## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

| 1200720290  |                               |                           |
|---|-------------------------------|---------------------------|
| FACILITY: LAKELAND CORRECTIONAL FACILITY          |                               | SRN / ID: K2087           |
| LOCATION: 38 FOURTH ST, COLDWATER                 |                               | DISTRICT: Kalamazoo       |
| CITY: COLDWATER                                   |                               | COUNTY: BRANCH            |
| CONTACT: David Karney , Physical Plant Supervisor |                               | ACTIVITY DATE: 01/13/2015 |
| STAFF: Dale Turton                                | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT  |
| SUBJECT:  |                               |                           |
| RESOLVED COMPLAINTS:                              |                               |                           |

An inspection was conducted to determine compliance with the Air Pollution Control (APC) Rules and the Permit to Install. Lakeland is the only portion of the larger complex still in use. Florence Crane Correctional Facility is not in use.

Ryan Krenzalek was not working the day of the visit. Larry Pope, another plant operator, assisted me during the power plant inspection. David Karney, physical plant supervisor, was also consulted on regarding permitting and consent order issues.

Permit to Install # 11-12 has been issued to MDOC Lakeland Correctional Facility to set restrictions on the operation of the boilers and generators. The permit also sets a limitation on the sulfur dioxide emissions in order to keep the facility under major source levels.

## **FGBOILERS**

EUBOILER1, EUBOILER2, EUBOILER3 are all identical gas/oil fired boilers installed in 1972. These are Keeler boilers with a rating of 40,000 # steam/hr, or 48 Million Btu as listed in the permit. The boilers are limited to burn only natural gas or #2 distillate oil. There are no emission limits for any one of the individual boilers. The three boilers as a group are limited to a usage of 2 million gallons of oil per 12-month rolling time period. The oil is limited to a sulfur content of 0.50% by weight.

Boilers 1 and 2 were operating on natural gas during the inspection. The amount of gas burned in all three boilers is being tracked and reported in the MAERS report. They have not fired on oil in several months. They are in compliance with the oil usage condition in the permit.

The oil in the one remaining tank is several years old, so they could not produce a specification sheet that is required with new shipments. It is reported as 0.3% in MAERS, less than the permit limit. In the very near future, all of the remaining oil will be pumped out of the tank and temporarily stored. The existing tank will be removed and a new 10,000 gallon tank in going to be installed. The old oil will be filtered and pumped back into the new tank. David agreed to take a sample of this oil and have it sent to a lab for sulfur analysis, and then share the results with AQD.

## **FGGENERATORS**

There are 6 generators located in various places at the facility. The make and size of these are all listed in the permit. I was able to look at 4 of them. These are all oil fired emergency generators. The largest generator (#5), made by Caterpillar is a 750 KW, or 1109 HP, and is located in the building located adjacent to the power plant. Generator #2 & 3 are small portable units located just outside the power plant, but they are never moved. Generator #6 is located in the power plant. Generator #1 is for the well and generator #4 is located closer to the prison buildings at Lakeland. These units are all run for ½ hour each week to assure they run properly. Once a month, each unit is load tested for about an hour to test the generating ability. Records are kept of the testing to assure each unit runs less than 100 hours per 12-month rolling time period. There is no limit on run time for true emergency situations, although this not a common occurrence.

None of these generators are subject to the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines due to their age.

## Consent Order

The facility is currently subject to Consent Order AQD No. 7-2010. This order was signed to resolve the failure of the facility to submit Rule 208A paperwork. With the issue of Permit to Install # 11-12, and the rescinding of Rule 208A, compliance with the order has been achieved.

The consent order was written with at least a 5 year life. It will be eligible for termination on March 4<sup>th</sup>, 2015. David will make sure this request for termination is made.

NAME Have In

DATE Jun 20, 2015 SUPERVISOR MA 1/20/2015