



MEMORANDUM

TO: Matt Deskins, Environmental Quality Analyst
FROM: Walt Pullins, Executive Director, Environment of Care and Hospitality Services
DATE: August 17, 2015
SUBJECT: Violation Notice response

Your inspection on July 7, 2015, identified two findings that resulted in violations. A summary of the actions taken is shown below:

1. FGSTERILIZERS finding indicated that we were out of compliance with Special Condition 1.3 under the Emission Limits, and VI.C and VI.2.D under the monitoring/recordkeeping of PTI No. 555-97A. This finding described how we were found not to be calculating or recording ethylene oxide from each sterilizer on a monthly basis, and we were not calculating/recording emissions in a 12 month rolling format. This had been the practice since the early 1990's. As of this date, we are now recording ETO emissions for each sterilizer on a monthly basis, and we are recording a rolling format tracking process for each sterilizer. We will rework our logs to meet compliance standards dating back to the original commissioning date of the Safe Cell DR50 ETO scrubber (2013)
2. FGBOILERS finding indicated that we were out of compliance with Special Condition VI.1 under the monitoring/recordkeeping of PTI No. 161.09. This finding indicated that we were not recording monthly natural gas/fuel oil usage for each boiler. We have been tracking our emissions for decades in this manner. We have now started logging which of the Cleaver Brooks boilers is on line each day, so we can keep track of natural gas or fuel oil use on a monthly basis and in a rolling format for each boiler. This process started as soon as it was identified as non-compliant (7/14/15).

Please do not hesitate to contact me if you need additional information.

Respectfully,

Walt Pullins 8/10/15

Walt Pullins

