

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

M195465492

<b>FACILITY:</b> COVENANT HEALTH CARE		<b>SRN / ID:</b> M1954
<b>LOCATION:</b> 700 COOPER ST, SAGINAW		<b>DISTRICT:</b> Bay City
<b>CITY:</b> SAGINAW		<b>COUNTY:</b> SAGINAW
<b>CONTACT:</b>		<b>ACTIVITY DATE:</b> 11/02/2022
<b>STAFF:</b> Gina McCann	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Inspection of PTI 135-09 and 529-79.		
<b>RESOLVED COMPLAINTS:</b>		

I (glm) performed a scheduled inspection at Covenant Healthcare to inspect the boilers permitted under PTI 135-09, 529-79, and NSPS Dc.

I met with Mick Enright (Facilities Manager) to review the permit conditions and tour the facilities. Covenant Healthcare consists of Covenant Harrison (former Saginaw General Hospital) and Covenant Cooper (formerly St Lukes Hospital) sites operated under common control.

Covenant Healthcare consists of Covenant Harrison (former Saginaw General Hospital) and Covenant Cooper (formerly St Lukes Hospital). Covenant Harrison was previously under the separate SRN G9481. The facility had been issued a PTI (807-92) for EtO sterilizer. The PTI was voided in 2009 and the facility does not operate this equipment. The hospital uses steam for sterilization of equipment. These contiguous and adjacent properties, operate under common control and are considered one stationary source and are listed under M1954. The 700 Cooper Street facility consists of three (3) boilers that primarily run-on natural gas, but do have the option to operate on diesel, and three (3), diesel fired, back-up generators. EU-CooperBlr3 was permitted under PTI 135-09 in response to a violation notice.

The Cooper site operates three steam generating boilers. All three boilers are fired on natural gas with fuel oil backup. Boiler specs are as follows:

Name	Installation Date	Rated Capacity	Fuel Type	NSPS Subject
#1	2000	16 MMBtu/hr	NG/FO	Y
#2	2000	16 MMBtu/hr	NG/FO	Y
#3 (EU-CooperBlr3)	1979	25.1 MMBtu/hr	NG/FO	N

**\*EU-CooperBlr3 was completely re-tubed in January 2022. In discussions to upgrade burner, asked if permitting would be necessary and I said it would need an evaluation.**

Boilers 1 and 2 were installed under permit to install exemption R282(b)ii but are subject to the NSPS based on an install date after June 9, 1989 and a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h). Boiler 3 is not subject to the NSPS, because of install date, but is permitted under PTI 135-09.

The Harrison boilers are covered under PTI 135-09 and are subject to the NSPS based on an install date after June 9, 1989 and a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).

Name	Installation Date	Rated Capacity	Fuel Type	NSPS Subject	Mft. SN
EU-HarrisonBlr1	2001	20 MMbtu/hr	NG/FO	Y	10082-01
EU-HarrisonBlr2	2001	20 MMbtu/hr	NG/FO	Y	10082-02

I reviewed the PTI requirements with Covenant staff. Mick stated that while they have fuel oil backup to all the boilers, they only fire them on it for exercise once per quarter. The boilers run on natural gas exclusively. I reviewed the appropriate records, as well as the flow monitor on each boiler. Chart records of boiler data, containing gas usage were available and stored in the operator's room. We also observed the natural gas meter to the site that exclusively services the boilers. This information is required to be recorded daily. For the 12-month rolling time period ending December 2021, the facility used 120 gallons of distillate. Natural gas usage for the 12-month rolling time period ending December 2021 for boilers, EU-HarrisonBlr1, EU-HarrisonBlr2, and EU-CooperBlr3 was 121 MMCF.

Covenant stated the diesel fuel is reconditioned annually. A company is sub-contracted to test for algae content. They bring a truck to pump out the diesel, clean it, and then recirculate it back into the tank. The PTI has a condition, FG-PTI Boilers, VII.1., 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.

#### Back-up Generators: In Compliance


Covenant-Cooper operates three emergency back-up generators. All three are fired on the same #2 fuel oil used as back-up for the boilers. The three generators include (1) 600 kw installed in 2001, (2) 600 kw installed in 1988 and (3) 500 kw installed in 2019. These three generators meet the exemption requirements under R282(b)(ii) and R285(g). Also, the two 600 kw generators were installed prior to the applicability date and are not subject to 40 CFR 60 Subpart IIII (NSPS for Compression Ignition RICE). The facility is working to determine applicability of the 500 kw

engine with the NSPS III. It is likely subject to the NSPS due to date of installation and size capacity over 500 horsepower.

ID	Installed	Serial No.
600 KW	2001	A010194798
500 KW	2019	7368574
600 KW	1988	49863

The facility does not report emissions from the generators to MAERS. The MAERS User Guide and Workbook says only report emissions of applicable criteria pollutants from fuel burning equipment that have a total annual throughput equal to or greater than 50 MMcf, or 400,000 gallons of fuel. The generators do not have throughput greater than these amounts.

The boiler rooms of the Harrison and Cooper sites were extremely clean and well maintained. Maintenance is performed on each piece of equipment routinely. I viewed maintenance logs at each piece of equipment. For purposes of this inspection the facility can be considered in compliance.

NAME 

DATE 11/28/2022

SUPERVISOR 