



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: March 4, 2005
RE: St. Vincent Health St. John's Health System / 095-17199-00038
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 1/10/05



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**MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY
and ANDERSON OFFICE of AIR MANAGEMENT**

**St. Vincent Health
Saint John’s Health System
2015 Jackson Street
Anderson, Indiana 46016**

(herein known as the Permittee) is hereby authorized to construct and 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 095-17199-00038	
Issued by: Origin signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 4, 2005 Expiration Date: March 4, 2010

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and Anderson Office of Air Management. The information describing the source contained in conditions A.1 through A.2 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 stationary general medical and surgical hospital.

Authorized Individual: President
Source Address: 2015 Jackson Street, Anderson, IN 46016
Mailing Address: 2015 Jackson Street, Anderson, IN 46016
General Source Phone: 1-765-646-8274
SIC Code: 8062
County Location: Madison County
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, Section 112 of the Clean Air Act

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) Two (2) natural gas-fired boilers, identified as Boiler #1 and #2, using Super Deselex 4 as alternate fuel, constructed in 1980, with a maximum capacity of 25.9 MMBTU/hr each, using no control device, and exhausting to stack I.D. B1 and B2.
- (b) One (1) natural gas-fired boiler, identified as Boiler #3, using Super Deselex 4 as alternate fuel, constructed in 1967, with a maximum capacity of 25.5 MMBTU/hr, using no control device, and exhausting to stack I.D. B3.
- (c) One (1) Generator, identified as 750 kw Cummins, using Super Deselex 4 as the fuel source, with a maximum capacity of 7.62 MMBTU/hr, using no control device, and exhausting to stack I.D. G1.
- (d) One (1) Generator, identified as 500 kw Onan, using Super Deselex 4 as the fuel source, with a maximum capacity of 4.72 MMBTU/hr, using no control device, and exhausting to stack I.D. G2.
- (e) One (1) Generator, identified as 500 kw Cat, using Super Deselex 4 as the fuel source, with a maximum capacity of 5.43 MMBTU/hr, using no control device, and exhausting to stack I.D. G3.
- (f) Two (2) Generators, identified as 60 kw Allis and 60 kw Cummins, using Super Deselex4 as the fuel source, with a maximum capacity of 0.78 MMBTU/hr each, using no control device, and exhausting to stack I.D. G4 and G5.
- (g) One (1) natural gas-fired boiler, identified as Boiler #7, with a maximum capacity of 1.00 MMBTU/hr, using no control device, and exhausting to stack I.D. B7.

- (h) One (1) natural gas-fired boiler, identified as Boiler #8, with a maximum capacity of 0.65 MMBTU/hr, using no control device, and exhausting to stack I.D. B8.

- (i) Two (2) natural gas-fired boiler, identified as Boiler #9 and #10, with a maximum capacity of 1.50 MMBTU/hr each, using no control device, and exhausting to stack I.D. B9 and B10.

SECTION B GENERAL 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 operate 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, the applicable definitions found in the statutes or regulations 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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

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

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating 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.7 Local Agency Requirement

An application for an operation permit must be made ninety (90) days before start up to:

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

The operation permit issued by and Anderson Office of Air Management shall contain as a minimum the conditions in the Operation Conditions section of this permit.

B.8 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 Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011
- (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, and Anderson Office of Air Management on or before the date it is due.

B.9 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 (PMPs) within ninety (90) days 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; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204, and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMP's as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, and Anderson Office of Air Management upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and Anderson Office of Air Management. IDEM, OAQ, and Anderson Office of Air Management may require the Permittee to revise its PMP whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Anderson Office of Air Management makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Anderson Office of Air Management within a reasonable time.

B.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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
Indianapolis, Indiana 46204

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

Any such application shall be certified by an "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)]

B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]

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, and Anderson Office of Air Management, 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.

B.12 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, and Anderson Office of Air Management 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, and Anderson Office of Air Management 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.

B.13 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to Anderson, OAM within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone number: 1-765-648-6158 (ask for Anderson, OAM, Billing Information), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (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 and Anderson Office of Air Management, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 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.4 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).

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements

C.6 Performance Testing [326 IAC 3-6]

- (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
Indianapolis, Indiana 46204

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and Anderson Office of Air Management not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and Anderson Office of Air Management, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.8 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.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.10 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and Anderson Office of Air Management upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

C.11 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.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required data, reports 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Anderson Office of Air Management makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Anderson Office of Air Management within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Anderson Office of Air Management
P. O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

- (b) 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, and Anderson Office of Air Management on or before the date it is due.
- (c) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Emissions Unit Description

- (a) Two (2) natural gas-fired boilers, identified as Boiler #1 and #2, using Super Deselex 4 as alternate fuel, constructed in 1980, with a maximum capacity of 25.9 MMBTU/hr each, using no control device, and exhausting to stack I.D. B1 and B2.
- (b) One (1) natural gas-fired boiler, identified as Boiler #3, using Super Deselex 4 as alternate fuel, constructed in 1967, with a maximum capacity of 25.5 MMBTU/hr, using no control device, and exhausting to stack I.D. B3.
- (c) One (1) Generator, identified as 750 kw Cummins, using Super Deselex 4 as the fuel source, with a maximum capacity of 7.62 MMBTU/hr, using no control device, and exhausting to stack I.D. G1.
- (d) One (1) Generator, identified as 500 kw Onan, using Super Deselex 4 as the fuel source, with a maximum capacity of 4.72 MMBTU/hr, using no control device, and exhausting to stack I.D. G2.
- (e) One (1) Generator, identified as 500 kw Cat, using Super Deselex 4 as the fuel source, with a maximum capacity of 5.43 MMBTU/hr, using no control device, and exhausting to stack I.D. G3.
- (f) Two (2) Generators, identified as 60 kw Allis and 60 kw Cummins, using Super Deselex 4 as the fuel source, with a maximum capacity of 0.78 MMBTU/hr each, using no control device, and exhausting to stack I.D. G4 and G5.

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

Emission Limitations and Standards

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

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from Boilers #1 and #2, rated at 25.9 MMBTU/hr each shall be limited to the lesser of 0.6 lbs per MMBTU and Boiler #3, rated at 25.5 MMBTU/hr shall be limited to the lesser of 0.8 lbs per MMBTU or the emission rate determined by the following equation:

For Boilers #1 and #2:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = 3.20 \text{ lbs/MMBTU}$$

where

$$C = 50 \text{ u/m}^3$$

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr) = 51.8

N = number of stacks = 2

a = plume rise factor (0.67)

h = stack height (ft) = 168

For Boiler #3:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = 3.24 \text{ lbs/MMBTU}$$

where

$$C = 50 \text{ u/m}^3$$

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr) = 25.5

N = number of stacks = 1

a = plume rise factor (0.67)

h = stack height (ft) = 84

Therefore, the PM emissions from Boilers #1 and #2 shall be limited to 0.6 lbs/MMBTU, and, the PM emissions for the Boiler #3 shall be limited to 0.8 lbs/MMBTU.

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from Boilers #1, #2, #3 and the five (5) generators, when burning fuel oil, shall not exceed five tenths (0.5) pounds per MMBTU heat input. Pursuant to 326 IAC 7-2-1(c)(3), compliance shall be demonstrated on a calendar month average and submitted upon request.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.1.2 shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pound per million Btu heat input by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
 - (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.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any 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.1.5 Visible Emissions Notations

- (a) Visible emission notations of the B1, B2 and B3 stack exhaust shall be performed once per shift during normal daylight operations 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 Response Plan – Preparation and Implementation shall be considered a violation of this permit.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ emission limit established in Condition D.1.2.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, 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.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the boiler stack B1, B2 and B3 exhaust while combusting fuel oil.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

- (a) The natural gas boiler certification shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

SECTION D.2 EMISSION UNIT OPERATION CONDITIONS

Emissions Unit Description

- (g) One (1) natural gas-fired boiler, identified as Boiler #7, with a maximum capacity of 1.00 MMBTU/hr, using no control device, and exhausting to stack I.D. B7.
- (h) One (1) natural gas-fired boiler, identified as Boiler #8, with a maximum capacity of 0.65 MMBTU/hr, using no control device, and exhausting to stack I.D. B8.
- (i) Two (2) natural gas-fired boilers, identified as Boiler #9 and #10, with a maximum capacity of 1.50 MMBTU/hr each, using no control device, and exhausting to stack I.D. B9 and B10.

(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 [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the Boilers #7 through #10 shall be limited to 0.35 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = Pounds of particulate matter emitted per million Btu of heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. Q=81.95

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facilities are in compliance. If testing is required by IDEM or Anderson Office of Air Management, compliance with the PM limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reporting Requirements

D.2.3 Reporting Requirements

The Natural Gas Boiler Certification shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
and ANDERSON OFFICE of AIR MANAGEMENT**

**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:	St. Vincent Health, St. John's Health Systems
Address:	2015 Jackson Street
City:	Anderson, IN 46016
Phone #:	1-765-646-8274
MSOP #:	095-17199-00038

I hereby certify that [source] is still in operation.
 no longer in operation.

I hereby certify that [source] is in compliance with the requirements of MSOP **095-17199-00038**.
 not in compliance with the requirements of MSOP **095-17199-00038**.

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:

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
COMPLIANCE DATA SECTION
and ANDERSON OFFICE of AIR MANAGEMENT**

SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: St. Vincent Health, St. John's Health Systems
Source Address: 2015 Jackson Street, Anderson, IN 46016
Mailing Address: 2015 Jackson Street, Anderson, IN 46016
Permit No.: 095-17199-00038

<input checked="" type="radio"/> Boilers # 1, 2 and 3	or,	<input checked="" type="radio"/> Boilers # 7-10
<input checked="" type="radio"/> Natural Gas Only		<input checked="" type="radio"/> Natural Gas Only
<input checked="" type="radio"/> 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 an authorized individual as defined by 326 IAC 2-1.1-1(1) is required for this report.

**Indiana Department of Environmental Management
Office of Air Quality
and ANDERSON OFFICE of AIR MANAGEMENT**

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

Source Background and Description

Source Name:	St. Vincent Health Saint John's Health System
Source Location:	2015 Jackson Street, Anderson, IN 46016
County:	Madison County
SIC Code:	8062
Operation Permit No.:	095-17199-00038
Permit Reviewer:	James Farrell

On March 18, 2004, the Office of Air Quality (OAQ) had a notice published in the Herald Bulletin located in Anderson, Indiana, stating that St. Vincent Health, Saint John's Health System had applied for a Minor Source Operating Permit to operate a general medical and surgical hospital. The notice also stated that OAQ proposed to issue a permit for this operation 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 April 12, 2004, St. Vincent Health, Saint John's Health System submitted comments on the proposed Minor Source Operating Permit. The summary of the comments are as follows:

Comment #1:

The source is currently listed on the IDEM's air permit web page under St John's Health System. Please reassign the permit to the proper listing of "St. Vincent Health, Saint John's Health System".

Response to Comment #1

The change has been made as requested.

Comment #2:

In Section C.5(a), the last sentence of this paragraph states that "all demolition projects require notification whether or not asbestos is present." It is our understanding that only those demolition projects where asbestos is suspected should be reported to the IDEM prior to conducting any demolition activities. Please clarify the statement located in Section C.5(a).

Response to Comment #2

The IDEM's position is 326 IAC 14-10-1(a)(1) states, "All the notification requirements of section 3 of this rule apply and a notification is required even if no asbestos is present." Therefore, no changes will be made to Section C.5(a) as a result of this comment.

Comment #3:

In Section D.1.2 and D.1.4, please insert additional language which states that these two sections are only applicable when burning diesel fuel. Currently, it appears that SO₂ emission limitations are required to be demonstrated on a monthly basis for the boilers even when burning natural gas. 326 IAC 7-1.1 applies to facilities that have the potential to emit SO_x emission in quantities greater than 25 tons/year. Only if these units are processing the fuel oil, will the potential emissions exceed 25 tons/year. Please clarify these two sections by inserting "when using diesel fuel" into the appropriate areas.

Response to Comment #3

Per the Technical Support Document, In the State Rule Applicability – Individual Facilities section, under 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), on page 6 of 7, it states:

...the source will comply with this rule by using Super Deselex 4 fuel oil with a maximum sulfur content of 0.15% or less in the three (3) boilers and five (5) generators.

This statement clarifies that fuel oil is required to comply with the SO₂ emission limitations as requested by the Permittee. Condition D.1.4 states that it is used to show compliance with Condition D.1.2, therefore, for the purpose of greater clarification Section D.1.2 shall be amended as follows:

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from Boilers #1, #2, #3 and the five (5) generators, **when burning fuel oil**, shall not exceed five tenths (0.5) pounds per MMBTU heat input. Pursuant to 326 IAC 7-2-1(c)(3), compliance shall be demonstrated on a calendar month average and submitted upon request.

Comment #4:

In Section D.1.7(a), a natural gas boiler certification is required to be submitted. St. Vincent Health, Saint John's Health System is in agreement that this report is required to be submitted for the three boilers. However, it is unclear to us as to the purpose of Section D.1.7(b). According to the information provided in this paragraph, this reporting requirement has been included in order to show compliance with the particulate matter regulation cited in Section D.1.1. In addition, there doesn't appear to be a form attached to the DRAFT permit which outlines the information required to be submitted to the IDEM in order to show compliance with Section D.1.1. We believe that Section D.1.7(b) should be removed since compliance with Section D.1.1 can be demonstrated annually through the submittal of the annual compliance certification.

Response to Comment #4

After further review the following changes shall be made to the permit.

D.1.7 Reporting Requirements

(a) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

~~(b) A semi-annual summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses 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. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.~~

Comment #5:

In the Technical Support Document (TSD) of the DRAFT permit under the section titled "State Rule Applicability – Entire Source", 326 IAC 2-6 (Emission Reporting), the source is not required to submit an annual air emission statement. However, the next paragraph states the source is required to submit actual emissions for the purposes of determining fees. It is our understanding that annual permit fees are based on a lump sum for minor sources. Therefore, submittal of actual emissions is not required for this source. Please remove this second paragraph from the TSD.

Response to Comment #5

The IDEM can not change TSD's. The IDEM can only amend and clarify errors in TSD's through an Addendum Technical Support Document. Upon further review of this request the second paragraph was listed incorrectly in the TSD and the annual fee requirement is properly represented in MSOP 095-17199-00038 Condition B.13.

The "State Rule Applicability – Entire Source", 326 IAC 2-6 (Emission Reporting) section should have been cited as follows:

326 IAC 2-6 (Emission Reporting)

This source is located in Madison County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year, therefore, 326 IAC 2-6 does not apply.

~~The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.~~

Conclusion

The operation of this general medical and surgical hospital shall be subject to the conditions of the Minor Source Operating Permit 095-17199-00038.

**Indiana Department of Environmental Management
Office of Air Quality
and ANDERSON OFFICE of AIR MANAGEMENT**

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

Source Background and Description

Source Name: St. Vincent Health
Saint John's Health System
Source Location: 2015 Jackson Street, Anderson, IN 46016
County: Madison County
SIC Code: 8062
Operation Permit No.: 095-17199-00038
Permit Reviewer: James Farrell

The Office of Air Quality (OAQ) has reviewed an application from St. Vincent Health, Saint John's Health System relating to the operation of a general medical and surgical hospital.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units and pollution control devices:

- (a) Two (2) natural gas-fired boilers, identified as Boiler #1 and #2, using Super Deselex 4 as alternate fuel, constructed in 1980, with a maximum capacity of 25.9 MMBTU/hr each, using no control device, and exhausting to stack I.D. B1 and B2, respectively.
- (b) One (1) natural gas-fired boiler, identified as Boiler #3, using Super Deselex 4 as alternate fuel, constructed in 1967, with a maximum capacity of 25.5 MMBTU/hr, using no control device, and exhausting to stack I.D. B3.
- (c) One (1) Generator, identified as 750 kw Cummins, using Super Deselex 4 as the fuel source, with a maximum capacity of 7.62 MMBTU/hr, using no control device, and exhausting to stack I.D. G1.
- (d) One (1) Generator, identified as 500 kw Onan, using Super Deselex 4 as the fuel source, with a maximum capacity of 4.72 MMBTU/hr, using no control device, and exhausting to stack I.D. G2.
- (e) One (1) Generator, identified as 500 kw Cat, using Super Deselex 4 as the fuel source, with a maximum capacity of 5.43 MMBTU/hr, using no control device, and exhausting to stack I.D. G3.
- (f) Two (2) Generators, identified as 60 kw Allis and 60 kw Cummins, using Super Deselex 4 as the fuel source, with a maximum capacity of 0.78 MMBTU/hr each, using no control device, and exhausting to stack I.D. G4 and G5.
- (g) One (1) natural gas-fired boiler, identified as Boiler #7, with a maximum capacity of 1.00 MMBTU/hr, using no control device, and exhausting to stack I.D. B7.

- (h) One (1) natural gas-fired boiler, identified as Boiler #8, with a maximum capacity of 0.65 MMBTU/hr, using no control device, and exhausting to stack I.D. B8.
- (i) Two (2) natural gas-fired boilers, identified as Boiler #9 and #10, with a maximum capacity of 1.50 MMBTU/hr each, using no control device, and exhausting to stack I.D. B9 and B10, respectively.

Existing Approvals

This is the first operating permit for this source.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
B1	Boiler #1	84	30	58,905	575
B2	Boiler #2	84	30	58,905	575
B3	Boiler #3	84	36	84,823	575

Enforcement Issue

There are no enforcement actions pending.

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.

A complete application for the purposes of this review was received on February 10, 2003.

Emission Calculations

See Appendix A, pages 1 through 7 of this document for detailed emissions calculations.

Potential To Emit

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."

The potential to emit for the source is as follows:

Pollutant	Potential To Emit (tons/year)
PM	6.01
PM-10	6.01
SO ₂	64.4
VOC	2.18
CO	33.15
NO _x	60.5
HAP's	Potential To Emit (tons/year)
Hexane	0.646
Formaldehyde	0.027

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of sulfur dioxide SO₂ and nitrogen oxides NO_x are equal to or greater than 25 tons per year but less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1-2, a minor source operating permit is required.
- (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.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Madison County.

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

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Madison County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 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

The source status is as follows:

Pollutant	Potential To Emit (tons/year)
PM	6.01
PM-10	6.01
SO ₂	64.4
VOC	2.18
CO	33.15
NO _x	60.5
HAP's	Potential To Emit (tons/year)
Hexane	0.646
Formaldehyde	0.027

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is 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 is the first air approval issued to this source.

Federal Rule Applicability

- (a) The boilers identified as #1, #2 and #3 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), due to they were all constructed prior to June 9, 1989. The boilers identified as #7-10 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), due to they are less than 10 MMBtu/hr, each.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Madison County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year, therefore, 326 IAC 2-6 does not apply.

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

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 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%) 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 6-2-3 (Emission Limitations for Sources of Indirect Heating)

- (a) Boilers #1 and #2, rated at 25.9 MMBtu/hr each, and constructed in 1980 are subject to 326 IAC 6-2-3 for indirect heating facilities constructed prior to September 21, 1983. Pursuant to this rule, PM emissions from the boiler shall be limited to the lesser of 0.6 lbs per MMBtu or the emission rate determined by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where: C = maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain = 50 micrograms per cubic meter
Pt = pounds of particulate matter emitted per million Btu of heat input
Q = total source maximum operating capacity rating in million Btu per hour heat input
N = number of stacks in fuel burning operation
a = plume rise factor = 0.67
h = stack height in feet

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

$$Pt = \frac{50 \times 0.67 \times 168}{76.5 \times 51.8^{0.75} \times 2^{0.25}}$$

$$Pt = 3.20 \text{ pounds per MMBtu}$$

Therefore, the PM emissions from Boilers #1 and #2 shall be limited to 0.6 lbs/MMBtu.

$$0.6 \text{ lbs/MMBtu} \times 51.8 \text{ MMBtu/hr} = 31.08 \text{ lb/hr} = 136.13 \text{ tons/year}$$

The potential worst case emissions from the two boilers of 1.72 tons of particulate matter is less than the allowable 136.13 tons per year. Therefore, this boiler is in compliance with this rule.

- (b) Boiler #3, rated at 25.5 MMBtu/hr, and constructed in 1967, is subject to 326 IAC 6-2-3 for indirect heating facilities constructed prior to June 8, 1972. Pursuant to this rule, PM emissions from the boiler shall be limited to the lesser of 0.8 lbs per MMBtu and the emission rate determined by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where: C = maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain = 50 micrograms per cubic meter
Pt = pounds of particulate matter emitted per million Btu of heat input
Q = total source maximum operating capacity rating in million Btu per hour heat input
N = number of stacks in fuel burning operation
a = plume rise factor = 0.67
h = stack height in feet

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

$$Pt = \frac{50 \times 0.67 \times 84}{76.5 \times 25.5^{0.75} \times 1^{0.25}}$$

$$Pt = 3.24 \text{ pounds per MMBtu}$$

Therefore, PM emissions from Boiler #3 shall be limited to 0.8 lbs/MMBtu.

$$0.8 \text{ lbs/MMBtu} \times 25.5 \text{ MMBtu/hr} = 20.4 \text{ lb/hr} = 89.35 \text{ tons/year}$$

The potential worst case emissions from boiler #3 of 0.85 tons of particulate matter is less than the allowable 89.35 tons per year. Therefore, this boiler is in compliance with this rule.

- (c) Boilers #7-10 are subject to 326 IAC 6-2-4 for sources of indirect heating facilities constructed after September 21, 1983. Pursuant to this rule, PM emissions from the boilers shall not exceed 0.35 lbs per MMBtu, determined by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = Pounds of particulate matter emitted per million Btu of heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. Q=81.95

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1, sulfur dioxide emissions from the back-up Super Dieselelex 4 fuel oil combustion in the three (3) boilers (Boilers # 1, 2, and 3), each with maximum heat input capacity of 25.9, 25.9 and 25.5 MMBtu per hour, respectively, and the five (5) generators, shall be limited to five-tenths (0.5) pounds per million Btu. This equates to a fuel oil sulfur content limit of 0.5%. This is based on the following calculations:

$$0.5 \text{ lbs/MMBtu} \times 140,000 \text{ Btu/1000 gal} = 70 \text{ lbs/1000gal}$$
$$70 \text{ lbs/1000 gal} / 157 \text{ lb/1000 gal} = 0.5\%$$

Therefore, the sulfur content of the fuel must be less than 0.5% in order to comply with this rule. The source will comply with this rule by using Super Dieselelex 4 fuel oil with a maximum sulfur content of 0.15% or less in the three (3) boilers and the five (5) generators.

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

The three (3) boilers (Boilers # 1, 2, and 3), each with maximum heat input capacity of 25.9, 25.9 and 25.5 MMBtu per hour, respectively, and the five (5) generators are subject to 326 IAC 7-2-1 (Reporting Requirements). This rule requires the source to submit to the Office of Air Quality and Anderson Office of Air Management upon request records of sulfur content, heat content, fuel consumption, and sulfur dioxide emission rates based on a calendar-month average.

326 IAC 9 (Carbon Monoxide Emissions Rules)

The seven (7) boilers (Boilers #1-3 and #7-10) and the five (5) generators are not subject to 326 IAC 9. This rule applies to Petroleum Refining emissions, Ferrous Metal Smelters and Solid Waste incineration and burning equipment, none of which are located at this source.

326 IAC 10 (Nitrogen Oxides Rules)

The seven (7) boilers (Boilers #1-3 and #7-10) and the five (5) generators are not subject to 326 IAC 10. This rule applies to Nitrogen Oxides Controls in Clark and Floyd Counties, Nitrogen Oxide Reduction Program for Specific Source Categories and Nitrogen Oxides Budget Trading, none of which are affected by this source.

Conclusion

The operation of this general medical and surgical hospital shall be subject to the conditions of the attached proposed **Minor Source Operating Permit 095-17199-00038**.