

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

N801364571

FACILITY: MICHIGAN BELL TELEPHONE COMPANY, DBA AT&T MICHIGAN		SRN / ID: N8013
LOCATION: 54 N MILL ST, PONTIAC		DISTRICT: Warren
CITY: PONTIAC		COUNTY: OAKLAND
CONTACT: Richard Martin , Network Operations Manager		ACTIVITY DATE: 08/18/2022
STAFF: Robert Joseph	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled inspection of engine generator		
RESOLVED COMPLAINTS:		

On August 18, 2022, I, Michigan Department Environment, Great Lakes, and Energy-Air Quality Division staff, Robert Joseph, conducted a scheduled inspection of Michigan Bell Telephone Company, d/b/a AT&T Michigan (SRN: N8013) located at 54 North Mill Street, Pontiac, Michigan. The purpose of the inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; and the Michigan Department Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, and conditions of the facility's Permit to Install (PTI 171-19).

General Facility Information

The facility is classified as a minor source and currently operates three small exempt boilers for space heating, and two diesel fuel-fired engine generators for backup power during electrical outages. Both engines are exempt from 40 CFR 60 Subpart IIII – NSPS Compression Ignition Internal Combustion Engines since they were manufactured prior to April 2006 (manufactured in 2004) and 40 CFR 63 Subpart ZZZZ since the facility is a minor source for HAPs. Both engines meet the purpose of emergency engines as defined in 49 CFR 63.6640(f), however, since one of the engine generators was relocated to this facility it triggered a PTI per Rule 201.

Facility Tour

I arrived onsite shortly after 11 a.m. and met with Robin Beasley, Infrastructure Operations. I introduced myself, presented my credentials, and stated the purpose of my visit. Robin indicated the facility operates daily with only a handful of employees on-site as most staff work remotely. She indicated that the engine generator only operates during electrical outages and during monthly testing. The engine is a Caterpillar 4CPXL58.6ERK Model 3512 with 1,818 horsepower referenced as EU-PNTCMIMN03.

PTI: 171 -19

EU-PNTCMIMN03

I. EMISSIONS LIMITS

There are no applicable emission limits for this emission unit.

II. MATERIAL LIMITS

Based on the Material Safety Data Sheet and Fuel Supplier Certification Record for the most recent diesel fuel purchase on July 13, 2022, the fuel has a sulfur content of 0.0015%

by weight. Also, there was no documentation referencing the cetane index or aromatic content. This constitutes a violation of this permit condition and 40 CFR 1090.305.

III. PROCESS/OPERATIONAL RESTRICTION(S)

Per facility operating records, the engine generator has operated less than 25 hours per 12-month rolling time period the last three years, however, the facility failed to satisfactorily maintain 12-month rolling operational totals.

IV. DESIGN/EQUIPMENT PARAMETER(S)

The engine is equipped with a non-resettable meter to track the operating hours of the engine. The engine has operated for 404 hours since its manufacture date. The nameplate references the engine model (3512), year (2004), and power rating (1,250 kW).

V. TESTING/SAMPLING

There are no applicable testing requirements for this emission unit.

VI. MONITORING/RECORDKEEPING

The facility failed to satisfactorily maintain monthly and the 12-month rolling time operating totals of the engine generator, however, per facility records, the hours of operation of the engine generator was just under 15 hours in 2020, 19 hours in 2021, and is currently under 16 hours thus far in 2022 per each 12-month rolling time period. Given the unsatisfactory maintenance of recordkeeping this constitutes a violation of this permit condition.

The facility has not been obtaining the proper fuel supplier certification record for each fuel delivery. Ms. Beasley indicated that staff was unaware of this requirement so I advised her that each purchase must be accompanied with a fuel supplier certification record. In addition, there was no documentation referencing the cetane index or aromatic content of the fuel oil used. A violation notice will be issued given that a fuel supplier certification record was not available to be viewed for each previous fuel purchase.

The fuel supplier certification record was made available for the most recent fuel purchase on July 13, 2022, which included the name of the oil supplier (Hightowers Petroleum), sulfur content (0.0015% by weight), however, there was information referencing the cetane index or aromatic content of the fuel oil.

VII. REPORTING

The facility failed to provide a written notification to the AQD within 30 days after completing the relocation of the engine generator, EU-PNTCMIMN03. Records indicate operation began on January 15, 2020. This constitutes a violation of this condition.

VIII. STACK/VENT RESTRICTION(S)

There did not appear to any obstructions relating to the emissions via the stack.

Conclusion

Robert Joseph

DATE 09-14-22

SUPERVISOR Joyce 