

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

M195266156

FACILITY: Acension St. Marys Saginaw		SRN / ID: M1952
LOCATION: 800 S WASHINGTON AVE, SAGINAW		DISTRICT: Bay City
CITY: SAGINAW		COUNTY: SAGINAW
CONTACT:		ACTIVITY DATE: 01/19/2023
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection of PTI 319-08		
RESOLVED COMPLAINTS:		

I (glm) conducted a targeted inspection at Saint Mary's of Michigan Facility. I was accompanied by Jeff Kleimola.

We reviewed the facility's air permit, PTI #319-08. 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. The facility was in compliance with their permits at the time of the inspection.

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 2023 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.

The facility operates two, 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 According to historical documents R336.33 was an active regulation in 1969 that stated, "The permit system does not apply to: (f) Gas fuel and No. 1 and No. 2 fuel-oil burning equipment used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. At the time of the inspection Boiler #1 was in operation. As I left the facility no visible emissions were observed from the stack.

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

PTI # 319-08: 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. The facility's fuel oil supplier does not provide certification of the sulfur content. During the inspection we called Hirshman oil supply. They had just bought Paxson oil, who was the supplier for St. Mary's. They offered to calculate a percent sulfur content for the blend St. Mary's received, but it would not have been representative of the actual fuel in the tank. The next tank will be blended at the refinery.

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 87.48 MMCF for natural gas and 25 gallons of distillate for the ending inventory year 2021.

The PTI has a condition, EUBOILER VII.2., that requires the facility to submit monthly fuel usage records, for boilers subject to the NSPS (40 CFR 60.48c(g)(3)), semi-annually. Upon review of the NSPS Dc, it appears that this requirement does not apply to these boilers. This requirement is for boilers that operate on distillate oil exclusively.

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. EGLE-AQD has not been delegated authority for this regulation, therefore compliance was not verified.

The facility was asked how equipment is sterilized and they use steam. No ethylene oxide on-site.



Image 1(St. Mary's) : Boiler Stack



Image 2(1969 Boiler Plate) : Boiler plate



Image 3(EUBOILER) : Permitted boiler plate.

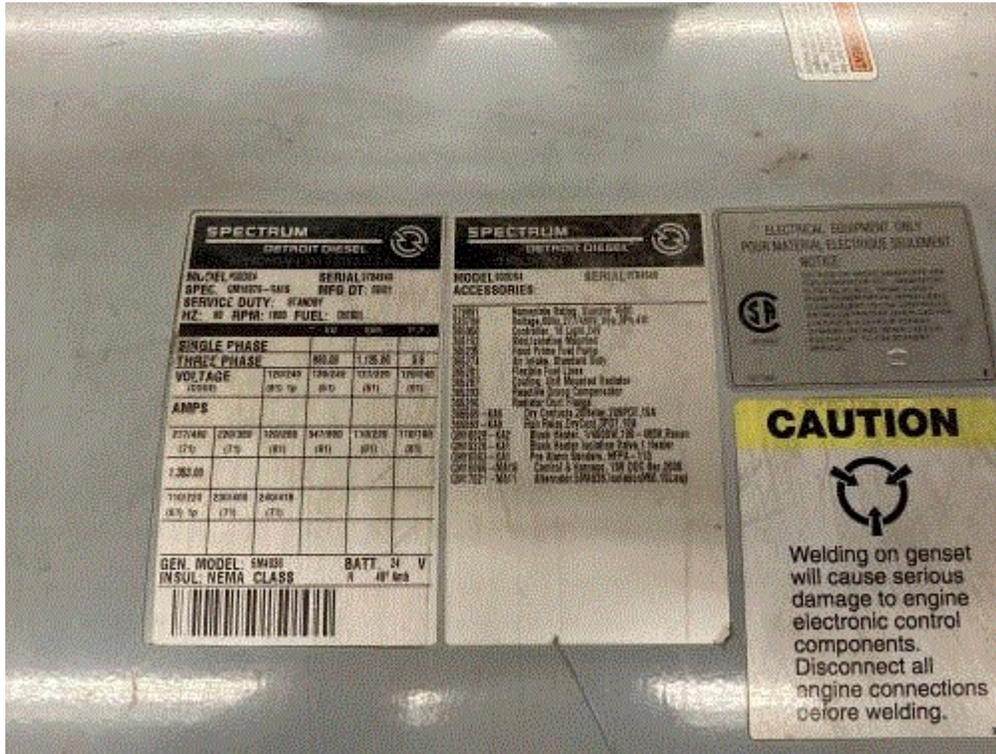


Image 4(Emergency Generator) : Serial 0704949

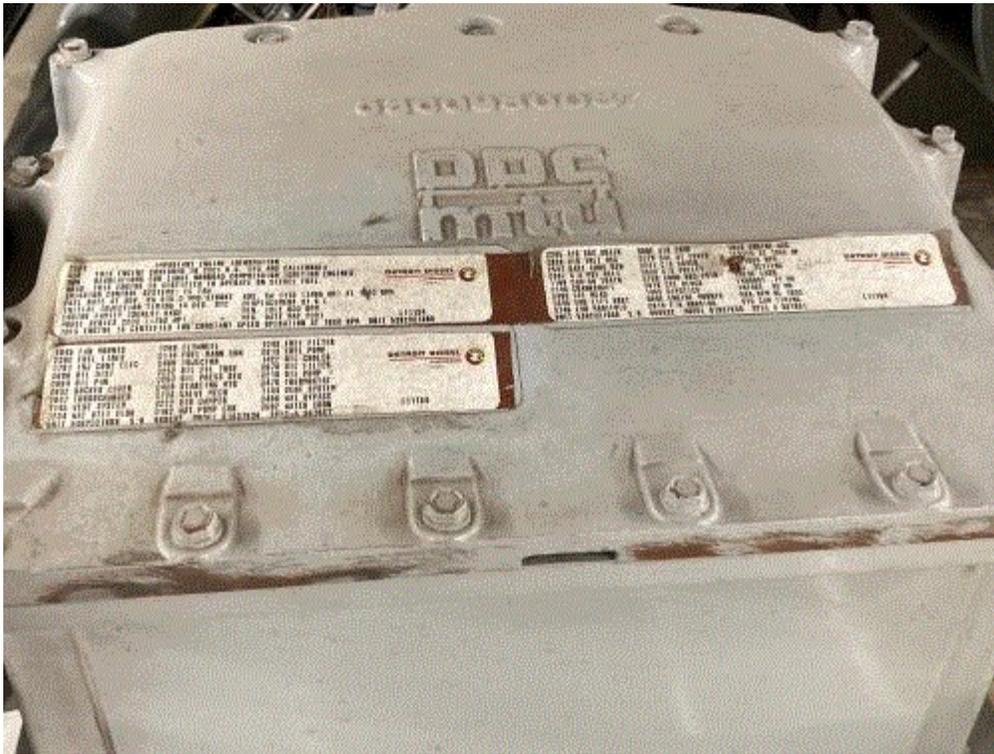


Image 5(Generator Info. 2) : Engine info.

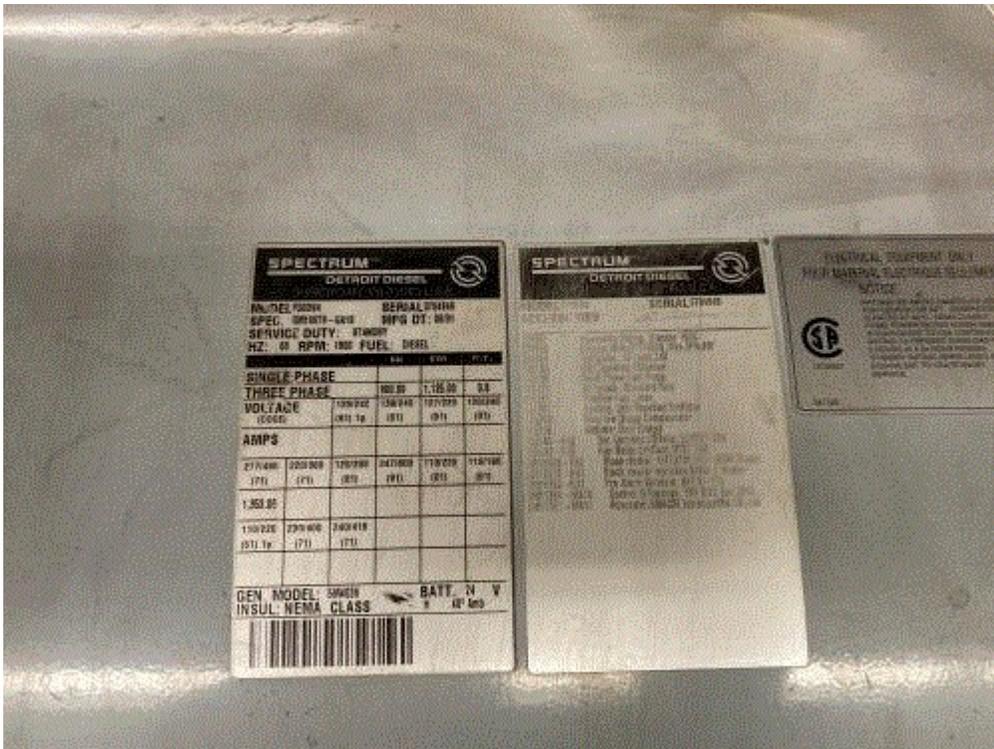


Image 6(Emergency Gen 1) : Serial Number 0704948

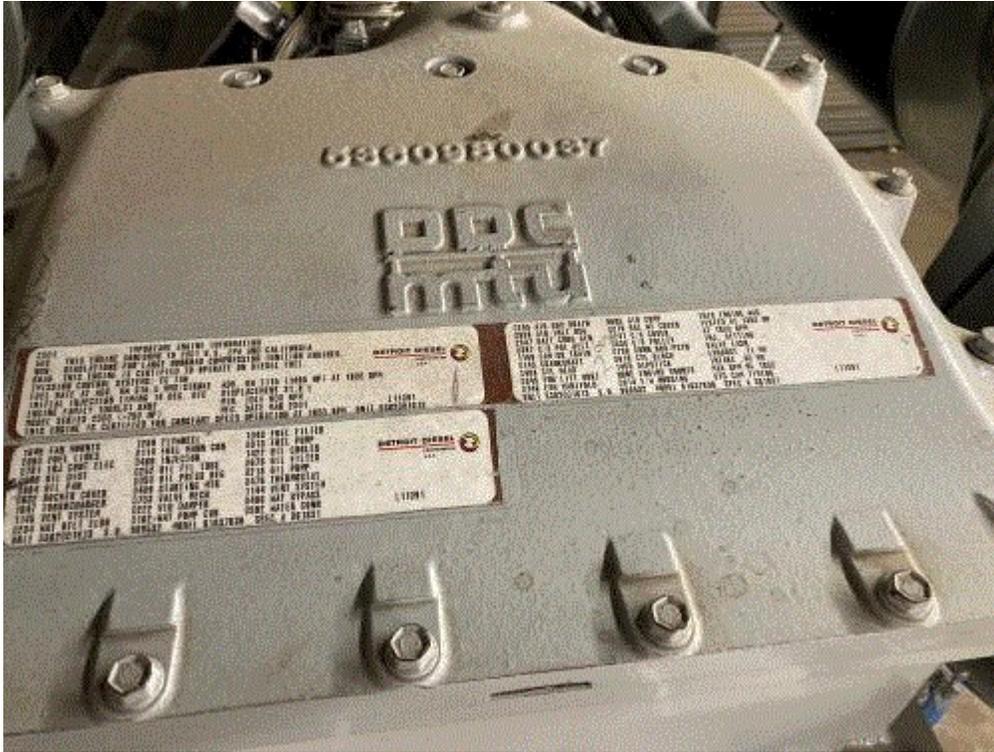


Image 7(Gen 1) : Engine info.

NAME *Mina J. [Signature]*

DATE 1/20/2023

SUPERVISOR *Chris Hare*