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MAY 12 2016

Mr. Rex Lane
Senior Environmental Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division
7953 Adobe Road
Kalamazoo, MI 49009-5025



Dear Mr. Lane:

The Battle Creek VA Medical Center (VAMC) submits the following response to the Violation Notice dated May 4, 2016, received from the State of Michigan, Department of Environmental Quality (DEQ), Air Quality Division (AQD). Please note that the EUBIO/NGSYSTEM is currently shut down while DeMaria Building Company, Inc., completes several items before final acceptance of the system by the VA. We are expected to be in a position to restart the EUBIO/NGSYSTEM by July 15, 2016.

1. EUCOOLTWR – Permit To Install (PTI) No. 187-10E, Special Condition III.1
 - a. **Violation:** Permittee was required to submit a Malfunction Abatement Plan (MAP) within 180 days of initial startup.
 - b. **Date Violation Occurred:** Initial startup occurred August 25, 2014.
 - c. **Explanation:** The BIO/NG SYSTEM began commissioning in August 2014. Intermittently the commissioning process continued through April 21, 2016. It was understood, by the VAMC, that the MAP submittal was required 180 days after the acceptance of the plant as identified by the date the equipment was turned over to the VAMC (April 28, 2016).
 - d. **Actions Taken:** The MAP was completed on December 18, 2013 and is enclosed for review.

2. EUMATERIAL – PTI No. 187-10E, Special Condition III.1
 - a. **Violation:** Permittee was required to submit a program for continuous fugitive dust control within 180 days of initial startup.
 - b. **Date Violation Occurred:** Initial startup occurred August 25, 2014.
 - c. **Explanation:** The BIO/NG SYSTEM began commissioning in August 2014. Intermittently the commissioning process continued through April 21, 2016. It was understood, by the VAMC, that the Fugitive Dust Plan submittal was required 180 days after the acceptance of the plant as identified by the date the equipment was turned over to the VAMC (April 28, 2016).
 - d. **Actions Taken:** The Fugitive Dust Plan was completed on January 2, 2014 and is enclosed for review.

3. EUMATERIAL – PTI No. 187-10E, Special Condition III.2
 - a. **Violation:** Permittee was required to submit a MAP within 180 days of initial startup.
 - b. **Date Violation Occurred:** Initial startup occurred August 25, 2014.
 - c. **Explanation:** The BIO/NG SYSTEM began commissioning in August 2014. Intermittently the commissioning process continued through April 21, 2016. It was understood, by the VAMC, that the MAP submittal was required 180 days after the acceptance of the plant as identified by the date the equipment was turned over to the VAMC (April 28, 2016).
 - d. **Actions Taken:** The MAP was completed on December 18, 2013 and is enclosed for review.

4. EUBIO/NGSYSTEM – PTI No. 187-10E, Special Condition III.1
 - a. **Violation:** Permittee was required to submit a MAP within 180 days of initial startup.
 - b. **Date Violation Occurred:** Initial startup occurred in August 2014.
 - c. **Explanation:** The BIO/NGSYSTEM began commissioning in August 2014. Intermittently the commissioning process continued through April 21, 2016. It was understood, by the VAMC, that the MAP submittal was required 180 days after the acceptance of the plant as identified by the date the equipment was turned over to the VAMC (April 28, 2016).
 - d. **Actions Taken:** The Fugitive Dust Plan was completed on December 18, 2013 and is enclosed for review.

5. EUBIO/NGSYSTEM – PTI No. 187-10E Special Condition III.2
 - a. **Violation:** Required Startup and Shutdown Plan has not been submitted.
 - b. **Date Violation Occurred:** Initial startup occurred August 25, 2014.
 - c. **Explanation:** The BIO/NG SYSTEM began commissioning in August 2014. Intermittently the commissioning process continued through April 21, 2016. It was understood, by the VAMC, that the Startup/Shutdown submittal was required 180 days after the acceptance of the plant as identified by the date the equipment was turned over to the VAMC (April 28, 2016).
 - d. **Actions Taken:** The Startup/Shutdown procedures were completed on December 18, 2013 and are enclosed for review.

6. EUBIO/NGSYSTEM – PTI No. 187-10E, Special Condition III.3
 - a. **Violation:** Permittee was required to submit a Biomass Fuel Procurement and Management Plan (BFPMP) within 180 days of initial startup.
 - b. **Date Violation Occurred:** Initial startup occurred August 25, 2014.
 - c. **Explanation:** The BIO/NGSYSTEM began commissioning in August 2014. Intermittently the commissioning process continued through April 21, 2016. It was understood by the VAMC that the Biomass Fuel Procurement and Management Plan submittal was required 180 days after the acceptance of the plant as identified by the date the equipment was turned over to the VAMC (April 28, 2016).
 - d. **Actions Taken:** The BFPMP was completed on September 24, 2014 and is enclosed for review.

7. EUBIO/NGSYSTEM – PTI No. 187-10E, Special Condition V.1 and V.2
 - a. **Violation:** Permittee was required to perform emission testing within 180 days of initial startup on gasified biomass fuel.
 - b. **Date Violation Occurred:** Initial startup occurred August 25, 2014.
 - c. **Explanation:** The BIO/NGSYSTEM began commissioning in August 2014. Intermittently the commissioning process continued through April 21, 2016. It was understood by the VAMC that the Emission Test submittal was required 180 days after the acceptance of the plant as identified by the date the equipment was turned over to the VAMC (April 28, 2016).
 - d. **Actions Taken:** The enclosed Emission Testing Plan will be executed upon completion of the remaining punch list items by DeMaria Building Company, Inc. This emission testing is estimated to be completed by August 1, 2016.

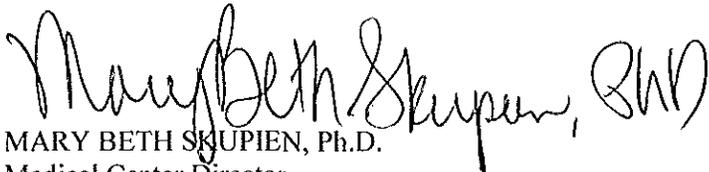
8. EUBIO/NGSYSTEM – PTI No. 187-10E, Special Condition VI.2
 - a. **Violation:** Continuous Opacity Monitoring (COM) Plan required per Appendix A has not been submitted.
 - b. **Date Violation Occurred:** Initial startup occurred August 25, 2014.

- c. **Explanation:** The BIO/NG SYSTEM began commissioning in August 2014. Intermittently the commissioning process continued through April 21, 2016. It was understood, by the VAMC, that the COM Plan submittal was required 180 days after the acceptance of the plant as identified by the date the equipment was turned over to the VAMC (April 28, 2016).
 - d. **Actions Taken:** The COM Plan was completed on May 3, 2016 and is enclosed for review.
9. EU-BOILER-2/3/4 – PTI No. 187-10E Special Condition III.1
- a. **Violation:** Permittee was required to submit a MAP within 180 days of initial startup.
 - b. **Date Violation Occurred:** Initial startup occurred October 21, 2013
 - c. **Explanation:** The Battle Creek VAMC lost track of the required submission requirements.
 - d. **Actions Taken:** The MAP was completed on December 18, 2013 and is enclosed for review.

Pursuant to the 40 CFR, Part 60, Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, we have also included the Initial Notification Form for the biomass/natural gas fired boiler.

In order to prevent a reoccurrence of these violations, the Battle Creek VAMC is in the process of filling its Green Environmental Management Systems (GEMS) Coordinator position. This position will assist the Battle Creek VAMC in all compliance related items with the DEQ. If you have any questions or require additional information, please contact Robert J Pavlovic, Energy Manager, at (269) 223-5274 or Thomas Stewart, Acting GEMS Coordinator, at (269) 966-5600 extension 33951.

Sincerely,



MARY BETH SKUPIEN, Ph.D.
Medical Center Director

Enclosure:

- EUBIO/NGSYSTEM Initial Notification (TAB 2)
- PTI (TAB 3)
- EUCOOLTWR MAP (TAB 4)
- EUMATERIAL Continuous Fugitive Dust Control Plan (TAB 5)
- EUMATERIAL MAP (TAB 6)
- EUBIO/NGSYSTEM MAP and Startup/Shutdown Plan (TAB 7)
- EUBIO/NGSYSTEM BFPMP (TAB 8)
- EUBIO/NGSYSTEM Emissions Testing (TAB 9)
- EUBIO/NGSYSTEM COM Plan (TAB 10)
- COM Monitor Locations (TAB 11)
- COM NIST Test Data (TAB 12)
- COM DUSTHUNTER T Operating Instruction (TAB 13)
- EU-BOILER-2/3/4 MAP (TAB 14)