

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

N801227360

FACILITY: MICHIGAN BELL TELEPHONE COMPANY, DBA AT&T MICHIGAN	SRN / ID: N8012
LOCATION: 114 DIVISION AVE, GRAND RAPIDS	DISTRICT: Grand Rapids
CITY: GRAND RAPIDS	COUNTY: KENT
CONTACT: Brian Van Horn, Plant Manager	ACTIVITY DATE: 09/25/2014
STAFF: Denise Plafcan	COMPLIANCE STATUS: Compliance
SUBJECT:	SOURCE CLASS: Minor
RESOLVED COMPLAINTS:	

Denise Plafcan (DP) conducted an unannounced scheduled inspection to determine compliance with state and federal Air Quality rules and regulations and PTI 135-12. DP met with, Tom Bobbett, Real Estate and Brian Van Horn, Plant Manager after a brief introduction and discussion, DP explained the purpose of the inspection and reviewed the Environmental Inspection brochure. Lou Solis is the Environmental Manager but he was not available. Tom and Brian were not familiar with PTI 135-12 so DP left a copy and arranged a second meeting for September 30, 2014.

9/30/14

DP met with Brian (Lou Solis was not available). A physical inspection of the unit located on the 6th floor was conducted. This new generator covered under PTI 135-12 is for the top 3 floors 4,5,and 6. The records of operation are located in the basement next to the second generator which is used for floors 1,2, and 3. The second generator, in the basement, was originally permitted under General Permit to Install PTI 80-08 issued on April 9, 2008. However, the General Permit for Diesel Generators was rescinded on July 6, 2010 and a notification letter was sent to the company and the company never took any action to re-permit the unit. DP agreed to send Brian the file for the engine located in the basement. Permit Engineer David Riddle sent Ms. Michele Blazek an e-mail reiterating that AQ needed to be notified when the engine covered under PTI 88-08 was replaced so the PTI could be voided. DP will discuss these ongoing issues regarding the General Permit with the corporations representative since several locations throughout the State are involved and a Violation Notice (VN) may be issued.

SPECIAL CONDITIONS**EMISSION UNIT SUMMARY
TABLE**

Emission Unit ID Emission Unit Description

EUENGINE1 A 1,500 kilowatts (kW) diesel-fueled emergency engine manufactured after April 1, 2006. Located at 114 Division Avenue N, Grand Rapids. 2012

DESCRIPTION: A 1,500 kilowatts (kW) diesel-fueled emergency engine manufactured after April 1, 2006. Engine will be used for back up to maintain operation of telecommunications equipment during power outages.

I. EMISSION LIMITS

1. NMHC + NOx 6.4g/kW-hr Test Protocol* EUENGINE1

2. CO 3.5 g/kW-hr Test Protocol* EUENGINE1

3. PM 0.20 g/kW-hr Test Protocol* EUENGINE1

Testing was not required as part of this compliance inspection. Manufacturer testing was submitted with the PTI application.

II. MATERIAL LIMITS

1. The permittee shall burn only diesel fuel, in EUENGINE1, with the maximum sulfur content of 15 ppm (0.0015 percent) by weight. Records were not available but were supplied with the PTI application.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EUENGINE1 for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. The 500 hours includes the 100 hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.2 The unit is run for 1 hour per month and for an extended 4hour test once per year. The continuous hour clock was at 28.9 hours since 2012.

2. The permittee may operate EUENGINE1 for no more than 100 hours per 12-month rolling time period as determined at the end of each calendar month for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. The continuous hour clock was at 28.9 ours since 2012.

3. The permittee shall install, maintain, and operate EUENGINE1 according to the manufacturer written instructions, or procedures developed by the owner/operator and approved by the engine manufacturer, over the entire life of the engine. It appears it is being operated properly with maintenance logs readily available.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip and maintain EUENGINE1 with a non-resettable hours meter to track the operating hours. Compliant

2. The nameplate capacity of EUENGINE1 shall not exceed 1,500 kW, as certified by the equipment manufacturer. CompliantV.

TESTING/SAMPLING Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall conduct an initial performance test for EUENGINE1 within one year after startup of the engine to demonstrate compliance with the emission limits in 40 CFR 60.4205 unless the engine has been certified by the manufacturer and the permittee maintains the engine as required by 40 CFR Part 60 Subpart IIII. Testing was conducted by the manufacturer. No additional testing was conducted as part of this compliance inspection.

VI. MONITORING/RECORDKEEPING Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any nitroing/recordkeeping special condition Records are being maintained as required.

3. The permittee shall monitor and record the total hours of operation and the hours of operation during non-emergencies for EUENGINE1, on a monthly and 12-month rolling time period basis, in a manner acceptable to the District Supervisor, Air Quality Division. Records are being maintained as required.

4. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EUENGINE1, demonstrating that the fuel sulfur content meets the requirement of 40 CFR 80.510(b). The certification or test data shall include the name of the oil

supplier or laboratory, and the sulfur content of the fuel oil. These records were not reviewed as part of this compliance inspection.

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUENGINE1. This notification was not received and DP informed the company they it was mandatory this be submitted. If it is not received within a couple of weeks a VN will be issued.

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted: Stack vent dimensions were not verified as part of this compliance inspection.

IX. OTHER REQUIREMENTS

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart IIII, as they apply to EUENGINE1. Appear to be in compliance.
2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to EUENGINE1, by the initial compliance date upon startup of the engine. Appear to be in compliance.

Based on the physical inspection and records reviewed the facility appears to be in compliance with state and federal Air Quality rules and regulations. If the required notification is not received in a timely manner then this report will be updated and a VN will be issued.

NAME Devin Phipps

DATE 9.30.14 SUPERVISOR PAB