

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

U41190638449271

FACILITY: West Michigan Shared Hospital Laundry		SRN / ID: U411906384
LOCATION: 3003 Walkent Drive, Grand Rapids		DISTRICT: Grand Rapids
CITY: Grand Rapids		COUNTY: KENT
CONTACT: Frank Gundrum , Maintenance/Facilities Director		ACTIVITY DATE: 06/21/2019
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled unannounced inspection		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the West Michigan Shared Hospital Laundry (WM) facility located in Grand Rapids, MI at 10:35am on June 21, 2019 to complete a scheduled unannounced inspection.

Facility Description

Prior to entering the facility, off-site odors and visible emission observations were completed. The weather conditions at the time of the inspection were sunny skies, temperatures in the upper sixties' degrees Fahrenheit, and winds from the north/northeast at 5-10mph. Emissions observed coming from the site appeared to be steam. A cleaning odor was noted in areas surrounding the site. A septic odor was noted as well but appeared to be coming from a neighboring facility.

During the course of the site inspection, AQD staff AS met with Ms. Amy Smith, Director of Human Resources, and Mr. Baltazar Cardoza, Maintenance, who provided a walk through of the facility and answered site specific questions. Additionally, AQD staff AS spoke with Mr. Frank Gundrum, Maintenance/Facilities Director, at the beginning of the inspection and for follow up additional information needed to complete the inspection report. WM is an industrial laundry facility for the medical field. The site currently doesn't operate with an air pollution control permit, but instead utilizes equipment which potentially falls under various air permit exemptions.

Observations

- Five iron machines were observed during the site inspection. The five machines vent externally. During a phone conversation with Mr. Gundrum it was stated that no lint will be exhausted from the iron machines though this was not verified during the site inspection.
- A custom job area was observed during the site inspection. Laundry materials processed here included nursing home items. Five dryers and four washers that can each hold 150 lbs of materials per load were noted. Copies of Safety Data Sheets (SDS) for all cleaning materials used were requested and provided to verify that the cleaning materials contain no volatile organic compounds (VOCs). Upon review, VOCs were noted in materials used. Additional information regarding the washer and dryer units will be discussed further below.
- A large sorting area was observed where products shipped on site are sorted prior to processing.
- Three commercial grade main washing units were observed. Each washing unit holds 2,820 lbs of soiled materials. Additionally, three L-Trans washing units were observed that can each hold 250-300 lbs of soiled materials. Copies of SDS for cleaning materials used were requested and reviewed. As previously mentioned, VOCs were found in cleaning materials used. Additional information regarding the washing units will be discussed further below.
- Twenty-seven dryers that each process 235 lbs of materials per load were observed. Each dryer has a lint capture system with the lint traps cleaned twice a day and the collection bags changed as needed. The rooftop of the site building was accessed during the inspection. At the time of the inspection, lint was observed in the area of the exhaust vents for the dryers. WM staff stated that this would be the limit of lint that they would allow before being cleaned up. It was later found out that a preventative maintenance plan was in place by WM that included monthly inspections of the rooftop and removal of any lint buildup. However, the employee who completed this task recently no longer works for the company. WM staff had stated that the day of the inspection the lint buildup on the rooftop had been removed. Moving forward, any lint buildup shall be addressed in a timelier manner. This will be discussed further with the company.

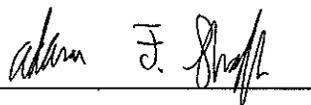
- Two emergency generators were observed during the course of the site inspection. Additional information regarding each generator is discussed further below.
 - **Emergency Generator #1** – This generator was observed along the northern exterior portions of the site. At the time of the inspection, the doors allowing access to the area of the generator with applicable information were locked. WM staff verified that this diesel fired generator was installed in January 2017 and is 600 KW in size. Based on the date of construction this emergency generator is subject to New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (NSPS Subpart IIII). A Certificate of Conformity was requested and provided by WM staff. A non-resettable hourly gauge was stated to be installed for the unit with 38 operating hours recorded since it was installed. Based on how low the total engine hours of operation are, WM appears to be meeting the yearly hourly limits of engine operation. Moving forward, AQD staff AS discussed with WM staff on keeping track of hours to demonstrate they are meeting the NSPS Subpart IIII yearly hours of operation requirements. Per NSPS Subpart IIII conditions, the sulfur content for diesel fuel used must be 15ppm or less. Documentation verifying that diesel fuel used by the emergency generator is 15ppm or less was requested and provided. Based on the information provided, the emergency generator appears to be meeting NSPS Subpart IIII requirements.
 - **Emergency Generator #2** – This generator was observed in the northern portions of the site building. The generator is 600 Kw in size, diesel fired and used during power outages. The unit was constructed in 1971 and was donated by a hospital and transported on site on 11/03/04. Based on the date of installation onsite, this unit is not subject to the NSPS Subpart IIII requirements. Based on the size of the unit, it appears to be exempt per Rule 285(2)(g).
- Two natural gas fired boilers that are used for water heating for on site operations were observed during the site inspection. Both boilers are approximately 6.8 MMBtu/hr and were installed in 2009. Based on the size of the boilers they are not subject to New Source Performance Standards Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The two boilers appear to be exempt per Rule 282(2)(b)(i).
- One parts washer was observed during the site inspection. The air vapor interface for the washer was less than 10 square feet and an operating label was noted on the parts washer. The parts washer appears to be exempt per Rule 281(2)(h).

The commercial washing and drying units observed during the site inspection would appear to be exempt per Rule 290, however, records were not available. Moving forward, it was discussed with WM staff and agreed that WM would contact Jenifer Dixon, Air Quality Compliance Assistance Specialist, of the Environmental Support Division to help complete Rule 290 records for the washing and drying units to demonstrate compliance. Once the records are completed, they will be submitted for review, and an addendum to the inspection report will be made to discuss the findings.

Conclusion

WM will be working with Jenifer Dixon of the Environmental Support Division in completing records for the washing and drying units to demonstrate compliance. As stated previously, once the records are completed, they will be submitted for review, and an addendum will be made to the inspection report to discuss the findings. At this time, WM appears to be in compliance with remaining applicable air pollution control rules.

NAME



DATE

07/30/19

SUPERVISOR

