



HENRY FORD ALLEGIANCE HEALTH

205 N. East Avenue  
Jackson, MI 49201  
(517) 205-4800  
HenryFordAllegiance.com

RECEIVED  
MDEQ - JACKSON

APR 30 2018

AIR QUALITY DIVISION

April 24, 2018

Mike Kovalchick  
Senior Environmental Engineer  
Air Quality Division  
517-416-5025

Subject: Violation Notice re: SRN: A2236, Jackson County  
Attachments: Emissions Data; 1GZ03164, 1GZ03154, EBG00465  
Attachments: Gen Set Performance Data; 3FZ01698 and photo of EPA Certification tabs

Dear Mr. Kovalchick:

The violation notice dated March 20, 2018 has been addressed and resolved to the best of our ability with cooperation from Caterpillar. The Process Description reads; "Three (3) emergency engines each rated at 1500KW fired by No. 2 fuel oil with a faceplate date of 2006 to 2008." The Comments as provided by the DEQ read; "No indication that the Company has filed the required initial notification form or conducted required performance testing. No indication that the engines carry an EPA certification."

Response

The performance and emissions testing was accomplished for each Emergency Generator (engine) at the time of installation and commissioning (2006 & 2008). All performance testing data sheets as well as all emissions testing records accompany this letter. In addition, a photo of the EPA certification tabs which have been placed on the (3) engines, has been included for your records. These Emergency Generators are tested monthly as are all connected transfer switches in accordance with the CMS and The Joint Commission. (NFPA 110, Standard for Emergency and Standby Power Systems; Life Safety Code 101; 9.1.3.1 / 9.1.3.2) In addition, the (3) engines are load bank tested at 100% capacity for a minimum of 4 hours annually. The initial notification form that is referenced in the Violation Notice is not familiar to Henry Ford Allegiance Health or



## HENRY FORD ALLEGIANCE HEALTH

205 N. East Avenue  
Jackson, MI 49201  
(517) 205-4800  
HenryFordAllegiance.com

Caterpillar. The on-line DEQ information related to the "Initial Notification for Stationary Reciprocating Internal Combustion Engines", finalized on March 3, 2010 (40 CFR, Part 63, Subpart ZZZZ (63.6580-63.6675)) states:

Who Does Not Notify;

Existing stationary residential, commercial, or institutional compression ignition engines located at an area source of HAP emissions.

This appears to best describe the engines and usage at Henry Ford Allegiance Health.

Sincerely;

A handwritten signature in black ink, appearing to read "George J. Gancsos Jr.", written in a cursive style.

George J. Gancsos Jr.  
Director of Plant Engineering  
Henry Ford Allegiance Health  
205 N. East Ave.  
Jackson, MI 49201

Cc: Via email – Ondrea Bates  
Ken Empey