



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

April 11, 2018

Mr. Dan Carter
Walter P. Reuther Psychiatric Hospital
30901 Palmer Road
Westland, Michigan 48186

SRN: M4132, Wayne County

Dear Mr. Carter:

VIOLATION NOTICE

On January 3, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Walter P. Reuther Psychiatric Hospital (WRPH) located at 30901 Palmer Road, Westland, Michigan. The purpose of this inspection was to determine WRPH'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 requirements of Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart III.

As a result of the inspection, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Main Generator	R 336.1201(1)	The facility installed the Main Generator without obtaining a permit to install.
Main Generator and AT Building Generator	40 CFR Part 60, Subpart III, §60.4211(c)	The facility has not provided documentation demonstrating that the engines are certified to the emission standards of 40 CFR Part 60, Subpart III.
	40 CFR Part 60, Subpart III, §60.4214(b)	The facility has not provided records of operation of emergency and non-emergency service.

R 336.1201 - Main Generator Permit to Install

During inspection on January 3, 2018, it was noted that WRPH had installed the Main Generator without obtaining a Permit to Install (PTI). The AQD staff advised WRPH on January 3, 2018, that this is a violation of Act 451, Rule 201 (R 336.1201).

The generator specification sheet provided via email on February 1, 2018 indicates a diesel fuel flow rate range of 90.5 to 104.9 gallon per hour. This equates to a heat input capacity range of 12.67 MMBtu to 14.686 MMBtu (90.5 gallon per hour (or 104.9 gph) x 140,000 Btu/gallon). The Main Generator does not qualify for PTI exemption under R 336.1285(2)(g) and is in violation of R 336.1201(1).

R 336.1285(2)(g): "Permit to install does not apply to...Internal combustion engines that have less than 10,000,000 Btu/hour maximum heat input."

A program for compliance may include a completed PTI application for the Main Generator. An application form is available by request, or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right hand side of the page)

Be advised that R 336.1201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines – Main Generator and AT Building Generator

The Main Generator and the AT Building Generator are subject to the federal Standards of Performance for New Sources (NSPS) for Stationary Compression Ignition Internal Combustion Engines. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart IIII. The Main Generator and AT Building Generator are subject to this regulation as the engines were manufactured after April 1, 2006 (40 CFR 60.4200).

As part of the inspection on January 3, 2018, records were requested to demonstrate compliance with Subpart IIII. Per §60.4211(c), the owner/operator must comply by purchasing an engine certified to the emission standards in Subpart IIII. Per §60.4214(b), the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter, unless the engine meets the emission standard applicable to non-emergency engines for the applicable model year. Records demonstrating compliance with Subpart IIII were requested via email on January 4 and 8 and February 1, 2018. No response was received regarding Subpart IIII requirements. An additional facility visit was made on February 22, 2018 and Subpart IIII records required to demonstrate compliance was discussed. At this time, the AQD has not received emission standard documentation ("certificate of conformity") or records of maintenance and readiness

Mr. Dan Carter
Page 3
April 11, 2018

checks. This is a violation of 40 CFR Part 60, Subpart IIII, §60.4211(c) and §60.4214(b).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 2, 2018 (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 WRPH 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 WRPH. 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.
Senior Environmental Engineer
Air Quality Division
313-456-2761

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Malcom Mead-O'Brien, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ