

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

C261231377

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| FACILITY: PENNOCK HOSPITAL | | SRN / ID: C2612 |
| LOCATION: 1009 WEST GREEN STREET, HASTINGS | | DISTRICT: Grand Rapids |
| CITY: HASTINGS | | COUNTY: BARRY |
| CONTACT: Zach McIntosh, Director - Plant Operations | | ACTIVITY DATE: 09/25/2015 |
| STAFF: Steve Lachance | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Self Initiated Inspection for FY '015 with emphasis on Boiler MACT/GACT | | |
| RESOLVED COMPLAINTS: | | |

This was an unannounced, self-initiated inspection. The primary purpose of the inspection was to verify the facility's status and preparation for pending Boiler MACT/GACT regulation. Since the facility is an Area Source of Hazardous Air Pollutants, it is subject to the Area Source version of this rule (*Boilers only*), i.e. 40 CFR 63 Subpart JJJJJJ.

Weather conditions at the time of the initial inspection activities (September 23, 2015, about 10:30 AM) were clear, about 65 F and with mild winds. No odors or visible emissions were observed. SL noted that "Spectrum Health" had apparently taken over operations of the hospital based on signage, and that the facility consisted of the main hospital along with the adjacent wellness center. (These two building share ownership per signage, serve the same general purpose, and are adjacent and connected by a shared parking lot.)

SL presented himself at the main reception area and the building's operations manager was paged. Shortly thereafter, Mr. Zach McIntosh (Director – Plant Operations) arrived. After quick introductions and SL's announcement of Intent to Inspect (including sharing the DEQ's "Environmental Inspections: Rights and Responsibilities" brochure), SL learned the following: Mr. McIntosh was well aware of the Boiler MACT/GACT regulation; he was working with the "Spectrum Team" on Boiler MACT Compliance and was familiar with both Mr. Neil Hikade of Spectrum and Ms. Jill Koebbe, of Air and Water Compliance Group, consultant to Spectrum on these issues; and, Mr. McIntosh was currently escorting the Fire Marshal on an inspection. Based on these circumstances, SL agreed with Mr. McIntosh to re-convene on Friday, September 25 at 1 PM.

Once again, SL noted no undue odors or any visible emissions attributable to the facility on September 25, 2015. Mr. McIntosh escorted SL throughout the inspection, which began at about 1 PM with a more complete entrance interview and discussion of potentially affected equipment at the source. SL provided background of AQD's permitting programs helped define the source, discussed "Area Source" definitions, and shared AQD's handbook of PTI Exemptions. SL's emphasis for the inspection included potential applicability of the Area Source Boiler MACT (40 CFR 63 JJJJJJ); Rule 201 applicability determinations for observed equipment; and development of an inventory of combustion equipment (Boilers and Reciprocating Internal Combustion Engines {RICE}).

Discussions identified six pieces of equipment to examine with respect to these requirements:

HOSPITAL BUILDING

Boiler 1; 1965; 4.18 mmBtu/hr on natural gas; fuel oil back-up; "Grandfathered" or exempt from Rule 201 per Rule 282(b)(i) and (b)(ii)

(This is reportedly the steady workhorse for facility operations.)

Boiler 2; 2004; 5.5 mmBtu/hr on natural gas; fuel oil back=up; Exempt per Rule 282(b)(i) and (b)(ii)

Boiler 3; 2004; 5.5 mmBtu/hr on natural gas; fuel oil back=up; Exempt per Rule 282(b)(i) and (b)(ii)

Emergency Generator; 1992; natural gas fuel; 600 engine hp, 400 kW electric production; heat input much less than 10 mmBtu/hr based on physical size; Exempt per Rule 285(g)

Further regulatory discussion; The boilers are too small (<10 mmBtu/hr), and in the case of Boiler 1, too old, for regulation by federal New Source Performance Standards (40 CFR 60 Subpart Dc); and as a

minor source of HAPs (as determined not based on full PTE evaluation but rather on overall size of facility, heat input capacities and so forth), NOT regulated by Boiler MACT/GACT per exemption for gas-fired boilers in 40 CFR 63 Subpart JJJJJJ. Note that "gas-fired boilers" does include unlimited use of liquid fuels in emergencies and for up to 48 hours per calendar year for testing; and the facility is aware of this per the attached. The emergency generator pre-dates the NSPS (40 CFR 60 Subpart JJJJ) and, as an existing, defined emergency unit at an Area Source of HAPs, has no requirements in the RICE MACT, 40 CFR 63 Subpart ZZZZ (see 63.6585(f)).

HEALTH/WELLNESS CENTER

Rooftop Boiler 1 and Rooftop Boiler 2; identical, small, natural gas-fired rooftop boilers. The nameplate was not observed based on accessibility; but these units are small than the Boiler 1 at the main hospital building. These are exempt per Rule 282(b)(i).

SUMMARY

SL concludes that the facility is in compliance with Rule 201 for combustion equipment, and that there are no Boiler MACT/GACT issues at the facility going into the January 31, 2016 compliance date. So long as testing hours for each boiler are documented as less than 48 hours per calendar year, the dual-fuel boilers qualify as "gas-fired" and so are not regulated per 40 CFR 63 Subpart JJJJJJ. SL noted no other issues with other potentially federally-regulated equipment; NSPS for Boilers under 40 CFR 60 Subpart Dc; and RICE MACT 40 CFR 63 Subpart ZZZZ.

ATTACHMENTS

Boiler MACT Correspondence with Spectrum Health, June 2015

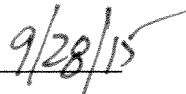
AWCG Compliance Assessment – Boiler 1

AWCG Compliance Assessment - Boilers 2 and 3

NAME



DATE



SUPERVISOR

