

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

B650826033

FACILITY: CLINTON VILLAGE OF		SRN / ID: B6508
LOCATION: 318 RIVER ST, CLINTON		DISTRICT: Jackson
CITY: CLINTON		COUNTY: LENAWEE
CONTACT: Gary Allen , Operator		ACTIVITY DATE: 07/10/2014
STAFF: Sersena White	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM 208A
SUBJECT: Unannounced targeted inspection at this Rule 208a facility with three peaking units subject to the RICE MACT.		
RESOLVED COMPLAINTS:		

SRN: B6508

Facility Name: Village of Clinton

Facility Address: 318 River Street, Clinton, MI 49236

Facility Contact: Gary Allen, Power Plant Operator

Supplemental Facility Contacts: Kevin Cornish, Clinton Village Manager; e-mail: [clintonvm@ini.net](mailto:clintonvm@ini.net)Matt Burk, Director of Environmental Compliance, Michigan South Central Power Agency (MSCPA); e-mail: [burkm@mscpa.net](mailto:burkm@mscpa.net)Introduction

The Village of Clinton has three reciprocating compression ignition combustion engines used to provide additional power to the Michigan South Central Power grid upon demand (peaking units). Information about the Village of Clinton Electrical Department is attached. Two of the three engines are grandfathered and one has a permit to install 521-77. The facility has been operating under Rule 208a requirements to avoid being subject to the Title V Renewable Operating permit program. On June 26, 2014, the village was sent a letter informing them that Rule 208a will be rescinded and that action is required by the facility. The rescission is expected to be finalized by early 2015.

Purpose

The purpose of the inspection is to determine compliance with Federal and State regulations and permit to install 521-77. The facility did notify our office that the engines are subject to 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This is referred to as the RICE MACT. The State of Michigan has delegated authority to evaluate compliance with this federal requirement. The applicable requirements that apply are for an area source (due to Rule 208a status) with compression ignition emergency use only diesel powered engines.

Inspection

On July 10, 2014, I arrived at the facility at approximately 9:17 a.m. I introduced myself to Gary and explained that I was there to conduct an inspection based on the permit to install and to go over the requirements of the MACT that applies to the engines. I gave him an inspection Rights and Responsibility brochure and pointed out the survey link on the back.

At the time of the inspection, none of the three engines were operating. I asked him when the last time the engines operated, and he went to his office and referred to a notebook where he kept dates of operation. Engines #1 was last operated on January 25, 2005 with load; Engine #2 was last operated on July 1, 2009 with load; Engine #6 was last operated on June 5, 2014 just to make sure that it was in good operating condition.

Table of Engines on site:

Emission Unit ID	Emission Unit Description	Installed Date	Michigan Regulatory Status
EU-ENG-1	Diesel Generator No. 1 (750 HP)	01/01/1937	Grandfathered
EU-ENG-2	Diesel Generator No. 2 (730 HP)	01/01/1937	Grandfathered
EU-ENG-6	Diesel Engine No. 6/Dual Fuel (2775 HP)	01/01/1978	PTI 521-77

He confirmed that diesel fuel is the only fuel used and on site. We briefly went over the requirements for area sources of emergency use compression ignition engines based upon Table 2d. The first thing that he pointed out was that the required engine oil change was cost prohibited because Engine #6 holds 1,100 gallons and the other two hold 375 gallons. I suggested that he write to EPA requesting an alternate compliance method due to the size and limited non-emergency use of these engines. I told him to copy our office on the letter.

The requirements of Table 2d to Subpart ZZZZ follows:

For each	You must meet the following requirement, except during periods of startup...
4. Emergency stationary CI RICE and black start stationary CI RICE <sup>2</sup>	a. Change oil and filter every 500 hours of operation or annually, whichever comes first <sup>1</sup>
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first; and replace as necessary.

<sup>1</sup>Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

<sup>2</sup>If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the acceptable risk under federal, state or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

After seeing the option to utilize an oil analysis program, I realized he may not have to contact the EPA. I made a copy of the requirements and I faxed them to the Village office with his attention on July 14, 2014.

I gave him a history of the opacity rule because the one cited in the permit has been replaced. I told him that it should basically have the same requirements. He offered to send me a video of the stack exhaust when engine #6 is operating. We looked at the stack dimensions in the permit and the height does not appear to meet the 36 feet above ground level. The diameter does appear to meet the 1.33 (approximately 16 inches) inches in diameter.

When I asked about engines #3, #4 and #5, he said they had been removed. I asked him to send me the dates when they were removed because they still appear in the Michigan Air Emissions Reporting System database.

Gary told me that the engines are on a three month operational maintenance schedule where he runs them at least 15 minutes each to ensure there are safe to operate. They test them annually to make sure there are no water leaks.

He asked me who would look at the records they are required to keep and I told him that AQD would look at them.

I left at approximately 9:37 a.m.

Follow-up

When I returned to the office, I faxed the Village of Clinton Supervisor, Kevin Cornish to ask him if the engines had hour meters, because I forgot to check while I was there. I also offered my assistance if they needed it to get a permit to install to opt out of Title V.

On July 15, 2014, at approximately 1:49 p.m., I called the Village of Clinton office to see if the faxes had been received and if Gary Allen or Kevin Cornish had looked at them. The lady that answered the phone told me that the faxes had been received. I told her that I wanted Gary Allen to get the information and so she transferred me to the garage where Gary works. I ended up leaving a message for Gary to contact me about the information in the faxes. As of July 17<sup>th</sup>, I have not heard back from Gary.

On July 17<sup>th</sup> I spoke with Kevin Cornish about the Rule 208a options because he did not understand them. I told him that if they could demonstrate true minor status then they would not have to get a permit. He said that the engines operated about 4 to 6 hours last year. I told him about the option to have the engine oil analyzed rather than changing it and he said that it would still be cost prohibitive annually. I told him that he would need to contact EPA in writing to request an alternate compliance schedule. He said that he would have Mark Burk of MSCPA contact me about choosing the best alternative for the Village of Clinton engines since Rule 208a is going to be rescinded. Mr. Cornish did confirm that all of the engines have non-resettable hour meters.

On July 21, I happened to be at MSCPA for an educational visit and I met Mark Burk. He showed me the language in the Memorandum: Calculating Potential to Emit (PTE) for Emergency Generators dated September 6, 1995, that the engines used by the Village of Clinton will not qualify as emergency generators. Under the Cautions Section it states- "Today's guidance is only meant to address emergency generators as described. Specifically, the guidance does not address: (1) peaking units at electric utilities; (2) generators at industrial facilities that typically operate at low rates, but are not confined to emergency purposes; and (3) any standby generator that is used during time periods when power is available from the utility." The units operated and maintained by the Village of Clinton are peaking units used when additional power is needed by the community. Based upon this conclusion, the Village of Clinton will need to apply for an Opt Out permit to restrict the PTE.

#### Conclusion

Based upon the information gathered during the inspection and follow-up, the Village of Clinton is complying with the requirements of permit to install 521-77. The MAERS data for 2013 show compliance with the VOC emission limit and the sulfur content of the diesel fuel. The visible emissions could not be verified because the unit was not in operation at the time of the inspection. The Village of Clinton will still need to write EPA regarding their compliance method and schedule regarding the maintenance of the engines.

Attachments include information about the Village of Clinton Electric Department, historical rules related to the opacity limit, information about the RICE compliance requirements and a copy of the Memorandum referenced, and copies of information from MAERS.

NAME Susan M. White DATE 7-22-2014 SUPERVISOR S

