



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

May 13, 2022

VIA E-MAIL

Mark Craft, Director, Facilities Management  
Sparrow Health System  
1215 East Michigan Avenue  
Lansing, Michigan 48912

SRN: M2017, Ingham County

Dear Mark Craft:

### **SECOND VIOLATION NOTICE**

On September 11, 2018, the Michigan Department of Environmental Quality (DEQ), now known as the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Sparrow Health System, located at 1215 E. Michigan Avenue, Lansing, Michigan. The purpose of the inspection was to determine Sparrow Health System's compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules, and the conditions of Permit to Install (PTI) number 294-06.

On October 25, 2018, the AQD sent Sparrow Health System a Violation Notice (VN) citing violations discovered as a result of the inspection and requested your written response by November 15, 2018. A copy of that letter is enclosed for your reference.

Along with violations of PTI number 294-06, for having rain caps installed on boiler exhaust stacks, EUGENERATOR5 was identified as having been installed without first having a PTI approved by the AQD, which is required by Rule 201 of the administrative rules.

On November 16, 2018, the AQD received your response from Brent Yager, at that time, Electrical Manager at Sparrow Health System. Violations related to PTI number 294-06 were addressed by a commitment to remove rain caps from boiler exhaust stacks by March 1, 2019. He also indicated that a PTI application would be submitted for EUGENERATOR5, by January 1, 2019, along with a facility-wide Potential to Emit (PTE) demonstration.

On March 28, 2019, Sparrow Health System's consultant, Duncan Mein, PE, Supervising Environmental Engineer of WSP, contacted the AQD to discuss resolving the outstanding VN. The matter of rain caps on boiler exhaust stacks from the VN was identified as having been resolved.

Mark Craft  
Sparrow Health System  
Page 2  
May 13, 2022

On May 15, 2020, Duncan Mein submitted a draft permit to install application. Our AQD permit engineer Ambrosia Brown and myself had a conference call with him on May 20, 2020, to discuss deficiencies with the application, and he indicated he would send a summary of that call, which was not subsequently received.

On April 6, 2021, I emailed guidance to Duncan, on making a stationary source determination, for determining what, at the Sparrow campus, must be considered part of the single stationary source. On April 29, 2021, I discussed with him by email the possibility of meeting to discuss this issue, and he appeared open to this. No further response was received, though.

On January 4, 2022, the AQD emailed you, to attempt to move forward on resolving the outstanding violation of Rule 201 for EUGENERATOR5. Subsequently, on January 18, 2022, a Teams meeting was held with the consulting firm WSP's Duncan Mein, PE, and Samuel Pendyala, to discuss submittal of a PTI application. Representing the AQD was our permit engineer Ambrosia Brown, and myself. Since the date of this meeting, a PTI application for EUGENERATOR5 has not been received.

A program for compliance with Rule 201 may include a completed PTI application for the EUGENERATOR5. An application form is available by request, or at [www.michigan.gov/egle/about/organization/air-quality/air-permits/new-source-review/guidance](http://www.michigan.gov/egle/about/organization/air-quality/air-permits/new-source-review/guidance).

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. In addition, please provide a facility-wide PTE demonstration for all pollutants at the source. Information on calculating PTE can be found at [www.michigan.gov/egle/about/organization/air-quality/air-permits/new-source-review/potential-to-emit](http://www.michigan.gov/egle/about/organization/air-quality/air-permits/new-source-review/potential-to-emit). This PTE demonstration can be submitted or part of your PTI application.

Additionally, please be aware that EUGENERATOR5 appears to be subject to the federal Standards of Performance for New Sources (NSPS) for Stationary Compression Ignition Internal Combustion Engines. The previously installed generators, EUGENERATOR1 through EUGENERATOR4, may also be subject. These standards are found in Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart IIII.

Please also be aware that EUGENERATOR5 and the previously installed generators may also be subject to the federal National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), also known as the RICE MACT (Maximum Achievable Control Technology). These standards are found in CFR, Part 63, Subpart ZZZZ.

Mark Craft  
Sparrow Health System  
Page 3  
May 13, 2022

Please be advised that failure to respond in writing and identifying actions Sparrow Health System will take or has taken to resolve the cited violation of Rule 201 may result in escalated enforcement action by the AQD. Please provide a response to address the violation of Rule 201 as requested in our October 25, 2018 letter by May 27, 2022, which corresponds to 14 days from the date of this letter.

Please submit the written response to EGLE, AQD, Lansing District, at Constitution Hall, P.O. Box 30242, First Floor South, Lansing, Michigan 48909 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violation or the actions necessary to bring Sparrow Health System into compliance, please contact me at the number listed below.

Sincerely,



Daniel A. McGeen  
Environmental Quality Analyst  
Air Quality Division  
517-648-7547

Enclosure

cc: Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Jenine Camilleri, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

October 25, 2018

Mr. Mark Craft  
Facilities Management Director  
Sparrow Health Services  
1215 East Michigan Avenue  
Lansing, Michigan 48912

SRN: M2017, Ingham County

Dear Mr. Craft:

**VIOLATION NOTICE**

On September 11, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Sparrow Health Services located at 1215 East Michigan Avenue, Lansing, Michigan. The purpose of this inspection was to determine Sparrow Health Services' 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 the conditions of Permit to Install (PTI) number 294-06.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBOILER1	PTI 294-06 Special Condition (SC) 1.7	Rain cap on stack prevents exhaust gases from being discharged unobstructed vertically upwards.
EUBOILER2	PTI 294-06 SC 1.7	Rain cap on stack prevents exhaust gases from being discharged unobstructed vertically upwards.
EUBOILER3	PTI 294-06 SC 1.7	Rain cap on stack prevents exhaust gases from being discharged unobstructed vertically upwards.
EUGENERATOR5	Rule 201	Installation of fifth generator without a permit to install.

EUGENERATOR5 appears to be subject to the federal Standards of Performance for New Sources (NSPS) for Stationary Compression Ignition Internal Combustion Engines. The previously installed generators, EUGENERATOR1 through EUGENERATOR4, may also be subject. These standards are found in Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart IIII.

EUGENERATOR5 and the previously installed generators may also be subject to the federal National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), also known as the RICE MACT (Maximum Achievable Control Technology). These standards are found in CFR, Part 63, Subpart ZZZZ.

During this inspection, it was noted that Sparrow Health Services had installed unpermitted equipment at this facility. The AQD staff advised Mr. Brent Yager on September 11, 2018, 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 fifth generator. An application form is available by request, or at the following website: [www.michigan.gov/deqair](http://www.michigan.gov/deqair) (in the shaded box on the upper right-hand side of the page). Also, the rain caps should be removed from the boiler exhaust stacks, so that they discharge unobstructed vertically upwards. Please be aware that acceptable alternatives to traditional rain caps include "no loss" stack designs.

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.

In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at <http://www.michigan.gov/deqair>. Choose the "Permits" Tab, then "Air Permitting-Potential to Emit" under the Air Permitting Assistance Heading. This PTE demonstration can be submitted or part of your PTI application.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 15, 2018 (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.

Please submit the written response to the DEQ, AQD, Lansing District, at 525 Allegan Street, PO Box 30242, Lansing, Michigan 48809, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Sparrow Health Services 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 violations cited above and for the cooperation that was extended to me during my inspection of Sparrow Health Services. 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,



Daniel McGeen  
Environmental Quality Analyst  
Air Quality Division  
517-284-6638

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Mr. Brad Myott, DEQ