

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

N801372628

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: Antone Boyer , Manger Network Services		ACTIVITY DATE: 07/02/2024
STAFF: Robert Joseph	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of facility		
RESOLVED COMPLAINTS:		

On July 2, 2024, 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) also referred to as "the facility," 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 generators 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 from 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. The permit was issued to Richard Martin, Network Operations Manager in Pontiac, however, the local facility contact is Antone Boyer and the out of state contact at the AT&T Headquarters located in Texas is Randall Yarbrough.

Background Information

The facility received a violation notice (VN) on September 19, 2022, after an AQD site inspection revealed unsatisfactory recordkeeping of the facility's permit and the failure of the facility to notify the AQD in writing of the relocation of the generator (PNTCMIMN03) as required. The facility failed to provide a satisfactory response regarding the VN and was issued a 2nd VN on October 19, 2022. The facility provided a satisfactory records submittal on October 19, 2022, as well as a satisfactory response to the VNs on November 3, 2022, via Liz Welch, AT&T Regional Manager, in the Dallas, TX office.

Facility Tour

I arrived onsite shortly after 11 a.m. and met with Isaac, Power Operations Technician. I introduced myself, presented my credentials, and stated the purpose of my visit. Isaac indicated the facility operates daily with approximately five employees on-site (most other departmental staff work remotely). Isaac indicated that the engine generator only operates during power outages - other than during its annual run test as well as during maintenance work. The engine is a Caterpillar 4CPXL58.6ERK, Model 3512, with a 1,818 horsepower referenced as EU-PNTCMIMN03.

PTI: 171 -19

GENERAL CONDITIONS

There were no concerns regarding these conditions at the facility. No visible emissions were observed, no malfunctioning equipment, and no modifications of the facility's equipment was observed.

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 June 24, 2024, the fuel has a sulfur content of 0.0015% by weight with a cetane index of 40. The fuel is labeled as Ultra Low Sulfur No.2 Diesel (Marathon Petroleum Company LP).

III. PROCESS/OPERATIONAL RESTRICTION(S)

Per facility operating records, the engine generator has operated for 24.5 total hours in 2023 and 2024, and the current 12-month rolling time period total was 14.4 hours at the time of inspection (June 2023 - May 2024).

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 434 hours since its manufacture date. The nameplate (ID# CAT00000VCMJ00875) 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

Per facility records, the 2023 12-month rolling total is 19.9 hours and 14.4 hours is the current 12-month rolling total.

The fuel supplier certification record provided the most recent fuel purchase on June 24, 2024, which included the name of the oil supplier (Marathon Petroleum), sulfur content (0.0015% by weight), and a cetane index of 40.

VII. REPORTING

The facility did not initially provide a written notification to the AQD within 30 days after completing the relocation of the engine generator (EU-PNTCMIMN03), but ultimately provided one on November 3, 2022. Records indicate operation began on January 15, 2020 began with the emission unit.

VIII. STACK/VENT RESTRICTION(S)

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

Conclusion

Based on the AQD inspection and records review, Michigan Bell Telephone Company d/b/a AT&T is in compliance with the aforementioned requirements and the conditions of the facility's PTI 171-19.

NAME Robert Joseph

DATE 08-23-24

SUPERVISOR Joyce