

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

N652430282

FACILITY: Diesel Plant		SRN / ID: N6524
LOCATION: 518 S. Harbor Dr., GRAND HAVEN		DISTRICT: Grand Rapids
CITY: GRAND HAVEN		COUNTY: OTTAWA
CONTACT: Paul Cederquist, Environmental Compliance Specialist		ACTIVITY DATE: 07/20/2015
STAFF: Steve Lachance	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FCE for FY '015.		
RESOLVED COMPLAINTS:		

This was an unannounced, scheduled inspection. Given weather conditions, SL had anticipated (*remotely*) possible operations this day. SL was accompanied by KD of this office. SL notified Mr. Paul Cederquist of the facility en-route to GHBLP's Sims Plant and announced his intention to complete an inspection of both facilities this day. Mr. Cederquist confirmed "no" operating plans for the day at the Diesel Plant, and accompanied SL and KD to this plant following activities at the JB Sims Plant. The inspection of the Diesel Plant itself occurred concurrently with the JB Sims inspection, concluding with an on-site review of equipment and pertinent on-site records.

Prior to meeting Mr. Cederquist at Sims, SL arrived in the facility vicinity and confirmed no visible emissions or operations. Weather conditions were clear, about 70 degrees F, with increasing WSW winds at about 10+ mph.

The inspection(s) commenced with a formal entrance interview at Sims; and SL shared DEQ's "Environmental Inspections: Rights and Responsibilities" brochure with Mr. Cederquist. SL outlined the following "Areas of Interest" for the inspection of the Diesel Plant:

- Current Operations;
- Records of Fuel and Operations, in support of 2014 MAERS; and through the last 12-month rolling time period;
- Compliance with "new" "Opt-Out" PTI No. 164-14;
- Any changes to equipment or process;
- RICE MACT Compliance; and
- Area Source Boiler MACT Applicability

Mr. Cederquist confirmed that no engines were operating on this date. Only engine No. 1 (7.9 MW) is currently operational and compliant with the RICE MACT. This is a Minor (Area) Source of HAPs, as limited by Opt-Out Permit to Install No. 164-14. As such it is an "Area" source with respect to the Boiler MACT. Rule JJJJJJ does not regulate "gas-fired" units, and so the on-site warming boiler (which burns natural gas only) is not subject to this rule.

In theory, monthly reports are compiled at the management level from the daily logs prepared on-site by the operators. These monthly reports also include current fuel usage estimates. In recent practice, the facility's engines have not operated since MACT testing in July

2014. These records (albeit "zero" fuel use and operations) were readily available. SL especially verified based on present paperwork that the last operations were indeed last July 17, 2014. See attached "2014 Operating" summary. Such reports are the basis for MAERS reporting; SL verified consistency with the EI2014 MAERS Report. Note, all reported material usages and emissions are well below levels allowed by PTI No. 164-14.

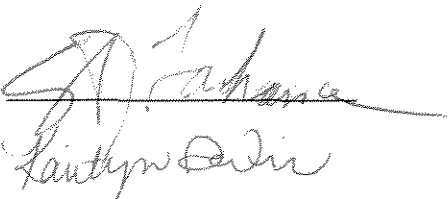
SL verbally confirmed his understanding (per previous inspections) that the old "heavy" distillate tank has been dismantled and **only** Ultra Low Sulfur Diesel (ULSD; defined as 15 ppm S maximum, i.e., 0.0015% Sulfur by weight) has been received/used on site since. Given the applicable sulfur restriction per Rule 402(1) of **1.7 pounds SO₂ per million Btu heat input**, compliance is assured with the use of ULSD.

SL confirmed that **concurrent opacity records (non-certified, but experienced observer) are taken at the time of operation. Operations may be limited to maintain opacity values of 20% or less.**

SL observed the installation of catalyst and differential pressure/inlet temperature monitors for Engine No. 1. Mr. Cederquist had previously provided the results of compliance testing for this engine; the results indicate compliance with the RICE MACT, at about 98% CO reduction and less than 4 ppmc CO.

FINAL SUMMARY; At this time, SL considers the source to be in compliance with applicable air use rules and regulations. Records are complete through the facility's last operations and recordkeeping provisions are in place should operations recommence. The RICE MACT has been addressed only for Engine 1 and so other engines on-site are now unavailable for any use other than emergencies. No Boiler MACT issues/concerns were noted based on use of natural gas (only) in the on-site warming boiler.

Attachment: Records through 2014 (no operations since)

NAME  DATE 7/24/15 SUPERVISOR 