials, and stated the purpose of my visit. Isaac indicated the facility operates daily with only a handful of employees on-site as most staff work remotely. He indicated that the engine generator only operates during electrical outages and during monthly testing. The engine is a Caterpillar 4CPXL58.6ERK, Model 3512, with a 1,818 horsepower referenced as EU-PNTCMIMN03.

PTI: 171 -19

GENERAL CONDITIONS

There were no concerns regarding these conditions at the facility. No visible emissions were observed, no malfunctioning equipment, and no modifications of the facility's equipment was observed

EU-PNTCMIMN03

I. EMISSIONS LIMITS

There are no applicable emission limits for this emission unit.

II. MATERIAL LIMITS

Based on the Material Safety Data Sheet and Fuel Supplier Certification Record for the most recent diesel fuel purchase on July 13, 2022, the fuel has a sulfur content of 0.0015% by weight with a cetane index of 40. The fuel is labeled as Ultra Low Sulfur No.2 Diesel.

III. PROCESS/OPERATIONAL RESTRICTION(S)

Per facility operating records, the engine generator has operated for 20 hours per the 12-month rolling time period since the AQD's last inspection visit in August 2022.

IV. DESIGN/EQUIPMENT PARAMETER(S)

The engine is equipped with a non-resettable meter to track the operating hours of the engine. The engine has operated for 424 hours since its manufacture date. The nameplate (ID# CAT00000VCMJ00875) references the engine model (3512), year (2004), and power rating (1,250 kW).

V. TESTING/SAMPLING

There are no applicable testing requirements for this emission unit.

VI. MONITORING RECORDKEEPING

The facility did not have the 12-month rolling time operating totals of the engine generator readily available upon request. Antone was informed of this and told that given the transfer of the responsibility from the AT&T operations team to the power team, that as a courtesy a VN will not be issued again at this time. I informed him that Liz had previously indicated

that staff would be trained to provide these records upon request. I informed Antone that the AQD would allow an additional day to provide 12-month rolling totals and that failure to do so during the next inspection will result in a VN to be issued. The facility submitted the records request and the December 2022 and August 2023 12-month rolling totals are 25.6 hours and 20 hours, respectively.

The fuel supplier certification record provided the most recent fuel purchase on July 13, 2022, which included the name of the oil supplier (Hightowers Petroleum), sulfur content (0.0015% by weight), and a cetane index of 40.

VII. REPORTING

The facility failed to provide a written notification to the AQD within 30 days after completing the relocation of the engine generator (EU-PNTCMIMN03) as previously stated, but ultimately provided one on November 3, 2022. Records indicate operation began on January 15, 2020 began with the emission unit.

VIII. STACK/VENT RESTRICTION(S)

There did not appear to any obstructions relating to the emissions via the stack.

Conclusion

Based on the AQD inspection and records review, the facility has improved its recordkeeping requirements, however, the facility did not have the 12-month rolling operational totals available upon request. The facility will be documented as non-compliant, however, a VN will not be issued at this time given the responsibility change regarding oversight of the generator. Should the records continue to not be readily available upon request it will result in future VNs to be issued. Therefore, the Michigan Bell Telephone Company d/b/a AT&T is not in compliance with the aforementioned requirements and the conditions of the facility's PTI 171-19.

NAME Robert Joseph

DATE 09-25-23

SUPERVISOR Joyce