



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

November 23, 2016

Mr. Matthew Ronan, Facilities Services Director
Beaumont Hospital - Dearborn
P.O. Box 2500
Dearborn, Michigan 48124

SRN: J4912, Wayne County

Dear Mr. Ronan:

VIOLATION NOTICE

On October 20, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Beaumont Hospital - Dearborn (BHD) located at 18101 Oakwood Boulevard, Dearborn, Michigan. The purpose of this inspection was to determine BHD's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; the conditions of Permit to Install (PTI) number 57-13; and the requirements of the federal Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units at 40 CFR 60, Subpart Dc (NSPS Dc).

As a result of the inspection, the following violations have been identified:

Process Description	Rule/Permit Condition Violated	Comments
FG-EMGRICE1-2 – Two 2937 brake horsepower (bhp) diesel fueled emergency engines (2MEG1 and 2MEG2)	PTI 57-13, Special Condition (SC) I.1	Manufacturer's performance data indicates NOx emissions at 52.67 lb/hr (8.29 g/bhp-hr) for each engine. The emission limit is 5.4 g/bhp-hr for each engine.
	PTI 57-13, SC I.2	Manufacturer's performance data indicates CO emissions at 2.48 lb/hr (0.39 g/bhp-hr) for each engine. The emission limit is 0.30 g/bhp-hr for each engine.
FG-BOILER5-7 – Three 33 million Btu per hour (MMBtu/hr) boilers, identified as Boilers #1, #2, and #3, capable of firing natural gas and No. 2 fuel oil	PTI 57-13, SC II.2; R 336.1205(1)(a) & (3)	During the inspection the facility stated No. 2 fuel oil is used as a back-up fuel in each boiler and the boilers are tested using No. 2 fuel oil. The permit condition allows for only pipeline quality natural gas to be fired in the boilers.

	PTI 57-13, SC IV.1	Boilers #1 and #2 each have a heat input capacity of 33,476,000 BTU/hr. The permit restricts the heat input capacity for each boiler to not more than 33.0 MMBTU/hr.
EU-00007 – A 33 MMBtu/hr boiler, installed in 2004 and identified as Boiler #3, capable of firing natural gas and No. 2 fuel oil	40 CFR 60.45c(a)	There is no record an initial performance test for opacity was completed for Boiler #3.
	40 CFR 60.47c(a) & (a)(1)	There is no record of subsequent opacity monitoring through either a continuous emissions monitor (COMS) or periodic performance tests.
	40 CFR 60.48c(g)(2)	Usage records have not been maintained for fuel oil combustion.
	40 CFR 60.48c(b), 40 CFR 60.48c(c)	The opacity performance test data and excess emission reporting has not been submitted.
Stationary source	R 336.1210(1)	The potential to emit sulfur dioxide exceeds 100 tons per year; the stationary source is operating without having obtained a Renewable Operating Permit (ROP).

Emergency Generators

Emergency generators (2MEG1 and 2MEG2) were permitted under PTI 57-13. PTI 57-13 indicates two 2937 break horse power (bhp) diesel fueled engines with permitted emissions of nitrogen oxides (NOx) at 5.4 grams per break horse power hour (g/bhp-hr) and carbon monoxide (CO) at 0.30 g/bhp-hr, per engine. The manufacturer (Caterpillar [CAT]) performance data provided as part of the inspection indicates that the engines installed do not match the permitted engines in PTI 57-13. The performance data provided indicates a bhp of 2885 and emissions of 52.67 pounds per hour NOx (8.29 g/bhp-hr) and 2.48 lb/hr CO (0.39 g/bhp-hr), per engine. These are in exceedance of the permitted limits within PTI 57-13 SCs I.1 and I.2.

Boilers

PTI 57-13 restricts the fuel for each boiler to pipeline quality natural gas. During the inspection the facility stated that the boilers are tested using fuel oil, and that fuel oil will be used in case of a natural gas disruption. Combustion of fuel oil is a violation of PTI 57-13 SC II.2.

PTI 57-13 restricts the heat input capacity for each boiler to not more than 33.0 MMBTU/hr (SC IV.1). The boiler plates observed during the inspection indicate Boiler

#1 and #2 each have a heat input capacity of 33.476 MMBTU/hr. These are violations of SCs IV.1.

NSPS – Subpart Dc

Boiler #3 is subject to the federal Standards of Performance for New Sources (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart Dc. Subpart Dc applies to boilers that have a heat input capacity greater than or equal to 10 MMBTU/hr and were constructed after June 9, 1989 (§60.40c). Boiler #3 was constructed in 2004.

40 CFR 60.43c(c) required that an initial performance test be conducted measuring opacity from Boiler #3 within 60 days of achieving the maximum production rate, but not later than 180 days after initial startup, as established at 40 CFR 60.8. Per 40 CFR 60.47c(a) and (a)(1), opacity monitoring on Boiler #3 is required through either the installation of a continuous opacity monitor (COMS) or through periodic performance tests. The AQD has no records of the initial opacity performance test, the periodic performance tests, or COMS measurements for Boiler #3.

40 CFR 60.48c(g)(2) requires that fuel records be maintained on a monthly basis. The facility was unable to produce fuel oil combustion records.

40 CFR 60.48c(b) and 60.48c(c) requires that performance test data and excess emission reports be submitted. At this time, no records of performance testing or excess emissions have been received.

Renewable Operating Permit Program

Because the facility combusts No. 2 fuel oil in Boilers #1, #2, and #3, the company's Potential-to-Emit (PTE) of sulfur dioxide (SO₂) exceeds the major source threshold of 100 tons per year (tpy) making the facility a major source under Rule 211.

A major source is defined as any source (facility) that actually emits or has the PTE 10 tons per year of any hazardous air pollutant, 25 tons per year of any combination of hazardous air pollutants, or 100 tons per year of any criteria pollutant (NO_x, Sulfur Dioxide, Carbon Monoxide, Particulate Matter, Volatile Organic Compounds, or Lead).

Under the State of Michigan's Air Pollution Control law and the federal Clean Air Act, a Renewable Operating Permit (ROP) program has been developed and implemented in Michigan. This program requires major sources of air emissions to obtain a facility-wide air use permit. This permit serves as a mechanism for consolidating and clarifying all air pollution control requirements which apply to the source. Rule 210(5) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires major sources to submit an application to the DEQ, AQD not more than 12 months after a stationary source commences operation as a major source, as defined by Rule 211(1)(a) of Act 451.

Mr. Matthew Ronan
Page 4
November 23, 2016

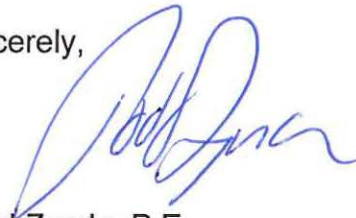
To date, the AQD has not received a ROP application from BHD. This constitutes a violation of Rule 210(1) of Act 451 which requires that a source not operate any emission units at a source required to obtain a ROP unless a timely and administratively complete application has been received by the DEQ. As a result of the failure to submit a timely and administratively complete application in accordance with the requirements of Rule 210(5) of Act 451, this facility has failed to obtain an "application shield".

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 14, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If BHD believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of BHD. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Todd Zynda, P.E.
Environmental Engineer
Air Quality Division
313-456-2761

Enclosure

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ