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

FACILITY: MT CLEMENS GENE	RAL HOSPITAL	SRN / ID: M4257		
LOCATION: 1000 HARRINGTO	N BLVD, MOUNT CLEMENS	DISTRICT: Southeast Michigan		
CITY: MOUNT CLEMENS		COUNTY: MACOMB		
CONTACT: Dennis Short, Facilities System Specialist Plant Operations		ACTIVITY DATE: 08/08/2014		
STAFF: Rebecca Loftus	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor		
SUBJECT:				
RESOLVED COMPLAINTS:				

On August 8, 2014, I, Rebecca Loftus, from the Department of Environmental Quality's (DEQ), Air Quality Division (AQD), conducted an unannounced inspection McLaren Macomb (formerly Mt. Clemens Hospital), SRN: M4257, located at 1000 Harrington Boulevard, Mt. Clemens, Michigan. The purpose of the inspection was to determine the facility's compliance with the Federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules.

## Facility Overview

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Mt. Clemens General Hospital opened in 1945. In the 1970's the hospital had an air permit for an incinerator; the incinerator was removed and the permit was voided in August 1997. In 2006, Mt. Clemens General Hospital became a subsidiary of McLaren Health Care and the hospital's name was changed to McLaren Macomb.

# Inspection observations

I arrived on-site at 1:30pm and met with Mr. Andrew Slawinsky, Plant Operations Supervisor, and Mr. Dennis Short, Facilities System Specialist Plant Operations. Mr. Slawinsky and Mr. Short escorted be through the facility and provided me records for the hospital's emergency generators and boilers.

During my inspection, Mr. Slawinsky and Mr. Short explained that McLaren Macomb has a total of four natural gas boilers, five emergency generators, three electric fire pumps, and two diesel fire pumps.

## **Boilers**

The four natural gas boilers are used to generate steam for heat and sterilization at the hospital. McLaren Macomb only uses 1-2 boilers at a time and use LPG as a back-up fuel source. Boiler #3 and #4 had diesel fuel back-ups but the diesel storage tanks and this capability were removed when the hospital was remolded in 2007. Below is a summary of the boiler specifications (see attached):

Boiler	Install			
#	Date	Manufacturer	Horsepower	btu/hr
1	2/22/2007	Clayton	300	12,553,000
2	2/22/2007	Clayton	500	20,922,000
3	1970	Johnston	400	<16,740,000
4	1970	Johnston	500	16,740,000

Based on the information provided, the boilers appear to be exempt from obtaining a permit to install (PTI) pursuant to Rule 282(b)(i). The boilers also appear to be exempt from, the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60 Subpart Dc.

#### Emergency Generators/Fire Pumps

The five natural gas fired emergency generators are located throughout the hospital campus: three near the boiler room, one in the east tower, and one in the surgery center. The generators are tested weekly, tested with load once a month, and used during power outages. A record of when the generators are tested and when they operate under emergency is available on-site. Below is a summary of the boiler specifications (see attached):

				hours
Engine				on
#	Install Date	Manufacturer	Kw	meter
1	1995	CAT	480	633
2	1995	CAT	450	652
3	1995	CAT	619	626
4	April 1995	CAT	>450	na
5	November 1995	Cummings	750	na

McLaren Macomb also has three electric fire pumps and two diesel fire pumps. Based on the information provided, the emergency generators and fire pumps appear to be exempt from obtaining a PTI pursuant to Rule 285(g).

For the federal regulations, these emergency generators are classified as Existing, >500 HP, Institutional Emergency Engines, constructed before June 12, 2006, at an area source of hazardous air pollutants and are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines at an area source, 40 CFR Part 63 Subpart ZZZZ, specifically section 63.6640(f). See the attached Summary of Requirements document.

Because the emergency generators were installed prior to June 12, 2006, they are not subject to the Standards of Performance for Emergency Spark Ignition Internal Combustion Engines, 40 CFR Part 60 Subpart JJJJ. If McLaren replaces/adds any emergency generators in the future, they may be subject to Subpart JJJJ. See the attached Summary of Requirements document.

### Other Equipment

In 2008, the hospital removed the Ethylene Oxide Sterilizers and now only uses steam for on-site sterilization. Steam sterilization is exempt from obtaining a PTI pursuant to Rule 281(i).

According to Mr. Slawinsky and Mr. Short, McLaren Macomb does not have any paint booths on-site or other processes with air contaminants of concern.

#### Conclusions

Based on information gathered, at this time, McLaren Macomb appears to be in compliance with Michigan's Air Pollution Control Rules and the Federal Clean Air Act.

date <u>9/17</u>

SUPERVISOR