

K1276
MawillDEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Off-site Inspection

K127673841

FACILITY: DMC Sinai Grace Hospital		SRN / ID: K1276
LOCATION: 6071 West Outer Drive, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 09/25/2024
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY 2024 Inspection		
RESOLVED COMPLAINTS:		

SCHEDULED INVESTIGATION REPORT
(PCE for an FCE source)**Date of Investigation:** September 25, 2024**Date of Report:** September 25, 2024**Source:** DMC Sinai Grace Hospital**SRN:** K1276**Address:** 6071 West Outer Drive, Detroit, Michigan 48235**Subject:** Fiscal Year 2024 Inspection (Off-Site)**Author:** Jill Zimmerman and Jeff Korniski, Air Quality Division, Detroit District Office**Facility Background:**

The Detroit Medical Center (DMC) Sinai Grace Hospital operates four natural gas fired boilers (with No. 2 fuel oil emergency backup) and two No. 2 fuel oil emergency generators under Permit to Install (PTI) No. 176-16, issued on 2/10/2017. The PTI is written such that the four boilers are included in one flexible group and the two emergency generators are included in another flexible group. An FG-FACILITY is not included in the PTI, but Rule 205(3) underlying applicable requirements are included such that, in combination, the emission limits represent synthetic minor limits. Presuming that this equipment represents the majority of emissions produced at the facility at the present, these emission limits allow the DMC Sinai Grace Hospital to opt-out of the Title V program.

Summary of Off-Site Inspection and Compliance Status:

As an existing synthetic minor Title V opt-out source, DMC Sinai Grace Hospital is scheduled for a full compliance evaluation (FCE) within the 2024 fiscal year; the last FCE was conducted in 2019. Diminished resources owing to temporary staff vacancies resulted in this being assigned as an off-site inspection for this fiscal year. DMC Sinai Grace Hospital was considered an appropriate candidate for an off-site inspection because, although an opt-out, emissions have historically been well below 50% of the Title V major source thresholds.

PTI No. 176-16

This permit provides Special Conditions (SC) for the four boilers, collectively (FG-BOILERS), and the two emergency generators, collectively (FG-GENSETS).

NOx emissions, collectively, from the natural gas fired boilers are limited to 24.3 tons per 12-month rolling time period (SC I.1) through the annual limitation of natural gas usage to 480 million standard cubic feet (SC II.3). Fuel oil is only to be burned during periods when natural gas is unavailable or curtailed (SC III.1), and when used the sulfur content is limited to 15 ppm by weight (SC II.2).

NOx emissions from the emergency generators, collectively, are limited to 15.5 tons per 12-month rolling time period (SC I.1) through an annual limitation of 500 hours per generator (III.1). The sulfur content of the fuel oil is limited to 15 ppm by weight (SC II.1).

Annual emissions reports submitted by this facility for calendar years 2019 through 2022 consistently show CO and NOx emissions at around 6 tons and 7 tons, respectively, with emissions of all other criteria pollutants less than 1 ton. In 2022, the boilers were reported to have emitted 7.35 tons of NOx while firing 147 million cubic feet of natural gas; fuel oil was not combusted. The generators were reported to have emitted 0.02 tons NOx while firing 77 gallons of fuel oil during 48 hours of operation during the year; this is typical of the amount fired for readiness testing. These values comply with the emissions and usage limitations within the permit.

The AQD received this facility's annual air emissions report for calendar year 2023 on 3/4/2024. The reported emissions and usage data were vastly higher than in previous years and are clearly in error; for example, emissions of CO and NOx were reported in the millions of tons. AQD suspects these errors are due to the transition from the former MACES emissions reporting system to the new SLEIS emissions reporting system. The AQD will attempt to correct these reporting errors through an on-site inspection in the next fiscal year.

Conclusion:

At the time of the investigation the Detroit Medical Center (DMC) Sinai Grace Hospital appears to be in compliance with applicable federal and State air regulatory requirements. The annual emissions report submitted for 2023 contains emissions and usage data are in error and appear to be a transition cost of moving to new annual emissions database. The AQD will attempt to correct this information in the next fiscal year.

NAME



DATE

10/24/24

SUPERVISOR

JK