

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

G506652530

<b>FACILITY:</b> ST JOSEPH MERCY HOSPITAL		<b>SRN / ID:</b> G5066
<b>LOCATION:</b> 44405 WOODWARD AVE, PONTIAC		<b>DISTRICT:</b> Southeast Michigan
<b>CITY:</b> PONTIAC		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b>		<b>ACTIVITY DATE:</b> 02/12/2020
<b>STAFF:</b> Robert Joseph	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Scheduled inspection of facility		
<b>RESOLVED COMPLAINTS:</b>		

On Wednesday, February 12, 2020, I, Michigan Department Environment, Great Lakes, and Energy staff Robert Joseph, conducted a scheduled inspection of St. Joseph Mercy Hospital-Oakland located at 44405 Woodward Avenue, Pontiac, MI 48341. The purpose of the 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 Public Act 451; Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules and conditions of the facility's Permit to Install (PTI), 216-07A.

### Introduction

I arrived at the facility at approximately 10:30 a.m. and met with the facility's Director, Aric Alexander, and Assistant Director, Leonard Shamly II. I presented my identification and credentials and stated the purpose of my visit.

Both Aric and Leonard indicated to me that they were unaware the facility had a permit on file with the AQD and were aware of any recordkeeping requirements. Aric indicated that the previous environmental compliance officer, Michael Tremblay, was no longer with the facility. They asked if I would participate in a conference call with their environmental consultant, Alec Stabler, from Arch Environmental. They indicated that Alec was a new employee at their consulting firm and that he was in the process of submitting the facility's MAERS report for 2019.

Alec indicated that he too was unaware of any permit issued to the facility. I informed Alec and Aric that if the facility had not been maintaining records per PTI 216-07A, that it would be subject to a violation notice. Aric apologized for the mix-up and indicated that the facility would work with their consultant going forward to maintain the proper records in accordance with their permit.

I asked both Aric and Leonard to provide me some background information about the facility. They indicated the facility employs approximately 3,000 employees and is opened 24 hours a day. The hospital has over 400 hospital beds and is a community teaching facility, a level II trauma center, and emergency room provider in Oakland County. The facility features a surgical pavilion, south patient tower with over 200 private rooms, and a recently renovated infant care unit.

The facility is an Opt-Out source due to the permit emission limit for NO<sub>x</sub>. I asked both Aric and Leonard to lead me on a tour of the facility's emission units.

### **Permit To Install : 216-07A**

#### FG-Boilers

There are three Cleaver Brooks fire-tubed boilers that are in the facility's permit. They were installed approximately in 1995 and have an input capacity of 25 MMBtu/hr with a maximum pressure of 150 lb/in<sup>2</sup>. They are natural gas boilers with oil-firing backup capabilities.

#### II. Material Limits

The facility indicates that only natural gas is used in these boilers. The facility indicates that #2 fuel oil is only used during test periods and that the sulfur content is does not exceed 0.5% by weight.

#### VI. Monitoring/Recordkeeping

The input capacity of each boiler is 25 MMBtu/hr and each is labeled with natural gas as the fuel source. The facility does not burn coal in the boilers in reference to the annual capacity factor for any fuel or mixture of fuels under 40 CFR Part 60 Subpart Dc, either 60.42c or 60.43c. The facility did not provide a notification of any emerging technology used for controlling SO<sub>2</sub> emissions. The facility did not maintain records for each fuel combusted during each calendar month, nor records for the heat content of each fuel combusted. The facility did not maintain records regarding #2 fuel oil usage for testing purposes.

### **FG-Facility**

#### **I. Emission Limits**

The facility is permitted a limit of 89.9 tons/yr per 12-month rolling time period as determined at the end of each calendar month.

#### **II. Material Limits**

The natural gas usage by the facility shall not exceed 933.6 MMft<sup>3</sup> per 12-month rolling time period as determined at the end of each calendar month. The facility did not maintain records regarding this.

#### **III. Process/Operational Restrictions**

The facility indicates that #2 fuel oil usage did not exceed 500 hours per 12-month rolling time period as determined at the end of each calendar month.

#### **VI. Monitoring/Recordkeeping**

The facility did not record in a satisfactory manner the monthly natural gas usage in MMft<sup>3</sup> for FGFACILITY on a monthly and 12-month rolling time period basis, the hours each piece of equipment burns #2 fuel oil on a monthly and 12-month rolling time period basis, and the total NOx mass emissions on a monthly and 12-month rolling time period basis.

### **Conclusion**

Upon completion of the facility tour I thanked both Aric and Leonard for their time and I left shortly after 1 p.m. Based on the AQD inspection and records review, St. Joseph Mercy-Oakland is not in-compliance with the Federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the conditions of PTI 216-07A. A violation notice will be issued to the facility for failure to maintain records. The facility is now aware of the recordkeeping requirements and maintains they will do so going forward.

NAME Robert Joseph

DATE 07/22/20

SUPERVISOR Sebastianykallemkal