

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

N593024972

FACILITY: DELTA COLLEGE		SRN / ID: N5930
LOCATION: 1961 Delta Drive, AUBURN		DISTRICT: Saginaw Bay
CITY: AUBURN		COUNTY: BAY
CONTACT: Jeffrey Jump , Asst. Director Facilities Management		ACTIVITY DATE: 04/21/2014
STAFF: Kathy Brewer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Determine compliance w/PTI #252-96A. Also reviewed Boiler MACT applicability. Facility does not appear subject to 40 CFR Part 63 Subpart JJJJJJ - Area Source Boiler MACT.		
RESOLVED COMPLAINTS:		

I conducted an announced inspection at the Delta College powerhouse facility. I was accompanied by Mr. Jeffrey Jump, Assistant Facilities Management Director of Delta College., and Mr. James Witucki, Delta Mechanical Maintenance.

The facility was issued PTI #252-96A in 2002 for 3 boilers that are capable of burning natural gas or oil. The facility is subject to 40 CFR Part 60 Subparts A and Dc (New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units). The facility does not appear to be subject to 40 CFR Part 63 Subpart JJJJJJ (Area source Boiler MACT)

We reviewed the facility's air permit PTI #252-96A and viewed the boiler room and associated operations, metering and records. There were no violations of air permit PTI#252-96A found during the inspection.

The Delta College powerhouse installed 3 Johnston high pressure steam boilers in August 1996. The main use is steam generation for heating and hot water at the college. Natural gas is the primary fuel for the boilers. #6 fuel oil is an alternate fuel source. The facility has not used fuel oil since installation. The facility also has a cogeneration boiler that has not been used for several years and is exempt to Rule 201 permitting per Rule 282 (b). The facility normally operates one boiler at a time. One of the larger boilers are used during peak demand and the smaller boiler used during lower demand time. Use of each larger boiler is alternated unless maintenance is required. The majority of PTI #252-96A emission limits and other special conditions apply during periods when fuel oil is burned.

**FINDINGS**PTI 252-96A: Compliant

The facility has two 20.9 MMBtu/hr and one 10.5 MMBtu/hr boilers. The PTE calculated for the PTI was based on emissions from burning fuel oil. Natural gas PTE emissions were not considered significant. The PTE for the three boilers was 114.5 TPY SO<sub>2</sub>, 32.0 TPY NO<sub>x</sub>, and 8.2 TPY CO. The PTI contains an emission limit of 28.0 TPY for SO<sub>2</sub>. The actual emissions reported in the 2013 MAERS were 42 lbs SO<sub>2</sub>, 6963 lbs NO<sub>x</sub>, and 5849 lbs CO w/a natural gas throughput of 69.63 MMBtu. No fuel oil was burned.

While burning fuel oil, the monitoring and recording of sulfur dioxide emissions, fuel oil use, and operating information, is required to comply with NSPS Part 60 Subpart Dc. According to Mr. Jump and on-site records no fuel oil has been used in the boilers.

FGBOILERS Special Condition 1.5, 1.6, and NSPS subpart Dc 60.48c (4) require the facility to record the amount of fuel combusted each month. Gas usage for the powerhouse is metered by Consumers Energy. The three boilers use over 90% of the total natural gas delivered to the powerhouse. The gas metering station totalizer reading was 421292 and the non-boiler gas meter reading was 217944. The facility also has read outs and records for each boiler. For reported throughput the facility uses the site gas total minus the non-boiler gas usage. We reviewed the daily gas usage records for December 2013, monthly gas usage records for the period of April 2014, December 2013, and calendar year 2013. Copies of example records are attached.

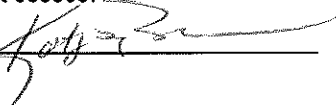
We viewed the meters and other monitoring devices for each boiler in the boiler room. Boiler #2 was operating. The instantaneous readouts at 10:15 am on 4-21-2014, for steam generation, was 76 PSI using natural gas at a rate of approximately 11,000 lbs/hr.

Mr. Jump & I reviewed regulatory information from the 40 CFR Part 63, Subpart JJJJJJ (Boiler MACT). Based on the definitions and applicability information in the regulation, the Delta College boilers are not covered by the Area Source Boiler MACT. The boilers are gas fired boilers as defined in 40 CFR 63.11237. Per 40 CFR 63.11195(e) they are not subject to subpart JJJJJJ.

NAME

DATE

SUPERVISOR



4/24/14

