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

P048744170

FACILITY: XEROX BUSINESS SERVICES		**SRN / ID:** P0487
LOCATION: 5225 Auto Club Drive, DEARBORN		**DISTRICT:** Detroit
CITY: DEARBORN		**COUNTY:** WAYNE
CONTACT: Brian Daley , Engineer		**ACTIVITY DATE:** 04/20/2018
STAFF: Jorge Acevedo	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

COMPANY NAME :Xerox Business Services
FACILITY ADDRESS :5225 Auto Club Drive, Dearborn, MI 48126
STATE REGISTRAT. NUMBER :P0487
SIC CODE :
EPA SOURCE CLASS : B
EPA POLLUTANT CLASS : O
LEVEL OF INSPECTION : PCE
DATE OF INSPECTION : 4/20/18
TIME OF INSPECTION :1:30 PM
DATE OF REPORT : 4/23/18
REASON FOR INSPECTION : Scheduled Inspection.
INSPECTED BY : Jorge Acevedo
PERSONNEL PRESENT :Patrick Whitton
FACILITY PHONE NUMBER :
FACILITY FAX NUMBER :

FACILITY BACKGROUND:

- The facility is a data recovery facility that allows its clients to operate back up IT systems in the event that their computer systems fail or disrupt.
- To insure that the facility is powered at all times, the facility installed diesel powered generator at the above location in May, 2014.
- The above generator is a Caterpillar 1,050 kw Emergency Power Diesel Fuel-Fired Engine Generator. According to the Eval Forms of the PTI, the Emission Unit (generator) is not subject to PSD, and the emissions of the air pollutants are not over 90% of any triggering significance.
- The facility is not subject to MAERS.
- The facility runs the generator for testing purposes on a monthly basis.

INSPECTION NARRATIVE:

On April 20, 2018, I conducted a Scheduled Inspection at Xerox Business Services (facility), located at 5225 Auto Club Dr., Dearborn, Wayne County. The purpose of the inspection was to determine the facility's compliance with Federal and State Air Acts, the Michigan Department of Environmental Quality, Air Quality Division (DEQ-AQD) rules, and the conditions of General Permit to Install No. 182-13. Mr. Patrick Whitton, represented the facility during the inspection. The facility was previously inspected in 2014. Xerox was purchased by ATOS in December 2014. The transaction was completed in June 2015. I explained to Mr. Whitton the purpose of the inspection. The emission unit of concern was the emergency generator which was installed in 2014. Mr. Whitton explained that Mr. Brian Daley was responsible for the records, but he was out of the office. I explained that I would follow up with Mr. Daley for the records in the next couple of days. Mr. Whitton accompanied me to the back of the building where the generator was installed. At the time of the inspection, the generator was not operating. Mr. Whitton explained that the generator runs every month to make sure it is still serviceable. I asked for the hour meter, and Mr. Whitton showed where it was located on the generator.

At the time of the inspection, the hour meter read 75.2 hours, which was how long it has run since it was installed in 2014. There was a 4000 gallon tank for diesel storage. Mr. Whitton explained that they receive periodic shipments because of the fact that the generator runs infrequently. I left the facility at 2:45PM.

COMPLAINT/COMPLIANCE HISTORY:
There have been no complaints against Xerox Business Services.

OUTSTANDING CONSENT ORDERS:
None
OUTSTANDING LOVs
None

OPERATING SCHEDULE/PRODUCTION RATE:

Xerox Business Services operates 24 hours a day, seven days a week.

APPLICABLE RULES/PERMIT CONDITIONS:

Xerox Business Services has an emergency generator which is subject to the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines.

Xerox Business Services has one permit issued to it:

182-12- Issued January 28, 2014.

The following conditions apply to: EU-EG02-

DESCRIPTION: A 1,500 kilowatts (kW) [2,010 bhp] Caterpillar model 3512C ATAAC diesel-fueled emergency engine manufactured in 2013. The engine is a 16 cylinder four stroke lean burn compression ignition engine with a 51.8 liter total engine displacement (3.24 liters/cylinder). The engine was manufactured in 2013 and was ordered in 2013.

POLLUTION CONTROL EQUIPMENT: N/A

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Compliance Determination
1. NMHC + NOx	6.4 g/kW-hr	Test Protocol*	EU-EG02	Compliance- Certificate of Conformity was received during records request.
2. CO	3.5 g/kW-hr	Test Protocol*	EU-EG02	Compliance- Certificate of Conformity was received during records request.
3. PM	0.20 g/kW-hr	Test Protocol*	EU-EG02	Compliance- Certificate of Conformity was received during records request.
*Test Protocol shall determine averaging time.				

II. MATERIAL LIMITS

1. The permittee shall burn only diesel fuel, in EU-EG02 with the maximum sulfur content of 15 ppm (0.0015 percent) by weight. (R 336.1205(1)(a) & (3), R 336.1402(1), 40 CFR 60.4207, 40 CFR 80.510(b))

Compliance- Fuel delivery records were received. Ulta-low Sulfur Diesel is being combusted in the generator. Ultra-Low Sulfur Diesel is defined as diesel fuel containing 15 ppm (0.0015 percent) by weight sulfur in the fuel.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EU-EG02 for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month, including the hours as specified in SC III.2. (R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))

Compliance- Total hours operated were 75.2 hours since start up in 2014.

2. The permittee may operate EU-EG02 for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. EU-EG02 may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply non-emergency power as part of a financial arrangement with another entity. (40 CFR 60.4211)

Compliance- Total hours operated were 75.2 hours since start up in 2014.

3. If the permittee purchased a certified engine, according to procedures specified in 40 CFR Part 60 Subpart IIII, for the same model year, the permittee shall meet the following requirements for EU-EG02:
   a) Operate and maintain EU-EG02 and control device according to the manufacturer's emission-related written instructions,
   b) The permittee may only change those settings that are permitted by the manufacturer. If you do not operate and maintain the engine and control device according to the manufacturer's emission-related written instructions, the engine must demonstrate compliance as specified in SC III.4, and
   c) Meet the requirements as specified in 40 CFR 89, as it applies to you.
   (40 CFR 60.4211(a))

Undetermined-It appears that the engine is maintained, it was not confirmed whether the engine was being maintained according to manufacturer's instructions.

4. If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan for EU-EG02 and shall, to the extent practicable, maintain and operate each engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 60.4211(g)(3))

NA- Engine is certified.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip and maintain EU-EG02 with non-resettable hours meters to track the operating hours. (R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 60.4209)

Compliance- Engine is equipped with non-resettable hours

2. The nameplate capacity of EU-EG02 shall not exceed 1,500 kW, as certified by the equipment manufacturer. (R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 60.4202, 40 CFR 89.112(a))

Compliance- Capacity of generator is 1500kW

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall conduct an initial performance test for EU-EG02 within one year after startup of the engine to demonstrate compliance with the emission limits in 40 CFR 60.4205 unless the engines have been certified by the manufacturer and the permittee maintains the engine as required by 40 CFR Part 60 Subpart IIII. If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. (40 CFR 60.4211, 40 CFR 60.4212, 40 CFR Part 60 Subpart IIII)

Compliance- Engine is Certified.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(1)(a) & (3), R 336.2803, R 336.2804,
   40 CFR 52.21 (c) & (d))

Compliance- Facility submitted emission calculations upon request.

2. The permittee shall keep, in a satisfactory manner, records of testing required in SC V.1 or manufacturer certification documentation indicating that EU-EG02 meets the applicable emission limitations contained in the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subpart IIII. If EU-EG02 becomes uncertified then the permittee must also keep records of a maintenance plan and maintenance activities. The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.4211)

Compliance- Facility has conformity certificate on file.

3. The permittee shall monitor and record the total hours of operation and the hours of operation during non-emergencies for EU-EG02, on a monthly and 12-month rolling time period basis, in a manner acceptable to the District Supervisor, Air Quality Division. The permittee shall document how many hours are spent for emergency operation of EU-EG02, including what classified the operation as emergency and how many hours are spent for non-emergency operation. (R 336.1205 (1)(a) & (3), 40 CFR 60.4211)

Compliance- Hours are monitored. Has not reached 100 hours since engine was installed in 2014.

4. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery or contract of diesel fuel oil used in EU-EG02, demonstrating that the fuel sulfur content meets the requirement of 40 CFR 80.510(b). The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil. (R 336.1205(1)(a) & (3), R 336.1402(1), 40 CFR 80.510(b))

Compliance- Facility submitted records of delivery for diesel fuel. Diesel fuel is ultra low sulfur diesel.

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EU-EG02. (R 336.1201(7)(a))

Compliance- Facility submitted notice of installation on July 9, 2014.

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed horizontally to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Compliance Determination
1. SV-EG02	8.0	12	Compliance assumed- Stack appeared correct height and diameter. Although measurements were not taken.

IX. OTHER REQUIREMENTS

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart IIII, as they apply to EU-EG02. (40 CFR Part 60 Subparts A & IIII)

Compliance- Facility is complying with NSPS in terms of record keeping and having certified engine.

2. The permittee shall submit all applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8 (e), (f)(4), and (f)(6), and 63.9(b) through (e), (g), and (h) by the dates specified. (40 CFR 63.6645(a)(3) and (f))

Compliance- Facility submitted appropriate notification on July 9, 2014.

IX. OTHER REQUIREMENTS

The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to EU-EG02, by

initial startup. (40 CFR Part 63 Subparts A and ZZZZ, 40 CFR 63.6595
Compliance- Facility is complying with NESHAP by keeping records and maintaining certified engine.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

N/A Xerox Business Services is a commercial property with a paved parking lot.

MAERS REPORT REVIEW
NA

FINAL COMPLIANCE DETERMINATION:

It appears that the facility is in compliance with all applicable regulations.

NAME _____ DATE 5-29-18 SUPERVISOR W.M.