

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

N652442802

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: 12/21/2017
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance
SUBJECT: The purpose of the inspection was to determine compliance with PTI No. 164-14.	
RESOLVED COMPLAINTS:	

On Thursday December 21, 2017 Air Quality Division (AQD) staff Kaitlyn DeVries (KD) conducted an announced, scheduled inspection at Grand Haven Board of Light and Power – Diesel Plant (Diesel Plant) located at 518 South Harbor Drive, Grand Haven, Michigan. The reason the inspection was announced was due to the fact that the diesel facility is primarily unmanned, unless in use. The purpose of the inspection was to determine compliance with PTI No. 164-14. KD contacted Mr. Paul Cederquist, Environmental Compliance Specialist, the day prior to the inspection.

Facility Description

The Diesel Plant operates one (1) diesel/natural gas engines for peak shaving. There are actually seven (7) units installed at the plant, however, all except for the one (1) have been decommissioned to the point that they are rendered inoperable. The plant only operates when called upon, but per Mr. Cederquist, the plant hasn't been called upon recently, so they just run the engine primarily for testing purposes. The last date that the engine ran was September 26, 2017.

Regulatory Analysis

The Diesel plant currently holds one (1) permit, PTI NO. 164-14. This is an Opt-Out permit, for Carbon Monoxide (CO) and for Nitrogen Oxides (NOx), restricting emissions below Title V major source thresholds. The engines are subject to the provisions of 40 CFR Part 63 Subpart ZZZZ, the National Emission Standard for Hazardous Air Pollutants (NEHSAP) for Stationary Reciprocating Internal Combustion Engines (RICE MACT). The onsite natural gas only boiler is not currently subject to, 40 CFR Part 63 Subpart JJJJJJ, the NESHAP for Industrial, Commercial, and Institutional Boilers, since the unit burns only natural gas, and the diesel plant is considered an area source. Additionally, Michigan does not currently have delegation for the RICE MACT at area sources, therefore Subpart ZZZZ will not be further evaluated.

Compliance Evaluation

The Diesel plant currently has opt-out limits for Carbon Monoxide (CO) and Nitrogen Oxides (NOx). Each are limited to less 70.8 tons per year (tpy) and less than 90.0 tpy, respectively, both 12-month rolling. Per the attached records, the 12-month rolling emissions for CO are 2.72 tons, and 3.06 tons for NOx. The emission factors, as specified in the permit, are being used to calculate the emissions in conjunction with the throughput of the fuel.

Biodiesel, in addition to diesel and natural gas, are allowed to be burned in the engines. However, Mr. Cederquist stated that they haven't burned biodiesel in a number of years, and the engine that had that capability is no longer in service.

Natural gas usage is limited to 35,214,778 cubic feet per year (cf/yr) based on a 12-month rolling average. Similarly, diesel/biodiesel usage is limited to 60,818 gallons/yr. Records indicate 12-month rolling throughputs of 1,424,750 cf/yr for natural gas and 700 gallons for diesel. All usage is properly monitored, tracked, and recorded. The reported emissions records and throughputs are fairly consistent with what has been reported in previous years MAERS reports.

As previously mentioned, there is one (1) small natural gas only boiler that was installed in 1964, and is "grandfathered" therefore not subject to Rule 201 permitting.

Finally, there is one (1) cold cleaner, that was properly closed, labeled, and empty that appears to be exempt from Rule 201 permitting under Rule 281(2)(h).

Compliance Determination

Based on the observations made during the inspection and a subsequent review of the records, it appears as if Grand Haven Board of Light and Power – Diesel Plant is compliant with PTI No 164-14.

NAME Kailey Davis DATE 12/27/17 SUPERVISOR [Signature]