

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

N554573025

FACILITY: CROSWELL LIGHT AND POWER DEPT		SRN / ID: N5545
LOCATION: 120 E SANBORN AVE, CROSWELL		DISTRICT: Bay City
CITY: CROSWELL		COUNTY: SANILAC
CONTACT: David Tait , City Administrator		ACTIVITY DATE: 08/08/2024
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Onsite inspection.		
RESOLVED COMPLAINTS:		

A full compliance evaluation (FCE) was completed by Air Quality Division (AQD) staff Adam Shaffer (AS) of the Croswell Light and Power Dept (CLP) site located at 120 East Sanborn Avenue Croswell, MI. An in-person inspection to verify compliance with Permit to Install (PTI) No. 438-94 was completed on August 8, 2024.

Facility Description

CLP is an electric utility company. The facility is an opt out source for nitric oxides and is in operation under PTI No. 438-94. Additionally, the site is subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (NESHAP Subpart ZZZZ). Since CLP is an area source, the AQD has not been granted delegation by EPA to enforce this federal standard.

Offsite Compliance Review

Based on the timing of the inspection, CLP had already submitted their State and Local Emissions Inventory System (SLEIS) Report for 2023 which had appeared acceptable. Upon review, no emissions were reported for the year of 2023, and it was also verified during the course of the onsite inspection that the five emergency engines did not run during that reporting time period. This appears acceptable.

Compliance Evaluation

The onsite inspection was completed on August 8, 2024. AQD staff AS and Haley Willman (HW) arrived at the facility at approximately 10:10am. Weather conditions at the time of the inspection were partly cloudy skies, calm winds and approximate temperatures in the low 70's degrees Fahrenheit. Upon arriving, AS and HW met with several company staff including Mr. David Tait, City Manager, who provided a tour of the site and answered site specific questions.

As mentioned above CLP is an electric utility company. During the inspection, the various components pertaining to site operations were discussed at length with company staff.

PTI No. 438-94

This permit is for five emergency engines (Unit 1, Unit 2, Unit 3, Unit 4 and Unit 5).

The five engines were observed during the course of the inspection and upon speaking with company staff, appear to have last been operated in 2013. The areas around the engines were clean and it was evident that the engines have not been used in a significant amount of time.

Per Special Condition (SC) 15 - 16, if the engines were operated, diesel fuel and / or natural gas usage limits are in place and applicable records are to be kept. Additionally, per SC 25, the engines are subject to hourly fuel usage rates. As stated above, upon speaking with company staff, the five emergency engines appear to have last been operated in 2013. Based on the length of time since the engines were last run, no applicable fuel records were requested.

Per SC 17, visible emissions from the emergency engines shall not exceed 10% opacity. Since the engines were not operating at the time of the inspection, this condition was not reviewed.

Per SC 18 – 21, the emergency engines are subject to various NOx and CO emission rates. Additionally, per SC 22, verification of NOx and / or CO emission rates may be requested at the owner's expense. Based on the length of time since the engines were last run, no testing or applicable records were requested.

Per SC 23, the sulfur dioxide emission rates from the Units shall not exceed 0.56 pounds per million BTUs heat input, based upon a 24-hour period. This is equivalent to using oil with a 0.50% sulfur content and a heat value of 18,000 BTUs per pound. During the course of the inspection, the approximately 9,000-gallon storage tank formerly used to store diesel fuel for the emergency engines was observed. Company staff stated that the tank was presently empty. This appears acceptable.

Per SC 24, there are five stacks associated with the five respective emergency engines and were observed during the course of the site inspection. Though the dimensions were not measured they appeared to be consistent with what is listed in PTI No. 438-94.

Additional Observations

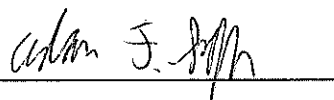
A maintenance area was observed during the course of the site inspection. One parts washer was noted that appeared to not have been recently used. The parts washer appeared to be exempt per Rule 281(2)(h).

Company staff stated that they complete a pre lube oil check every three months to help prevent any issues in the event that the engines are turned on. The engines are rolled over but not actually turned on.

Conclusion

Based on the observations made and records reviewed, CLP appears to be in compliance with PTI No. 438-94 and applicable air pollution control rules.

NAME



DATE

08/12/24

SUPERVISOR

