## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Scheduled Inspection** 

B152524156

FACILITY: COLDWATER BOARD OF PUBLIC UTILITIES		SRN / ID: B1525 ,
LOCATION: 25 BENNETT STREET, COLDWATER		DISTRICT: Kalamazoo
CITY: COLDWATER		COUNTY: BRANCH
CONTACT: William Metcalfe, Electric Superintendant		ACTIVITY DATE: 01/23/2014
STAFF: Dale Turton	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

Staff conducted an unannounced inspection at Coldwater Board of Public Utilities to determine compliance with Michigan Air Pollution Control (APC) Rules and Renewable Operating Permit No. MI-ROP-B1525-2010. Staff met with Bill Metcalfe and Ryan Crabtree. The plant operator, Ted Barnes was out on extended leave.

The facility currently operates one diesel-powered generator (EU-ENG-4) that is part of the flexible group (FG-ENGINES). This is the GM-Electromotive diesel fired engine currently listed as a 2750 KW unit. A portable 500 gallon fuel oil tank is being used to supply the engine. Records show that this was operated for 9 hours in CY 2013. According to the condition VI(1), records are also kept regarding the fuel oil usage rate. This was not operating at the time of the inspection. This unit will probably be taken out of service and removed from the site this spring or summer.

Two dual fuel (fuel oil and natural gas) engines (EU-ENGINE-3 & EU-ENGINE-5) have been removed from service and from the plant. Engine 3 was removed in September 2012 and engine 5 was removed in the fall of 2013. The large stationary fuel oil storage tank has also been removed.

The 3 engines are subject to the applicable requirements of 40 CFR Part 63 ("National Emission Standard for Hazardous Air Pollutants for Source Categories"), Subparts A ("General Provisions") and ZZZZ ("National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"). Since there is only one engine left, there is now only one subject engine. If all of the engines are removed, then there will be no more requirements for Coldwater BPU. If new engines are installed at this site, or at other locations, they may be subject to the New Source Performance Standard (NSPS).

Condition II.a and II.b of thr ROP requires that the maximum sulfur content in fuel oil shall not exceed the equivalent of 0.39% by weight as calculated on the basis of 18,000 BTU/lb of liquid fuel. A fuel oil analysis of a sample taken 4/29/2013 shows compliance.

There are some replacement engines either being installed or planned to be installed. These are to be located at the Water Plant, the Wastewater Plant, or other locations. Coldwater BPU should be looking to determine if permits are needed for the installation of any or all of these.

After the completion of the engine removals, Coldwater CPU should evaluate the future need to be a Title V major source.

NAME Gale Juston

DATE Jan 28, 2014 SUPERVISOR MB 1/28/2018