



DEPARTMENT OF VETERANS AFFAIRS

**Medical Center
5500 Armstrong Road
Battle Creek, MI 49037-7314**

In Reply Refer To: 515/138

Ms. Karen Kajiya-Mills
Supervisor - Technical Program Unit MDEQ-Air Quality
Division
PO Box 30260
Lansing, MI 48909

Dear Ms. Kajiya-Mills:

The Battle Creek VA Medical Center (VAMC) is responding to the Violation Notice dated June 23, 2014.

During the recent stack testing of Boilers 2, 3 and 4 on March 26, 27th and April 17th and 18th; the boilers did not meet the permitted NOX emission limits while combusting oil. The Boilers did meet the emission limits of PTI 187-10B while combusting natural gas. Natural gas is the boilers primary fuel, and oil is only used for backup. When the VAMC determined that the boiler emission limits were exceeded on oil, a consultant was hired to submit a permit modification to increase the boiler emission limits during fuel oil combustion. The permit application was submitted on April 25th 2014 and was assigned PTI 187-10C. It should be noted that since fuel oil is used as a backup fuel, the increase in NOX emissions while combusting oil from the permitted limit of 0.05 lb/MMBTU to the new limit being requested of 0.138 lb/MMBTU; results in less than 0.04 ton per year increase in annual NOX emissions.

At the request of the MDEQ, the VAMC withdrew the application for PTI 187-10C on June 20, 2014. The MDEQ requested that the VAMC withdraw this application and resubmit a new PTI application to include both the increase in the boiler emission limits; as well as several replacement emergency generators which were being installed. The VAMC believed that the emergency generators were exempt from the requirement to obtain a PTI due to their low emission rates, and because the boiler project and emergency generator project were two different activities. However, as requested, the VAMC will submit a new PTI application by August 1, 2014. The new PTI application will request an increase in the NOX emission rates during fuel oil combustion, in order to correct this exceedance.

If you have any questions please contact Robert Pavlovic at (269) 223-5274.

Sincerely,

RANDY J. CRANDAL
Chief, Facilities Management Service

cc: Ms. Mary Douglas, District Supervisor, MDEQ-AQD Kalamazoo District