

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

C990248036

<b>FACILITY:</b> CLINTON MEMORIAL HOSPITAL		<b>SRN / ID:</b> C9902
<b>LOCATION:</b> 805 S OAKLAND, SAINT JOHNS		<b>DISTRICT:</b> Lansing
<b>CITY:</b> SAINT JOHNS		<b>COUNTY:</b> CLINTON
<b>CONTACT:</b> Beth Daugherty , Vice President, Patient Care Services		<b>ACTIVITY DATE:</b> 02/05/2019
<b>STAFF:</b> Julie Brunner	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled inspection of a for-profit critical access hospital (institution) - Staff Activity Report located at:S:\Air Quality Division\@District Facilities\C9902\Activity Reports\C9902 Clinton Memorial Hospital Inspection 2-5-2019.docx		
<b>RESOLVED COMPLAINTS:</b>		

**Inspection Date:** February 5, 2019

Arrived: 9:25 am

Departed: 10:40 am

**Weather:**

32°F, NW 7 mph, cloudy

**Facility Contact:**

Ms. Beth Daugherty, BSN, RN, MPH, Vice President, Patient Care Services, 989-227-3383,  
beth.daugherty@sparrow.org

**Last AQD Inspection Date:** October 30, 2007

**Facility Description:**

Clinton Memorial Hospital (CMH) hospital. The facility commenced operations in 1927, and also provides emergency services. CMH is located in central St. Johns, and is surrounded by residential housing and some commercial establishments.

CMH is a minor source with two (2) voided Permit to Install (PTI) Nos. 8-82I and 53-68I for incinerators. The incinerator equipment has been removed from the facility.

The facility is staffed 24/7 with approximately 260 full and part time staff.

No odors or visible emissions were identified outside of CMH upon arrival.

Facility heat, hot water, and low pressure steam is provided by four (4) natural gas-fired boilers with propane for back-up. The boilers vent through vertical stacks to the roof.

SG-1 - Kewanee Boiler, Model No. KF 0.75-762-G

Boiler Type – Fire Tube

Heat Input – 1.125 – 2.100 MMBtu/hr

Manufacture Date – 3/2/1996

Operating at 60 psi during inspection.

HWB-1 - Kewanee Hot Water Boiler, Model No. L3W-70-G

Boiler Type - Fire Tube

Heat Input – 0.977 – 2.930 MMBtu/hr

Year Built – 1996

HWB-2 - Kewanee Hot Water Boiler, Model No. L3W-70-G

Boiler Type - Fire Tube

Heat Input – 0.977 – 2.930 MMBtu/hr

Year Built – 1996

Hurst Boiler, Model No. J15A-10U – steam boiler operated in the summer

Boiler Type - Fire Tube  
Heat Input – 0.300 – 0.630 MMBtu/hr  
Year Built – 1999

40 Code of Federal Regulations (CFR) Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units - The provisions of this subpart apply to each steam generating unit that commences construction, modification, or reconstruction after June 9, 1989, and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr). None of the boilers at CMH are subject to this standard because they are too small.

The boilers are exempt from permitting under Rule 282(2)(b)(i) for fuel-burning equipment that is used for space heating, service water heating, electric power generation, oil and gas production or processing, or indirect heating and which burns natural gas and LPG in equipment that has a rated heat input capacity of not more than 50 MMBtu/hr.

There is one (1) natural gas-fired emergency generator. It is a Caterpillar Generator Set, Sales Model 3412, 480 KW and 600 KVA, and engine Serial no. 7DB01238, Date delivered: 3-4-2012, compression ratio 9 – 7 to 1, 691 HP and 515 kw. The maximum heat input as estimated by AQD staff is less than 10 MMBtu/hr. The engine clock has 302 hours on it. It is run monthly for a half hour test of operation. The emergency generator is exempt from permitting under Rule 285(2)(g) for internal combustion engines that have less than 10 MMBtu/hr maximum heat input. It is not subject to 40 CFR Part 63, Subpart ZZZZ for stationary reciprocating internal combustion engines (RICE) because it meets the definition of an institutional emergency stationary RICE. The RICE may be subject to 40 CFR Part 60, Subpart JJJJ for Standards of Performance for Stationary Spark Ignition Internal Combustion Engines if the emergency engine was manufactured after January 1, 2009 with a maximum engine power greater than 19 kw (25 HP). The manufacture date of the engine is in question. The facility has been contacted about the manufacture date of the engine on the generator set.

**Sterilizers:**

The facility is using steam to sterilize equipment. There are two (2) steam sterilizers currently used by the facility. A small Primus sterilizer using 271 lb steam with 3 min and 20 min cycle times is seldom used as a best practice. It is considered "just in time". The larger Primus sterilizer using 267 lb steam with a 55 min regular and 1 hr 10 min cycle times is used for larger equipment. The equipment is air dried after sterilization. The steam sterilizers are exempt per Rule 281(2)(i).

**Propane Storage Tanks:**

The facility has 2 – 1,000 gallon propane tanks for back-up boiler fuel. The tanks are in a fenced in yard and exempt per Rule 284(2)(b).

All site pictures are located at: S:\Air Quality Division\@District Facilities\C9902\Site Pictures.

**Summary:**

CMH has all exempt equipment, and is in compliance with state and federal air rules and regulations as far as can be determined.

NAME Julie L. Brown DATE 3/20/19 SUPERVISOR B.M.