

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

K192144659

|   |                               |                           |
|---|-------------------------------|---------------------------|
| FACILITY: Munson Healthcare Cadillac Hospital |                               | SRN / ID: K1921           |
| LOCATION: 400 Hobart Street, CADILLAC         |                               | DISTRICT: Cadillac        |
| CITY: CADILLAC                                |                               | COUNTY: WEXFORD           |
| CONTACT:                                      |                               | ACTIVITY DATE: 06/11/2018 |
| STAFF: Kurt Childs                            | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR       |
| SUBJECT: compliance inspection.               |                               |                           |
| RESOLVED COMPLAINTS:                          |                               |                           |

**Minor Source Inspection: Munson Healthcare Cadillac Hospital (Formerly Mercy Hospital)**

I conducted an inspection of this minor source to determine compliance with Permits to Install 339-76, 4-90I, and the Air Pollution Control Rules. There are currently two active Permits to Install associated with SRN K1921. PTI 339-76 is for a 300 hp Kewanee boiler and PTI 4-90I is an incinerator permit. A PTI for an ethylene oxide sterilizer was previously voided.

I met with Mr. Corey Christensen, Director, Facilities Department and Rick C. of the Facilities Department. They informed me the incinerator had been removed a long time ago, Rick C. has been there 16 years and it was gone before he began working there. We inspected the room where the incinerator had been previously located which was now being used for storage. There was no incinerator present but the hole in the ceiling for the exhaust stack was still evident.

The hospital has 5 boilers; three gas-fired 125hp Kewanee boilers installed in 1964 one of which has been converted to also fire diesel fuel; one 300 hp Kewanee boiler installed in 1975 (PTI 339-76) that is gas and diesel fired; one 500 hp Cleaver-Brooks boiler installed in 2011 that is natural gas and diesel fired. PTI 339-76 was issued on July 31, 1980 and the hospital address at that time was 815 Oak St. Renovations at the hospital since then have resulted in the current hospital address being 400 Hobart St.

The three 125 hp boilers are currently maintained in storage condition and not used regularly. The 300 hp Kewanee is used primarily as a back-up. The Cleaver-Brooks boiler is the primary source of steam for building heating and autoclave use. The boilers normally burn natural gas but are operated 2 hours per month on diesel fuel for maintenance purposes.

**Regulatory evaluation:**

The three 125 hp Kewanee boilers are grandfathered and would currently qualify for the Rule 282(b)(ii) exemption from the permitting requirements of Rule 201 based on their size and fuel type (not more than 20 MMBtu/hr. and diesel fuel less than 0.4% sulfur). Munson Healthcare Cadillac Hospital uses ultra low sulfur diesel, No. 2 diesel 15ppm sulfur in all of the boilers. These boilers are not currently operating.

The 300 hp Kewanee boiler is covered by PTI 339-76 which includes requirements for; 20% maximum visible emissions, notification of the department if diesel fuel use exceeds 12 hours, and notification of the department within 10 days of any change in the natural gas supply from a firm to an interruptible rate. Under current Air Pollution Control rules this boiler could also be exempt from Rule 201 based on it's size (300hp = 10.04 MMBtu/hr.) and fuel type. This boiler is currently maintained in a ready state -heated but not producing steam. There were no visible emissions from the stack which is located on the roof of the boiler room approx. 25-40 feet above ground and less than 24" in diameter. This boiler currently is in compliance with PTI 339-76.

The 500 hp Cleaver-Brooks boiler is the primary source of steam and was operating at the time of the inspection though not a high rate due to the lack of need for heating. There were no visible emissions from the stack which is located on the boiler room roof approximately 24-35 feet high and is less than 24" in diameter. This boiler is likely in compliance with the Rule 282 (b)(ii) exemption based on size (500 hp = 16.7MMBtu/hr) and fuel type (natural gas with diesel fuel < 48hrs annually).

The New Source Performance Standards, Subpart Db, for Industrial, commercial, institutional steam generating units do not apply to these boilers since they are below the 100 MMBtu size threshold.

The National Emission Standards for Hazardous Air Pollutants, Subpart JJJJJ, for Industrial, Commercial, and Institutional Boilers Area Sources do not apply to these boilers since they meet the Subpart JJJJJJ definition of gas-fired boilers which reads; "*Gas-fired boiler* includes any boiler that burns gaseous fuels

not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.”, and 63.11195(e) states that “gas-fired boilers” are not subject to this subpart.

**Summary:**

PTI 4-90I for the incinerator can be voided since the incinerator has been removed. I have requested that the AQD permits unit void this permit and provided Mr. Christensen’s contact information. The three 125 hp Kewanee boilers are currently in compliance with the Air Pollution Control rules since they do not require permitting and are not currently in use. The 300 hp Kewanee boiler is currently permitted and is operating in compliance with that permit. The 500 hp Cleaver-Brooks boiler appears to be exempt from the requirement to obtain a permit and is operating in compliance with the Air Pollution control Rules. None of the boilers are subject to either NSPS or NESHAP requirements based on their size and fuel type.

NAME 

DATE 6-11-18 SUPERVISOR SN