

N8026
MAWILB

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

N802638687

FACILITY: MICHIGAN BELL TELEPHONE CO		SRN / ID: N8026
LOCATION: 17651 MICHIGAN AVE, DEARBORN		DISTRICT: Detroit
CITY: DEARBORN		COUNTY: WAYNE
CONTACT: Richard Jones , Telecommunications Specialist		ACTIVITY DATE: 02/14/2017
STAFF: Todd Zynda	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

PURPOSE OF INSPECTION: Targeted
 INSPECTED BY: Todd Zynda (AQD)
 PERSONNEL PRESENT: Richard Jones, Telecommunications Specialist
 FACILITY PHONE NUMBER: (313) 320-9657

FACILITY BACKGROUND

Michigan Bell Telephone Company (MBC) dba AT&T Michigan (AT&T) located at 17651 Michigan Avenue, Dearborn, Michigan, is a telecommunications switching facility. The facility includes office space for approximately 50 engineers. The facility operates 24 hours a day, seven days a week.

COMPLAINT/COMPLIANCE HISTORY

There are no records of complaints for this facility on file.

During inspections of 2009, 2013, and 2015, the facility was determined to be in compliance with applicable Federal and State air quality regulations.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING VNs

None

INSPECTION NARRATIVE

On February 14, 2017 the MDEQ Air Quality Division (AQD) inspector Mr. Todd Zynda conducted an unannounced inspection of MBC located at 17651 Michigan Avenue, Dearborn, Michigan. During the inspection Mr. Richard Jones, Telecommunications Specialist, provided information and tour of facility operations. Additional information was provided via email by Ms. Liz Welch, APEX Titan, Inc. on behalf of AT&T EH&S.

The inspection was conducted to determine the facility's compliance with the Natural Resources and Environmental Protection Act (NREPA), Act 451, Part 55, and PTI No. 145-11. MBC operates one 1500 kilowatts (KW) diesel fueled emergency engine. During the inspection, no visible emissions were observed.

During the inspection the emergency engine was observed to be equipped with a nonresettable hour meter. Mr. Jones provided engine run log records and fuel delivery information. During the inspection the engine was not in operation. According to Mr. Jones the facility also operates a 15,000 gallon diesel underground storage tank.

APPLICABLE RULES/PERMIT CONDITIONS

Permit to Install 145-11

EU-DRBRMIFB01

SC I. 1, 2, 3, SC V. 1, and SC VI. 2. **COMPLIANCE.** NMHC + NO_x emissions shall not exceed 6.4 g/KW-hr (4.8 g/hp-hr). CO emissions shall not exceed 3.5 g/KW-hr (2.6 g/hp-hr). PM emissions shall not exceed 0.20 g/KW-hr (0.15 g/hp-hr). The USEPA Certificate of Conformity was provided via email on February 21, 2017. The engine specification sheet indicates that the following emissions for "rated speed nominal data": Total NO_x and Total HC = 5.60 g/hp-hr (5.48 + 0.12); Total CO = 0.48 g/hp-hr; and PM = 0.03 g/hp-hr. However, the engine specification sheet also specifies that the "limits are weighted cycle averages and are in compliance with the emergency stationary regulations" (40 CFR Part 60, Subpart IIII).

The engine model 3512C is also listed under the USEPA database as a 2011 certified engine (see attached). The USEPA Certification inventory for 2011 CI engines indicates that Engine Family BCPXL78.1NZS (which model number 3512C is part of) has certification levels of the following: NO_x – 5.26 g/KW-hr; CO – 1.15 g/KW-hr; and PM – 0.106 g/KW-hr.

SC II. 1 and SC VI. 4. **COMPLIANCE.** Shall only burn diesel fuel with maximum sulfur content of 15 ppm (0.0015 percent) by weight. The generator uses diesel fuel. The shipping information indicates that the fuel is 15 ppm sulfur maximum.

SC III. 1 and 2, and SC VI 3. **COMPLIANCE.** Shall not operate each engine for more than 500 hours per year on a 12-month rolling basis. Maintenance checks and readiness testing is limited to no more than 100 hours per 12-month rolling time period. Facility records indicate that the highest 12-month rolling hours occurred at the end of January 2017 at 24.2 hours.

SC III. 3. **UNDETERMINED.** Shall install, maintain, and operate EU-DRBRMIFB01 according to manufacturer written instructions or procedures developed by the owner/operator and approved by the manufacturer over the entire life of the engine. While it appears the engines is maintained, it was not confirmed that the engine is being operated per manufacturer instructions.

SC IV 1 and 2. **COMPLIANCE.** The engine shall be equipped with a non-resettable hour meter. The name plate capacity of the engine shall not exceed 1500 KW. The engine is equipped with a nonresettable hour meter and the name plate indicates an engine capacity of 1500 KW.

SC VI. 1. **COMPLIANCE.** Required calculations shall be kept in an acceptable format. Records provided appear to meet this requirement.

SC VII.1. **UNDETERMINED.** Within 30 days after completion of installation, construction, etc., shall notify the AQD District Supervisor in writing of the completion of the activity. Notification was not located in facility files.

SC VIII. **COMPLIANCE.** During the inspection, the stack appeared to meet permit requirements. Measurements were not collected.

SC IX. 1. **COMPLIANCE.** Shall comply with all provisions of 40 CFR Part 60, Subparts A and IIII. At this time the facility appears to be in compliance with applicable conditions.

SC IX. 2. **UNDETERMINED.** Shall comply with all provisions of 40 CFR Part 63, Subparts A and ZZZZ. The MDEQ AQD is not the delegated authority for this regulation. Therefore applicable conditions of Subpart ZZZZ were not evaluated.

SC IX. 3. **COMPLIANCE.** Shall not operate the 1500 KW engine covered by PTI 145-11 simultaneously with the 750 KW emergency engine covered by PTI 98-08. During the inspection, it was confirmed that the 750 KW has been removed. PTI 98-08 was voided on May 2, 2012.

Federal Requirements

40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

The emergency engine at the facility is subject to 40 CFR Part 60, Subpart IIII as the engine was constructed after July 11, 2005 and manufactured after April 1, 2006 per §60.4200(a)(2). PTI 145-11 appears to contain applicable conditions of Subpart IIII within the permit special conditions listed above.

40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The emergency engine appears to be subject to 40 CFR Part 63, Subpart ZZZZ per §63.6585. However, the MDEQ AQD is not the delegated authority for this regulation. Therefore applicable conditions of Subpart ZZZZ were not evaluated.

PERMIT TO INSTALL EXEMPT EQUIPMENT**15,000 Diesel Storage Tank**

The 15,000 gallon diesel underground storage tank is exempt from PTI requirements under the following Rule.

R336.1284(2)(d): "Permit to install does not apply to...storage of..diesel fuel oils."

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS

Not Applicable. All lots are paved.

MAERS

The facility is not required to submit MAERS. Per the attached email correspondence from Mr. Dennis McGeen, MDEQ AQD, the facility is not required to report MAERS. In addition fees have been waived.

FINAL COMPLIANCE DETERMINATION:

At this time, this facility appears to be in compliance with PTI 145-11 and federal and state regulations.

NAME



DATE

3/17/17

SUPERVISOR

JK