



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

September 1, 2016

Mr. Paul Florkey, Director Plant Operations
Detroit Medical Center- Sinai Grace Hospital
6071 West Outer Drive
Detroit, MI 48235

SRN: K1276, Wayne County

Dear Mr. Florkey:

VIOLATION NOTICE

On June 9, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Detroit Medical Center- Sinai Grace Hospital (DMC-Sinai Grace) located at 6071 West Outer Drive, Detroit, Michigan. The purpose of this inspection was to determine DMC-Sinai Grace'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); and the Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two 700 horsepower (HP) boilers Two 300 HP Boilers Two Emergency Generators	R 336.1201(1)	Installation of boilers and generators without obtaining a permit to install pursuant to R 336.1201(1)
Two 700 HP Boilers Two 300 HP Boilers	New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR, Part 60, Subparts A and Dc	The natural gas boilers (with fuel oil back-up) were installed in 2015 and 2016 and each boiler has a design capacity greater than 10 million BTU per hour. The boilers are subject to NSPS, 40 CFR 60, Subparts A and Dc. Initial notification was not submitted in accordance with 40 CFR 60.7. Notification is required 15 days after startup of affected facility.

Two Emergency Generators	NSPS for Stationary Compression Ignition and Spark Ignition Internal Combustion Engines, 40 CFR, Part 60, Subparts A and IIII	The generators were installed in 2015 and manufactured after 2006; the generators are subject to NSPS, 40 CFR 60, Subparts A and IIII. Initial notification was not submitted in accordance with 40 CFR 60.7. Notification is required 15 days after startup of affected facility.
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During this inspection, it was noted that DMC-Sinai Grace had installed and commenced operation of unpermitted equipment at this facility. The AQD staff requested information via electronic mail to determine if said equipment was permit exempt on June 13, 2016, June 22, 2016, and July 7, 2016. AQD staff received partial information from those requests. Based on calculations performed to determine potential air emissions from the equipment, it appears the equipment is not exempt and installed without a permit to install. This is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the boilers and generators. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please note that based on the partial information received, potential air emissions were calculated from the four boilers and two generators. The company's Potential-to-Emit (PTE) of Sulfur Dioxide exceeds the major source threshold of 100 tons per year (tpy).

A major source is defined as any source (facility) that actually emits or has the PTE 10 tpy of any hazardous air pollutant, 25 tpy of any combination of hazardous air pollutants, or 100 tpy of any criteria pollutant (Nitrogen Oxides, Sulfur Dioxide, Carbon Monoxide, Particulate Matter, VOCs, and Lead).

Under the State of Michigan's Air Pollution Control law and the federal Clean Air Act, a Renewable Operating Permit (ROP) program has been developed and implemented in Michigan. This program requires major sources of air emissions to obtain a facility-wide air use permit. This permit serves as a mechanism for consolidating and clarifying all air pollution control requirements which apply to the source. Rule 210(5) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires major sources to submit an ROP application to the

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DEQ, AQD not more than 12 months after a stationary source commences operation as a major source, as defined by Rule 211(1)(a) of Act 451.

The boilers are subject to the federal NSPS for Small Industrial-Commercial-Institutional Steam Generating Units. These standards are found in Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart Dc.

The generators are subject to the federal NSPS for Stationary Compression Ignition and Spark Ignition Internal Combustion Engines. These standards are found in Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart IIII.

Finally, please provide the following information that was requested in previous communications with the company:

- Name plate information from boilers (serial numbers, capacity, heat input, steam output, etc.)
- Installation dates for the 700 HP boilers and 300 HP boilers
- Specifications and datasheet (size of generator- in kW) for the emergency generators
- Installation dates for emergency generators

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 22, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If DMC-Sinai Grace believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of DMC-Sinai Grace. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jorge Acevedo
Senior Environmental Engineer
Air Quality Division
313-456-4679

cc: Ms. LaReina Wheeler, City of Detroit BSEED
cc via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ