

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

N784435541

FACILITY: DTE (EMERGENCY GENERATORS AT FORD R&E CENTER)		SRN / ID: N7844
LOCATION: 21500 OAKWOOD BLVD, DEARBORN		DISTRICT: Detroit
CITY: DEARBORN		COUNTY: WAYNE
CONTACT: Thomas Shoemaker , Supervising Operator		ACTIVITY DATE: 07/15/2016
STAFF: Jorge Acevedo	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Syn Minor Opt Out
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

**COMPANY NAME** : DTE Energy Services  
**FACILITY ADDRESS** : 21500 Oakwood Blvd., Dearborn, MI 48124  
**STATE REGISTRAT. NUMBER** : N7844  
**SIC CODE** :  
**EPA SOURCE CLASS** : Synthetic Minor Opt Out  
**EPA POLLUTANT CLASS** : O  
**LEVEL OF INSPECTION** : PCE  
**DATE OF INSPECTION** : 07/15/16  
**TIME OF INSPECTION** :  
**DATE OF REPORT** :  
**REASON FOR INSPECTION** : Targeted Inspection  
**INSPECTED BY** : Jorge Acevedo  
**PERSONNEL PRESENT** : Thomas Shoemaker  
**FACILITY PHONE NUMBER** : 313-982-1195  
**FACILITY FAX NUMBER** : 313-982-1196

#### FACILITY BACKGROUND

The five diesel fired generators located at the Ford Research and Engineering Center are owned and operated by DTE Energy Services. The generators provide energy during peak shaving periods. The generators are not staffed and are maintained as needed. During May through September, the generators are run weekly for a half hour. During October through April, the generators are run monthly for a half hour.

There is a contract between Ford Motor Company and DTE Energy Services which was recently renewed in 2015. The contract specifies that DTE Energy Services is responsible for operation and environmental compliance for the generators.

#### INSPECTION NARRATIVE:

On July 15, 2016, I performed a scheduled inspection of the DTE Energy Services five diesel fired generators. I arrived at 1:00pm at the site of the generators, which are located on the property of Ford Motor Company Research and Engineering facility. There three stacks associated with the five generators. There were no visible emissions.

I met with Mr. Thomas Shoemaker, Supervising Operator. I observed five generators. They are all Caterpillar Model 3516B, 2MW diesel fired generators. I asked Mr. Shoemaker how they get their fuel to run the generators. He said that fuel is pumped from one of Ford's underground tanks which supplies fuel for their motor pool. The fuel is pumped into the 200 gallon day tank that each generator has. I asked to see the hours that each generator has run:

Generator 1 - 487  
 Generator 2 - 438  
 Generator 3 - 501  
 Generator 4 - 486  
 Generator 5 - 370

The generators were installed in 2001. Each generator has run approximately 7-9 hours per year.

I asked Mr. Shoemaker for records for hours run, emission calculations, and fuel shipments. He gave me contact information for his colleagues and I was able to get the required information from them.

I asked Mr. Shoemaker to grab a sample of the fuel oil for lab analysis. I left at 1:22PM shortly after getting the sample. The sample was submitted to Merrit Labs on July 20, 2016. Results were received on July 29, 2016 and showed the sulfur content of the fuel was 0.02% by weight.

**COMPLAINT/COMPLIANCE HISTORY:**

The facility has never been inspected.

**OUTSTANDING CONSENT ORDERS:**

None

**OUTSTANDING LOVs**

None

**APPLICABLE RULES/PERMIT CONDITIONS:**

Permit 181-00A

3. Applicant shall not operate any of the generators comprising FGGENERATORS for more than 250 hours per 12-month rolling time period as determined at the end of each calendar month. A written log of the operating hours for each engine shall be kept on file for a period of five years and made available to the Air Quality Division upon request. This condition is necessary to ensure that FGGENERATORS will not be a major stationary source as defined in the Federal Prevention of Significant Deterioration regulations, 40 CFR 52.21, and R336.1211(a)(ii), R336.1205(1)(a), and R336.1205(3).

**COMPLIANCE-** Records are kept. The highest 12 month rolling total was 9.85 hours in May 2016.

4. Visible emissions from FGGENERATORS shall not exceed a six-minute average of 10 percent opacity. (R336.1301(c))

**UNDETERMINED-** Generators were not operating during the time of the inspection

5. Nitrogen Oxides (NOx) emissions from FGGENERATORS shall not exceed 30.4 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month. Records of the emissions shall be kept on file for a period of five years and made available to the Air Quality Division upon request. (40 CFR 52.21 and R336.1211(a)(ii), R336.1205(1)(a), and R336.1205(3).

**COMPLIANCE-** Records are kept. NOx emissions are well below the 30.4 Tons per Year permit limit.

6. The sulfur content in the fuel oil fired in FGGENERATORS shall not exceed 0.05%, by weight. Records of the sulfur content of each shipment of fuel oil shall be kept on file for a period of five years and made available to the Air Quality Division upon request. (Wayne County Ordinance, Section 6, Rule 6010, and to ensure that FGGENERATORS are not subject to 40 CFR Part 72.7).

**COMPLIANCE-** Sample of fuel oil was taken the day of the inspection. Results were received on July 29, 2016. Results showed that the sulfur was 0.02% sulfur which is below the limit of 0.05% by weight. Lab results were placed in facility file.

**APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:**

N/A- Lot is paved.

**NSPS Subpart IIII- Stationary Compression Ignition Internal Combustion Engines**

The generators were installed in 2001. Therefore, the generators are not subject be 40 CFR 60 Subpart IIII because the applicability date is:

- Constructed (ordered) after July 11, 2005, and manufactured after April 1, 2006 (July 1, 2006 for fire pump engines), or
- Modified or reconstructed after July 11, 2005.

**NESHAP Subpart ZZZZ- Reciprocating Internal Combustion Engines**

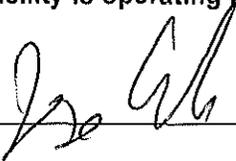
The emergency generators were installed in 2001. They are located at an area source of HAPS. The facility is complying with the oil analysis program instead of changing oil at a specified frequency. The hours of operation are monitored and recorded. Maintenance records were not checked this time as hours of operation have been around 7-9 hours a year.

**MAERS REPORT REVIEW:**

MAERS was submitted for 2015 timely and a review was completed. There were no major issues found during the review. MAERS is required because the facility is considered an opt-out source for New Source Review.

**FINAL COMPLIANCE DETERMINATION:**

The facility is operating in compliance with applicable regulations.

NAME 

DATE 8-2-16

SUPERVISOR W.M.