

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P099954386

FACILITY: GM LLC, CCA - Davison Road		SRN / ID: P0999
LOCATION: 4420 DAVISON ROAD, BURTON		DISTRICT: Lansing
CITY: BURTON		COUNTY: GENESEE
CONTACT: Karen Carlson , Senior Environmental Engineer		ACTIVITY DATE: 07/29/2020
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of a facility permitted in 2019, which has not previously been inspected by AQD .		
RESOLVED COMPLAINTS:		

On 7/29/2020, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a scheduled inspection of General Motors (GM) LLC, Customer Care Aftersales (CCA) - Davison Road facility.

Environmental contacts:

- Karen Carlson, Senior Environmental Engineer, 517-204-9011; karen.j.carlson@gm.com
- Lee Ann Slosar, Environmental Engineer; lee.slosar@gm.com
- Julie Lenz, Staff Environmental Engineer; 810-234-4906; julie.lenz@gm.com

Facility description:

This facility is a processing center, where automotive parts are received in bulk, and are then packaged, and sent primarily to parts distribution centers across the country.

Permitted emission units:

Emission Unit* ID	Emission Unit description	Permit to Install (PTI) No.	Applicable Federal Regulations	Compliance Status
EUEG-1	A 1528 hp (1140 kW) diesel-fueled Mitsubishi emergency engine manufactured in 2018. Associated with a Kohler generator, known as the south generator. NOx emissions controlled by an ignition timing retard device.	27-19	40 CFR Part 60, Subpart III, and 40 CFR Part 63, Subpart ZZZZ	Compliance
EUEG-2	A 1881 hp (1403kW) diesel-fueled Mitsubishi emergency engine manufactured in 2018. Associated with a Kohler generator, aka the north generator. NOx emissions controlled by an ignition timing retard device.	27-19	40 CFR Part 60, Subpart III, and 40 CFR Part 63, Subpart ZZZZ	Compliance

*An emission unit is any part of a stationary source that emits or has the potential to emit an air contaminant.

Flexible Group Summary Table:

Flexible Group ID	Flexible group Description	Associated Emission Unit IDs
FGENGINES	Two diesel-fueled emergency engines	EUEG-1, EUEG-2

****A flexible group is used in a permit to install (PTI) or Renewable Operating Permit (ROP) to combine two or more emission units that have common or identical requirements.**

This facility is considered a *minor source* for criteria air contaminants; that is, those pollutants for which a National Ambient Air Quality Standard exists. These pollutants include carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO₂), volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns in diameter (PM-10), and particulate matter smaller than 2.5 microns in diameter (PM_{2.5}). A *major source* has a potential to emit (PTE) of 100 tons per year (TPY) or more of one or more individual criteria pollutants.

This facility is also considered a minor or *area source* for hazardous air pollutants (HAPs). A source is considered to be major for HAPs if it has a PTE of 10 TPY or more of a single HAP, or 25 TPY or more of aggregate HAPs.

Because of the diesel-fueled, reciprocating internal combustion engines (RICE), this facility is subject to 40 CFR Part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*. This regulation is one of the federal New Source Performance Standards (NSPS). It is my understanding that these engines were purchased as certified, and are being operated in a certified manner. This exempts them from performance testing requirements under the NSPS.

Because of the RICE engines, the facility is also subject to 40 CFR Part 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, also known as The RICE MACT. AQD does not have delegation of this Area Source MACT, and so AQD staff are not to verify compliance with these requirements at this time.

Exempt emission units

The following emission units are considered by the facility to be exempt from the requirement of Michigan Air Pollution Control (MAPC) Rule 201 to obtain a permit to install, because they are considered to meet the relevant exemption criteria. MAPC Rule 285(2)(g), for internal combustion engines with less than 10 million Btu/hr maximum heat input, applies to the fire pumps. MAPC Rule 282(2)(b)(i) for burning sweet natural gas for the purpose of heating, applies to heaters and HVAC units.

- Fire Pump 1 (West) - aka Fire Pump B; MAPC Rule 285(2)(g)*
- Fire Pump 2 (East) - aka Fire Pump A; MAPC Rule 285(2)(g)*
- UH-1; one 0.2 million (MM) Btu/h Reznor unit heater; MAPC Rule 282(2)(b)(i)
- HVAC; four 0.15 MMBtu/hr Carrier HVAC units; MAPC Rule 282(2)(b)(i)
- HVAC; four 0.224 MMBtu/hr Carrier HVAC units; MAPC Rule 282(2)(b)(i)
- HVAC; ten 0.115 MMBtu/hr Carrier HVAC units; MAPC Rule 282(2)(b)(i)
- HVAC; one 0.35 MMBtu/hr Carrier HVAC unit; MAPC Rule 282(2)(b)(i)
- HVAC; one 0.4 MMBtu/hr Carrier HVAC unit; MAPC Rule 282(2)(b)(i)
- HVAC; two 0.25 MMBtu/hr Carrier HVAC unit; MAPC Rule 282(2)(b)(i)
- HV-1, 5, 6, 7, 8; five 2.2 MMBtu/hr Cambridge heat and vent units; MAPC Rule 282(2)(b)(i)
- HV-2, 3, 4; three 3.03 MMBtu/hr Cambridge heat and vent units; MAPC Rule 282(2)(b)(i)

***Although exempt from needing a permit to install, Fire Pumps 1 and 2 appear to be subject to 40 CFR Part 60, Subpart IIII.**

Fee status:

This facility is not considered to be fee-subject. AQD does not consider sources to be fee-subject where internal combustion engines subject to a NSPS standard or a MACT standard would be the only reason they are subject.

This facility is not required to submit an annual air emissions report through the Michigan Air Emission Reporting System (MAERS).

Location:

This facility is located in a commercial and residential area. To the immediate north are commercial establishments and some residences, with a subdivision behind them. To the immediate east are a number of residences. To the west are a few businesses, with undeveloped land south of them. To the south is a residential subdivision.

History:

This facility was built for MI NP Burton Distribution, LLC, who received a PTI for EG-1 and EG-2 in 2019. I learned during the course of today's inspection that they originally owned the facility, and leased it to GM, who subsequently purchased it.

AQD has not previously visited this site. AQD has never received any air pollution complaints regarding this facility.

Performance testing:

Performance testing is not required of the two ICEs at the site. Because they were reportedly purchased as certified engines, and appear to be operated and maintained in a certified manner, they are exempted from Subpart III's performance testing requirements. This is discussed in more detail, later in this report. Please see the discussion of FG ENGINES, PTI No. 27-19 Special Condition (SC) Nos. V. TESTING/SAMPLING 1. a, b, and c.

Safety apparel required:

I wore safety glasses and steel-toed boots for this inspection, and brought hearing protection. I was not wearing a yellow high visibility safety vest, because at some GM sites, yellow vests are worn by crane operators, and this could lead to confusion (I subsequently learned that the AQD vest would have been permissible at this site). Due to the COVID-19 pandemic, I was wearing a disposable paper mask, per EGLE requirements for field work (discussed below). I was also wearing a hard hat with an attached clear plastic face shield, as a voluntary additional layer of protection against the risk of transmitting or receiving the coronavirus.

Arrival:

During the COVID pandemic, EGLE guidance to inspectors, as of July 2020, on conducting inspections was as follows:

- pre-arrange inspections with facilities, to facilitate a plan to conduct the inspection while adhering to facility guidelines for safety.
- always wear a mask, when conducting field work.

Therefore, the time and date for this inspection had been pre-arranged with the GM environmental contacts. Due to a Flint area complaint investigation this morning, however, I was behind schedule, and called GM staff to let them know I would be arriving late. .

Prior to arrival, I drove downwind of the GM site, to check for odors. I detected a slight odor east of the facility (downwind) that I could not identify. Weather conditions were cloudy, humid, and 76 degrees F, with winds out of the west at 10 miles per hour.

Note: throughout the remainder of the inspection, I was not able to detect the unidentified odor described above. The source of the odor is unknown.

I arrived in the north parking lot at 10:23 AM. No odors could be detected in the parking lot. In the lobby, I signed in on their visitor register, and my temperature was checked. For the duration of the

inspection, I was given a GM high visibility safety vest, and was told that the AQD yellow safety vest would have been acceptable to wear.

I met with Ms. Karen Carlson, senior environmental engineer, Ms. Lee Ann Slosar, environmental engineer, and Ms. Julie Lenz, staff environmental engineer.

This was the first visit by AQD staff to this facility. This large, warehouse-like building is a processing center. I was advised that auto parts arrive in bulk, and are then packed individually, to be sent primarily to parts distribution centers across the country, and from there to dealerships. I was told that they do not manufacture cardboard boxes here; rather, the boxes are pre-made, and they are taped or banded shut, once auto parts have been packed.

I was informed that GM initially leased this building from the original owner, MI NP Burton Distribution, LLC, and started up here in April 2019. I was told that in November 2019, GM purchased the building.

Inspection:

I was advised that they are keeping the records required by PTI No. 27-19, and was given hardcopies of the latest records; please see facility file. These will be discussed in the review of permit conditions.

EU-EG1 is associated with:

- Mitsubishi engine, model S12H-Y2PTAW-1, serial #GM81540-GA12
- Kohler generator, model 1000REOZMD, serial # 333NGMFR0002

EU-EG2 is associated with:

- Mitsubishi Engine, Model S12R-Y2PTAW-1, Serial # GM80624-GA9
- Kohler Generator, Model 1250REOZMD, serial # 334TGMFN0001

These ICEs were purchased as certified engines, I was told, and they are following the requirements for certified engines. The various requirements for non-certified engines in the PTI therefore do not apply to these units.

Neither ICE was operating at this time. As discussed in the following review of the permit special conditions, each unit is required to have a non-resettable hours meter. We examined the engines, and I saw the non-resettable hours meter on EG-1, which is referred to as the south generator. EG-2 is a larger unit, and is referred to as the north generator. I was told that the non-resettable hour meter on this unit appears to be in the form of a display on the touch pad control screen for the unit. I will follow up to determine if this is non-resettable.

Compliance with the individual Special Conditions of PTI No. 27-19 was checked, as follows:

Special Condition (SC) FGEngines I. EMISSION LIMIT(S)

1. NMHC + NO_x is limited to 6.4 g/kW-hr.

INSPECTION FINDING: COMPLIANCE. *The monitoring/testing method for determining compliance in the emission limit table is monitoring and recordkeeping of the engines, as required by SC FGEngines VI. 2 and 3. The requirements depend on whether the engines are certified or non-certified. The facility appears to be operating and maintaining the engines as certified, and has complied with the requirements of SC VI. 2 and 3, as discussed later in this report.*

2. CO is limited to 3.5 g/kW-hr.

INSPECTION FINDING: COMPLIANCE. *The monitoring/testing method for determining compliance in the emission limit table is monitoring and recordkeeping of the engines, as required by SC*

FGENGINES VI. 2 and 3. *The requirements depend on whether the engines are certified or non-certified. The facility appears to be operating and maintaining the engines as certified, and has complied with the requirements of SC VI. 2 and 3, as discussed later in this report.*

3. Particulate matter (PM) is limited to 0.2 g/kW-hr.

INSPECTION FINDING: COMPLIANCE. *The monitoring/testing method for determining compliance in the emission limit table is monitoring and recordkeeping of the engines, as required by SC FGENGINES VI. 2 and 3. The requirements depend on whether the engines are certified or non-certified. The facility appears to be operating and maintaining the engines as certified, and has complied with the requirements of SC VI. 2 and 3, as discussed later in this report.*

SC FGENGINES II. MATERIAL LIMIT(S)

1. The permittee is required to burn only diesel fuel in FGENGINES with a maximum sulfur content of 15 ppm (0.0015 percent) by weight, and a minimum Cetane Index of 40 or a maximum aromatic content of 35 volume percent.

INSPECTION FINDING: COMPLIANCE. *I was given a printout (please see plant file) of the manufacturer's specification for Marathon Ultra Low Sulfur No 2 Diesel (No. 2 MV15). It has a maximum sulfur content of 15 ppm, as required.. The Cetane index was certified as 40 minimum. This satisfies the above permit condition.*

SC FGENGINES III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee is prohibited from operating each engines in FGENGINES 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 hours necessary for the purpose of necessary maintenance checks and readiness testing.

INSPECTION FINDING: COMPLIANCE. *For FGENGINES, I received a hardcopy of their form "FGENGINES Group Engine Hours" (please see plant file). It showed that as of June 2020, the 12-month rolling hours were 26.81, far below the maximum limit of 500 hours. This demonstrated compliance with the above permit condition. The form also showed flexible group monthly runtime hours, hours for emergency use vs. non-emergency use, and 12 month year to date (YTD) non-emergency hours.*

2. This condition prohibits the permittee from operating each engine in FGENGINES for more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing. Each engine in FGENGINES may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance testing.

INSPECTION FINDING: COMPLIANCE. *AQD was given hardcopies of a form titled "Engine Runtime - Emergency Generator / Pump" for EG-1 and for EG-2. (please see plant file) This form tracked the monthly hours each unit was run, and whether it was for maintenance and testing hours, other non-emergency hours (like alarm faults), or hours for emergency use (power outage). The form also tracked 12 month YTD non-emergency hours, 12-month YTD other non-emergency hours, and 12-month YTD total hours. Please see below.*

- *EG-1 was shown to have only run for 13.4 hours total, since it first started up in May of 2019, 14 months prior to today's inspection. Since the start of January 2020, 8.8 hours were run. Of those, 5.8 hours were non-emergency, for maintenance and testing, 0 hours were for non-emergency hours (like alarm faults), and the remaining hours were for emergency use, in a power outage. This complies with the permit requirement.*

- *EG-2 was shown to have only run for 17.9 hours total, since it first started up in May of 2019, 14 months prior to today's inspection. Since the start of January 2020, 12.1 hours were run. Of those hours, 5.1 were non-emergency, for maintenance and testing, 0.5 hours were for non-emergency hours (like alarm faults), and the remaining 6.5 hours were for emergency use, in a power outage. This complies with the permit requirement.*

3. This condition states that if the permittee purchased a certified engine, according to procedures specified in 40 CFR Part 60 Subpart IIII, for the same model year and maximum engine power, the permittee must operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, change only those emission-related settings that are permitted by the manufacturer, and meet the requirements of 40 CFR 89, 94, and/or 1068, as applicable.

INSPECTION FINDING: COMPLIANCE. It is my understanding that they are operating and maintaining these engines as certified. I was given a hardcopy (please see plant file) of the "EPA 2018 MODEL YEAR CERTIFICATE OF CONFORMITY WITH THE CLEAN AIR ACT" for EG-1 and a copy of the certificate for EG-2, as follows:

- For EG-1: Certificate Number JMVXL49.0BBA-014
- For EG-2: Certificate Number JMVXL37.1BBA-013

4. This condition states that if the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan for FGENGINES and shall maintain and operate each engine in a manner consistent with good air pollution control practice for minimizing emissions.

INSPECTION FINDING: NON-APPLICABLE (NA). It is my understanding that these engines were purchased as certified, and are being operated and maintained in a certified manner.

SC FGENGINES IV. DESIGN/EQUIPMENT PARAMETERS

1. This condition states, "The permittee shall equip and maintain each FGENGINES with non-resettable hours meters to track the operating hours."

INSPECTION FINDING: PENDING. For EG-1, the south engine generator, I was shown the non-resettable hours meter which indicated engine run time was 13.7 hours.

However, for EG-2, the north engine generator, I was advised that the hour meter appears to be in the form of the display panel on the touch pad screen. I will look into this further, to verify that a digital meter can be considered acceptable for compliance. It may be necessary for GM to install a traditional non-resettable hours meter, in order to meet this permit condition.

Recordkeeping shows EG-2 at only 17.9 total hours of operation since it first started up, in May 2019, far below the 100 hours per year allowed for each engine for maintenance checks and readiness testing. The flexible group, FGENGINES, at a 12-month rolling average of 26.8 hours, was far below its respective limit of 500 hours per year. Although the hours of operation are quite low for these engines, AQD must follow up on the non-resettable hours meter required for EU-EG2.

2. This condition states that the maximum rated power output of EUEG-1 shall not exceed 1140 kW (1528 HP), as certified by the equipment manufacturer.

INSPECTION FINDING: NOT CHECKED. The engines were not operating today, and I did not verify compliance with this condition. I inquired by email, as this report was being finalized.

3. This condition states that the maximum rated power output of EUEG-2 shall not exceed 1403 kW (1881 HP), as certified by the equipment manufacturer.

INSPECTION FINDING: NOT CHECKED. The engines were not operating today, and I did not verify compliance with this condition. I inquired by email, as this report was being finalized.

SC FGENGINES V. TESTING/SAMPLING

1. a., b. and c. This condition and its subparts apply only if an engine is not installed, configured, operated, or maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer. They require performance testing within 1 year after startup or within 1 year after an engine is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer. They also require retesting within 8,760 hours of engine operation or every 3 years, whichever comes first.

INSPECTION FINDING: NA. *It is my understanding that GM is following the manufacturer's operation and maintenance manual for RICE, but the manufacturer did not say if it was emission-related. I was advised that GM therefore reviewed the RICE MACT, and made a list of maintenance they've done at all GM facilities, basically, reviewed maintenance manuals, and identified which steps are emission-related. They identify these for their staff, and require them for compliance, I was told, in lieu of the manufacturer not providing emission-related instructions. Therefore, I determined this special condition to be nonapplicable.*

SC FGENGINES VI. MONITORING/RECORDKEEPING

1. This condition requires the permittee to complete all required recordkeeping in a format acceptable to the AQD District Supervisor, by the 30th day of the calendar month, for the previous calendar month.

INSPECTION FINDING: COMPLIANCE. *The provided recordkeeping (please see plant file) was in an acceptable format, and it was within the required time frame. Today was the 29th day of the month of July, and the records for the previous month, June, were up to date.*

2. This condition requires the permittee to keep, in a satisfactory manner, the following records for each engine in FGENGINES.

a. For each certified engine: The permittee shall keep records of the manufacturer certification documentation:

INSPECTION FINDING: COMPLIANCE. *I was provided with hardcopy EPA certification forms (please see plant file), as described below:*

- "EPA 2018 MODEL YEAR CERTIFICATE OF CONFORMITY WITH THE CLEAN AIR ACT" for EG-1, Certificate Number JMVXL49.0BBA-014
- "EPA 2018 MODEL YEAR CERTIFICATE OF CONFORMITY WITH THE CLEAN AIR ACT" for EG-2, Certificate Number JMVXL37.1BBA-013

b. For each uncertified engine, the permittee is required to keep records of the testing required for uncertified engines.

INSPECTION FINDING: NA. *This is nonapplicable, as these engines are certified engines.*

The permittee is required to keep the above records on file, and to make them available upon request.

INSPECTION FINDING: COMPLIANCE. *I was provided with copies of the above required recordkeeping.*

3. The permittee is required to keep, in a satisfactory manner, the following records of maintenance activity for each engine in FGENGINES:

a. For each certified engine: The permittee shall keep records of the manufacturer's emission-related written instructions, and records demonstrating that the engine has been maintained according to those instructions, as required by SC III. 3.

INSPECTION FINDING: COMPLIANCE. *As discussed previously in this inspection report, it is my understanding that GM is following the manufacturer's operation and maintenance manual for RICE, but the manufacturer did not say if it was emission-related. I was advised that GM therefore reviewed the RICE MACT, and made a list of maintenance they've done at all GM facilities, basically, reviewed maintenance manuals, and identified which steps are emission-related. They identify these for their staff, and require them for compliance, I was told, in lieu of the manufacturer not providing emission-related instructions. I did not ask for copies of maintenance-related recordkeeping, but from other recent GM inspections, I have found that GM regularly keeps maintenance records for generators.*

b. For each uncertified engine: The permittee shall keep a record of a maintenance plan, as required by SC III. 4, and maintenance activities.

INSPECTION FINDING: NA. *This is nonapplicable, as these are not uncertified engines.*

The permittee is required to keep all records on file and make them available to the Department upon request.

INSPECTION FINDING: COMPLIANCE. *Although I did not ask for copies of maintenance records, GM had immaculate recordkeeping for all other records required by the PTI, and my prior experience is that GM keeps detailed maintenance records on ICEs, at their various sites. During a future inspection, AQD will ask for copies of maintenance records.*

4. This condition requires the permittee to monitor and record, in a satisfactory manner, the total hours of operation for FGEngines, on a monthly and 12-month rolling time period basis, and the hours of operation during non-emergency operation, on a calendar year time period basis. The permittee is also required to document how many hours are spent for emergency operation of FGEngines, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

INSPECTION FINDING: COMPLIANCE. *The hardcopy records I was given (please see plant file) indicated that all of the above are being done.*

5. This condition requires the permittee to keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in each engine in FGEngines, demonstrating that the fuel meets the requirements of 40 CFR 80.510(b). The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil.

INSPECTION FINDING: COMPLIANCE. *It is my understanding that this is being done. As noted earlier in this inspection report, I was given a copy of a Marathon fuel specification sheet for Marathon Ultra Low Sulfur No 2 Diesel (No. 2 MV15). The sulfur content and Cetane Index were identified as being in compliance with permit requirements.*

SC FGEngines VII. REPORTING

1. This condition requires the permittee, within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this permit to notify the AQD District Supervisor, in writing of completion of this activity.

INSPECTION FINDING: COMPLIANCE. *MI NP Burton, LLC notified AQD after the completion of installation of the two ICEs, but well after 30 days had passed. My understanding is that GM brought this to their attention. On 1/21/2020, AQD received a 1/10/2020 letter, providing notification of completion of installation of the two engines/generators. This was said to have been done on 5/20/2018, pursuant to PTI No. 27-19. Although the notification was late, this permit requirement has been addressed, and a Violation Notice (VN) will not be sent.*

2. This condition requires the permittee to submit a notification specifying whether each engine in FGEngines will be operated in a certified or a non-certified manner to the AQD district Supervisor, within 30 days following the initial startup of the engine, and within 30 days of switching the manner of operation.

INSPECTION FINDING: COMPLIANCE. *The 1/10/2020 letter also included notification that each engine would be operating in a certified manner. Although not done within 30 days following the initial start up of the engines, this permit requirement has been addressed, and a VN will not be sent.*

SC FG ENGINES VIII. STACK/VENT RESTRICTION(S)

1. This condition requires that SVEG-1, the exhaust stack for EUEG-1, have a maximum exhaust diameter of 12 inches, and a minimum height above ground level of 13 feet.

INSPECTION FINDING: COMPLIANCE. *Although my view of the stack was obscured from ground level, the height of the cabinet in which the ICE was housed was such that an exhaust stack would be reasonably estimated to be in the range of 13 feet.*

2. This condition requires that SVEG-2, the exhaust stack for EUEG-2, have a maximum exhaust diameter of 12 inches, and a minimum height above ground level of 14 feet.

INSPECTION FINDING: COMPLIANCE. *Although my view of the stack was obscured from ground level, the height of the cabinet in which the ICE was housed was such that an exhaust stack would be reasonably estimated in the range of 14 feet.*

SC FG ENGINES IX. OTHER REQUIREMENT(S)

1. This condition requires the permittee to comply with the federal Standards of Performance for New Stationary Sources, as specified in 40 CFR Part 60, Subparts A and IIII, as they apply to each engine in FG ENGINES.

INSPECTION FINDING; COMPLIANCE. *Based on the data reviewed earlier in this report, the facility appeared to be doing this.*

2. This condition requires the permittee to comply with 40 CFR Part 63, Subparts A and ZZZZ, as they apply to each engine in FG ENGINES.

INSPECTION FINDING: NOT CHECKED. *Because AQD does not have delegation of authority from EPA for this area source MACT standard, I did not determine compliance with Subpart ZZZZ.*

Exempt emission units observed during the inspection:

Fire pumps with emergency engines/generators; Rule 285(2)(g):

The facility has two fire pumps, which are each powered by an engine/generator. They are identified as Fire Pump 1 (West) - aka Fire Pump B, and Fire Pump 2 (East) - aka Fire Pump A. I was told they are being operated as certified engines, under 40 CFR Part 60, Subpart IIII. It is my understanding that these engines were purchased as certified, and are being operated and maintained in a certified manner. I was given a hardcopy (please see plant file) of the "EPA 2018 MODEL YEAR CERTIFICATE OF CONFORMITY WITH THE CLEAN AIR ACT" for the fire pumps, both sharing the same certificate, Certificate Number JJDXL135103-010.

Recordkeeping was as follows:

Fire Pump 1 (West) - aka Fire Pump B:

I received an engine runtime form for Fire Pump 1, which showed hours run on a monthly basis since the unit first ran, in July 2019. Total hours run since then were 22.8. On the runtime form, GM states that maintenance/testing/other non-emergency hours cannot exceed 100 hours in 12 months. This appears to be in reference to 40 CFR 60.4211(f).

For 2020, YTD hours of operation were 9.3. Of those, 6.3 were for maintenance and testing, while 3.0 were for other non-emergency hours (in this case, the pump was run for 3.0 hours, to lower the fuel level in the tank, in July 2020).

Fire Pump 2 (East) - aka Fire Pump A

Total hours run on Fire Pump 2 (East) - aka Fire Pump A were 25.2, from July 2019 through the end of July 2020. This is well below the maximum allowed 100 hours per calendar year for maintenance checks and readiness testing. For 2020, YTD, hours of operation were 9.2. Of those, 7.2 were for maintenance and testing, while 2.0 were for other non-emergency hours, when a sprinkler head was said to have broken, and caused the pump to run.

I did not check for compliance with 40 CFR Part 63, Subpart ZZZZ, because AQD does not have delegation of authority for this regulation.

Cardboard baler; Rule 285(2)(l)(vi)(B):

While walking through the processing center, I observed a cardboard baler, which was reported to be rated at 600 tons per hour. It was not running at the time, but any emissions of particulate would have been released only into the general, in-plant atmosphere. This would be consistent with the criteria for the Rule 285(2)(l)(VI)(B) permit exemption.

Conclusion:

No instances of noncompliance were observed.

NAME Daniel W. Maesen

DATE 1/8/2021

SUPERVISOR B. M.