



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

September 13, 2018

Mr. Stan Burland
Hospital Network Ventures, LLC
6212 American Avenue
Portage, Michigan 49002

SRN: N7127, Kalamazoo County

Dear Mr. Burland:

VIOLATION NOTICE

On July 18, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Hospital Network Ventures, LLC (Facility), located at 6212 American Avenue, Kalamazoo, Michigan. The purpose of this inspection was to determine the Facility'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 Permits to Install (PTI) No. 41-02A and 21-16A.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGMICROWAVES	PTI No. 41-02A, Special Condition 1.5	Facility does not have records to prove that the pressure drop across the HEPA filters has not ever exceeded 3.0 inches of water.
FGMICROWAVES	PTI No. 41-02A, Special Condition 1.14	The Facility could not produce records for the pressure drop across the HEPA
FGMICROWAVES	PTI No. 41-02A, Special Condition 1.15	The Facility could not produce records for the carbon filter change outs.
EUAUTOCLAVE1	PTI No. 21-16A, Special Condition III.1	The Facility did not submit a Preventative Maintenance Plan/Malfunction Abatement Plan within

		the required timeframe and could not produce either of these plans during the inspection.
EUAUTOCLAVE1	PTI No. 21-16A, Special Condition IV.1	The Facility could not produce a Preventative Maintenance/Malfunction Abatement Plan. Therefore, it cannot be determined whether or not the Facility has all the proper monitoring devices.
EUAUTOCLAVE1	PTI No. 21-16A, Special Condition IV.2	The condensate goes into a bin with no lid and could evaporate into the in-plant environment.
EUAUTOCLAVE1	PTI No. 21-16A, Special Condition VI.1	Many records are not being kept.
EUAUTOCLAVE1	PTI No. 21-16A, Special Condition VI.4	The Facility does not have a Preventative Maintenance/Malfunction Abatement Plan and is not keeping many of the required records to prove compliance with other conditions in the permit.
EUAUTOCLAVE1	PTI No. 21-16A, Special Condition VIII.1	There was a large garage door, right next to the autoclave unit and the open condensate container, that was open during the inspection.
Tub washing equipment	R 336.1281(2)(e) (Rule 281) and R 336.1201 (Rule 201)	Non-compliance: At the time of the inspection, the Facility could not prove that the tub washing operation meets the Rule 281(2)(e) exemption from permitting. Therefore, it is also in violation of Rule 201. The Facility may

		choose to get a permit for this process, provide data to prove that the current washing material complies with Rule 281, or change the washing material to one that can comply with the requirements of Rule 281.
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During this inspection, the Facility was unable to produce many of the required records. Some of these records were needed to determine compliance with other conditions in the permit. The Facility also does not have the Preventative Maintenance/Malfunction Abatement Plan that is required by PTI No. 21-16A. The Facility should develop this document as soon as possible and submit it to the DEQ, Kalamazoo District Office.

During this inspection, it was also noted that the Facility had commenced operation of a tub washing process. During the inspection, the Facility could not provide data to prove that the tub washing process complies with the exemption requirements in R 336.1281(2)(e). If the Facility cannot use a material in the washing process that can be proven to comply with this exemption, the process will require a permit. The AQD staff advised Mr. Stan Burland on September 7, 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 tub washing process equipment. An application form is available by request, or at the following website: www.michigan.gov/deqair (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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 4, 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 recurrence.

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Please submit the written response to the DEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility 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 the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Monica Brothers
Environmental Quality Analyst
Air Quality Division
269-567-3552

MB:CF

Enclosure

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