

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

M444548191

FACILITY: Riverview Health Systems		SRN / ID: M4445
LOCATION: 7733 E. JEFFERSON, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Nick Berger , Facility Manager		ACTIVITY DATE: 03/27/2019
STAFF: Katherine Koster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY2019 Scheduled Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection

INSPECTED BY: Katie Koster, AQD

PERSONNEL PRESENT: Nick Berger, Facility Manager

FACILITY PHONE NUMBER: 313-432-1200

FACILITY BACKGROUND

Riverview Health and Rehab Center is located at 7733 E. Jefferson. It was formerly the site of St. John Riverview Hospital which closed in 2011. Riverview acquired the building the same year. Prior to that, it was known as Detroit Macomb Hospital. Riverview Health & Rehab Center Jefferson offers short-term rehabilitation and long-term skilled nursing care with many private or semi-private rooms for residents of all ages. The company that owns and manages the property is DRSN Real Estate LLC.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received against the facility. The prior inspection in 2017 resulted in a first and second violation notice for an unpermitted emergency engine. The facility initially refused to respond to the notice or apply for a permit to install as they believed that since they did not install the generator, it was not their responsibility to permit it. An enforcement referral was developed. Finally, the facility applied for a permit to install before enforcement action was taken.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING LOVs

There are no outstanding LOV's for this facility.

INSPECTION NARRATIVE

AQD inspector, Katie Koster, arrived at Riverview Health and Rehab Center on 3/26/19 around 11:30 a.m. I was met by Mr. Nick Berger, facility manager. The former facilities manager, Mr. Rick DeBolt, has retired. We went to the basement of the facility. All equipment was already installed when Riverview purchased the property. Three Clayton steam generators were originally installed by the prior owners; #3 steam generator has been out of service for about six years. Steam generator #1 and #2 heat hot water. There are heat exchangers in each patient room. Steam generators do not operate in the summer. Scheduled maintenance occurs yearly in October. The two Clayton Steam Generators are each 250 HP and 9,085,213 BTU heat input.

The prior owners had also installed two emergency generators. One has been partially dismantled and is basically used for spare parts. The other generator was installed in 1984. There are two 10,000 gallon diesel tanks. Each are about 7,000 gallons full. Facility has not received any diesel fuel since purchasing the facility. Maintenance is performed by PM technologies. Based on the nameplate, the rating is 965 kW. It is an emergency generator, Cummins KTA-50-G. Riverview staff runs a full load test monthly for about 45 minutes. I recorded 615 hours on the non-resettable hour meter; the meter was at 566.5 hours on 2/28/17 based on information in the prior inspection report. Load test records include the hour meter read before and after the test is run. This suffices for a log of operating hours at this time. According to Mr. Berger, the generator has not been run for any other reason. The facility is serviced by two grids so it is unlikely that the generator would need to be utilized. PM technologies performs fuel tests and oil changes for Riverview. Generator has been undergoing maintenance work to replace transfer switches so monthly load test has not been performed. Invoice was provided to demonstrate this situation.

There were boilers on site but they have been removed. He showed me where they had been located and the stack that had been in use.

APPLICABLE RULES/PERMIT CONDITIONS

PTI 157-17 was issued to DRSN Real Estate LLC on March 9, 2018. Permit was issued for one 965 kW Cummins generator manufactured in late 1983.

II.1 Permittee shall only burn diesel fuel. **IN COMPLIANCE.** Engine is only capable of burning diesel fuel.

III.1 Shall not operate more than 500 hours per 12 month rolling time period. **IN COMPLIANCE.** Based on operating records, engine has only operated about 1 hour per month or 12 hours per 12 month rolling time period.

IV.1. Nameplate capacity shall not exceed 965 kW or 1850 hP. **IN COMPLIANCE.** No modifications have been made to the engine that would change the capacity.

IV.2 Shall install and maintain generator with a non-resettable hours meter. **IN COMPLIANCE.** Meter is installed.

VI.2. Shall record hours of operation on a monthly and 12 month rolling basis. **IN COMPLIANCE.** Records are maintained.

VI.3 Shall maintain spec sheet. **IN COMPLIANCE.** Spec sheet is maintained and was provided during permitting.

VIII. Stack dimension. **DID NOT EVALUATE.** However, stack dimensions were provided by generator servicer during recent permit application.

The two steam generators appear to be exempt per Rule 282(2)(b)(i) as they are each below 10 MMBTU/hr heat input and burn natural gas.

Diesel tanks appear to be exempt per Rule 284(2)(d).

NSPS/MACTS/NESHAP

From the PTI eval form:

40 CFR Part 60 Subpart IIII - NSPS for Stationary Compression Ignition Internal Combustion Engines

NSPS IIII is for Stationary Compression Ignition Internal Combustion Engines. This NSPS was promulgated in 2006 and is applicable to engines that were constructed after July 11, 2005. This engine was manufactured in 1983 (estimated) and installed in March of 1984. The engine is too old to be subject to NSPS IIII.

40 CFR Part 63 Subpart ZZZZ - NESHAP for Stationary Reciprocating Internal Combustion Engines

NESHAP Subpart ZZZZ applies to major and area sources of HAP emissions, this facility is an area source of HAP emissions. Existing institutional emergency engines are exempt from NESHAP Subpart ZZZZ per 40 CFR 63.6585(f)(3). DRSN counts as an institution.

Regardless of the installation date, the steam generators do not meet the criteria for being subject to NSPS Dc as it applies to equipment with a minimum size of 10 MMBTU/hr.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS

N/A; the area around this facility appears to be paved roads and parking lots.

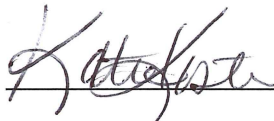
MAERS REPORT REVIEW

N/A; this appear to be a true minor source and not subject to MAERS reporting.

FINAL COMPLIANCE DETERMINATION

Facility is in compliance with the permit to install PTI 157-17.

NAME



DATE

4/17/19

SUPERVISOR

W.M.