

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

E680764531

FACILITY: SPECTRUM HEALTH BLODGETT CAMPUS		SRN / ID: E6807
LOCATION: 1840 WEALTHY ST SE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Paul Chulski , Electircian		ACTIVITY DATE: 08/31/2022
STAFF: Michael Cox	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Unannounced Inspection		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Michael Cox (MTC) arrived at the Spectrum Health Blodgett Hospital located at 1840 Wealthy Street SE, Grand Rapids, MI on August 31, 2022, at 9:00am to complete a scheduled unannounced inspection. Prior to entering the facility, offsite odors and emission observations were completed. No odors or visible emissions were observed.

### FACILITY DESCRIPTION

Spectrum Health Blodgett Hospital is a full-service hospital facility. Sources of emissions from the hospital campus are from utility equipment, which includes eight steam boilers, three emergency electric generators, and two underground fuel storage tanks. The generators are subject to 40 CFR Part 60, Subpart IIII. Spectrum Health Blodgett Hospital is in operation with Permit to Install (PTI) number (No.) 51-11. The facility has actual and potential emissions that would make it a true minor source due to the hours of operation restriction on the three emergency generators, however, the hospital elected to keep PTI No. 51-11 making it a Synthetic Minor source of Nitrogen Oxide emissions (NO<sub>x</sub>).

### COMPLIANCE EVALUATION

Upon arrival onsite, AQD staff MTC met with Mr. Paul Chulski, Lead Electrician, who provided a walkthrough of the facility and answered site specific questions. Records were provided by Mr. Chulski and Ms. Jill Koebbe of Air & Water Compliance Group, LLC.

#### PTI No. 51-11:

The facility has three, 1 megawatt (MW), Kohler emergency generators permitted under PTI No. 51-11. Each generator has a diesel-fired, reciprocating internal combustion engine with a heat input capacity about 10.43 mmBtu/hour. Engines 1 and 2 were installed in early 2006 and are subject to "Tier I" emission standards; Engine 3 was installed

in 2010 and is subject to "Tier II" emissions certification requirements as well as 40 CFR Part 60, Subpart IIII. Each engine has a U.S.EPA Certificate of Conformity documenting expected emissions. Engine 3 is also subject to 40 CFR Part 63, Subpart ZZZZ as an area source. Compliance with Subpart ZZZZ area source requirements is assured by compliance with Subpart IIII.

All three engines are required to use ultra-low sulfur diesel fuel with a sulfur content of less than 15ppm. Fuel vendor certification from Crystal Flash was requested and provided, which denoted a maximum of 15ppm sulfur content, meeting the requirement.

The company is also required to have non-resettable hours meters which was verified by AQD staff. None of the engines were operating at the time of the inspection. Records of operating hours were requested and provided for the time period of January 2021 through August 31, 2022. The engines had the following operating hours:

	Highest 12-month rolling (hours)	Total cumulative run time since installation
Engine 1	40-period ending May 2022	608.5
Engine 2	39-period ending July 2022	609.3
Engine 3	39-period ending July 2022	497.9
Total	118 (< 1,500 hour per 12-month rolling limit)	

**Steam Boilers:**

There are eight identical boilers with low-NOx burners. Each boiler is dual-fueled, natural gas and diesel, and are rated at 5.978 mmBtu/hour. The boilers are exempt from Rule 201 permitting per Rule 282(2)(b). The units are not subject to 40 CFR Part 60, Subpart Dc because they are less than 10 mmBtu/hour in size and are also not subject to 40 CFR 63, Subpart DDDDD due to being considered "gas-fired". During the inspection three of the eight boilers were operating on natural gas. The following table represents the dates the boilers were last inspected and internal maintenance was conducted:

<b>Boiler #</b>	<b>Last Inspection Date:</b>
Boiler #1	November 10, 2021
Boiler #2	October 12, 2021
Boiler #3	April 6, 2022
Boiler #4	March 23, 2022
Boiler #5	October 12, 2021
Boiler #6	March 23, 2022
Boiler #7	April 6, 2022
Boiler #8	November 10, 2021

### **Fuel Storage Tanks:**

There are two 20,000 gallon, underground storage tanks for diesel fuel. These tanks are exempt from air use permitting under Rule 284(2)(d).

### **SUMMARY**

Based on observations made during the inspection and records reviewed,

**Spectrum Health Blodgett Hospital appears to be in compliance with Opt-out PTI No. 51-11 and all other State and Federal air quality regulations.**

NAME *Michael P. Cox*

DATE 9/14/2022

SUPERVISOR *[Signature]*