

GRETCHEN WHITMER GOVERNOR

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY





PHILLIP D. ROOS DIRECTOR

October 1, 2024

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Kevin Hauffman Ascension Genesys Hospital 1 Genesys Parkway Grand Blanc, Michigan 48439

SRN: N6016, Genesee County

Dear Kevin Hauffman:

VIOLATION NOTICE

On July 22, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Ascension Genesys Hospital located at 1 Genesys Pkwy, Grand Blanc, Michigan. The purpose of this inspection was to determine Ascension Genesys Hospital'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 the conditions of Permit to Install (PTI) number 41-15.

During the inspection, staff observed the following:

	Rule/Permit	
Process Description	Condition Violated	Comments
Three 33MMBTU/Hr boilers capable of firing on natural gas and fuel oil.	PTI 41-15, FGDUALFUELBOILER Special Condition (SC) VI.1, 2, 3, and 4	Facility did not provide monthly and 12-month rolling records of NO _X emission calculations and fuel usage.
All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	PTI 41-15, FGFACILITY SC VI.1, 2, 3, and 4	Facility did not provide records of sulfur content in the fuel oil, or monthly and 12-month rolling SO ₂ emission calculations.

During this inspection, Ascension Genesys Hospital was unable to produce emission records.

This is a violation of the emission limitations specified in Special Condition (SC) I.1 under FGDUALFUELBOILER and SC I.1 under FGFACILITY of PTI number 41-15, and the recordkeeping requirements specified in Section VI under FGDUALFUELBOILER and FGFACILITY of PTI number 41-15.

Kevin Hauffman Ascension Genesys Hospital Page 2 October 1, 2024

The conditions of PTI number 41-15 require records to be completed by the 15th day of each calendar month, for the previous month, which are required to be kept on file at the facility and made available for review upon request by the AQD staff.

Enclosed is a copy of the above cited permit.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 22, 2024, (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 David Rauch at EGLE, AQD, Lansing District, at P.O. Box 30242, Lansing, Michigan 48909-7742 **and** to RauchD2@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ascension Genesys Hospital 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 Ascension Genesys Hospital. 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,

Michelle M Regers . for

David Rauch Environmental Quality Analyst Air Quality Division 517-897-6598

Enclosure

cc: Annette Switzer, EGLE Christopher Ethridge, EGLE Brad Myott, EGLE Jenine Camilleri, EGLE Robert Byrnes, EGLE

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

June 4, 2015

PERMIT TO INSTALL 41-15

ISSUED TO Genesys Regional Medical Center

LOCATED AT

One Genesys Parkway Grand Blanc, Michigan

IN THE COUNTY OF

Genesee

STATE REGISTRATION NUMBER N6016

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

 DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:

 April 3, 2015

 DATE PERMIT TO INSTALL APPROVED:

 June 4, 2015

 DATE PERMIT VOIDED:

 SIGNATURE:

 DATE PERMIT VOIDED:

 SIGNATURE:

 DATE PERMIT REVOKED:

 SIGNATURE:

PERMIT TO INSTALL

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	Common Acronyms		ollutant / Measurement Abbreviations
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	со	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO ₂ e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
СОМ	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H ₂ S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
МАСТ	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NOx	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	РМ	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	μg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

GENERAL CONDITIONS

- 1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. (R 336.1301)
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
- Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). (R 336.1370)
- The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. (R 336.2001)

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID	
EUBOILER1	33MMBTU/Hr boiler capable of firing on natural gas and fuel oil	FGDUALFUELBOILER FGFACILITY	
EUBOILER2	33MMBTU/Hr boiler capable of firing on natural gas and fuel oil	FGDUALFUELBOILER FGFACILITY	
EUBOILER3	33MMBTU/Hr boiler capable of firing on natural gas and fuel oil	FGDUALFUELBOILER FGFACILITY	
EUBOILER4	0.4MMBTU/Hr boiler fired on natural gas	FGFACILITY	
EUEMERGENGINE1	1482HP diesel fired reciprocating internal combustion engine driving an emergency generator.	FGFACILITY	
EUEMERGENGINE2	1482HP diesel fired reciprocating internal combustion engine driving an emergency generator.	FGFACILITY	
EUEMERGENGINE3	300KW diesel fired reciprocating internal combustion engine driving an emergency generator.	FGFACILITY	
EUEMERGENGINE4	160HP diesel fired reciprocating internal combustion engine driving an emergency fire pump.	FGFACILITY	

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGDUALFUELBOILER	Three 33MMBTU/Hr boilers capable of firing on natural gas and fuel oil.	EUBOILER1 EUBOILER2 EUBOILER3
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

The following conditions apply to: FGDUALFUELBOILER

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NOx		12-month rolling time period as determined at the end of each calendar month.	FGDUALFUELBOILER	VI.1	40 CFR 52.21(c) & (d)

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Fuel oil	223 gallons	Hour	Each emission unit in FGDUALFUELBOILER	VI.2	40 CFR 52.21(c) & (d)

III. PROCESS/OPERATIONAL RESTRICTIONS

1. Visible emissions from FGDUALFUELBOILER shall not exceed 10% opacity. (R 336.1301)

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

1. Verification of nitrogen oxide emission rates from the units by testing, at owner's expense, in accordance with Department requirements, may be required for operating approval. Verification of emission rates includes the submittal of a complete report of the test results. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the District Supervisor, Air Quality Division, and results shall submitted within 120 davs of the written requirement for such verification. be (40 CFR 52.21(c) & (d))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (40 CFR 52.21(c) & (d))

- 2. The permittee shall calculate the NOx emission rates from FGDUALFUELBOILER for each calendar month and 12-month rolling time period, using a method acceptable to the AQD District Supervisor. The permittee shall keep records of NOx emission rates on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c) & (d))
- 3. The permittee shall monitor and record, in a satisfactory manner, the fuel use in FGDUALFUELBOILER. (40 CFR 52.21(c) & (d))
- 4. The permittee shall keep, in a satisfactory manner, fuel use records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c) & (d))

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOILER1	48	61.3	40 CFR 52.21(c) & (d)
2. SVBOILER2	48	61.3	40 CFR 52.21(c) & (d)
3. SVBOILER3	48	61.3	40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. SO2	4 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	VI.1	R 336.1205(1)(a) & (3)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The sulfur content of the fuel oil shall not exceed 0.0015 percent by weight. (R 336.1205(1)(a))

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall keep, in a satisfactory manner, records of the maximum sulfur content in the fuel oil for each delivery. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(1)(a) & (3))
- The permittee shall calculate the SO2 emission rates from FGFACILITY for each calendar month and 12-month rolling time period, using a method acceptable to the AQD District Supervisor. The permittee shall keep records of SO2 emission rates on file at the facility and make them available to the Department upon request. (R 336.1205(1)(a) & (3))
- 3. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(1)(a) & (3))
- 4. The permittee shall keep, in a satisfactory manner, all SO2 emission calculation records as required by SC VI.2 on file at the facility and make them available to the Department upon request. (R 336.1205(1)(a) & (3))

Genesys Regional Medical Center (N6016) Permit No. 41-15

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA