

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

M351751543

FACILITY: ST JOSEPH HOSPITAL		SRN / ID: M3517
LOCATION: 15855 19 MILE, MOUNT CLEMENS		DISTRICT: Southeast Michigan
CITY: MOUNT CLEMENS		COUNTY: MACOMB
CONTACT: Joe Saldivar , Director of Facilities		ACTIVITY DATE: 11/21/2019
STAFF: Shamim Ahammod	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Conducted a scheduled inspection of Henry Ford Health System (SRN: M3517) to determine the company's compliance with the requirements of the Permit to Install.		
RESOLVED COMPLAINTS:		

On Thursday, November 21, 2019, Michigan Department of Environment, Great Lakes and Energy-Air Quality Division (EGLE-AQD) staff, I (Shamim Ahammod) conducted a scheduled inspection of Henry Ford Health System (SRN: M3517) located at 15855 Nineteen Mile Road, Clinton Township, MI 48038. The purpose of the inspection was to determine the company'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; and the conditions of Permit to Install (PTI) No. 125-18, PTI No. 996-78, and PTI No. 995-78.

SOURCE DESCRIPTION:

On October 4, 2018, PTI No. 125-18 was issued to Henry Ford Health System to install and operate a 2750 BHP diesel-fueled emergency engine.

On 8/28/1979, PTI No. 996-78 was issued to Henry Ford Health System (previous name: Saint Joseph Hospital) to install and operate two water tube boilers rated at 36,000 LBS/M. On August 3, 1990, as a result of the necessity to retain #2 fuel oil back-up capability for emergency purposes, the PTI No. 996-78 had been revised. Per Special Condition (SC) 10, visible emissions from the boilers shall not exceed a 6-minute average of 20% opacity, except as specified in Rule 301(1)(a). At the time of inspection, I did not observe any visible emissions from the boilers' stack. Per SC 11, the applicant shall not fire any fuel in the two boilers other than natural gas, except for 2# fuel oil during burner testing operations or when the natural gas supply has been interrupted during emergency situations. The permittee only burns pipeline-quality natural gas in the boilers.

On 4/13/1979, PTI No. 995-78 was issued to Henry Ford Health System (previous name: Saint Joseph Hospital) to install and operate a 5,000 gallon and a 20,000 underground fuel oil storage tank. Per SC 9, I did not observe any visible emissions at the time of inspection.

INSPECTION:

At 10:00 AM, I arrived at the facility and greeted by Mr. John March, Plant Operations Supervisor. Then I met with Joe Saldivar, Director of Facilities and Ms. Kelly Jones Brown, Quality Accreditation Specialist at the conference room. I introduced myself, provided credentials and stated the purpose of the inspection. During the pre-inspection meeting, I discussed the permit conditions requirements and requested the record and monitoring information. Then I toured the facility with Mr. March, Mr. Saldivar, and Ms. Brown.

REGULATORY ANALYSIS**EUENGINE1****Emission Unit Conditions**

The facility operates a diesel fuel-fired emergency engine to generate electricity during emergencies. PTI No. 125-18 was issued to this facility to install and operate a 2750 bhp diesel-fueled emergency generator with the model year of 2001, and a displacement of 4.3 liters/cylinder. At the time of

inspection, I verified the nameplate and records. I observed the engine capacity was 1825 KW (approximately 2447 BHP) and the engine displacement per cycle was 4.3 liters.

Pollution Control Equipment: NA

Emission Limits: NA

Material Limits

Per SC II.1, the permittee shall burn only diesel fuel, in EUENGINE1 with the maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. I was provided a BP Ultra Low Sulfur No. 2 Diesel Fuel product information. I reviewed this information. It appears that the permittee burns only diesel fuel in EUENGINE1 with the maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40.

Process/operational Restrictions

Per SC III.1, the permittee shall not operate EUENGINE1 for more than 500 hours per year on a 12-month rolling time period as determined at the end of each calendar month. Based on records, the total operating hours of the emergency generator was 27.75 hours from January 2019 through November 2019. Compliance with SC III.1 of EUENGINE1 will be determined when the permittee runs this emergency generator for at least 12 months.

Design/Equipment Parameters

Per IV.1, I observed a non-resettable hour meter was installed on the engine and the total operation time of the emergency generator was 10348 hours on November 21, 2019. The permittee started operating this engine on January 5th, 2019 with an indication of 10319 hours in the non-resettable meter. Per SC IV.2, the maximum rated power output of EUENGINE1 shall not exceed 2750 BHP as certified the equipment. I verified the nameplate of the engine and observed the maximum rated power output of the engine was 1825 KW (approximately 2447 BHP).

Monitoring/recordkeeping

As required in SC VI.2, I was provided a record of the total hours of operation and the hours of operation during non-emergencies for EUENGINE1, on a monthly and 12-month rolling time period. The total 4.75 hours were spent for an emergency operation and 24 hours were spent for non-emergency operation.

Per SC VI.3, I was provided fuel supplier record, BP Ultra Low Sulfur No. 2 Diesel Fuel product information. I reviewed this information. It appears the permittee burns only diesel fuel in EUENGINE1 with the maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40.

Reporting

Per VII.1, within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this permit to install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the installation, construction, reconstruction, relocation, or modification.

The engine was installed on 12-27-2018 and started operating on January 5th, 2019. However, the AQD district office received a notification letter on November 25, 2019, via mail. The permittee did not submit a notification, in writing within 30 days after completion of the installation of EUENGINE1 to the AQD District Supervisor. This is a violation of SC VII.1 of EUENGINE1 of PTI No. 125-18. At this time, a notice of violation will not be sent to the facility for not complying with EUENGINE1, SC

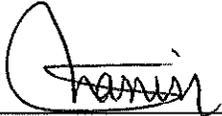
VII.1.

Stack/vent restrictions

Stack and vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above ground (feet)
1. SVENGINE1	16	19

At the time of inspection, the exhaust stacks appeared vertical and unobstructed and the SVENGINE1 stack diameter appeared 16 inches in diameter and appeared to be at least 19 feet above ground in height.

Based on an onsite inspection, and review of records, the facility appears to be in non-compliance with the conditions of SC VII.1 of EUENGINE1 of PTI No. 125-18 which requires submitting a notification letter, in writing within 30 days after completion of the installation of EUENGINE1 to the AQD District Supervisor.

NAME 

DATE 12.6.19

SUPERVISOR 