

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

U50150917531298

FACILITY: Chatterton Middle School		SRN / ID: U501509175
LOCATION: 24333 Ryan, Warren		DISTRICT: Southeast Michigan
CITY: Warren		COUNTY: MACOMB
CONTACT: Bill Rudd , Supervisor - Maintenance		ACTIVITY DATE: 08/24/2015
STAFF: Kerry Kelly	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT:		
RESOLVED COMPLAINTS:		

On August 24, 2015, Sebastian Kallumkal and I conducted a self-initiated inspection at Chatterton Middle School located at 24333 Ryan, Warren, Michigan. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; and Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451).

**HISTORY**

Chatterton Middle School is part of Fitzgerald Public Schools. There are six schools in this district. Two of the schools, Chatterton Middle School and Fitzgerald High School, received a Permit to Install (PTI) from Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) in the 1980's. Both permits were voided, per request by Fitzgerald Public Schools, on May 7, 2001. Below is a detailed timeline of these PTI events:

**August 15, 1980**

- Fitzgerald High School was issued PTI 32-80I for one solid waste incinerator

**May 30, 1986**

- Chatterton Middle School was issued PTI 3-86I for one solid waste incinerator

**July 31, 2000**

- AQD received a facsimile, signed by Scotty Perks, from Fitzgerald Facilities Office requesting PTI 32-80I be voided. A hand-written note on the void request stated "Per phone call 7/31/00 no incinerators at any schools" (see attachment).

**May 7, 2001**

- PTI 32-80I and PTI 3-86I were voided
- A letter from the MDEQ was sent to Fitzgerald Public Schools stating that PTI 32-80I and PTI 3-86I had been voided (see attachment)

**INSPECTION**

We entered the site, presented our DEQ employee photo identification, explained the purpose of the inspection, and gave a copy of the pamphlet "Environmental Inspections: Rights and Responsibilities" to Ms. Laurie Fournier, Principal, Mr. Keith Tonn, Principal and Mr. Bill Rudd, Supervisor -Maintenance. Mr. Tonn and Mr. Rudd accompanied us on the inspection.

**EMISSION UNITS***Solid Waste Incinerator*

We inspected an unpermitted, natural gas-fired, institutional solid waste incinerator at this facility. Mr. Rudd estimated that the incinerator was installed in 1969. There have been no modifications or reconstructions to Mr. Rudd's knowledge. The maximum heat input capacity of the incinerator is 6 MMBtu/h. The rated material capacity is 350 lb/hr (4.2 tons/day). According to Ms. Fournier and Mr. Rudd, only paper and books are burned in the incinerator. The incinerator is used daily between 7:00 pm and 9:30 pm during the school year only. It appears this incinerator is in violation R336.1201.

The AQD is developing a state plan for the operation of Other Solid Waste Incineration Units (OSWI) to comply with federal rule 40 CFR 60, Subpart FFFF, Emission Guidelines and Compliance Times for Other Solid Waste Incineration Units That Commenced Construction On or Before December 9, 2004. It

appears the incinerator at Chatterton Middle School will be subject to the requirements of this rule after it has been promulgated. This regulation specifies very stringent operation and emission requirements for your OSWI unit, which may make it cost-prohibitive to continue to operate, and includes the following principal components:

- Waste Management Plan requirements
- Operator Training and Qualification requirements
- Emission Limitations and Operating Limits
- Initial and Annual Performance Testing requirements
- Initial and Continuous Compliance Requirements
- Monitoring requirements (e.g. install, calibrate, maintain, and operate continuous emission monitoring systems for carbon monoxide and for oxygen)
- Recordkeeping and reporting requirements (e.g. semi-annual and annual reports)
- Title V Requirements (e.g. obtain an ROP pursuant to Rule 211(1)(c) and pay associated annual fees)

#### *Boilers*

There are two natural gas-fired boilers located at this facility. Each boiler was installed in 1969 and has a rated heat input capacity of 6.5 MMBtu/h. These units appear to be exempt from R 336.1201 in accordance with R 336.1283(b)(i) because the rated heat input capacity for each unit is not more than 50,000,000 Btu/h (50 MMBtu/h). MDEQ, AQD has not accepted delegation from the USEPA for enforcing the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR 63 Subpart JJJJJJ).

#### CONCLUSION

Chatterton Middle School appears to be in violation of R 336.1201 for installing and operating an unpermitted institutional solid waste incinerator. A violation notice has been issued.

NAME Kerup Kelly DATE 9/21/15 SUPERVISOR CTE