

P0961  
MANILA

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

P096147534

FACILITY: Fresenius Kidney Care		SRN / ID: P0961
LOCATION: 5250 Auto Club Drive, DEARBORN		DISTRICT: Detroit
CITY: DEARBORN		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 01/09/2019
STAFF: Katherine Koster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Targeted FY19 inspection		
RESOLVED COMPLAINTS:		

**Reason for Inspection: Targeted Inspection**

**Level of Inspection: PCE**

**Inspected by: Katie Koster, AQD**

\*\*\*\*\*

**FACILITY BACKGROUND**

Fresenius Kidney Care is a medical facility that provides dialysis services. It is located at 5250 Auto Club Drive in Dearborn, MI and has started providing patient services within the last couple of weeks. On April 27, 2018, AQD received a letter from Arcadis on behalf of Fresenius. The letter stated that the company intended to install a "standby" generator to avoid any potential interruptions in dialysis treatment. The letter states the generator will be Kohler model, 275 kW, diesel fired John Deere engine, and that the maximum heat input will be 2,383,000 BTU/hr based on maximum hourly fuel usage.

**COMPLAINT/COMPLIANCE HISTORY**

No complaints have been received.

**OUTSTANDING CONSENT ORDERS**

There are no outstanding consent orders.

**OUTSTANDING VIOLATION NOTICES**

There are no outstanding violation notices.

**INSPECTION NARRATIVE**

On January 9, 2019, I arrived at Fresenius Kidney Care around 10:00 a.m. I met with the supervisor of the facility who is also a nurse. There are no maintenance personnel on site. Maintenance is contracted to a third party. He escorted me outside, and we viewed the generator. Based on the nameplate on the equipment, it is the same generator as the one described in the April 2018 letter. Kohler Genset Model 275REOZJE, 275kW, standby, MFG Date 3/27/18. There was also an "emission control information" sticker by John Deere that stated this engine complies with USEPA regulations for 2017 stationary emergency diesel engines including fire pumps. Sticker also states "low or ultra low sulfur fuel only." The supervisor stated that it was installed in June or July 2018. He was not exactly sure as he was on vacation at that time.

We viewed the non-resettable hour meter which read 62 hours. I inquired about the type of fuel that was in the generator and whether there was a record/receipt that it was ultra-low sulfur diesel. I spoke to someone named Chris on the phone. He stated that the generator came with a full tank of diesel, similar to when a person purchases a new car, and he did not have a purchase receipt for the fuel. He stated that he would try to track something down, and I provided my phone number for follow up. I reviewed supplemental documentation that was presented in a binder, including generator specs and the operation and maintenance manual. These items included statements that the generator met EPA Tier 3 emission requirements.

The facility supervisor stated that no maintenance has occurred as the equipment is new and there have not been any problems. It automatically runs once a week on Tuesday for an hour for readiness testing. At this time, a written log of when it runs is not being maintained. I explained that someone needs to record any time the generator runs; especially when it is outside of the weekly readiness check. Outside

of maintenance/readiness, he explained that it has only run one other time. When it was first installed, the contractor overfilled the generator with fuel. They decided to run the generator to reduce the fuel amount. At the time of my inspection, the generator was not in use.

#### RULES/PERMIT CONDITIONS EVALUATED

The generator appears to be subject to 40 CFR Part 60 Subpart IIII, standards for stationary compression ignition internal combustion engines per 60.4200(a)(2)(i): "Owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are: (i) manufactured after April 1, 2006 and are not fire pump engines.

For emergency generators, the general requirements in Subpart IIII are as follows:

1. Purchase a certified engine that meets the emission limits or perform testing and operate according to manufacturer's instruction (60.4211). Certification provided and no maintenance has been performed as of yet.
2. Install non resettable hour meter (60.4209). Meter was installed as verified during the on site inspection.
3. If the engine is to be classified as an emergency engine, it can only operate 100 hours per calendar year for maintenance, testing, and emergency demand; 50 of which can be for "other" non-emergency purposes (60.4211). The generator has not been in operation for a year. Since June 2018, it has operated 62 hours according to the non-resettable hour meter. Assuming one hour of operation per week since July 1, would be 27 hours of readiness checks so the engine was run approximately 35 hours for "other" non-emergency purposes. Additionally, since the regulation is based on calendar year, it appears that the clock "resets" on January 1. As the inspection was conducted in the second week of January, based on information provided by the facility, the generator has only run for two hours of the 2019 calendar year.
4. Fuel used can only be 15 ppm maximum sulfur content (60.4207). This is unknown as the facility was unable to provide a record of fuel specifications.
5. Written log of operating hours is required (60.4214). Written log is not being maintained at this time. Facility to maintain log moving forward.
6. No initial notification is required for emergency ICE per 60.4214(b).

Generator appears to be exempt from the requirement to obtain a permit to install per Rule 336.1285(2)(g).  $250\text{kW} = 0.853 \text{ MMBTU/hr}$ . At a 25% efficiency conversion, the maximum heat input is  $3.4 \text{ MMBTU/hr}$ .

Alternatively, using the maximum fuel usage information equates to  $17.4 \text{ gal/hr} * 138,000 \text{ MMBTU/gal}$  of diesel =  $2.4 \text{ MMBTU/hr}$  heat input.

#### COMPLIANCE DETERMINATION

At this time, as the facility has not exceeded 100 hours of operation, discretion is being used regarding a log of generator activity. Facility will be maintaining a log moving forward. AQD will follow up with facility regarding sulfur content in fuel.

NAME

DATE

SUPERVISOR