

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

N813555989

FACILITY: LOWE'S HOME CENTERS, INC		SRN / ID: N8135
LOCATION: 8550 HIGHLAND RD, WHITE LAKE		DISTRICT: Warren
CITY: WHITE LAKE		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 10/29/2020
STAFF: Adam Bogнар	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On Thursday, October 29, 2020, I, Adam Bogнар, Environmental Engineer with the Michigan Department of Environment, Great Lakes, and Energy– Air Quality Division (EGLE-AQD) conducted a scheduled inspection of Lowe’s Home Centers, Inc. (the “facility” or “Lowe’s”), located at 8550 Highland Road, White Lake, MI. The purpose of this inspection was to determine the facility’s compliance status with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; and Michigan Department of Environment, Great Lakes, and Energy (EGLE-AQD) rules.

This facility operates a diesel generator previously permitted under Permit to Install (PTI) No. 270-08 (issued August 15, 2008). During an inspection on December 6, 2012, AQD identified a recordkeeping violation as part of PTI No. 270-08. Fuel usage records were kept for the previous 12-month period, but not kept for the previous 5-year period as required. No violation notice was sent.

To resolve this violation, AQD asked the facility to submit 12-month rolling time period records at the end of each month going forward. Lowe’s responded to this request, stating that Lowe’s believes the violation is not applicable since generator could be exempt from Rule 201 requirements to obtain a permit to install by Rule 285. AQD responded saying that the permit requirements supersede the exemption rule – therefore the recordkeeping violation was still valid. This permit was voided on June 26, 2013. The facility now operates this generator as PTI exempt under Rule 285 (2)(g).

I arrived at Lowe’s at around 12:30 pm. I identified myself and stated the purpose of the inspection to an employee at the customer service desk. The employee called someone in shipping and receiving who showed me the diesel generator. The employee was busy assisting other customers, but he unlocked the fenced in area behind the store that contains the generator so that I could inspect the engine.

The only AQD regulated equipment at this facility is a diesel generator used as a backup electricity source. The generator is a diesel fired 350 kW (<500 HP), 4-stroke, compression ignition, internal combustion engine (Kohler D350 12.1A65). The unit sits on top of a 1,500-gallon diesel tank. The unit was installed on December 18, 2006. The employee I spoke with stated that the engine is started and inspected by a contractor on a quarterly basis. It has been used during a couple of recent power outages. A contractor comes in to top of fluids and inspect the generator after each emergency use.

The unit is subject to 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (MACT ZZZZ). The only

requirement of MACT ZZZZ is to comply with 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (NSPS IIII). The manufacturers plate on the engine states that it was manufactured in 2005. Since the engine was manufactured before April 1, 2006, the engine is not subject to NSPS IIII.

I left the facility at around 1 pm.

Compliance Determination

Lowe's Home Centers, Inc. appears to be in compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; and Michigan Department of Environment, Great Lakes, and Energy (EGLE-AQD) rules. The diesel emergency generator appears to be exempt from Rule 201 requirements pursuant to Rule 285 (2)(g) since it has less than 10,000,000 BTU/hr maximum heat input. 350KW output at 25% efficiency gives a maximum heat input of approximately 4,776,996 BTU/hr. The diesel fuel tank appears to be exempt from Rule 201 requirements pursuant to Rule 284 (2)(g) since it is used exclusively for diesel fuel.

NAME Adam Bogros

DATE 11/6/2020

SUPERVISOR K. Kelly