



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
CADILLAC DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 10, 2021

Mr. Robert Richardson
Munson Medical Center
105 Sixth Street
Traverse City, Michigan 49684

SRN: D5884, Grand Traverse County

Dear Mr. Richardson:

VIOLATION NOTICE

On July 29, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a review of site records for Munson Medical Center located at 1105 Sixth Street, Traverse City, Michigan. The purpose of this review was to determine Munson Medical Center'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

During the review, staff confirmed the following:

Process Description	Rule/Permit Condition Violated	Comments
Ethylene Oxide Sterilization System	R 336.1201 of Air Pollution Control Rules	Facility confirmed installation and operation

This process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hospital Ethylene Oxide Sterilizers. These standards are found in 40 CFR Part 63, Subpart WWWW.

During this review, it was noted that Munson Medical Center had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised Munson Medical Center on July 30, 2021, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the ethylene oxide sterilization process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

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.

Mr. Robert Richardson
Munson Medical Center
Page 2 of 2
August 10, 2021

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 31, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Cadillac District, at 120 West Chapin Street, Cadillac, Michigan 49601 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Munson Medical Center 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.

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

Sincerely,



Jodi Lindgren
Environmental Quality Analyst
Air Quality Division
231-942-2863 / LindgrenJ2@Michigan.gov

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Shane Nixon, EGLE