

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

M195234966

FACILITY: ST MARY'S of Michigan		SRN / ID: M1952
LOCATION: 800 S WASHINGTON AVE, SAGINAW		DISTRICT: Saginaw Bay
CITY: SAGINAW		COUNTY: SAGINAW
CONTACT: Patrick Hoover ,		ACTIVITY DATE: 06/14/2016
STAFF: Gina McCann	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Targeted inspection of PTIs #319-08 and #555-80.		
RESOLVED COMPLAINTS:		

I (glm) conducted a targeted inspection at Saint Mary's of Michigan Facility. I was accompanied by Patrick Hoover, Facilities Coordinator. Mr. Hoover is new to the position.

We reviewed the facilities air permits, PTI #319-08 and #555-80. The facility is subject to the requirements contained in NSPS Dc for small industrial-commercial-institutional steam generating units, 40 CFR Part 60 Subpart Dc.

Recordkeeping violation of air permits PTI #319-08 and #555-80 and 40 CFR Part 60 Subpart Dc.

Description:

According to the facility's website the hospital was born on Saturday, August 21, 1874. Four Daughters of Charity arrived in Saginaw prepared to do God's work in the wilderness and founded the city's first hospital, which was also the only hospital north of Detroit. Father van de Bom took the Sisters to see the temporary facility leased for the new hospital-the Monitor House, formerly a hotel and boarding house with 15 room; 11 to serve as patient rooms while the remaining four would become chapel, kitchen, rectory and parlor. Fast forward to 2016 and St. Mary's of Michigan is a regional health system offering high quality care in cardiovascular, neurosciences, orthopedics, emergency and trauma care, cancer care, bariatrics, imaging diagnostics and primary care. They were the first verified Level II Trauma Center and certified Primary Stroke Center in the region. They currently have 268 beds and over 20 specialty centers, and provide care for people from over 70 counties.

The facility operates three, dual fired, boilers that supply energy to the facility. Boiler #1 was installed in 1969 and was determined to be exempt from permitting at that time. According to historical documents R336.33 was an active regulation in 1969 that stated, "The permit system does not apply to: (f) Gas fuel and No. 1 and No. 2 fuel-oil burning equipment used for space heating, service water heating and electric power generation. Attached is a copy of R336.33 (f). At the time of the inspection Boiler #1 was in operation. As I left the facility at 10:00 a.m., no visible emissions were observed from the stack.

Boiler #2 is covered by PTI #555-80 and boiler #2 is covered by PTI #319-08 and is also an NSPS Dc subject boiler.

Findings

PTI # 555-80: Non-Compliant

Mr. Hoover and I viewed boiler #3. Boiler #3 is decommissioned as they have disconnected steam and fuel lines. The PTI restricts the sulfur dioxide emission to 0.5 pounds per million BTUs of heat input or 0.5% sulfur content. The facility's fuel oil supplier does not provide certification of the sulfur content. I could not verify compliance with this requirement. The facility was receiving a delivery the day of the inspection and Mr. Hoover called the operator to make sure they received a certification. Moving forward this should not be an issue.

PTI # 319-08: Non-Compliant

The equipment permitted is a 24 MMBtu/hr natural gas fired boiler with distillate oil backup, (Johnston

Boiler PFTA 60-4 boiler). The permit limits the sulfur content of all distillate oil used to 0.5 percent by weight. Again, the facility's fuel oil supplier does not provide certification of the sulfur content. I could not verify compliance with this requirement. The facility was receiving a delivery the day of the inspection and Mr. Hoover called the operator to make sure they received a certification. Moving forward this should not be an issue.

Conditions VI.1. and VI.2. require natural gas and distillate oil usage to be recorded on a monthly basis and the sulfur content of the distillate oil for each month that distillate oil is fired in EUBOILER, respectively. Records of monthly use and sulfur content were not available during the inspection. A material limit of 1.1 million gallons per 12-month rolling time period is also required by the permit. The facility submits MAERS on an annual basis and reported 83.1 MMCF for the ending inventory year 2015.

Condition VII.2 requires semi-annual reports to be submitted to the AQD District Supervisor with respect to the NSPS Dc. The facility is not currently submitting reports as they were unaware of the requirement.

The reports should include:

(11) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1), (2), (3), or (4) of this section, as applicable. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

(f) Fuel supplier certification shall include the following information:

(1) For distillate oil:

(i) The name of the oil supplier;

(ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c; and

(iii) The sulfur content or maximum sulfur content of the oil.

(2) For residual oil:

(i) The name of the oil supplier;

(ii) The location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil, specifically including whether the oil was sampled as delivered to the affected facility, or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility, or other location;

(iii) The sulfur content of the oil from which the shipment came (or of the shipment itself); and

(iv) The method used to determine the sulfur content of the oil.

Quarterly reporting must be postmarked by the 30th day following the end of the reporting period, e.g. Reporting period from January 1 to June 30, the report is due on July 31st.

Miscellaneous

The facility has 2-900 kw emergency generators that were installed in 2001. These generators are also fired on the fuel oil blend used as backup for the boilers. They are test fired once per month and have a reactive bank load test on an annual basis. Based on maximum fuel consumption and heating value, these generators are rated at 8.5 MMbtu/hr. Therefore, these generators meet the requirements of exemption R285(g) and did not

require a permit to install. As the facility is an area source of HAPs the generators are likely to maintenance requirements in the RICE MACT. The MDEQ-AQD has not been delegated authority for this regulation, therefore compliance was not verified.

I left the site at 10:00 A.M.

A VN will be sent to resolve the outstanding administrative violations.

NAME Gina L. Mann DATE 6/15/2016 SUPERVISOR C. Hese