

September 3, 2004

Certified Mail: 70000600002351883267

Mr. Ronald A. Duperroir
WMH Physicians' Hospital, LLC, d/b/a
Winona Memorial Hospital
3232 North Meridian Street
Indianapolis, Indiana 46208

Re: Notice Only Change No. 097-18897-00296 to MSOP Permit No. 097-12334-00296

Dear Mr. Duperroir:

Winona Memorial Hospital was issued a Minor Source Operating Permit (MSOP) on August 21, 2000 for the operation of boilers and generators at their hospital. A Notice Only Change (097-16639-00296) was also issued on November 26, 2002. Further, an application was received on March 25, 2004 requesting that the emission statement condition be removed from the permit due to the revisions to 326 IAC 2-6 (Emission Reporting) which became effective on March 25, 2004. The Permittee is no longer required to submit an emission statement; therefore, the emission statement condition will be removed from the permit. The bold language is new language that has been added, and the language with a line through it has been taken out. Pursuant to the provisions of 326 IAC 2-6.1-6 (g) the permit is hereby revised as follows:

1. Condition A.1 is revised as follows:

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 Hospital.

Authorized Individual: Plant Manager
Source Address: 3232 North Meridian Street, Indianapolis, Indiana 46208
Mailing Address: 3232 North Meridian Street, Indianapolis, Indiana 46208
SIC Code: 8062
County Location: Marion
~~County Status: Attainment for all criteria pollutants~~
County Status: **Non attainment for Ozone under the 8-hour Standard and Attainment for all other criteria pollutants.**
Source Status: Minor Source Operating Permit
Minor Source, under Section 112 of Clean Air Act

2. Condition C.13 is Deleted.

~~C.13 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);~~

WMH Physicians' Hospital, LLC., d/b/a/
Winona Memorial Hospital
Indianapolis, Indiana
Permit Reviewer: DRA

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WMW

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~~(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~~

~~_____ and~~

~~_____ Office of Environmental Services
_____ Air Compliance Section
_____ 2700 South Belmont Avenue
_____ Indianapolis, Indiana 46221~~

~~(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, and OES 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.

All other conditions of the permit shall remain unchanged and in effect. Please find a copy of the revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Warner Myron Waters, at (317) 327-2182.

Sincerely,

Original Signed by,

John B. Chavez
Administrator

Attachments: Updated Permit

JBC/wmw

cc: Marion County Health Department
Air Compliance, Matt Mosier
IDEM, Mindy Hahn
Permits, (2 Copies)
U.S. EPA- R5

**NEW SOURCE CONSTRUCTION AND MINOR SOURCE
OPERATING PERMIT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**WMH Physicians' Hospital, LLC. d/b/a/
Winona Memorial Hospital
3232 North Meridian Street
Indianapolis, Indiana 46208**

(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 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-12334-00296

Issued by:

Mona A. Salem
Chief Operating Officer
Department of Public Works
City of Indianapolis

Issuance Date: August 21, 2000

Expiration Date: August 21, 2005

First Notice Only Change Number 097-18897-00296 issued November 26, 2002

Second Notice Only Change: 097-18897-00296

Conditions Affected: A.1 and C.13 (Emission Statement deleted)

Issued by:

Original Signed by,

John B. Chavez, Administrator
Office of Environmental Services

Issuance Date: September 3, 2004

Expiration Date: August 21, 2005

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C.13 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.9, 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, OAM and EMRD 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.14 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, OAM, and EMRD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or EMRD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or EMRD 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.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
2700 South Belmont Avenue
Indianapolis, Indiana 46221
- (c) 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, OAM, and ERMD on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) 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.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Management and ERMD 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 Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resource Management Division
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (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, OAM, and ERMD on or before the date it is due.

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