

M0239
MAW14

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

M023941635

FACILITY: WAYNE STATE UNIVERSITY		SRN / ID: M0239
LOCATION: 5454 CASS AVENUE, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 08/24/2017
STAFF: Stephen Weis	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Compliance inspection of the Wayne State University stationary source in Detroit. The Wayne State facility is scheduled for inspection in FY 2017.		
RESOLVED COMPLAINTS:		

Location:

Wayne State University (SRN M0239)
Main Campus
5454 Cass Avenue
Detroit 48202

Date of Activity:

Thursday, August 24, 2017

Personnel Present:

Steve Weis, DEQ-AQD Detroit Office
Larry Fodor, Director of Utilities and Energy Management, Wayne State University

Purpose of Activity

A self-initiated inspection of the Wayne State University Main Campus facility (hereinafter "Wayne State") was conducted on Thursday, August 24, 2017. Wayne State is on my list of sources targeted for an inspection during FY 2017. The purpose of this inspection was to determine compliance of operations at the Wayne State facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), Federal standards, and with any applicable permits.

Facility Description

Wayne State is a public research university having its main campus located in the Midtown area of Detroit. Wayne State was founded in 1868 as the Detroit Medical College, and the school became Wayne State University per Act 183 of the Michigan Public Acts of 1956. The main campus currently encompasses over 200 acres, and consists of well over 100 separate buildings that are used in campus/facility operations ranging from education and research, libraries, residential properties, medical centers and maintenance activities. Many of the campus buildings are located in the area between Forest Avenue to the south, Interstate 94 to the north, John R Street to the east and Trumbull Avenue to the west. Wayne State also has a medical campus that is included as part of the stationary source, which is located in the area on the east side of John R Street between Warren and Mack Avenues. There are other buildings that are located outside of this area that are also included as part of the Wayne State stationary source; Wayne State has expanded into the area along Cass Avenue north of Interstate 94, and the Mike Ilitch School of Business is currently being constructed on the west side of Woodward Avenue near Temple Street. A map is attached to this report that shows the location of the Wayne State campus relative to surrounding areas in Detroit. Buildings that are part of Wayne State's main campus are highlighted on this map.

Facility Operations

As mentioned in the last section, Wayne State is a public research university. The Wayne State campus covers over 200 acres in the Midtown area of Detroit, and includes over 100 separate buildings.

From an air quality perspective, Wayne State is subject to regulations and the terms and conditions of DEQ-AQD permits due to some of the activities associated with the operations of the university, primary among them the use and operation of fuel fired equipment to provide heat, steam and back-up electrical power. This type of equipment is in use throughout the Wayne State campus. Attached to this report is the Emission Unit Summary Table from PTI No. 80-06A. This table provides a listing of the natural gas fired boilers, diesel fuel fired generators, natural gas fired generators, and natural gas fired incinerators that operate at Wayne State. The list also provides the location on campus of each of these emission units, the rating (i.e. heat input capacity, power output), and the installation/modification date of each unit.

Wayne State installed several of these emission units in 2006, when Wayne State was in the process of changing the arrangement through which the steam needs of the campus were met. At that time, Wayne State was a customer of the Detroit Thermal district steam network. The university made the decision to meet the steam needs for most of the campus by providing their own steam, generating it from their own equipment. PTI No. 80-06, which was issued on June 7, 2006, addressed the installation and operation of 63 new boilers and 10 new generators to provide heat and emergency back-up power for existing campus buildings. The cover letter that was submitted with the PTI application states the following:

"These are being added to 39 existing boilers and miscellaneous natural gas combustion sources under permit exemption Rule 282(b)(i) and Rule 285(g). The miscellaneous combustion sources include gas-fired emergency back-up generators and portable emergency back-up generators. We are seeking legally enforceable conditions that would limit the facility's potential to emit of any criteria pollutant to less than 90 tons per year."

"These", as referenced in this quote, are the 63 boilers and 10 generators that were being installed at that time.

The boilers and generators that are in operation on the Wayne State campus are small enough in terms of their respective maximum rated heat input capacities to be exempt from DEQ-AQD permitting requirements. Many of the boilers that have been installed at Wayne State are small package boilers, and they often operate in association with small, closed loop heat pumps to distribute heat to particular buildings to meet specific heating needs. Wayne State applied for and received PTI No. 80-06 in order to limit the potential emissions of NOx and CO from the increasing amount of combustion equipment at the facility to below major source thresholds.

Similarly, Wayne State applied for and received PTI No. 80-06A (issued on November 19, 2015) to allow for the addition of some new combustion equipment to the campus – six new diesel-fired emergency generators. Two of these generators were installed in association with the new IBio research building, and the other four were installed at other buildings on the Wayne State campus that need backup emergency power. These six generators were permitted to limit their potential emissions, and to include their emissions as part of the facility-wide limits for NOx and CO in combination with the emission units that were previously addressed by PTI No. 80-06.

I was told during the site visit that some upcoming new projects and developments on the Wayne State campus will also involve the installation and operation of combustion equipment. Wayne State will apply for a permit revision to include this equipment in their facility-wide permit, and to limit emissions from the new equipment in accordance with the existing facility-wide emission limits. Among these upcoming projects are a new housing project that is going to be built on Anthony Wayne Drive that will need one generator and some package boilers, and the new Mike Ilitch Business School, which will have some heaters. In addition, Scott Hall and the Pharmacy Building are currently still on the district steam network, and Wayne State has a contract with Detroit Thermal to provide the steam needs for those buildings. That contract is set to expire, and Wayne State is looking at providing their own steam needs for these two buildings going forward.

Inspection Narrative

I arrived at the Wayne State Facilities Planning and Management offices, located at 5454 Cass Avenue, at 1:00pm. I checked in at the front desk, and I was soon met by Larry Fodor. Larry and I proceeded to a conference room and we began the site visit and facility compliance review.

Larry started the discussion by presenting me with a couple of maps of the Wayne State campus that were prepared for me. These maps show all of the buildings at the main campus, and include a legend that provides

the name of each building. The maps also include symbols that represent generators and boilers and shows their location on campus. One of the maps is small enough that I was able to attach it to this report. The other map is relatively large, and it has been placed in the Wayne State facility file for reference.

Larry then provided me with an update regarding projects on campus. He described Wayne State's current efforts to move the campus' electrical supply from the City of Detroit's Public Lighting Department/Authority to DTE. The current project will convert the source of electricity for 34 buildings on campus. Two DTE substations, Temple and Stone School, will serve the campus. He described the new construction and renovation projects. A new housing project is to be constructed on Anthony Wayne Drive. Larry stated that this project is to include some package boilers to provide heat, and one generator for back-up power. The Mike Ilitch Business School building is currently under construction on the west side of Woodward at Temple. Larry told me that this building will be considered as part of the Wayne State stationary source, and any gas-fired heating equipment that is installed at that building will be included in the facility's permit. The Engineering Library is going to be remodeled and made into the new STEM (Science, Technology, Engineering and Mathematics) Building. Larry told me that the building will have its heating requirements met by excess capacity from the Biosciences Building.

Larry and I then started to discuss Wayne State's compliance status with PTI No. 80-06A. Larry provided me with several print outs of spreadsheets that detail many parameters related to the compliance status of the fuel burning combustion equipment on the Wayne State campus. These spreadsheets include:

- One titled "WSU Diesel Generators - Operating Hours, Monthly Fuel Consumption, and NOx and CO Emissions". This spreadsheet includes all of the equipment and Flexible Groups in the permit that cover diesel generators. Each diesel generator is listed in a column that includes the location of the generator on campus. Information included in this spreadsheet includes monthly records of the hours of operation, NOx emissions, and CO emissions.
- A spreadsheet titled "WSU Natural Gas Generators - Operating Hours, Monthly Fuel Consumption, and NOx and CO Emissions". This spreadsheet includes all of the equipment and Flexible Groups in the permit that cover natural gas-fired generators. Each natural gas generator is listed in a column that includes the location of the generator on campus. Information included in this spreadsheet includes monthly records of the hours of operation, NOx emissions, and CO emissions.
- A spreadsheet titled "Wayne State University – RY 2017 MAERS". This spreadsheet details the monthly natural gas usage by building, and it provides emission estimates for Wayne State's MAERS Report for each Flexible Group and Emission Unit.

These spreadsheets are attached to this report for referenced. Larry also provided me with a couple of examples of a report titled "Emergency Engine Generators – Operating Hours Summary" that detail each time that an engine is operated, the amount of time that the engine operated, and the reason for the operation (i.e. load test, maintenance, emergency use). I was provided with a printout of the forms for the generator in the Physics Building (EUGEN41) and the generator in the Computer Services #2 Building (EUGEN30), copies of which are attached to this report. I was also provided with examples of the monthly natural gas usage form (titled "WSU Monthly Natural Gas Usage, NOx and CO Emissions – By Building") that is used for each building on campus. The form also lists the natural gas fired equipment that is located in the building. Copies of the forms for the AAB and 259 Mack (Applebaum) buildings are attached to this report.

Larry told me that for the pathological incinerators that make up the FGINCIN Flexible Group, only the Scott Hall incinerator designated in the permit as EUSCINCINHUM is still in place; the other two incinerators have been permanently removed from service. The Scott Hall incinerator was taken offline in March 2016, and has not been operated since. Wayne State has not yet decided whether this remaining incinerator will operate again. We discussed having this Flexible Group either modified or removed when the PTI is next revisited/modified to include the new combustion equipment that will be installed at the facility.

We discussed the maintenance of the engines at Wayne State. Larry told me that regular maintenance and tune-ups are performed on all of the engines. The facility currently contracts with Michigan CAT, GMT Power/Wolverine and PMT Technologies to perform the maintenance. Wayne State schedules maintenance based on the engine manufacturer's recommendations in terms of the types of maintenance tasks and the time intervals between them.

After some closing conversation, we concluded the site visit. I left the facility at 2:30pm.

Permits/Orders/Regulations

Permits

The Wayne State facility currently has two active DEQ-AQD Permits to Install (PTI) – No. 80-06A, which addresses facility-wide NOx and CO emissions, and No. 99-04, which is a General PTI for an ethylene oxide sterilizer process. Larry is not involved with monitoring the operation of or maintained records for the sterilizer, which is located in Scott Hall. He told me that he could provide me with a contact person who would be familiar with the operating status of the sterilizer. The operation of this equipment was not evaluated as part of this site visit.

PTI No. 80-06A

This permit addresses the fuel combustion equipment at Wayne State. The various fuel combustion equipment at the facility has been placed in various Flexible Groups for the purposes of this permit, and there is a Flexible Group (FGFACILITY) that places facility-wide NOx and CO emission limits and a natural gas usage limit on all of the combustion equipment at Wayne State. PTI No. 80-06A was issued to address the installation and include the operation of six new diesel fuel-fired emergency generators, adding this equipment to of the fuel combustion equipment that was included in and permitted by PTI No. 80-06.

The following paragraphs provide a description of Wayne State's compliance with the terms and conditions put forth by PTI No. 80-06A, with the headings representing the Flexible Groups in the PTI.

FG1, FG2, FG3, FG4, and FG7

These five Flexible Group represent the natural gas-fired boilers covered by the permit. The special conditions in these Flexible Group tables are pretty much identical.

I. Emission Limits

Each of these Flexible Groups includes a NOx and CO emission limit in units of lb/MMBTU. There is no specific requirement to test the boilers to verify these emission limits; there is a reference to General Condition 13, which states that compliance emission testing may be required upon request by DEQ-AQD. Emission factors, presented in units of lb/MMcf of natural gas, and converted from the emission limits by assuming a natural gas heating value of 1,020 BTU/cubic foot, are put forth in Appendix A of the PTI. Per the guidance associated with the appendix, these emission factors are to be used, in combination with the recorded natural gas usage, to estimate NOx and CO emissions.

II. Material Limits

FG2, FG3 and FG4 include a Special Condition (SC) limiting the equipment in those Flexible Groups to only combust natural gas.

III. Process/Operational Restrictions

FG7 includes a Special Condition (SC) in this section limiting the equipment in those Flexible Groups to only combust natural gas.

VIII. Stack/Vent Restrictions

All of the FGs except FG7 include a listing of the stacks and stack parameters for all of the equipment in the respective Flexible Group. The stack information was not verified or discussed during this site visit.

Wayne State is **in compliance** with the terms and conditions in FG1, FG2, FG3, FG4 and FG7.

FG5

This Flexible Group includes the natural gas-fired generators currently operating at Wayne State.

I. Emission Limits

This Flexible Groups puts forth five separate NOx and CO emission limits in units of pounds per hour; the five separate limits are assigned to either individual or groups of equipment (i.e. natural gas-fired generators) that are

part of this Flexible Group. There is no specific requirement to test the generators to verify these emission limits; there is a reference to General Condition 13, which states that compliance emission testing may be required upon request by DEQ-AQD. Per the guidance associated with Appendix A to the permit, Wayne State is instructed to track the hours of operation of these generators, and multiply the hours by the emission limit in pounds per hour associated with each generator to estimate the NOx and CO emissions from these generators.

II. Material Limits

SC II.1 limits the generators in this Flexible Group to only combust natural gas. **Compliance.**

III. Process/Operational Restrictions

SC III.1 – **Compliance.** Each generator is limited to 500 hours of annual operation. The spreadsheet titled "WSU Natural Gas Generators – Operating Hours, NOx and CO Emissions", is used to track the hours of operation of each generator in this Flexible Group. This spreadsheet shows that the hours of operation are well in compliance with this limit.

VI. Monitoring/Recordkeeping

SC VI.1 – **Compliance.** The spreadsheet referenced in the discussion for SC III.1 is used to track the operating hours of each generator, the NOx emissions and the CO emissions on a monthly basis.

SC VI.2 – **Compliance.** Wayne State calculates NOx and CO emissions from these generators, and this information is used as part of the source-wide emission calculation, in accordance with Appendix A.

VIII. Stack/Vent Restrictions

The stack information was not verified or discussed during this site visit.

Wayne State is **in compliance** with the terms and conditions in FG5.

FG6

This Flexible Group includes the diesel fuel-fired generators currently operating at Wayne State.

I. Emission Limits

This Flexible Groups puts forth nine separate NOx and CO emission limits in units of pounds per hour; the five separate limits are assigned to either individual or groups of equipment (i.e. diesel fuel-fired generators) that are part of this Flexible Group. There is no specific requirement to test the generators to verify these emission limits; there is a reference to General Condition 13, which states that compliance emission testing may be required upon request by DEQ-AQD. Per the guidance associated with Appendix A to the permit, Wayne State is instructed to track the hours of operation of these generators, and multiply the hours by the emission limit in pounds per hour associated with each generator to estimate the NOx and CO emissions from these generators.

II. Material Limits

SC II.1 limits the generators in this Flexible Group to only combust diesel fuel. **Compliance.**

SC II.2 – **Compliance.** Wayne State utilizes one fuel supplier for all of the diesel used on campus. Every time that a building receives a load of diesel fuel, Wayne State receives a separate bill of lading. I was provided with correspondence from Wayne State's fuel supplier, D&W Oil Company, stating that D&W delivers only ultra low sulfur diesel fuel (0.0015% maximum sulfur content) to all Wayne State stand by generators. A copy of this correspondence, that includes safety data sheets and specification information, is attached to this report for reference.

III. Process/Operational Restrictions

SC III.1 – **Compliance.** Each generator is limited to 500 hours of annual operation. The spreadsheet titled "WSU Diesel Generators – Operating Hours, NOx and CO Emissions", is used to track the hours of operation of each generator in this Flexible Group. This spreadsheet shows that the hours of operation are well in compliance with this limit.

VI. Monitoring/Recordkeeping

SC VI.1 – **Compliance.** The spreadsheet referenced in the discussion for SC III.1 is used to track the operating hours of each generator, the NOx and CO emissions, and the fuel usage on a monthly basis. Fuel receipts are also kept as described in the discussion for SC II.2.

SC VI.2 – **Compliance.** Wayne State calculates NOx and CO emissions from these generators, and this information is used as part of the source-wide emission calculation, in accordance with Appendix A.

VIII. Stack/Vent Restrictions

The stack information was not verified or discussed during this site visit.

Wayne State is **in compliance** with the terms and conditions in FG6.

FG-NSPSIII

This Flexible Group includes the diesel fuel-fired generators that are subject to the requirements of 40 CFR Part 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines). These generators are those designated in the permit as EUGEN40, EUGEN41, EUGEN42, EUGEN43, EUGEN44 and EUGEN45. These are also the six generators that necessitated the application for and issuance of PTI No. 80-06A.

I. Emission Limits

This Flexible Groups puts forth separate NOx and CO emission limits in units of pounds per hour for the six generators, and a NOx+HC and CO emission limit in units of g/kW-hr that applies to all six generators.

The permit application materials for this permit put forth the pounds per hour values for NOx and CO, as presented in SCs I.1 through I.12 in this Flexible Group, and state that these hourly emissions rates are based on the maximum rated capacity of the engines in full standby mode. Thus, like the pounds per hour values in the Emission Limit SCs for FG6, Wayne State is to use these emission rates, in combination with the actual hours of operation of each of these generators, to estimate the NOx and CO emissions from these generators.

Under the "Testing/Monitoring Method" column in the Emission Limit table, for SCs I.1 through I.12, SCs V.1 and V.2 are provided as the method. SCs V.1 and V.2 put forth the testing requirements associated with Subpart IIII. The emission limits in SCs I.1 through I.12 are not NSPS Subpart IIII emission limits. In addition, these limits are to be used in the same way as those for the generators in FG6 – in combination with fuel usage to estimate emissions from the generators. Thus, the Testing/Monitoring Method for these engines should be GC 13.

II. Material Limits

SC II.1 limits the generators in this Flexible Group to only combust diesel fuel. **Compliance.**

SC II.2 – **Compliance.** As mentioned in the discussion for FG6, Wayne State utilizes one fuel supplier for all of the diesel used on campus. Every time that a building receives a load of diesel fuel, Wayne State receives a separate bill of lading. I was provided with correspondence from Wayne State's fuel supplier, D&W Oil Company, stating that D&W delivers only ultra low sulfur diesel fuel (0.0015% maximum sulfur content) to all Wayne State stand by generators. A copy of this correspondence, that includes safety data sheets and specification information, is attached to this report for reference.

III. Process/Operational Restrictions

SC III.1 – **Compliance.** Each generator is limited to 500 hours of annual operation. The spreadsheet titled "WSU Diesel Generators – Operating Hours, NOx and CO Emissions", is used to track the hours of operation of each generator in this Flexible Group. This spreadsheet shows that the hours of operation are well in compliance with this limit.

SC III.2 – **Compliance.** Facility staff track the hours of operation of these six generators, and the reason for the operation, on a form titled "Emergency Engine Generators – Operating Hours Summary". A copy of the form for EUGEN41, which shows year-to-date information up through July, is attached to this report for reference.

SC III.3 and III.4 – **Compliance**. The engine are certified engines, and they are operated and maintained in accordance with manufacturer's instructions.

IV. Design/Equipment Parameters

SC IV.1 – **Compliance**. The generators are equipped with non-resettable hours meters.

SCs IV.2 through 5 – **Compliance**. I was told that the nameplate capacity of each of the six generators does not exceed the value listed in the SC.

V. Testing/Sampling

SC V.1 and V.2 – **Compliance**. All six of the generators/engines are certified engines. The Certifications are provided in Appendices B and C of the application materials for PTI No. 80-06A. A copy of the information in Appendices B and C is attached to this report. Accordingly, a performance test is not required.

VI. Monitoring/Recordkeeping

SC VI.1 – **Compliance**. The spreadsheet referenced in the discussion for SC III.1 is used to track the operating hours of each generator, the NOx and CO emissions, and the fuel usage on a monthly basis.

SC VI.2 – **Compliance**. Wayne State calculates NOx and CO emissions from these generators, and this information is used as part of the source-wide emission calculation, in accordance with Appendix A.

SC VI.3 – **Compliance**. Wayne State maintains records of the engine certifications for the six generators in this Flexible Group.

SC VI.4 – **Compliance**. As mentioned in the discussion for SC III.2, facility staff track the hours of operation of these six generators, and the reason for the operation, on a form titled "Emergency Engine Generators – Operating Hours Summary".

SC VI.5 – **Compliance**. As mentioned in the discussion for SC II.2, Wayne State maintains records for each delivery of diesel fuel that is received. Information relating to the requirements of this SC are attached to this report.

VII. Reporting

Wayne State is **in compliance** with the requirements in this section. The notification required by Subpart IIII was submitted to DEQ-AQD via correspondence dated April 4, 2016. A copy is attached to this report for reference.

VIII. Stack/Vent Restrictions

The stack information was not verified or discussed during this site visit.

Wayne State is **in compliance** with the terms and conditions in FG-NSPSIII.

FGINCIN

This Flexible Group addresses three pathological incinerators that have been in operation at Wayne State – one at Mott Hall, and the other two at Scott Hall. I was told during this site visit that the Scott Hall pathological incinerator identified as EUSCINCINHUM was the only incinerator operating. The other two units in this Flexible Group, EUMOTTINCINANIM and EUSDINCINANIM, are no longer in operation and have been permanently shut down. EUSCINCINHUM was taken offline in 2016, and Wayne State is uncertain as to whether they will operate this unit again.

This Flexible Group places annual feed rates on each of the incinerators. EUSCINCINHUM is limited to 40 tons per year of feed by SC II.3. The MAERS Report for 2016 shows a reported 8.54 tons of feed for the Flexible Group. This is well under the limit in the permit.

SC VI.1 requires that records be kept of the amount of material fed to each incinerator. I was told that records were kept when the units were operating.

Wayne State appears to be **in compliance** with FGINCIN.

FGNSPSDc

This Flexible Group addresses natural gas fired boilers with a maximum heat input capacity of greater than 10 MMBTU/hour that are subject to 40 CFR Part 60, Subpart Dc. The conditions in this Flexible Group require that the equipment in this Flexible Group only combust natural gas (SC III.1), and that the notification requirements in 40 CFR 60.7 and 60.48c(a) are met. Wayne State is **in compliance** with these requirements. The notification required by Subpart Dc was submitted to DEQ-AQD via correspondence dated November 29, 2006. This information can be found in Wayne State's facility file.

FGFACILITY

This Flexible Group places facility-wide limits on NOX and CO emissions, as well as natural gas usage.

I. Emission Limits

SCs I.1 and 1.2 – **Compliance**. The spreadsheet titled "Wayne State University – RY 2017 MAERS" is being used to track facility-wide emissions for 2017. The facility's 2016 MAERS report showed emissions of 25.6 tons of CO and 32 tons of NOx in 2016.

II. Material Limits

SC II.1 limits the amount of natural gas that can be used at the Wayne State facility to 1.45 billion cubic feet per 12 month rolling time period. Natural gas usage at the facility is tracked using the various spreadsheets referenced throughout this report by building, and by flexible group. The records that are kept by building include 12 month rolling natural gas usage. The facility's 2016 MAERS report showed that 667.72 MMCF of natural gas was used in 2016. **Compliance**.

VI. Monitoring/Recordkeeping

SC VI.1 – **Compliance**. Wayne State calculates NOx and CO emissions for the facility, in accordance with the procedures in Appendix A of PTI No. 80-06A.

SC VI.2 – **Compliance**. Wayne State tracks and records the amount of natural gas used at the facility. Natural gas usage is tracked and recorded by building, and by emission unit.

Compliance Determination

Based upon the results of the August 24, 2017 site visit and subsequent records review, Wayne State University appears to be in compliance with all of the terms and conditions of PTI No. 80-06A, as well as applicable State and Federal regulations.

Attachments to this report: A map of the Wayne State campus relative to surrounding areas in Detroit, on which buildings that are part of Wayne State's main campus are highlighted; a copy of the Emission Unit Summary Table from PTI No. 80-06A; a map of the Wayne State campus with the locations of the generators and boilers on campus highlighted; a copy of a spreadsheet titled "WSU Diesel Generators - Operating Hours, Monthly Fuel Consumption, and NOx and CO Emissions"; a copy of a spreadsheet titled "WSU Natural Gas Generators - Operating Hours, Monthly Fuel Consumption, and NOx and CO Emissions"; a copy of a spreadsheet titled "Wayne State University – RY 2017 MAERS"; examples of the "Emergency Engine Generators – Operating Hours Summary" report; examples of the monthly natural gas usage form titled "WSU Monthly Natural Gas Usage, NOx and CO Emissions – By Building"; a copy of correspondence from D&W Oil Company relating to oil used at Wayne State; Appendices B, C and D from the application for PTI No. 80-06A that contain emissions and certification information for the six newest generators at the facility; a copy of the certified operation notification for the six newest generators that is required by SC VII.1 in FG-NSPSIII.

NAME Steve WeissDATE 12/15/17SUPERVISOR JK