

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

G740743007

FACILITY: NORTH OTTAWA COMMUNITY HOSPITAL		SRN / ID: G7407
LOCATION: 1309 SHELDON ROAD, GRAND HAVEN		DISTRICT: Grand Rapids
CITY: GRAND HAVEN		COUNTY: OTTAWA
CONTACT: Mark Reenders , Director of Facilities		ACTIVITY DATE: 12/21/2017
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2018 unannounced minor source inspection.		
RESOLVED COMPLAINTS:		

Background

North Ottawa Community Hospital (NOCH) SRN: G7407 is a small regional hospital. The facility is located at 1309 Sheldon Road, Grand Haven, Michigan. NOCH is located in a primarily residential area with the nearest residential structures approximately 200 feet north, east and south of the facility. There is an elementary school located approximately 200 feet west of the hospital. The facility was inspected on 12/21/2017 by Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division. The purpose of this inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and permit to install (PTI) No. 459-85A. PTI 459-85A covers a 3M 5XL Steri-vac ethylene oxide sterilizer, Castle aerator, exhaust hood and a Donaldson ethylene oxide abater system. The previous inspection staff activity report (SAR) CA G740714863 from 7/26/2011 indicated that the facility intended to remove this process. The facility is a minor source of air contaminants. The largest emission units on site are the boilers and emergency generators. These processes emit minor levels of combustion products which could include the criteria pollutants carbon monoxide (CO), sulfur dioxides (SOx), particulate matter (PM) and nitrogen dioxides (NOx).

Inspection

Site arrival was at approximately 1:00 pm on 12/21/17. Upon meeting, I presented my State of Michigan identification card, informed the facility representative of the intent of my inspection and was permitted onto the site. The facility's primary contact, Mark Reenders was not available to show me the facility. One of the facility's mechanics, David Clark showed me around the hospital. Mark showed me the cleaning area, the boilers and the facility's emergency generators.

Cleaning/ Central Processing

Central processing is responsible for sanitizing and or sterilizing the hospitals equipment. NOCH has an active permit 459-85A for an ethylene oxide sterilizer for this process. While inspecting the cleaning area of the hospital, I spoke with the lead technician Kathy Kruienza. Kathy informed me that they no longer use ethylene oxide. She informed me that they have since switched to a hydrogen peroxide system. Kathy informed me that it has been several years since they have used ethylene oxide. The ethylene oxide equipment appears to have been uninstalled and the permit should be voided. The new process does not appear to require a permit to install pursuant to Rule 201 because it appears to meet the permit exemption R 336.1281(2)(i) for cleaning, washing and drying equipment.

The permit exemption states in part...

...(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

... (i) Sterilization equipment processing mercury-free materials at medical and pharmaceutical facilities using steam, hydrogen peroxide, peracetic acid, or a combination thereof.

Boilers

NOCH maintains the two twin 1969 Johnson fire-tube boilers with a maximum heat input of 14.58 mmBTU (85% efficiency) as previously mentioned in SAR CA G740714863 from 7/26/2011. The processes appear to meet the permit exemption R 336.1282(2)(b)(ii) for no. 2 fuel fired boilers with a maximum heat input of 20,000,000 BTU per hour. These boilers predate the New Source Performance Standard (NSPS) for industrial-

commercial-institutional steam generating units 40 CFR part 60 Subpart Dc.

Emergency Generators

NOCH has five small no. 2 fuel oil (1000 kW or less) emergency generators on site. These generators are used to provide the facility with back up electricity in the case of a power outage. The facility had recently installed a new 1000 kW generator approximately a year ago. I spoke with Mark Reenders and Cummins Sales Representative Dave Lyngklip about the size and power rating and exemption status of the two newest generators. Dave indicated that the two engines associated with the generators had maximum heat input ratings of 4,309,000 BTU per hour and 9,730,000 BTU per hour. Both generators appear to meet permit exemption R 336.1285(2)(g) which in part states...

R 336.1285 Permit to install exemptions; miscellaneous. Rule 285. (2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following: ...

...(g) Internal combustion engines that have less than 10,000,000 Btu/hour maximum heat input.

NSPS Subpart IIII

The new generator are EPA certified engines. The facility appears to comply with the requirements of the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines 40 CFR Part 60, Subpart IIII.

Conclusion

It appears that NOCH is in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and permit to install (PTI) No. 459-85A. The associated sterilizers permitted by PTI 459-85A have been uninstalled and the permit will be voided.

NAME



DATE

2/5/18

SUPERVISOR

