

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

FY 2015 Insp

M196829234

FACILITY: PONTIAC OSTEOPATHIC HOSPITAL	SRN / ID: M1968
LOCATION: 50 N PERRY ST, PONTIAC	DISTRICT: Southeast Michigan
CITY: PONTIAC	COUNTY: OAKLAND
CONTACT: Robert Pickup, Director of Buildings and Grounds	ACTIVITY DATE: 04/23/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SOURCE CLASS: SM OPT OUT	
SUBJECT: FY 2015 level-2 scheduled inspection of McLaren Oakland, dba POH Regional Medical Center (M1968), fka Pontiac Osteopathic Hospital, a McLaren Health Service	
RESOLVED COMPLAINTS:	

M1968 - SAR - 2015 04 23

**POH Regional Medical Center (M1968)
 fka Pontiac Osteopathic Hospital
 A McLaren Health Service
 50 N. Perry St.
 Pontiac, Michigan 48342-2217**

www.pohmedical.or mclaren.org

Phone: 248-338-5382

E-mail: robert.pickup@mclaren.org

PTI Nos.: 45-98 (ROP Synthetic Minor or opt-out) for three identical 500-hp boilers and 134-97 for two EO sterilizers

PTI voids: PTI No. 27-84I for Pathological Incinerator (April 10, 2012 based upon FY 2012 inspection).

PTI application voids: PTI Nos. 46-98 (4/23/1998) and 47-98 (4/23/1998) for two 500-hp boilers. These two boilers are incorporated into PTI No. 45-98 (3 boilers including these 2).

VNs: AQD issued Violation Notices dated February 19, 1998 (as a result, POH obtained ROP Synthetic Minor PTI No. 45-98), October 28, 2011 (Boiler NSPS Dc and EO sterilizers) and several VNs (failure to submit MAERS in a timely manner). POH is habitually tardy about MAERS.

POH Regional Medical Center's three (3) identical 500-hp principally natural gas fired steam boilers with fuel oil backup are subject to: New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR, Part 60, Subpart Dc).

Fee: Category II (fuel oil back-up for NSPS Dc boilers).

POH Regional Medical Center's boilers (3) may be subject to: NESHAP / MACT 6J, 40 CFR Part 63, Subpart JJJJJJ / 6J National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers, Page 15554, Federal Register / Vol. 76, No. 54 / Monday, March 21, 2011 / Rules and Regulations / Final rule. This rule does NOT apply to boilers that burn only gaseous fuels or any solid waste.

POH Regional Medical Center's emergency diesel (CI RICE) generators may be subject to: CI RICE MACT 4Z, Area Source NESHAP / MACT ZZZZ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines / Final rule (Page 3568, Federal Register / Vol. 73, No. 13 / Friday, January 18, 2008 / Rules and Regulations / Final rule).

POH Regional Medical Center's ethylene oxide sterilizers (2) are subject to: Area Source NESHAP / MACT 5W: Ethylene Oxide (EO) sterilizers are subject to Area Source NESHAP / MACT 5W, National Emission Standards for Hospital Ethylene Oxide Sterilizers, 40 CFR Part 63, Subpart WWWW, Page 73611, Federal Register /Vol. 72, No. 248 / Friday, December 28, 2007 /Rules and Regulations / Final rule.

On April 23, 2015, I conducted a level-2 **scheduled** inspection of McLaren Oakland, dba POH Regional Medical Center (M1968), fka Pontiac Osteopathic Hospital, a McLaren Health Service, located at 50 N. Perry St., Pontiac, Michigan 48342-2217. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994, PA 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Robert Pickup (Phone: 248-338-5382; Fax: 248-338-5127; Cell: 248-705-3166; E-mail: robert.pickup@pohmedical.org / robert.pickup@mclaren.org), Director, Buildings and Grounds, Mr. Tom Tesolin (Phone: 248-338-5142), Biomed Manager, Ms. Jennifer L. Distefano (Phone: 248-338-5138; Fax: 248-338-5060; Cell: 734-347-6501; Pager: 248-407-3523 E-mail: Jennifer.distefano2@mclaren.org) CSR (Central Sterile Reprocessing) Manager, Sterilization, assisted me.

Jayne Strehlke (248-338-5138) CSR Manager, Sterilization, separated about December 2014.

Pathological Incinerator (PTI No. 27-84I - void)

Pathological incinerator does not exist since 1995. PTI No. 27-84I is voided on April 10, 2012 based upon FY 2012 inspection.

Ethylene Oxide Sterilizers (PTI No. 134-97)

Two (2) identical AMSCO (Steris Co) Model 3017 Ethylene Oxide (EO) Sterilizers are present; one unit is stacked above the other. Only one operates at any given time. The sterilizers use 100-gram EO canister; one canister per EO sterilization cycle. 13-hour sterilization cycle consists of 1 hour of EO exposure to destroy pathogens and 12 hours of aeration. An infectious biological sample is kept inside along with surgical instruments and tested at the end of the process in order to ensure thorough sterilization. Of two EO sterilizer machines (one stacked above the other), only one machine is used at a given time. One common catalytic oxidizer, which oxidizes ethylene oxide to water and carbon dioxide, serves both sterilization units is present.

Ethylene oxide emissions are controlled using Donaldson EO Abator. The Abator converts

ethylene oxide (C₂H₄O) to carbon dioxide and water. The reaction is accompanied by release of heat (exothermic) and is assisted by a proprietary catalyst.

AQD issued a Violation Notice dated October 28, 2011, for failure to keep EO usage records & perform required calculations and to operate properly EO catalytic abatement (PTI No. 134-97, SCs 17 & 18, Appendix A). Please refer to the October 28, 2011, Violation Notice for details.

AQD received a violation response letter dated November 14, 2011, that attached with it NSPS Dc Initial Notification and that stated that sulfur content records, natural gas & fuel usage records, EO sterilization records would be kept and the required calculations would be performed.

The EO sterilization system is equipped with an interlock system such that the sterilization process is shut down if the required temperature at the catalyst bed of a common catalytic abatement is not attained and maintained (280-550 °F). Steris Company (800-333-8828) installed temperature chart about February 2012. I confirmed that charts are installed (March 29, 2012). The sterilization area of the hospital is equipped with two EO monitoring alarms. Employees' health is monitored.

December 2015 EO usage is 21 canisters, i.e., 2100 grams with attendant ethylene oxide (EO) emissions of 2.1 grams per month. In CY 2014, 219 canisters (100 grams EO per canister, i.e. 21,900 grams usage) were used with attendant ethylene oxide (EO) emissions of 21.9 grams per year (PTI No. 134-97, SC 13 limit: 73 grams per year emissions and SC 14 limit: 730 canisters or 73,000 pounds per year or 161 pounds per year EO usage). POH is modified the permit's Appendix A for the site-specific use. The required record-keeping and attendant calculations according the Appendix A are done (PTI No. 134-97, SC 16: records, based FY 2015 inspection records kept, SC 17: Appendix A calculations and SC 19: temperature charts present).

Testing is not required at this time especially considering that EO sterilizer will be phased out soon (PTI No. 134-97, SC 15: testing may be required).

Per FY 2015 inspection, EO batches and canister usage records are kept. One canister per batch is used. Per Thursday, April 23, 2015, e-mail from Jennifer L. DiStefano, CIS, CRCST, and the attached spreadsheet, EO usage is:

1. 21 canisters per month, 2100 grams per month usage, 2.1 grams of emissions per month (Dec 2014)
2. 219 canisters per year, 21,900 grams per year usage, 21.9 grams of emissions per year (CY 2014)

Area Source NESHAP / MACT 5W: Ethylene Oxide (EO) sterilizers are subject to Area Source NESHAP / MACT 5W, National Emission Standards for Hospital Ethylene Oxide Sterilizers, 40 CFR Part 63, Subpart WWWW, Page 73611, Federal Register /Vol. 72, No. 248 / Friday, December 28, 2007 /Rules and Regulations / Final rule. The owner or operator of an existing (installed before November 6, 2006) area source must comply with this area source NESHAP by December 29, 2008. AQD has decided not to take delegation of these standards and therefore no attempt has been made to evaluate the POH's compliance with

NESHAP / MACT 5W. For questions regarding the Area MACT 5W, POH must deal directly with Region 5, US EPA, Chicago.

About March 2015, one Hydrogen Peroxide (H₂O₂) Plasma Sterrad 100 NX equipment for sterilization is purchased and installed. The unit is manufactured by Advanced Surgical Products, a subsidiary of Johnson and Johnson. 98 percent of surgical instruments are validated for H₂O₂ plasma. Soon ethylene oxide (EO) usage will be reduced substantially. Eventually, EO sterilizer will be removed as cost of this process is extremely high due to indoor air monitoring and above all employee health (periodic medical exams) monitoring.

Three NSPS Dc Boilers with Fuel Oil Back-up (ROP opt-out PTI No. 45-98).

In 1995, POH Medical Center installed three boilers at the Pontiac Hospital facility. Each boiler has a rated or design capacity of 21 million BTU per hour (500 hp). Each boiler of capacity 21 million BTU per hour (500 hp), with fuel oil back-up, was installed after June 9, 1989 (1995). Hence, these boilers (3) are subject to federal New Source Performance Standards (NSPS Dc) for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR, Part 60, Subpart Dc). Hence, pursuant to Act 451 of 1994, as amended, § 324.5522 (2)(b), POH facility is subject to Category II air quality fees. In addition, pursuant to Rule 336.1282(b), the boilers burning sweet natural gas (up to 50 million BTU per hour) are exempt from Rule 336.1201 (Permit-to-Install). Furthermore, pursuant to Rule 336.1282(b), the fuel oil fired boilers (up to 20 million BTU per hour) are exempt from Rule 336.1201 (Permit-to-Install) subject to the condition that fuel oil (limited to No.1 and No.2) burnt has sulfur content no greater than 0.40 percent by mass. It may be noted that NSPS Dc allows sulfur content up to 0.50 percent sulfur by mass (0.5 pounds of sulfur dioxide per million BTU heat input).

Because each boiler has design capacity over 20 million BTU per hour, three identical boilers (21 MM BTU / hour CleverBrook CB Packaged Boilers Model CB-200-500 hp-1507, max. 150 psi steam pressure) are NOT exempt from Rule 336.1201 (Permit-to-Install). As a matter fact, AQD (Pinga) issued Violation Notice (VN) dated February 19, 1998. As result of the VN, POH obtained ROP opt-out PTI No. 45-98.

Rule 336.1201 requires an air use permit be obtained prior to installation, construction, reconstruction, relocation, or alteration of any process or process equipment that may be a source of an air contaminant.

The NSPS Dc boilers are:

1. SL No. OLO-93788: CleverBrook CB Packaged Boilers Model CB-200-500 hp-1507, max. 150 psi steam pressure, principally natural gas fired, ULSD Diesel (15 ppm sulfur) as backup fuel
2. SL No. OLO-93789: CleverBrook CB Packaged Boilers Model CB-200-500 hp-1507, max. 150 psi steam pressure, principally natural gas fired, ULSD Diesel (15 ppm sulfur) as backup fuel
3. SL No. OLO-93922: CleverBrook CB Packaged Boilers Model CB-200-500 hp-1507, max. 150 psi steam pressure, principally natural gas fired, ULSD Diesel (15 ppm sulfur) as backup fuel

NSPS Dc Revisions:

1. 72 FR 32759 = Page 32759 Federal Register / Vol. 72, No. 113 / Wednesday, June 13, 2007 / Rules and Regulations / Final Rule – to add compliance alternatives and to revise certain recordkeeping and reporting requirements.
2. 74 FR 5091 = Page 5091 Federal Register / Vol. 74, No. 17 / Wednesday, January 28, 2009 / Rules and Regulations / Final Rule - to correct technical and editorial errors.

The NSPS revisions simplified the natural gas usage recordkeeping.

AQD issued Violation Notice dated October 28, 2011, for failure to comply with NSPS Dc and PTI No. 45-98 (SCs 13, 18,19) requirements. The ROP opt-out permit was obtained to limit sulfur dioxide emissions (88 tpy) with a corresponding fuel usage limit (2,506,000 gallons / year No. 2 fuel oil, 0.5% sulfur). Please refer to October 28, 2011, Violation Notice for details. AQD received a violation response letter dated November 14, 2011, that attached with it NSPS Dc Initial Notification and that stated that sulfur content records, natural gas & fuel usage records, EO sterilization records will be kept and the required calculations will be performed.

Only off-road (no road tax) ULSD containing 15 ppm sulfur (S) is fired as backup fuel oil (PTI No. 45-98, SC 13 limits: 87.7 tons of sulfur dioxide per year, 31.5 pounds of sulfur dioxide per hour and max. 0.5% S together with SC14: 2,506,000 gallons / year; SC 18: sulfur in fuel testing not required 15 ppm sulfur ULSD).

The boilers are test fired once per year using ULSD (common fuel between generators and boilers) to satisfy the hospital certification requirements (PTI No. 45-98, SC 13, 15 limit: 2,506,000 gallons / year, fuel oil usage records).

POH is submitting MAERS data and uses only ULSD 15 ppm fuel (PTI No. 45-98, SC 19: monitoring and emissions records need not be submitted at this time as long as ULSD off road diesel is used).

On April 10, 2015, one load of ULSD received: 651 gallons for this load, \$1,340.41.

Natural gas meter readings are taken once per week to compare to utility bills:

1. January 07, 2014: 77,355
2. December 29, 2014: 137,035
3. CY 2014 Natural gas usage (approx.): 59,680 M SCF per year.

As the boilers are designed to be capable of burning liquid fuels such as fuel oil, POH Regional Medical Center's boilers are subject to: NESHAP / MACT 6J, 40 CFR Part 63, Subpart JJJJJJ / 6J National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers, Page 15554, Federal Register / Vol. 76, No. 54 / Monday, March 21, 2011 / Rules and Regulations / Final rule. This NESHAP / MACT 6J rule does NOT apply to boilers that burn only gaseous fuels or any solid waste; the POH's boilers are designed for liquid fuels, such as fuel oil, as well.

AQD has decided not to take delegation of these standards and therefore no attempt has been made to evaluate the POH's compliance with NESHAP / MACT 6J.

CFR 63, subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, Page 80598 Federal Register / Vol. 76, No. 247 / Friday, December 23, 2011 / Proposed Rules). The EPA will accept comment on the reconsideration proposal until February 21, 2012.

Emergency diesel fuel (2) and natural gas (1) fired generators

During the inspection, I discovered that three generators of capacity 1,000 kW / 1 MW, 230 kW / 0.23 MW and 288 kW / 0.28 MW were installed as follows:

1. 1,000 kW (1 MW) emergency diesel generator: Caterpillar Diesel Generator Model 3513, 1,000 kW (1 MW). 1250 KVA, PF = 0.8. Installed 1995
2. 230 kW (0.23 MW) emergency NG generator: Waukesha NG fired Model VCL 00G generator. Installed in 1975
3. 288 kW (0.28 MW) emergency diesel generator: Caterpillar Diesel Generator Model SR-4B, 288 kW (0.288 MW). Installed 1998

The generators are test fired: once per week for 10 minutes, once a month for 30 minutes and once per year for 4 hours for full load testing.

1,000 kW (1 MW) generator is equivalent to 8.2 million BTU per hour heat input based upon 60 gallons per hour fuel (diesel) consumption at peak load and 137,000 BTU per gallon of diesel. Therefore, the generators (<10 million BTU per hour heat input internal combustion engines) are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 285(g).

On July 11, 2006, EPA promulgated 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE).

RICE MACT 4Z: Emergency diesel generators may be subject to RICE MACT 4Z, Area Source NESHAP / MACT ZZZZ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines / Final rule (Page 3568, Federal Register / Vol. 73, No. 13 / Friday, January 18, 2008 / Rules and Regulations / Final rule). For questions regarding the Area MACT 4J, POH must deal directly with Region 5, US EPA, Chicago. If and only if the engine operates as an emergency engine under the rule (40 CFR 63.6675 & 63.6640; exceptions apply, e.g., interruptible service contract with a power utility) and is located at residential, institutional, or commercial establishments (including hospitals), the generators are exempt from RICE MACT.

AQD has decided not to take delegation of these standards and therefore no attempt has been made to evaluate the POH's compliance with NESHAP / MACT 4Z.

In summary, CI RICE MACT 4Z for existing units requires:

1. Change oil and filter every 500 hours of operation or annually, whichever comes first.

2. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
3. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

I asked Mr. Pickup to comply with the above CI RICE MACT 4Z requirements.

Annual Air Quality Fees and MAERS

G. Vinson Hellwig, AQD Chief, sent the letter dated November 21, 2011 along with an Invoice No. 733832 dated November 17, 2011, for \$10,770.00 (2006-2011). In addition, Lynn Fiedler, Asst. AQD Chief, sent the letter dated April 23, 2012 along with an Invoice No. 754831 dated April 24, 2012, for \$1,795.00 (2012). Although POH is tardy in submitting MAERS, subsequently fee bills are paid.

Conclusion

The Violation Notice dated October 28, 2011, was issued for failure to comply with NSPS Subpart Dc and EO sterilizer permit. EO sterilizer will be phased out and hydrogen peroxide plasma sterilizer will be phased in.

FYI: Violation Notice

October 28, 2011

Mr. Clarence Sevillian, President
 POH Regional Medical Center
 50 N. Perry St.
 Pontiac, MI 48342-2217

SRN: M1968, Oakland (63) County

Dear Sevillian:

VIOLATION NOTICE

On October 11, 2011, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of POH Regional Medical Center, fka Pontiac Osteopathic Hospital, a McLaren Health Service, located at 50 N. Perry St., Pontiac, Michigan. The purpose of this inspection was to determine POH Medical Center's compliance with the requirements of the federal Clean Air Act; Part 5: Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules and PTI No. 134-97 (2 EO sterilizers) & ROP opt-out PTI No. 45-98 (3 boilers).

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Boiler Nos. 1, 2 & 3 ^β	New Source Performance Standards	POH Medical Center has failed to comply with these federal standards

	(NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units. 40 CFR, Part 60, Subparts A and Dc. PTI No. 45-98, SC 19	since 1995.
Boiler Nos. 1, 2 & 3 ^β	40 CFR, Part 60, Subpart Dc, § 60.44c & § 60.48c and 40 CFR, Part 60, Subpart A, § 60.7 & § 60.8. PTI No. 45-98, SC 18 & 19	POH Medical Center has failed to comply with written initial notification and initial performance test requirements. ^Δ
Boiler Nos. 1, 2 & 3 ^β	40 CFR, Part 60, Subpart Dc, § 60.48c (g). PTI No. 45-98, SC 19	POH Medical Center has failed to keep a record of amount of each fuel combusted although fuel usage data is available via utility bills. The fuel usage information shall be maintained using an Excel spreadsheet in a manner acceptable to AQD on a 12-month rolling basis; i.e. monthly fuel usage information with monthly 12-month summation. ^θ
Boiler Nos. 1, 2 & 3 ^β	40 CFR, Part 60, Subpart Dc, § 60.48c (d), (e) & (f) PTI No. 45-98, SC 13 (0.5% sulfur limit) & 19	POH Medical Center has failed to obtain fuel supplier certification and keep records of it. Alternatively, POH Medical Center may conduct its own sulfur-in-fuel analyses. If only commercially available ultra-low-sulfur diesel (ULSD, 15 ppm sulfur) for compression ignition diesel engines is used in the boilers, such documentation (e.g. MSDS) shall be maintained on file but the certification or the analysis is not necessary.
2 Ethylene Oxide (EO) sterilizers with catalytic abatement system	PTI No. 134-97, SC 17, Appendix A	Although EO sterilizer production data (e.g., number of sterilization cycles and EO canisters), is available, POH Medical Center failed to keep EO usage records, to perform EO emissions calculations and determine emissions rates according to Appendix A.
2 Ethylene Oxide (EO) sterilizers with catalytic abatement system	PTI No. 134-97, SC 18, 19	POH Medical Center failed to monitor catalyst bed temperature and hence failed to operate properly EO catalytic abatement system. The catalytic oxidizer is not equipped with a temperature data logger or a chart.
^β Three identical 150 psi pressure steam boilers (Model CB-200-500-1507), known as Boiler Nos. 1, 2 & 3, of design capacity 500 HP (21 million BTU per hour heat input) installed in December 1995. All three boilers predominantly burn natural gas with fuel oil as a back-up fuel. In response to February 19, 1998, Violation		

Notice, POH Medical Center obtained Permit-to-Install Number 45-98 for the boilers. It may be noted that, although boilers are capable of burning fuel oil, the boilers are never fired with fuel oil; not even for test purposes so that proper functioning of the burners is ensured to be reliable for an emergency situation of natural gas supply disruption. Since the boilers are installed in CY 1995 (after June 9, 1989), the boilers are subject to New Source Performance Standards (NSPS), 40 CFR, Part 60, Subparts Dc and A.

△ A copy of initial notification form may be obtained at http://www.michigan.gov/documents/deq/deq-oppca-eqp3551_297296_7.pdf

θ Since each boiler is a NSPS Dc (40 CFR, Part 60, Subpart Dc) facility, fuel records shall be maintained separately for each boiler. However, according to NSPS Dc revisions (1. 72 FR 32759 = Page 32759 Federal Register / Vol. 72, No. 113 / Wednesday, June 13, 2007 / Rules and Regulations / Final Rule – to add compliance alternatives and to revise certain recordkeeping and reporting requirements and 2. 74 FR 5091 = Page 5091 Federal Register / Vol. 74, No. 17 / Wednesday, January 28, 2009 / Rules and Regulations / Final Rule - to correct technical and editorial errors), natural gas usage by the boilers (three boilers combined, as allowed by the revised NSPS Dc regulations for natural gas) in standard cubic feet (or million BTU) per calendar month and per year, based upon 12-month rolling time period, as determined at the end of each calendar month, may be maintained using an Excel spreadsheet. POH Medical Center shall keep fuel oil usage records according to PTI No. 45-98, SC 14 & 15; SC 14 limit of 2,506,000 gallons per year corresponds to SC 13 limit of 87.7 tons of sulfur dioxide per year based upon 12-month rolling period.

The boilers are subject to the federal Standards of Performance for New Sources (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. For additional Plain English details, please refer to Boiler Factsheet, which is located at: http://www.michigan.gov/documents/deq/deq-ess-caap-factsheet-nsps_boiler_dist_oil_203323_7.pdf

If fuel oil is used only for natural gas supply emergency (not to exceed 48 hours per year including any testing), the boilers are considered natural gas fired and are **not** subject to Area Source NESHAP / MACT 6J, National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart JJJJJJ, Page 15608 Federal Register / Vol. 76, No. 54 / Monday, March 21, 2011 / Rules and Regulations / Final rule. For additional details, please visit http://www.michigan.gov/deq/0,4561,7-135-3310_4148-262365--,00.html. If 48-hour fuel oil usage limit is breached, POH Medical Center becomes subject the MACT 6J and please refer to the compliance guide at:

http://www.epa.gov/ttn/atw/boiler/imptools/area_sm_biz_compli_guide_appx.pdf. For questions regarding the Area MACT 6J, deal directly with Region 5, US EPA, Chicago.

Ethylene Oxide (EO) sterilizers are subject to Area Source NESHAP / MACT 5W, National Emission Standards for Hospital Ethylene Oxide Sterilizers, 40 CFR Part 63, Subpart WWWW, Page 73611, Federal Register / Vol. 72, No. 248 / Friday, December 28, 2007 / Rules and Regulations / Final rule. The owner or operator of an existing (installed before November 6, 2006) area source must comply with this area source NESHAP by December 29, 2008. For questions regarding the Area MACT 5W, deal directly with Region 5, US EPA, Chicago.

Emergency diesel generators may be subject to RICE MACT 4Z, Area Source NESHAP / MACT ZZZZ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines / Final rule (Page 3568, Federal Register / Vol. 73, No. 13 / Friday, January 18, 2008 / Rules and Regulations / Final rule). For questions regarding the Area MACT 4J, deal directly with Region 5, US EPA, Chicago. If and only if the engine operates as an emergency engine under the rule (40 CFR 63.6675 & 63.6640; exceptions apply, e.g., interruptible service contract with a power utility) and is located at residential, institutional, or commercial establishments (including hospitals), the generators are exempt from RICE MACT.

Please initiate actions necessary to correct the cited and submit a written response to this Violation

Notice by November 18, 2011 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the occurred; an explanation of the causes and duration of the ; whether the ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If POH 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 cited above and for the cooperation that was extended to me during my inspection of October 11, 2011. If you have any questions regarding the or the actions necessary to bring this facility into compliance, please contact me at the number listed below or the DEQ, Air Quality Division (AQD), Southeast Michigan District Office, 27700 Donald Court, Warren, Michigan 48092-2793.

Sincerely,

Iranna Konanahalli

Air Quality Division
586-753-3741

ISK/VLL

Enclosures: Factsheets

cc: Mr. Robert Pickup, POH Regional Medical Center

Mr. George Czerniak, U. S. EPA

Ms. Teresa Seidel, DEQ

Mr. Thomas Hess, DEQ

Mr. Christopher Ethridge, DEQ

Mr. Dennis McGeen, DEQ

Mr. Steve Weis, DEQ

Iranna Konanahalli
NAME

04/27/2015
DATE

CJE
SUPERVISOR

Konanahalli, Iranna (DEQ)

From: Jennifer Distefano <Jennifer.Distefano2@mclaren.org>
Sent: Thursday, April 23, 2015 1:12 PM
To: Konanahalli, Iranna (DEQ)
Subject: ETO 2014 record McLaren Oakland
Attachments: ETO LOG FOR MICHIGAN 2014.xlsx

Hello Mr. Konanahalli, Here is a copy of our 2014 ETO records with the yearly sums included. Thank you for clarifying that with me. If there is anything else I can provide you please don't hesitate to ask. Have a great day.

Best regards,

Jennifer L. DiStefano, CIS, CRCST
SpecialtyCare
Manager, Central Sterile Reprocessing
McLaren Oakland Hospital
Office Phone 248-338-5138
Fax 248-338-5060
Pager 248-407-3523 (In House) #6-225
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