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## Environmental Services

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September 11, 2020

Mr. Jorge Acevedo  
EGLE, AQD, Detroit District  
3058 West Grand Boulevard, Suite 2-300  
Detroit, MI 48202

Dear Mr. Acevedo:

**Re: Notices of Violation (NOV) – Missing Data- Ascension St. John Hospital (ASJH)  
SRN MI8912 Wayne County**

This is in response to the NOV issued to ASJH on August 31, 2020. In brief, The NOV showed the following rule/permit conditions that were violated due to unreported missing recorded data for years 2018 and 2019:

1. **Monthly and 12-month NOx emission calculation records for Diesel Oil boilers and generators (4 dual fuel boilers and 7 generators).**
2. **A written log of the monthly hours of operation of Diesel Oil boilers (4 dual fuel boilers and 7 generators).**
3. **Monthly and 12-month NOx emission calculation records for Natural Gas boilers (4 dual fuel boilers).**

Starting from August 21, 2020, communications, through emails, were started between ASJH and Mr. Acevedo. We'd like to express our deep appreciation to Mr. Acevedo for his professional help and instructions to ASJH for achieving full compliance with the established rules and regulation associated with such NOV.

The attached spreadsheets were developed to cover the unreported missing data for year 2018 and 2019. Those spread sheet were submitted to AQD via emails. The spreadsheets' calculations were intended to simplify the data records than the comprehensive spreadsheet used before year 2018. At the same time, the new spreadsheets has integrated data used for the calculation of the emissions of all the pollutants as established in MAERS reporting system and those data records required for NOx and operating time as established in the Permit to Install (PTI) number 313-06.

ASJH will continue using such spreadsheets for compliance with both MAERS and PTI requirements and will be available upon request for any future on-site inspection.

The cause of such missing records could be attributed to lack of follow ups from a person who was assigned to keep track and input the records during the aforementioned periods. However, ASJH has assigned a new employee to be responsible on retrieving the monthly measurements from the emission boilers and generators and running the spreadsheets to satisfy the requirements of both MAERS and PTI.

To this end, this was the first time that ASJH received such NOV. On behalf of my client ASJH, I want to assure you that ASJH continually strives to operate efficiently with all regulatory requirements. ASJH commitment to environmental compliance is very important and its past efforts to maintain full compliance with environmental laws and regulations are documented.

Thank you for your patience and assistance in this matter and please contact me to discuss any question, comments, or concern regarding this response.

Sincerely,



Bahi Habib, PE, CHMM, MBA, MCHEN, MHWM  
Chemical Environmental Engineer

Attachments

CC: Ms. Jenine Camilleri, Enforcement Unit Supervisor – EGLE-AQD  
Mr. Salvatore Asaro, director of Facilities Services  
Mr. Mike Pruss, Manager Maintenance/Facilities