



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

October 25, 2018

Mr. Mark Craft  
Facilities Management Director  
Sparrow Health Services  
1215 East Michigan Avenue  
Lansing, Michigan 48912

SRN: M2017, Ingham County

Dear Mr. Craft:

**VIOLATION NOTICE**

On September 11, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Sparrow Health Services located at 1215 East Michigan Avenue, Lansing, Michigan. The purpose of this inspection was to determine Sparrow Health Services' 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 Permit to Install (PTI) number 294-06.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBOILER1	PTI 294-06 Special Condition (SC) 1.7	Rain cap on stack prevents exhaust gases from being discharged unobstructed vertically upwards.
EUBOILER2	PTI 294-06 SC 1.7	Rain cap on stack prevents exhaust gases from being discharged unobstructed vertically upwards.
EUBOILER3	PTI 294-06 SC 1.7	Rain cap on stack prevents exhaust gases from being discharged unobstructed vertically upwards.
EUGENERATOR5	Rule 201	Installation of fifth generator without a permit to install.

EUGENERATOR5 appears to be subject to the federal Standards of Performance for New Sources (NSPS) for Stationary Compression Ignition Internal Combustion Engines. The previously installed generators, EUGENERATOR1 through EUGENERATOR4, may also be subject. These standards are found in Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart IIII.

EUGENERATOR5 and the previously installed generators may also be subject to the federal National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), also known as the RICE MACT (Maximum Achievable Control Technology). These standards are found in CFR, Part 63, Subpart ZZZZ.

During this inspection, it was noted that Sparrow Health Services had installed unpermitted equipment at this facility. The AQD staff advised Mr. Brent Yager on September 11, 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 fifth generator. An application form is available by request, or at the following website: [www.michigan.gov/deqair](http://www.michigan.gov/deqair) (in the shaded box on the upper right-hand side of the page). Also, the rain caps should be removed from the boiler exhaust stacks, so that they discharge unobstructed vertically upwards. Please be aware that acceptable alternatives to traditional rain caps include "no loss" stack designs.

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.

In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at <http://www.michigan.gov/deqair>. Choose the "Permits" Tab, then "Air Permitting-Potential to Emit" under the Air Permitting Assistance Heading. This PTE demonstration can be submitted or part of your PTI application.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 15, 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 reoccurrence.

Please submit the written response to the DEQ, AQD, Lansing District, at 525 Allegan Street, PO Box 30242, Lansing, Michigan 48809, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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

Sincerely,



Daniel McGeen  
Environmental Quality Analyst  
Air Quality Division  
517-284-6638

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