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

N784454468

FACILITY: DTE (EMERGENCY GENERATORS AT FORD R&E CENTER)		SRN / ID: N7844
LOCATION: 21500 OAKWOOD BLVD, DEARBORN		DISTRICT: Detroit
CITY: DEARBORN		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 07/22/2020
STAFF: Jorge Acevedo	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

COMPANY NAME : DTE Energy Services
FACILITY ADDRESS : 21500 Oakwood Blvd., Dearborn, MI 48124
STATE REGISTRAT. NUMBER : N7844
SIC CODE :
EPA SOURCE CLASS : B
EPA POLLUTANT CLASS : O
LEVEL OF INSPECTION : PCE
DATE OF INSPECTION : 07/20/20
TIME OF INSPECTION :
DATE OF REPORT :
REASON FOR INSPECTION : Targeted Inspection
INSPECTED BY : Jorge Acevedo
PERSONNEL PRESENT : Jonathan Neal, Jared Kolwyck
FACILITY PHONE NUMBER : 313-982-1195
FACILITY FAX NUMBER : 313-982-1196

FACILITY BACKGROUND

The five diesel fired generators located at the Ford Research and Engineering Center are owned and operated by DTE Energy Services. The generators provide energy during peak shaving periods. The generators are not staffed and are maintained as needed. During May through September, the generators are run weekly for a half hour. During October through April, the generators are run monthly for a half hour.

There is a contract between Ford Motor Company and DTE Energy Services which was recently renewed in 2015. The contract specifies that DTE Energy Services is responsible for operation and environmental compliance for the generators.

INSPECTION NARRATIVE:

On July 22, 2020, I performed a scheduled inspection of the DTE Energy Services five diesel fired generators. I arrived at 9AM at the site of the generators, which are located on the property of Ford Motor Company Research and Engineering facility. There are three stacks associated with the five generators. There were no visible emissions.

I met with Mr. Jonathan Neal and Jared Kolwyck. I observed five generators. They are all Caterpillar Model 3516B, 2MW diesel fired generators. I asked Mr. Kolwyck how they get their fuel to run the generators. He said that fuel is pumped from one of Ford's underground tanks which supplies fuel for their motor pool. The fuel is pumped into the 200 gallon day tank that each generator has. I asked to see the hours that each generator has run:

- Generator 1 - 551
- Generator 2 - 494
- Generator 3 - 561
- Generator 4 - 541
- Generator 5 - 424

The generators were installed in 2001. Each generator has run approximately 7-9 hours per year.

I asked Mr. Kolwyck for records for hours run, emission calculations, and fuel shipments. I left at 9:30AM. I asked for records via email on July 22, 2020 and received them from Mr. Kolwyck on July 29, 2020.

COMPLAINT/COMPLIANCE HISTORY:

The facility has never been inspected.

OUTSTANDING CONSENT ORDERS:

None

OUTSTANDING LOVs

None

APPLICABLE RULES/PERMIT CONDITIONS:

Permit 181-00A

3. Applicant shall not operate any of the generators comprising FGGENERATORS for more than 250 hours per 12-month rolling time period as determined at the end of each calendar month. A written log of the operating hours for each engine shall be kept on file for a period of five years and made available to the Air Quality Division upon request. This condition is necessary to ensure that FGGENERATORS will not be a major stationary source as defined in the Federal Prevention of Significant Deterioration regulations, 40 CFR 52.21, and R336.1211(a)(ii), R336.1205(1)(a), and R336.1205(3).

COMPLIANCE- Records are kept. The highest 12 month rolling total was 9.85 hours in May 2016.

4. Visible emissions from FGGENERATORS shall not exceed a six-minute average of 10 percent opacity. (R336.1301(c))

UNDETERMINED- Generators were not operating during the time of the inspection

5. Nitrogen Oxides (NO_x) emissions from FGGENERATORS shall not exceed 30.4 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month. Records of the emissions shall be kept on file for a period of five years and made available to the Air Quality Division upon request. (40 CFR 52.21 and R336.1211(a)(ii), R336.1205(1)(a), and R336.1205(3).

COMPLIANCE- Records are kept. NO_x emissions are well below the 30.4 Tons per Year permit limit.

6. The sulfur content in the fuel oil fired in FGGENERATORS shall not exceed 0.05%, by weight. Records of the sulfur content of each shipment of fuel oil shall be kept on file for a period of five years and made available to the Air Quality Division upon request. (Wayne County Ordinance, Section 6, Rule 6010, and to ensure that FGGENERATORS are not subject to 40 CFR Part 72.7).

COMPLIANCE- Sample of fuel oil was taken the day of the inspection. Results were received on July 29, 2016. Results showed that the sulfur was 0.02% sulfur which is below the limit of 0.05% by weight. Lab results were placed in facility file.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

N/A- Lot is paved.

NSPS Subpart IIII- Stationary Compression Ignition Internal Combustion Engines

The generators were installed in 2001. Therefore, the generators are not subject to 40 CFR 60 Subpart IIII because the applicability date is:

- Constructed (ordered) after July 11, 2005, and manufactured after April 1, 2006 (July 1, 2006 for fire pump engines), or
- Modified or reconstructed after July 11, 2005.

NESHAP Subpart ZZZZ- Reciprocating Internal Combustion Engines

The emergency generators were installed in 2001. They are located at an area source of HAPS. The facility is complying with the oil analysis program instead of changing oil at a specified frequency. The hours of operation are monitored and recorded. Maintenance records were not checked this time as hours of operation have been around 7-9 hours a year.

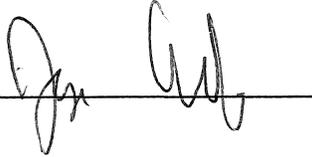
MAERS REPORT REVIEW:

MAERS was submitted for 2015 timely and a review was completed. There were no major issues found during the review. MAERS is required because the facility is considered an opt-out source for New Source Review.

FINAL COMPLIANCE DETERMINATION:

The facility is operating in compliance with applicable regulations.

NAME



DATE

7-22-20

SUPERVISOR

