

**NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT**

Preliminary Findings Regarding a Construction and Operation Permit
for **Elkhart General Hospital**
in **Elkhart County**

MSOP 039-11996, Plt ID 039-00118

Notice is hereby given that the company mentioned above, located at 600 East Blvd, Elkhart, Indiana, 46515, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a permit to operate a general medical hospital. There is a change in status from Title V/FESOP to MSOP.

IDEM is aware that this source has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. IDEM, OAQ does not have jurisdiction in specifying and implementing requirements for zoning, odor or noise. For such issues, please contact your local officials. A copy of the application and staff review is available for examination at the Elkhart Public Library, 300 S. 2nd, Elkhart, Indiana and at the Northern Regional Office, 220 West Colfax Avenue, Suite 200, South Bend, IN 46601-1634. A copy of the draft permit is also available for examination at www.IN.gov/idem/air/permits. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If appropriate adverse comments concerning the **air pollution impact** of this proposed source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to Nishat Hydari, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, call (800) 451-6027, press 0 and ask for extension (3-6878), or dial (973) 575-2555, extension 3216.

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Elkhart General Hospital
600 East Blvd
Elkhart, Indiana 46515**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-11996-00118	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: Expiration Date:

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
B	GENERAL CONSTRUCTION CONDITIONS	5
B.1	Permit No Defense [IC 13]	
B.2	Definitions	
B.3	Effective Date of the Permit [IC 13-15-5-3]	
B.4	Modification to Permit [326 IAC 2]	
B.5	Permit Term [326 IAC 2-6.1-7]	
C	SOURCE OPERATION CONDITIONS	6
C.1	PSD Minor Source Status [326 IAC 2-2][40 CFR 52.21]	
C.2	Preventive Maintenance Plan [326 IAC 1-6-3]	
C.3	Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]	
C.4	Inspection and Entry [326 IAC 2-7-6(2)]	
C.5	Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]	
C.6	Permit Revocation [326 IAC 2-1-9]	
C.7	Opacity [326 IAC 5-1]	
C.8	Fugitive Dust Emissions [326 IAC 6-4]	
C.9	Stack Height [326 IAC 1-7]	
C.10	Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]	
C.11	Compliance Monitoring [326 IAC 2-1.1-11]	
C.12	Maintenance of Monitoring Equipment [IC 13-14-1-13]	
C.13	Monitoring Methods [326 IAC 3]	
C.14	Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]	
	Record Keeping and Reporting Requirements	
C.15	Malfunctions Report [326 IAC 1-6-2]	
C.16	Annual Emission Statement [326 IAC 2-6]	
C.17	Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-3]	
C.18	General Record Keeping Requirements [326 IAC 2-6.1-2]	
C.19	General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]	
C.20	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
D.1	Emissions unit OPERATION CONDITIONS - Boilers	15
	Emission Limitations and Standards	
D.1.1	Particulate Matter Limitation (PM) [326 IAC 6-2-3]	
D.1.2	Sulfur Dioxide (SO ₂) [326 IAC 7-1.1-1]	
	Compliance Determination Requirements	
D.1.3	Sulfur Dioxide Emissions and Sulfur Content	
	Compliance Monitoring Requirements	
D.1.4	Visible Emissions Notations	
	Record Keeping and Reporting Requirements	
D.1.5	Record Keeping Requirements	
D.1.6	Reporting Requirements	

D.2	Emissions unit OPERATION CONDITIONS - Emergency Generators	18
	Emission Limitations and Standards	
	D.2.1 Operation Limitation	
	Record Keeping and Reporting Requirements	
	D.2.2 Record Keeping Requirements	
	Annual Notification	19
	Semi-Annual Natural Gas Fired Boiler Certification	20
	Malfunction Report	21

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a general medical hospital.

Authorized Individual: Wesley Davis, Executive Vice President
Source Address: 600 East Blvd., Elkhart, IN 46515
Mailing Address: 600 East Blvd., Elkhart, IN 46515
Phone Number: (219) 523-3141
SIC Code: 8062
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Three (3) natural gas-fired boilers (using no. 2 fuel oil as backup, with a maximum sulfur content of 0.1%), identified as B-1, B-2 and B-3, constructed in 1971, each with a maximum heat input rate of 24.4 million (MM) British thermal units (Btu) per hour, all exhausting to one (1) stack, identified as B-1;
- (b) One (1) natural gas-fired generator, constructed in 1991, with a maximum heat input rate of 7.31 MMBtu/hr, exhausting to one (1) stack, identified as G-2;
- (c) Emergency generators as follows:
 - (1) One (1) emergency generator, rated at 804 HP, using diesel;
 - (2) One (1) emergency generator rated at 940 HP, using diesel;
 - (3) One (1) emergency generator rated at 1005 HP, using fuel oil;
 - (4) One (1) emergency generator, rated at 235 HP, using fuel oil;
- (d) One (1) 3M sterivac 5XL ethylene oxide sterilizer, identified as E-1, constructed in 1990; and
- (e) One (1) 12,000 gallon under ground diesel storage tank, identified as T-1 and constructed in 1971.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Permit Term [326 IAC 2-6.1-7]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR

51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Maintenance of Monitoring Equipment [IC 13-14-1-13]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or

- (4) The process has already returned to operating within “normal” parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

Record Keeping and Reporting Requirements

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.17 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon

request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.19 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (b) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) All instances of deviations must be clearly identified in such reports. A reportable deviation

is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) A malfunction as described in 326 IAC 1-6-2; or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (d) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.20 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1 Emissions unit OPERATION CONDITIONS

Emissions Unit Description [326 IAC 6-2-3] [326 IAC 7-1.1-1]

- (a) Three (3) natural gas-fired boilers (using no. 2 fuel oil as backup, with a maximum sulfur content of 0.1%), identified as B-1, B-2 and B-3, constructed in 1971, each with a maximum heat input rate of 24.4 million (MM) British thermal units (Btu) per hour, all exhausting to one (1) stack, identified as B-1.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the three (3) natural gas-fired boilers used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations): sulfur dioxide emissions from the three (3) boilers using No. 2 fuel oil shall be limited to 0.5 pounds per million BTU heat input when using No. 2 fuel oil. This equates to a fuel oil sulfur content limit of less than or equal to 0.5%.

Compliance Determination Requirements

D.1.3 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-3-4, the Permittee shall demonstrate that the No. 2 distillate fuel oil sulfur content does not exceed 0.5% by weight by:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the two (2) boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-2.1.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the boiler stack (B-1) exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual No. 2 distillate fuel oil and No. 2 distillate fuel oil equivalent usage per month since last compliance determination period and equivalent SO₂ emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

 - (4) Fuel supplier certifications.
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of

- the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the boiler stack (B-1) exhaust once per shift.
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

- (a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34);
- (b) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.

SECTION D.2

Emissions unit OPERATION CONDITIONS

Emissions Unit Description

- (b) One (1) natural gas-fired generator, constructed in 1991, with a maximum heat input rate of 7.31 MMBtu/hr, exhausting to one (1) stack, identified as G-2;
- (c) Emergency generators as follows:
 - (1) One (1) emergency generator, rated at 804 HP, using diesel;
 - (2) One (1) emergency generator rated at 940 HP, using diesel;
 - (3) One (1) emergency generator rated at 1005 HP, using fuel oil;
 - (4) One (1) emergency generator, rated at 235 HP, using fuel oil;
- (d) One (1) 3M sterivac 5XL ethylene oxide sterilizer, identified as E-1, constructed in 1990; and
- (e) One (1) 12,000 gallon under ground diesel storage tank, identified as T-1 and constructed in 1971.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Operation Limitation

Pursuant to the definition of emergency generators, operation of the four (4) emergency generators shall be limited to an annual total of 500 hours, each.

Record Keeping and Reporting Requirement

D.2.2 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records of the following:
 - (1) The hours of operation of each emergency generator;
 - (2) Records of the annual fuel usage of each emergency generator.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Elkhart General Hospital
Address:	600 East Blvd., Elkhart, IN 46515
City:	Elkhart
Phone #:	(219) 523-3141
MSOP #:	039-11996-00118

I hereby certify that Elkhart General Hospital is still in operation.
 no longer in operation.

I hereby certify that Elkhart General Hospital is in compliance with the requirements of MSOP 039-11996-00118.
 not in compliance with the requirements of MSOP 039-11996-00118.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Elkhart General Hospital
Source Address: 600 East Blvd., Elkhart, IN 46515
Mailing Address: 600 East Blvd., Elkhart, IN 46515
MSOP Permit No.: 039-11996-00118

9	Natural Gas Only
9	Alternate Fuel burned
	From: _____ To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.	
Signature:	
Printed Name:	
Title/Position:	
Phone:	
Date:	

A certification by the responsible official as defined by 326 IAC 2-1.1-1(1) is required for this report.

—
MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

PAGE 1 OF 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

—

—

**Indiana Department of Environmental Management
Office of Air Quality**

Addendum to the
Technical Support Document for a Minor Source Operating Permit
(MSOP)

Source Name: Elkhart General Hospital
Source Location: 600 East Blvd, Elkhart, Indiana 46515
County: Elkhart
Operation Permit No.: MSOP 039-11996-00118
SIC Code: 8062
Permit Reviewer: NH/EVP

On October 26, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Elkhart General Hospital had applied for a Minor Source Operating Permit (MSOP) for the operation of a general medical hospital. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 19, 2001, Elkhart General Hospital submitted comments on the proposed MSOP. The summary of the comments and corresponding responses is as follows (**bolded** language has been added, the language with a ~~line~~ through it has been deleted):

Comment 1

Page 20 of 22

De we have to fill out this page and send it in every year, because we are under 250 tons per year?

Response 1

Page 20 of 22 of the MSOP permit contains the "Semi-Annual Natural Gas Fired Boiler Certification". This certification shall be submitted within thirty (30) days after the end of the six (6) month period being reported. The certification is used to certify the type of fuel burned by the three (3) boilers during the six months being reported.

The semi-annual natural gas boiler certification is not required based on the potential to emit of the source. It is required for all natural gas boilers with a heat input capacity of greater than 10 million British thermal units per hour.

The incorrect reference to "Part 70 Operating Permit" has been changed to "Minor Source Operating Permit" in the "Semi-Annual Natural Gas Fired Boiler Certification" report.

The incorrect reference to "A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report" has been changed to "A certification by the responsible official as defined by 326 IAC 2-1.1-1(1) is required for this report" in the semi-annual natural gas fired boiler certification report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 MINOR SOURCE OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Elkhart General Hospital
Source Address: 600 East Blvd., Elkhart, IN 46515
Mailing Address: 600 East Blvd., Elkhart, IN 46515
MSOP Permit No.: 039-11996-00118

9	Natural Gas Only
9	Alternate Fuel burned
	From: _____ To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC ~~2-7-1(34)~~ 2-1.1-1(1) is required for this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Elkhart General Hospital
Source Location: 600 East Blvd, Elkhart, Indiana 46515
County: Elkhart
SIC Code: 8062
Operation Permit No.: MSOP 039-11996-00118
Permit Reviewer: NH/EVP

The Office of Air Quality (OAQ) has reviewed an application from Elkhart General Hospital relating to the operation of general medical hospital.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (a) Three (3) natural gas-fired boilers (using no. 2 fuel oil as backup, with a maximum sulfur content of 0.1%), identified as B-1, B-2 and B-3, constructed in 1971, each with a maximum heat input rate of 24.4 million (MM) British thermal units (Btu) per hour, all exhausting to one (1) stack, identified as B-1;
- (b) One (1) natural gas-fired generator, constructed in 1991, with a maximum heat input rate of 7.31 MMBtu/hr, exhausting to one (1) stack, identified as G-2;
- (c) Emergency generators as follows:
 - (1) One (1) emergency generator, rated at 804 HP, using diesel;
 - (2) One (1) emergency generator rated at 940 HP, using diesel;
 - (3) One (1) emergency generator rated at 1005 HP, using fuel oil;
 - (4) One (1) emergency generator, rated at 235 HP, using fuel oil;
- (d) One (1) 3M sterivac 5XL ethylene oxide sterilizer, identified as E-1, constructed in 1990; and
- (e) One (1) 12,000 gallon under ground diesel storage tank, identified as T-1 and constructed in 1971.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Exemption 039-12402-00118, issued on August 14, 2000.

None of the conditions from the permit were incorporated into this permit because the source did not install the scrubber due to the fact that they decommissioned their incinerator.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
B-1	Boilers B-1, B-2 and B-3	85	50"	8313	275
G-2	Natural gas-fired Generator	20	8.5"	7260	895
E-1	Ethylene Oxide Sterilizer	30	1.25"	< 0.01	70
T-1	Diesel Storage Tank	20	3"	< 0.01	70

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 10, 2000, with additional information received on November 15, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 4).

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	5.16
PM-10	7.80
SO ₂	0.60
VOC	2.47
CO	33.72
NO _x	66.90

HAP's	Potential To Emit (tons/year)
Ethylene Oxide	0.09
TOTAL	0.09

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.
- (b) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance attainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	5.16
PM10	7.80
SO ₂	0.60
VOC	2.47
CO	33.72
NO _x	66.90
HAPs	0.09

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, the total emissions indicated in this permit **MSOP-039-11996-00118**, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) The three (3) 24.4 MMBtu per hour boilers, identified as B-1, B-2 and B-3, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because they were constructed prior to June 9, 1989.
- (b) The one (1) 12,000 gallon tank is not subject to the New Source Performance Standards (NSPS)(40 CFR Part 60, Subpart K) because it was constructed prior to June 11, 1973.
- (c) There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) that are applicable to the equipment sterilization process. Also, there are no National Emissions Standards for Hazardous Air Pollutants (326 IAC 14, 40 CFR Part 61, 326 IAC 20, and 40 CFR Part 63) that apply to the equipment sterilization process because the potential to emit a single HAP is less than 10 tons per year and the potential to emit a combination of HAPs is less than 25 tons per year.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of oxides of nitrogen (NO_x) and is located in Elkhart County.

Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which began operation on or before June 8, 1972, shall in no case exceed 0.8 lb/MMBtu heat input.

This limitation is based on the following equation:

$$P_t = (C \cdot a \cdot h) / (76.5 \cdot Q^{0.75} \cdot N^{0.25})$$

where: P_t = maximum allowable particulate matter (PM) emitted per MMBtu heat input
 C = maximum ground level concentration (50 $\mu\text{g}/\text{m}^3$, for a period not to exceed 60 min.)
 Q = total source max. indirect heater input = B-1 + B-2 + B-3 = 24.4 + 24.4 + 24.4 = 73.2 MMBtu/hr
 N = number of stacks in the fuel burning operation = 1
 a = plume rise factor (0.67, for $Q < 1,000$)
 h = average stack height in feet = 85 feet

$$P_t = (50 \cdot 0.67 \cdot 85) / (76.5 \cdot 73.2^{0.75} \cdot 1^{0.25}) = 1.49 \text{ lbs PM/MMBtu}$$

Therefore, the PM emissions from the three (3) boilers (identified as B-1, B-2, B-3 and constructed in 1971) each rated at 24.4 MMBtu per hour heat input shall be limited to 0.8 pounds per MMBtu heat input.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The three (3) natural gas-fired boilers using no. 2 fuel oil as back-up fuel are subject to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations). Pursuant to 326 IAC 7-1.1-2, sulfur dioxide emissions from the three (3) boilers using No. 2 fuel oil shall be limited to 0.5 pounds per million BTU heat input when using No. 2 fuel oil. This equates to a fuel oil sulfur content limit of 0.5%.

326 IAC 7-2-1 (Sulfur Dioxide Reporting Requirements)

Pursuant to this rule, the source shall submit reports of calendar month average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rate (pounds SO_2 per MMBtu), to the OAQ upon request.

Conclusion

The operation of this general medical hospital shall be subject to the conditions of the attached proposed **Minor Source Operating Permit 039-11996-00118**.

Company Name: Elkhart General Hospital
Address, City IN Zip: 600 East Blvd, Elkhart, IN 46515
MSOP: 039-11996
Plt ID: 039-00118
Reviewer: NH/EVP

Potential Emission using Natural Gas

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
73.2	641.2

Facilities include three (3) boilers each rated at 24.4 MMBtu/hr

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.61	2.44	0.19	32.06	1.76	26.93

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Bumer = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Potential Emissions using No. 2 Fuel Oil

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
73.2	4580.22857	0.1

Facilities include three (3) boilers each rated at 24.4 MMBtu/hr

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10	SO2	NOx	VOC	CO
	2.0	3.3	14.2 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	4.58	7.56	32.52	45.80	0.78	11.45

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)
 *PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton
 Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Boilers 1, 2 and 3 can operate using either natural gas or no. 2 fuel oil. The total represents the worst case emissions for each pollutant.

	PM	PM10	SO2	NOx	VOC	CO
Potential Emission in tons/yr	4.58	7.56	32.52	45.80	1.76	26.93

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Elkhart General Hospital
Address City IN Zip: 600 East Blvd, Elkhart, IN 46515
MSOP: 039-11996
Plt ID: 039-00118
Reviewer: NH/EVP

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.31	64.0

Facilities	MMBtu/hr
Generator #2 (G-2)	7.31
Total	7.31

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.06	0.24	0.02	3.20	0.18	2.69

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emission Calculations

Company Name: Elkhart General Hospital
Address City IN Zip: 600 East Blvd, Elkhart, IN 46515
MSOP: 039-11996
Plt ID: 039-00118
Reviewer: NHEVP

Uncontrolled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Boilers	Emergency Generators	Natural gas-fired Generator	Ethylene Oxide Sterilizer*	TOTAL
PM	4.58	0.52	0.06	0.00	5.16
PM10	7.56	0.00	0.24	0.00	7.80
SO2	32.52	0.60	0.02	0.00	33.14
NOx	45.80	17.90	3.20	0.00	66.90
VOC	1.76	0.53	0.18	0.00	2.47
CO	26.93	4.10	2.69	0.00	33.72
total HAPs	0.00	0.00	0.00	0.09	0.09
worst case single HAP	0.00	0.00	0.00	0.09	0.09
Total emissions based on rated capacity at 8,760 hours/year.					
* Based on emission calculations provided by the source.					
Controlled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Boilers	Emergency Generators	Natural gas-fired Generator	Ethylene Oxide Sterilizer*	TOTAL
PM	4.58	0.52	0.06	0.00	5.16
PM10	7.56	0.00	0.24	0.00	7.80
SO2	32.52	0.60	0.02	0.00	33.14
NOx	45.80	17.90	3.20	0.00	66.90
VOC	1.76	0.53	0.18	0.00	2.47
CO	26.93	4.10	2.69	0.00	33.72
total HAPs	0.00	0.00	0.00	0.09	0.09
worst case single HAP	0.00	0.00	0.00	0.09	0.09
Total emissions based on rated capacity at 8,760 hours/year, after control.					
* Based on emission calculations provided by the source.					

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Emergency Generator (>600 HP)**

Company Name: Elkhart General Hospital
Address City IN Zip: 600 East Blvd, Elkhart, IN 46515
MSOP#: 039-11996
Plt ID: 039-00118
Reviewer: NH/EVP

Emissions calculated based on output rating (hp)

Power Output Potential Throughput
Horsepower (hp) hp-hr/yr

S= 0.1 = WEIGHT % SULFUR

2984.0	1492000.0
--------	-----------

Facilities	HP
Generator (G-1)	804
Generator (G-3)	940
Generator (G-4)	1005
Generator (G-5)	235
Total	2984

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0007	not provided	0.0008 (.00809S)	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	0.52	0.00	0.60	17.90	0.53	4.10

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr
Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.

Methodology

Potential Throughput (hp-hr/yr) = hp * 500 hr/yr
Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1.
Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)
PTE was calculated using 500 hours per year for emergency generator.

* No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included.