

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

B650855831

FACILITY: CLINTON VILLAGE OF		SRN / ID: B6508
LOCATION: 318 RIVER ST, CLINTON		DISTRICT: Jackson
CITY: CLINTON		COUNTY: LENAWEE
CONTACT: Kevin Cornish , Village Manager		ACTIVITY DATE: 10/22/2020
STAFF: Stephanie Weems	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

Opt-Out Source: Full Compliance Evaluation (FCE) and Inspection (PCE) of Village of Clinton

Facility Contact

Kevin Cornish – Village Manager

CornishK@villageofclinton.org

517-456-7494 ext. 213

Purpose

On October 22, 2020 I conducted an announced virtual compliance inspection of Village of Clinton located in Clinton, Michigan in Lenawee County. This inspection was announced and conducted virtually through email due to safety precautions being taken during the ongoing COVID-19 pandemic. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules and PTI 521-77A.

Facility Background

The facility was last inspected on June 14, 2017 and was found to be in compliance.

The Village of Clinton has three reciprocating internal combustion engines (RICE) that are used to provide backup power to the Michigan South Central power grid during periods when peak load demands additional power.

Previous inspection reports indicate that the plant does not come online very often and no longer operates to generate power for profit. It was also noted that these peaking units had only operated for maintenance and capacity testing in the three years prior to the last inspection, and it was likely that they would be retired in the near future.

Regulatory Applicability

The entire facility operates under PTI 521-77A.

The engines are subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) under 40 CFR 63, Subpart ZZZZ for Reciprocating Internal Combustion Engines (RICE), a.k.a. the RICE MACT.

On July 19, 2019, AQD received delegation of authority to implement 40 CFR Part 63, Subpart ZZZZ from the United States Environmental Protection Agency (USEPA).

Facility Contact, Introduction, and Record Request.

Due to the current COVID-19 pandemic, this inspection was conducted virtually through email. An email (see below, original email exchange with this report in facility file) explaining the situation and a record request list was created based upon PTI 521-77A and was sent to the facility contacts on October 21, 2020.

“To Whom It May Concern,

I am reaching out in regards to the required Air Quality Division inspection for the Village of Clinton for this fiscal year. Typically, these inspections are conducted in-person and unannounced, but due to the current issue with COVID-19, we are handling inspections a little differently. For the inspection this year, an onsite inspection will not be conducted. Instead, I am requesting that the required recordkeeping documents and pictures of the engines/non-resettable hour meters be sent via email.

I have attached a list of the records and pictures required for submittal. Please submit this information by **Friday, November 13th**.

If my contact information is outdated, please let me know how to get into contact with the correct contact for this site.

If you have any questions, please let me know.

Thank you!

Stephanie Weems

The following record request was also provided to the facility contact at that time:

RECORD REQUEST

ALL RECORDS REQUESTED FROM JANUARY 2019 TO PRESENT

- Please provide pictures of each engine (EU-ENG-1, EU-ENG-2, and EU-ENG-6) and the associated non-resettable hour meter that each engine is equipped with.
- Calculations for the NOx and CO emission rates from FGFACILITY for each calendar month and 12-month rolling time period.
- Records to show compliance with 40 CFR Part 63, Subpart ZZZZ. (According to the last inspection report, this facility was utilizing the oil analysis program)

Record Review

On October 22, 2020, Kevin Cornish, Village Manager, responded to my email. He informed me that the three engines have been decommissioned and they are working on turning the area that housed the engines into a garage.

I asked Kevin if he could provide me with the dates that the units were decommissioned. He submitted the Village Minutes from February 2020 showing the Village agreeing to decommission the engines. He also included the U.S. Department of Energy report showing that the engines were retired in December 2019.

Post-Inspection Meeting

After learning of the decommissioning dates for the engines, I thanked Kevin for his time and cooperation. I also provided Kevin with the information he needs to follow in order to void the facility's permit.

Compliance Summary

Based upon the information provided, it appears that the Village of Clinton is in compliance at the time of this inspection. Moving forward, when the permit is voided, this facility will be marked as closed in MACES.

Note: Kevin has already sent a request to permit section to void the permit.

NAME Steph Weems _____ DATE 10/22/20 SUPERVISOR 