



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

August 18, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Elkhart General Hospital / 039-19232-00118

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 9/16/03



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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Commissioner

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August 18, 2004

Mr. David Earnhart  
Elkhart General Hospital  
600 East Blvd.  
Elkhart, Indiana 46515

Re: 039-19232  
First Minor Permit Revision to  
MSOP 039-11996-00118

Dear Mr. Earnhart:

Elkhart General Hospital was issued a permit on December 4, 2001 for a general medical hospital. A letter requesting changes to this permit was received on May 24, 2004. Pursuant to the provisions of 326 IAC 2-6.1-6 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of three (3) No. 2 fuel oil fired emergency generators, identified as M1, M2, and M3, each with a maximum rated capacity of 1,481 horse power and one (1) No. 2 fuel oil storage tank, identified as Main-1, with a maximum capacity of 10,000 gallons.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval 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.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this revision and the following revised permit pages to the front of the original 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 Linda Quigley, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (973) 575-2555, extension 3284.

Sincerely,  
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

LQ/EVP

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Data Section - Karen Ampil  
Administrative and Development  
Technical Support and Modeling - Michelle Boner



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## 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: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 4, 2001  Expiration Date: December 4, 2006

First Notice Only Change No.: 039-16828-00118 Issued March 11, 2003

First Minor Permit Revision No.: 039-19232-00118	Pages Affected: 2, 4, 11-14, 18
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 18, 2004

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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). 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: Team Leader, Engineering Services  
Source Address: 600 East Blvd., Elkhart, IN 46515  
Mailing Address: 600 East Blvd., Elkhart, IN 46515  
Phone Number: (574) 523-3362  
SIC Code: 8062  
County Location: Elkhart  
County Status: Non-attainment for ozone under the 8-hour standard  
Attainment for all other criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD and Non-attainment NSR

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;
  - (5) Three (3) No. 2 fuel oil fired emergency generators, identified as M1, M2 and M3, each constructed in 2004, each with a maximum rated capacity of 1,481 horse power, and exhausting to stack/vents S-M1, S-M2, and S-M3, respectively;
- (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.
- (f) One (1) No. 2 fuel oil storage tank, identified as Main-1, constructed in 2004, with a maximum capacity of 10,000 gallons.

## **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 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.17 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.18 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.19 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.

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**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;
  - (5) Three (3) No. 2 fuel oil fired emergency generators, identified as M1, M2 and M3, each constructed in 2004, each with a maximum rated capacity of 1,481 horse power, and exhausting to stack/vents S-M1, S-M2, and S-M3, respectively;
- (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.
- (f) One (1) No. 2 fuel oil storage tank, identified as Main-1, constructed in 2004, with a maximum capacity of 10,000 gallons.

(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 seven (7) 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**

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

**Source Background and Description**

<b>Source Name:</b>	<b>Elkhart General Hospital</b>
<b>Source Location:</b>	<b>600 East Blvd., Elkhart, Indiana 46515</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>8062</b>
<b>Operation Permit No.:</b>	<b>039-11996-00118</b>
<b>Operation Permit Issuance Date:</b>	<b>December 4, 2001</b>
<b>Permit Revision No.:</b>	<b>039-19232-00118</b>
<b>Permit Reviewer:</b>	<b>Linda Quigley/EVP</b>

The Office of Air Quality (OAQ) has reviewed an application from Elkhart General Hospital relating to the construction and operation of three (3) emergency generators and one (1) fuel storage tank at the general medical hospital.

**New Emission Units and Pollution Control Equipment**

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

- (a) three (3) No. 2 fuel oil fired emergency generators, identified as M1, M2 and M3, each constructed in 2004, each with a maximum rated capacity of 1,481 horse power, and exhausting to stack/vents S-M1, S-M2, and S-M3, respectively;
- (b) one (1) No. 2 fuel oil storage tank, identified as Main-1, constructed in 2004, with a maximum capacity of 10,000 gallons.

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

**Existing Approvals**

The source has been operating under previous approvals including, but no limited to, the following:

- (a) MSOP 039-11996-00118, issued on December 4, 2001; and
- (b) Notice Only Change 039-16828-00118, issued on March 11, 2003.

All conditions from previous approvals were incorporated into this permit.

**Justification for the Revision**

The MSOP is being modified through a Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-6.1-6(g)(4), as a modification that would have a potential to emit less than twenty five (25) tons per year and greater than ten (10) tons per year of SO<sub>2</sub> and NO<sub>x</sub>.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S-M1	Emergency generator	30	1.0	7519	796
S-M2	Emergency generator	30	1.0	7519	796
S-M3	Emergency generator	30	1.0	7519	796

### Recommendation

The staff recommends to the Commissioner that the construction and 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 May 24, 2004.

### Emission Calculations

See Appendix A of this document for detailed emission calculations, pages one (1) and two (2).

### Potential to Emit of Revision 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/yr)
PM	0.49
PM-10	0.40
SO <sub>2</sub>	14.06
VOC	5.46
CO	5.92
NO <sub>x</sub>	22.27

HAPs	Potential to Emit (tons/yr)
Benzene	0.0054
Toluene	0.0020
Xylene	0.0013
Formaldehyde	0.0005
Actaldehyde	0.0002
Acrolein	0.0001
Napthalene	0.0009
Total	less than 25

- (a) The potential to emit of this modification (as defined in 326 IAC 2-6.1-6(g)(4)), of SO<sub>2</sub> and NO<sub>x</sub> are each less than 25 tons per year, and greater than 10 tons per year. Therefore, the modification requires a Minor Permit Revision.
- (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 <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-hour Ozone	maintenance attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

### Source Status

Existing Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	5.16
PM-10	7.80
SO <sub>2</sub>	0.60
VOC	2.47
CO	33.72
NO <sub>x</sub>	66.90
Single HAP	Less than 10
Combination HAPs	Less than 25

- (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 greater, no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on emission calculations for MSOP 039-11996-00118.

### Proposed Modification

PTE from the proposed modification (based on 8760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

	PM (ton/yr)	PM-10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)	Total HAPs (ton/yr)
Proposed Modification	0.49	0.40	14.06	5.46	5.92	22.27	0.10
Existing Source	5.16	7.80	0.60	2.47	33.72	66.90	0.09
<b>Total Sourcewide</b>	<b>5.65</b>	<b>8.20</b>	<b>14.66</b>	<b>7.93</b>	<b>39.64</b>	<b>89.17</b>	<b>0.19</b>
PSD or Offset Threshold Level	< 250	< 250	< 250	< 100	< 250	< 100	< 25

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This modification to an existing minor stationary source is not major because the emission increase is less than the Emission Offset major source levels. Therefore, pursuant to 326 IAC 2-3, the requirements for Nonattainment NSR do not apply.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 039-19232-00118, 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 per 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 one (1) 10,000 gallon No. 2 fuel oil storage tank is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb) (Standards of Performance for Volatile Organic Liquid Storage Vessels) since it has a storage capacity of less than 75 cubic meters.
- (b) The three (3) new emergency generators, M1, M2 and M3, to be constructed in 2004 are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ because this source is not a major source of Hazardous Air Pollutants.

### **State Rule Applicability – Entire Source**

#### 326 IAC 2-6 (Emission Reporting)

This source is no longer subject to 326 IAC 2-6 (Emission Reporting) because it is not located in Lake or Porter Counties and is not subject to the Part 70 program. This source is located in Elkhart County and the potential to emit of all criteria pollutants is less than 100 tons per year. Therefore, 326 IAC 2-6 does not apply.

### **State Rule Applicability – Individual Facilities**

#### 326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any source that constructs or reconstructs a major source of HAPs, which has the potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs, must control emissions from that source using technologies consistent with the Maximum Achievable Control Technology (MACT). This source has potential single HAP and total HAP emissions of less than 10 and 25 tons per year, respectively, therefore, this rule does not apply.

#### 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The one (1) storage tank, to be constructed in 2004, is not subject to 326 IAC 8-4-3 because the tank has a storage capacity of less than 39,000 gallons.

### **State Rule Applicability - Emergency Generators**

For the emergency generators, the potential to emit air pollutants was calculated at a maximum of 500 operating hours per year for each unit. As a result, a condition is included in the permit to make the number of operating hours enforceable.

## Proposed Changes

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

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The Permittee owns and operates a general medical hospital.

Authorized Individual: Team Leader, Engineering Services  
Source Address: 600 East Blvd., Elkhart, IN 46515  
Mailing Address: 600 East Blvd., Elkhart, IN 46515  
Phone Number: (574) 523-3362  
SIC Code: 8062  
County Location: Elkhart  
County Status: **Non-attainment for ozone under the 8-hour standard**  
Attainment for all **other** criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD **and Non-attainment NSR**

### A.2 Emissions units and Pollution Control Equipment Summary

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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;
  - (5) **Three (3) No. 2 fuel oil fired emergency generators, identified as M1, M2 and M3, each constructed in 2004, each with a maximum rated capacity of 1,481 horse power, and exhausting to stack/vents S-M1, S-M2, and S-M3, respectively;**
- (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.
- (f) **One (1) No. 2 fuel oil storage tank, identified as Main-1, constructed in 2004, with a maximum capacity of 10,000 gallons.**

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

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- ~~(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.~~

Subsequent Section C Conditions have been renumbered accordingly.

## 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;
  - (5) Three (3) No. 2 fuel oil fired emergency generators, identified as M1, M2 and M3, each constructed in 2004, each with a maximum rated capacity of 1,481 horse power, and exhausting to stack/vents S-M1, S-M2, and S-M3, respectively;**
- (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.
- (f) One (1) No. 2 fuel oil storage tank, identified as Main-1, constructed in 2004, with a maximum capacity of 10,000 gallons.**

(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)~~ **seven (7)** emergency generators shall be limited to an annual total of 500 hours, each.

## **Record Keeping and Reporting Requirement**

### **D.2.2 Record Keeping Requirements**

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- (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.

## **Conclusion**

The construction and operation of the emergency generators and fuel storage tank shall be subject to the conditions of the **Minor Permit Revision 039-19232-00118**.

**Appendix A: Emissions Calculations**  
**Large Stationary Diesel Engines**  
**No. 2 fuel oil**

**Company Name:** Elkhart General Hospital  
**Address, City IN Zip:** 600 East Blvd., Elkhart, Indiana 46515  
**Permit Number:** 039-19232  
**Plt ID:** 039-00118  
**Reviewer:** Linda Quigley/EVP  
**Date:** June 15, 2004

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
kgals/year

S = Weight % Sulfur  
2.00

27.84

13920

	Pollutant					
	PM10	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.06	0.07	2.02 (1.01S)	3.20	0.09	0.85
Potential Emission in tons/yr	0.42	0.49	14.06	22.27	0.63	5.92

**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 500 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Each 1,481 horsepower (hp) generator is equal to 9.28 million British Thermal units (MMBtu) per hour, for a total of 27.84 MMBtu/hr, based on information provided by the manufacturer.

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)

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

See page 2 for HAPs emission calculations.

**Appendix A: Emissions Calculations**  
**Large Stationary Diesel Engines**  
**No. 2 fuel oil**  
**HAPs Emissions**

**Company Name:** Elkhart General Hospital  
**Address, City IN Zip:** 600 East Blvd., Elkhart, Indiana 46515  
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**Date:** June 15, 2004

	HAPs - Metals				
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	4.88E-04	3.66E-04	3.66E-04	3.66E-04	1.10E-03

	HAPs - Metals (continued)			
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	3.66E-04	7.32E-04	3.66E-04	1.83E-03

**Methodology**

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)\*Emission Factor (lb/mmBtu)\*500 hrs/yr / 2,000 lb/ton