

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

G525246278

<b>FACILITY:</b> Oakland Co. Service Center	<b>SRN / ID:</b> G5252
<b>LOCATION:</b> 1200 North Telegraph Building 22 East, PONTIAC	<b>DISTRICT:</b> Southeast Michigan
<b>CITY:</b> PONTIAC	<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Joseph Murphy , Facilities Manager	<b>ACTIVITY DATE:</b> 09/07/2018
<b>STAFF:</b> Robert Elmouchi	<b>COMPLIANCE STATUS:</b> Unknown
<b>SOURCE CLASS:</b> SM OPT OUT	
<b>SUBJECT:</b> Oakland County Department of Facilities Central Power House. Compliance determination pending R278a request on September 25, 2018.	
<b>RESOLVED COMPLAINTS:</b>	

**Oakland County Department of Facilities Central Power House (Power House)  
SRN: G5252**

On September 7, 2018, I conducted a scheduled inspection of the Oakland County Department of Facilities Central Power House. The facility is located in Building No. 22 at 1200 North Telegraph Road, Pontiac, Michigan. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules, and Air Use Permit to Install (PTI) 150-03.

The Oakland County Department of Facilities Central Power House (Power House) is in building No. 22. PTI 150-03 was approved on January 21, 2004, for the installation of four natural gas and fuel oil-fired boilers. These boilers are used to provide heat and cooling for the buildings at the Oakland County seat. PTI 150-03 was issued under the name of Oakland County.

I entered the site and met with Mr. Hank Roehl, Chief of Boiler Area; and Mr. Dan Cole, Boiler Mechanic. Mr. Joseph M. Murphy, Facilities Manager was present later for the majority of the inspection.

The Oakland County Central Power House is in Pontiac within the Oakland County Service Center East Campus. It consists of four (4) boilers that produce steam for heating and cooling county buildings in the surrounding county service center. The facility runs 24 hours a day, 7 days a week.

Three of the four boilers (Nos. 1 through 3) are drum water tube boilers, manufactured by Erie City Boilers, which are rated at 30,000 lbs. steam per hour and can be fired on either natural gas or No. 6 fuel oil (bunker oil). Each of the three boilers has a heat input rating of 36 MMBTU/hour each. This facility has the option to burn No. 6 fuel oil or natural gas. Natural gas has been used to fuel the boilers since February 2014. The primary reason for firing only with natural gas is because of the relative low cost of natural gas.

The fourth boiler (No. 4) is a water tube keystone boiler, which can only burn natural gas. This boiler is manufactured by Zurn (with a Coen burner) rated at 60,000 lbs. steam per hour and has a heat input rating of 72 MMBTU/hour.

The boilers at this facility are not subject to 40 CFR Part 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, because this facility is not a major source of hazardous air pollutants (HAPs).

There are three (3) storage tanks in the facility basement with a total capacity of 90,000 gallons of No. 6 Fuel oil. Per PTI special condition 1.3, the sulfur weight percent of all fuel oil is limited to 1.5% or less. The certificate of analysis records provided by Mr. Murphy indicate that the weight percent of sulfur in the fuel deliveries were about 0.5% or less, which is about one-third of the permitted limit. Hard copies of fuel oil shipment analysis receipts are attached to this report.

Number 6 fuel oil is also known as bunker oil. No. 6 fuel oil is a very thick fuel oil. It takes about 2 to 3 days of warming to reduce the viscosity enough for it to be injected into a fuel burner. The sulfur weight percent limit of the No.6 fuel oil is a limiting factor in firing the boilers with this fuel because low sulfur bunker oil is not readily available in this area due to limited demand. Transportation fees may also increase the cost of this fuel. The last

40 CFR Part 60 Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

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[SID=adc4920edc6a52929ad139fd64588de8&mc=true&node=sp40.8.60.iiii&rgn=div6](https://www.ecfr.gov/cgi-bin/text-idx?SID=adc4920edc6a52929ad139fd64588de8&mc=true&node=sp40.8.60.iiii&rgn=div6)

and

40 CFR Part 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

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[SID=44952aa5f53b68efded22d7bc5b4a406&mc=true&node=sp40.15.63.zzzz&rgn=div6#se40.15.63\\_16585](https://www.ecfr.gov/cgi-bin/text-idx?SID=44952aa5f53b68efded22d7bc5b4a406&mc=true&node=sp40.15.63.zzzz&rgn=div6#se40.15.63_16585)

**Please provide the requested demonstration by Thursday, October 25, 2018.**

As always, please feel free to contact me if you have any questions.

Regards,

Bob

Robert Elmouchi  
Environmental Quality Analyst

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**CONCLUSION**

The Oakland County Department of Facilities Central Power House appears to be in compliance with the evaluated conditions of PTI No. 150-03. The AQD compliance determination regarding the new genset is pending for a response to my request for an exemption applicability demonstration per R336.1278a and applicability determinations regarding 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ.

NAME Robert Elmouchi

DATE 9/25/2018

SUPERVISOR Joyce St