

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

P007449698

FACILITY: Chippewa County Road Commission		SRN / ID: P0074
LOCATION: 3949 S Mackinaw Trail, SAULT S MARIE		DISTRICT: Upper Peninsula
CITY: SAULT S MARIE		COUNTY: CHIPPEWA
CONTACT: Brian Decker , Manager		ACTIVITY DATE: 07/02/2019
STAFF: Michael Conklin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Targeted inspection for FY 2019		
RESOLVED COMPLAINTS:		

Facility: Chippewa County Road Commission (SRN: P0074)
Location: 3949 S Mackinaw Trail, Sault St Marie, MI
Contact: Brian Decker, Office Manager, 906-635-5295

Regulatory Authority

Under the Authority of Section 5526 of Part 55 of NREPA, the Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

Facility Description

Chippewa County Road Commission (CCRC), located in Sault Ste. Marie, operates year-round maintaining roads in Chippewa County from Whitefish Point to Drummond Island. The facility operates a used oil heater to provide heat to the Sault Ste. Marie garage during winter months.

Emissions

Used oil is any oil refined from crude oil or any synthetic oil that has been used and as a result of such use is contaminated by physical or chemical impurities. Used oils include spent automotive lubricating oils, spent industrial oils, and spent industrial process oils. The definition of used oil includes oil used for the purpose of lubrication that becomes contaminated as a result of such use and residues and sludges derived from used oil.

Pollutants emitted from the combustion process of used oil include carbon monoxide (CO), sulfur oxides (SO_x), nitrogen oxides (NO_x), particulate matter (PM), toxic metals, organic compounds, hydrogen chloride, and global warming gases. Ash levels are higher in used oils and can cause higher emission levels of PM and trace metals than virgin fuel oils. Sulfur oxide emissions are related to the sulfur content of the fuel. Higher levels of halogenated solvents are found in used oil as well. Emissions of the organic compounds are related to the efficiency of the combustor.

Emissions Reporting

The facility is a minor source for all regulated air pollutants and is not subject to any federal New Source Performance Standards (NSPS), and thus does not have to report its annual emissions to MAERS.

Compliance History

The facility was last inspected in 2016 and was found to be out of compliance by operating the used oil heater outside the Permit To Install (PTI) exemption conditions of R 336.1282(b)(iv). Before the 2016 inspection, the facility was operating the heater under the PTI exemption rule with it having a rated heat input capacity of 250,000 Btu/hr and burning only used oil generated on-site. Beginning in September of 2016, the facility started to accept used oil generated off-site and thus required a PTI. PTI No. 25-17 was issued to Chippewa County Road Commission on April 21, 2017.

Regulatory Analysis

Chippewa County Road Commission is subject to PTI No. 25-17 for a used oil heater. The facility is considered a true minor source with all regulated air pollutants being below the major source thresholds and is also considered an area source with individual HAP emissions being below 9 tpy and aggregate HAP emissions being below 25 tpy. Used or waste oil falls under the waste regulations of the Resource Conservation and Recovery Act (RCRA) and can be found specifically in 40 CFR Part 279 - Standards for the Management of Used Oil. 40 CFR 279.23 allows on-site burning of waste oil in space heaters.

Inspection

On July 2, 2019, I conducted an unannounced inspection at Chippewa County Road Commission in Sault Ste. Marie, MI. I arrived at the facility and met with office manager, Brian Decker. I explained to Mr. Decker that the purpose of the inspection was to ensure compliance with PTI No. 25-17.

The meeting proceeded with inspecting the used oil heater. Mr. Decker stated there has been no changes to the heater since PTI No. 25-17 has been issued. EUFURNACE still has a rated heat input capacity of 250,000 Btu/hr (SC II.1 and VI.2). We next discussed the types of fuel that have been burned in the heater, and whether the oil was generated on-site or received from off-site sources. Mr. Decker stated that a majority of the oil that is burned in EUFURNACE is used hydraulic and crankcase oil from the plow trucks and that no virgin fuel oils are used (SC VI.1). A small portion of the oil burned is used motor oil from off-site sources. Mr. Decker provided me a Liquid Industrial By-Product (LIB) Report for 2018 showing that 220 of the 4200 gallons was received from off-site sources (SC VI.1). This equates to roughly 5% of the oil burned in EUFURNACE for 2018 is from off-site sources. Mr. Decker stated that the equipment on-site provides enough used oil to fire the heater all through out the winter months that the facility takes very little shipments of off-site oil. With a small percentage of the used oil fired in EUFURNACE being from off-site, it was determined that possible hazardous materials in the off-site oil would not impact the oil in the tank considerably. Based on this, a used oil fuel analysis was not requested.

Compliance

Based on this inspection, Chippewa County Road Commission is in compliance with state air quality rules and federal regulations.

NAME Michael Toblin DATE 7/29/2019 SUPERVISOR EDZ