

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : UNIVERSITY OF MICHIGAN	SRN : M0675
Location : 1239 KIPKE DR EHS / CSSB	District : Jackson
	County : WASHTENAW
City : ANN ARBOR State: MI Zip Code : 48109	Compliance Status : Compliance
Source Class : MAJOR	Staff : Diane Kavanaugh Vetort
FCE Begin Date : 9/8/2019	FCE Completion Date : 9/8/2020
Comments : Major T5 Facility, FCE / PCE	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/03/2020	Stack Test	Compliance	Test Results Report received for Institute for Social Research (ISR) emergency generator 2020 3-year emissions test performed on 6/25/20. Originally scheduled for 4/15/20, the test was rescheduled for 5/29/20. Rescheduling is due to Governor's order COVID-19. UM submitted a waiver request on 3/30. On 6/2 UM notified AQD of rescheduled date of 6/25. NOx, CO, VOC (700HP and 450kW). AQD TPU Test Plan Approval 3/27/20; Mark D. TPU observed testing.
09/03/2020	Scheduled Inspection	Compliance	Major Source FCE inspection conducted virtually on two dates: 9/3 and 9/8. PCE Records review under separate report.
09/03/2020	Records Review (In office)	Compliance	PCE of FCE: required compliance records requested by email prior to inspection, and additional submittals received during and/or following inspection.
06/05/2020	ROP Other		COVID -19 Enforcement Discretion request. EUGEN-ISR required NSPS testing postponed until May 29, 2020. UM is Public University and testing was not able to be scheduled /completed due to the Stay Home Stay Safe order. On 6/2/20 received notice, proposed Test Date is now 6/25.

Activity Date	Activity Type	Compliance Status	Comments
05/01/2020	MAERS	Compliance	REPORT RECEIVED. CERTIFICATION received. Support documents hard copy attached. Report missing ammonia for RGBIrs7,8 and T9, T10. DKV added from support doc summary for accurate total in MAERS. CO 143 tons, NOx 312 tons, VOC 12.5 tons SO2 1.5 tons, PM10 and 2.5 about 35 tons total. Ethylene Oxide 0.50lb.
04/30/2020	CEM RATA	Compliance	Relative Accuracy Test Audit Test Results Report (RATA). Central Power Plant boilers 3, 4,6. Montrose Air Quality Services, LLC testers. TPU Lindsey Wells, and DKV District observed days of testing. BLRs 11 runs #6 and 12 runs each #3, #4. NOx RA, ppm concentration and O2%. #3 average 128 klb/hr steam load & 154 kscf/hr nat gas. #4 average 120 klb/hr & 147 kscf/hr. #6 average 122 klb/hr & 163 kscf/hr. Compliant.
04/30/2020	Stack Test	Compliance	Stack Test Results Report - Emergency Generator SI-RICE at Campus Safety Service Bldg. EU-CSSB in ROP and NSPS JJJJ required testing every 3 years. Testing was conducted on 3/10. Impact Compliance & Testing consultant. Lindsey Wells, TPU observed. Cummins GTA38 natural gas, dual stacks, 500 kW with non-selective catalytic reduction (NSCR) system for CO, NOx and VOC. Operated at 98% of max capacity at 490 kW. Results: CO 305 ppmvd (limit 540); NOx 72.1 (160); VOC 5.36 (86). COMPLIANT
04/30/2020	CEM RATA	Compliance	Quarter 1 CEMS Report for Boiler 6, Central Power Plant. ROP(prior PTI 42-98). Excess Emissions and Monitoring System Performance report and quarterly linearity. Minimal downtime. Compliant.
04/02/2020	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD Annual Report identifying all subject boilers. 54 pages, two boilers listed per page. Section 3 of report is the Certification - complete. Operating information is included in MAERS.

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04/02/2020	ROP Annual Cert	Compliance	2019 ROP Annual Cert & Dev Report. 2nd semi report 1 deviation of Boiler MACT, ROP Table I.X.3. The notification was not submitted within 15 days of startup at Ford Robotics Building. It was submitted once learned the boilers were started up on 12/23/19.
04/02/2020	ROP SEMI 2 CERT	Compliance	2019 2nd Semi-annual Cert & Dev report. Report 1 deviation of Boiler MACT, ROP Table I.X.3. The notification was not submitted within 15 days of startup at Ford Robotics Building. It was submitted once learned the boilers were started up on 12/23/19.
03/13/2020	Other	Compliance	Documents question from Brandi regarding COMs on Boilers CPP (3,4,6) that is required when operating fuel oil (not regularly used). Previously included reference with annual RATA. Testers don't qa/qc the COMs and want to remove from this testing/reporting. Discussed with Lindsey, TPU and District. Agreed to keep annual COMs data on site (refers to annual calibration data records). No requirement to submit it annual was found. However District noted the permit requirements and if they use it, and exceedances need to be reported.

Activity Date	Activity Type	Compliance Status	Comments
02/28/2020	Stack Test	Compliance	Received TEST PROTOCOL Natural gas fired Emergency Generator at Institute for Social Research (ISR) EUGEN-ISR. Cummins GTA28, 450kW SI-RICE. UM has 3 year test requirement, 40 CFR 60 Subpart JJJJ. Scheduled for April 7, 2020. Impact Compliance & Testing, Inc. Hard copy to TPU. 3/24 CHANGE: Covid-19 may result in UM unable to have all personnel to conduct testing. Submitted a request to delay - however will be beyond required NSPS deadline. 4/8/20 Request for Enf Discretion approved. Process instituted on 3/31 and this was communicated to Brandi. Had already sent in a letter; followed the email online process. Test Postponed until May 29, 2020. TEST AGAIN POSTPONED until June 25, 2020. Testing was completed / Mark D., TPU observed.
02/11/2020	Stack Test Observation	Compliance	Conducted stack test observation of Day 1 of 3 day testing at CPP. Boilers 3, 4, and 6 RATAs. Boiler 6 was conducted to day. Boiler 3 or 4 will be done on Wednesday and Thursday. Montrose is the Tester. Lindsey Wells, TPU observed testing today. Mark Dzaidosz is scheduled for Weds and another new staff for Thursday.
02/11/2020	Meeting Notes	Compliance	Following Stack Test Observation met with Brandi at UM Offices to go over preliminary ROP Working Draft. I prepared a draft W.D. close to being finalized for Company review period. Pointed out significant changes. Gave copy to Brandi to follow up on questions related to dates, testing, R201(3) replacements, non-applicable requirements and other items.
02/06/2020	Stack Test	Compliance	Received TEST PROTOCOL Natural gas fired Emergency Generator EU-CSSB at CSSB (front office). UM has 3 year test requirement, 40 CFR 60 Subpart JJJJ. Scheduled for March 10, 2020. Impact Compliance & Testing, Inc. Hard copy to TPU.

Activity Date	Activity Type	Compliance Status	Comments
01/24/2020	Excess Emissions (CEM)	Compliance	CPP Boiler 6 Quarterly Report 4th. 3 incidents reported. Downtime 0.19 percentage of operating duration. Also includes quarterly linearity (passed) and the fuel oil report, 20,905.3 gallons per hour fuel oil was used in October 2019.
01/09/2020	Stack Test	Compliance	Test Results Report; Ross Emergency Generator, 500 kW, 803 HP, natural gas. Tested 11/14/2019 for NOx, CO, VOC. Subject NSPS Subpart JJJJ. Tested within 10% of max. capacity. Results: 23 ppm NOx (160 standard); 299 ppm CO (540 standard); 2.5 ppm VOC (86 standard). Required every 8760 hrs or 3 years, whichever comes first. New, will be added to Renewal in-house. Regina, TPU observed testing. Impact Compliance & Testing, Inc. (ICT) testers. 2/5/20 TPU Memo =acceptable test = compliance
12/13/2019	Stack Test	Compliance	CEMS RATA test plan for CPP Boilers 3, 4, and 6. Opacity Monitor calibration error test Boiler 6. Schedule for the week of February 11, 2020. Montrose Air Quality Services, LLC Tester. Pollutants measured NOx and O2. TPU assigned Lindsey Wells. Approval protocol sent 1/6/20
11/26/2019	MACT (Part 63)	Compliance	Initial Notification NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. EU ID M-449876 Boiler, Cleaver Brooks, Coliseum (Bldg), 1.96 MMBtu/hr natural gas (fuel organic HAPs from incomplete combustion). Start-up date is 11/14/19.
09/11/2019	ROP Semi 1 Cert	Compliance	1st Semi annual Cert & Deviation report. No deviations reported. ROP renewal currently in house under review. Acceptable.

Name: *Stacy Pittman*

Date: *10/14/20*

Supervisor: *[Signature]*