



TO: Interested Parties / Applicant

RE: Saint Vincent Hospitals and Health Services / **T097-19419-00129**

FROM: Felicia A. Robinson  
Manager of Environmental Planning

## 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, 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 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



**INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
  
PART 70 OPERATING PERMIT RENEWAL**

**Saint Vincent Hospital and Health Services  
2001 W. 86<sup>th</sup> Street  
Indianapolis, Indiana 46240**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T097-19419-00129	
Issued by:	Issuance Date: December 30, 2005
Original signed by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Expiration Date: December 29, 2010
Felicia A. Robinson, Manager of Environmental Planning Indianapolis Office of Environmental Services	

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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 City of Indianapolis Office of Environmental Services (OES). 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates stationary General Medical and Surgical Hospital

Responsible Official:	Director of Facility Services
Source Address:	2001 W. 86 <sup>th</sup> Street, Indianapolis, Indiana 46240
Mailing Address:	2001 W. 86 <sup>th</sup> Street, P.O. Box 40970, Indianapolis, Indiana 46260
General Source Phone Number:	317-338-3712
SIC Code:	8062
County Location:	Marion
County Status:	Nonattainment for ozone under the 8-hour standard Nonattainment for PM2.5 Attainment for all other criteria pollutants.
Source Status:	Part 70 Permit Program Minor Source under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) 29.2 MMBtu/hr Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1971, identified as EU-01, exhausting to stack/vent ID 01 with a production capacity of 24,000 pounds per hour of steam.
- (b) One (1) 29.2 MMBtu/hr Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1971, identified as EU-02, exhausting to stack/vent ID 02 with a production capacity of 24,000 pounds per hour of steam.
- (c) One (1) 35.5 MMBtu/hr Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1987, identified as EU-03, exhausting to stack/vent ID 03 with a production capacity of 30,000 pounds per hour of steam.
- (d) One (1) steam boiler, constructed in 2003, identified as EU-04, capable of burning natural gas and #2 fuel oil, with a maximum heat input capacity of 34.8 MMBtu/hr when burning #2 fuel oil and 36.5 MMBtu/hr when burning natural gas, with a low NOx burner, and exhausting to stack 04.
- (e) One (1) 35.5 MMBtu/hr Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1993, identified as EU-05, exhausting to stack/vent ID 05 with a production capacity of 30,000 pounds per hour of steam.
- (f) One (1) 11.33 MMBtu/hr Caterpillar Number 2 fuel oil fired emergency generator, constructed in 1992, identified as Emergency Generator #1 (EU-06), exhausting to stack/vent ID 06.
- (g) One (1) 11.33 MMBtu/hr Caterpillar Number 2 fuel oil fired emergency generator, constructed

in 1992, identified as Emergency Generator #2 (EU-07), exhausting to stack/vent ID 07.

- (h) One (1) fuel 13.6 MMBtu/hr Number 2 fuel oil fired emergency generator, constructed in 2002, identified as Emergency Generator #3 (EU-08), exhausting to stack/vent ID 08.
- (i) One (1) 5.3 MMBtu/hr H.B. Smith natural gas and Number 2 fuel oil fired boiler, constructed in 1985, identified as EU-09, exhausting to stack/vent ID 09.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) One (1) 2.96 MMBtu/hr (1,160 HP) Caterpillar Number 2 fuel oil fired emergency generator, constructed in 1985, identified as Emergency Generator #4 (EU-10), exhausting to stack/vent ID 10.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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- (a) This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-7-1]**

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 2-7) shall prevail.

### **B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 15-13-6(a)]**

- (a) This permit, T097-19419-00129, 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, modifications, or amendments of this permit do not affect the expiration date of this permit
- (b) If IDEM, OAQ, and OES, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Enforceability [326 IAC 2-7-7]**

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Appendix A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through May 10, 2003 and published in the Indiana Register on June 1, 2003, unless otherwise indicated in the adoption by reference or in Appendix A. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

### **B.5 Severability [326 IAC 2-7-5(5)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

This permit does not convey any property rights of any sort or any exclusive privilege.

### **B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]**

- (a) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report 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.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;

- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and OES may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (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.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.11 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been

discovered;

Telephone Number: 1-800-451-6027 (ask for IDEM, OAQ, Compliance Section), or:  
Telephone Number: 317-233-5674 (ask for IDEM, OAQ, Compliance Section)  
Facsimile Number: 317-233-5967;

and

Telephone Number: 317-327-2234 (ask for OES, Air Compliance)  
Facsimile Number: 317-327-2274.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, and OES shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after

IDEM, OAQ, or OES has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or OES has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T097-19419-00129 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
- (2) revised under 326 IAC 2-7-10.5, or
- (3) deleted under 326 IAC 2-7-10.5.

**B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or OES determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, or OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

and

Indianapolis OES  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) 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.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and OES, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and

OES, any additional information identified as being needed to process the application.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
  
and  
  
Indianapolis OES  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221  
  
Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.  
[326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

Indianapolis OES  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit

shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5] ~~[326 IAC 2-2-2]~~ and/or ~~[326 IAC 2-3-2]~~**

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]**

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 OES U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Indianapolis OES  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-

11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and OES within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, or OES, the applicable fee is due April 1 of each year.
- (a) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licencing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions 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 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 thirty percent (30%) 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

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

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

**C.8 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

Indianapolis OES  
Asbestos Section  
2700 South Belmont Avenue  
Indianapolis, IN 46221

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 the "responsible official" 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) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to

use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) 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

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES if the Permittee submits to IDEM, OAQ, and OES 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.10 Compliance Requirements [326 IAC 2-1.1-11]**

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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 [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for 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

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 10, 2005.
- (b) Upon direct notification by IDEM, OAQ, and OES, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include,

but is not limited to, the following:

- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, and OES within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ, and OES that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.
- (c) IDEM, OAQ, and OES reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) The 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.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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 IDEM Commissioner or OES Administrator make a request for records to the Permittee, the Permittee shall furnish the records to the IDEM Commissioner or OES Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (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 Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 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, OAQ, and OES on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) 29.2 MMBtu/hr Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1971, identified as EU-01, exhausting to stack/vent ID 01 with a production capacity of 24,000 pounds per hour of steam.
- (b) One (1) 29.2 MMBtu/hr Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1971, identified as EU-02, exhausting to stack/vent ID 02 with a production capacity of 24,000 pounds per hour of steam.
- (c) One (1) 35.5 MMBtu/hr Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1987, identified as EU-03, exhausting to stack/vent ID 03 with a production capacity of 30,000 pounds per hour of steam.
- (d) One (1) steam boiler, constructed in 2003, identified as EU-04, capable of burning natural gas and #2 fuel oil, with a maximum capacity of 34.8 MMBtu/hr when burning #2 fuel oil and 36.5 MMBtu/hr when burning natural gas, with a low NOx burner, and exhausting to stack 04.
- (e) One (1) 35.5 MMBtu/hr Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1993, identified as EU-05, exhausting to stack/vent ID 05 with a production capacity of 30,000 pounds per hour of steam.
- (i) One (1) 5.3 MMBtu/hr H.B. Smith natural gas and Number 2 fuel oil fired boiler, constructed in 1985, identified as EU-09, exhausting to stack/vent ID 09.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Rules; Marion County [326 IAC 6.5-6]

- (a) Pursuant to 326 IAC 6.5-6 (Particulate Rules), the particulate (PM) emissions from the three (3) Zurn natural gas and Number 2 fuel oil fired boilers identified as EU-01, EU-02, and EU-03 shall not exceed 0.011 pounds per million Btu (lbs/MMBtu) heat input, and combined PM emissions shall not exceed 0.7 tons per year.
- (b) Fuel consumption in boilers EU-01, EU-02, and EU-03 combined shall be limited to less than 700,000 gallons per year of #2 fuel oil or less than 184.2 million cubic foot per year of natural gas. These limits are equivalent to 326 IAC 6.5-6 limit of 0.7 tons PM per year.
- (c) For purposes of determining compliance based on PM emissions, each 1,000 gallons of #2 fuel oil shall be equivalent to 0.2632 million cubic feet of natural gas.

#### D.1.2 Particulate [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emission from the 34.8/36.5 MMBtu/hr boiler, identified as EU-04, shall be limited to 0.286 pounds per million Btu of heat input; particulate matter (PM) emissions from the 35.5 MMBtu/hr boiler, identified as EU-05, shall be limited to 0.305 pounds per million Btu of heat input, and particulate matter (PM) emissions from the 5.3 MMBtu/hr boiler, identified as EU-09, shall be limited to 0.370 pounds per million Btu of 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 (lb/MMBtu) heat input  
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

**D.1.3 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-2] [326 IAC 12-1]**

Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO<sub>2</sub> emissions from the two (2) boilers, identified as EU-04, capable of burning natural gas and #2 fuel oil, with a maximum heat input capacity of 34.8 MMBtu/hr when burning #2 fuel oil and 36.5 MMBtu/hr when burning natural gas, with a low NO<sub>x</sub> burner, and EU-05, capable of burning natural gas and #2 fuel oil, with a maximum heat input capacity of 35.5 MMBtu/hr, shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

**D.1.4 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-2] [326 IAC 7-2-1]**

Pursuant to 326 IAC 7-1.1-2 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from the five (5) natural gas and # 2 fuel oil fired boilers identified as EU-01, EU-02, EU-03, EU-04, and EU-05 shall not exceed five tenths (0.5) pound per MMBtu heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.6 Sulfur Dioxide Emissions and Sulfur Content**

Compliance with Conditions D.1.3 and D.1.4 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) pounds 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 boilers, identified as EU-04, capable of burning natural gas and #2 fuel oil, with a maximum heat input capacity of 34.8 MMBtu/hr when burning #2 fuel oil and 36.5 MMBtu/hr when burning natural gas, with a low NO<sub>x</sub> burner, and EU-05, capable of burning natural gas and #2 fuel oil, with a maximum heat input capacity of 35.5 MMBtu/hr, 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 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.1.7 Visible Emissions Notations**

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- (a) Visible emission notations of the of the six (6) boilers identified as EU-01, EU-02, EU-03, EU-04, EU-05, and EU-09 stack exhausts ID 01 to 05 and 09, when combusting #2 fuel oil, shall be performed once per day during normal daylight operations when exhausting to the atmosphere. 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C Condition C.15 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.8 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1(b), D.1.3, D.1.4, and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
  - (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.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the six (6) boilers identified as EU-01, EU-02, EU-03, EU-04, EU-05, and EU-09 stack exhausts ID 01 to 05 and 09, when combusting #2 fuel oil, once per shift.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 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 forms 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 natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).

## **SECTION D.2 FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-7-5(15)]:**

- (f) One (1) 11.33 MMBtu/hr Caterpillar Number 2 fuel oil fired emergency generator, constructed in 1992, identified as Emergency Generator #1 (EU-06), exhausting to stack/vent ID 06.
- (g) One (1) 11.33 MMBtu/hr Caterpillar Number 2 fuel oil fired emergency generator, constructed in 1992, identified as Emergency Generator #2 (EU-07), exhausting to stack/vent ID 07.
- (h) One (1) fuel oil fired emergency generator, identified as Emergency Generator #3 (EU-08), with a maximum capacity of 13.6 MMBtu/hr and exhausting to stack 08.
- (j) One (1) 2.96 MMBtu/hr (1,160 HP) Caterpillar Number 2 fuel oil fired emergency generator, constructed in 1985, identified as Emergency Generator #4 (EU-10), exhausting to stack/vent ID 10.

(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.2.1 Limitation of Operating Hours**

Operation of each emergency generator shall in no case exceed 500 hours of operation per twelve (12) consecutive month period. Any changes to the source that would require operating any of the emergency generators for more than 500 hours per year shall require prior approval from IDEM, OAQ, and OES.

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

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

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records of the dates of operation and the number of hours of operation for each generator.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-5674  
Fax: 317-233-5967**

and

**Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Saint Vincent Hospitals and Health Services  
Source Address: 2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240  
Mailing Address: 2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240  
Part 70 Permit No.: T097-19419-00129

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify)

Report (specify)

Notification (specify)

Affidavit (specify)

Other (specify)

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:

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

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Saint Vincent Hospitals and Health Services  
Source Address: 2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240  
Mailing Address: 2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240  
Part 70 Permit No.: T097-19419-00129

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>C The Permittee must notify the Office of Air Quality (OAQ), and OES within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

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

Source Name: Saint Vincent Hospitals and Health Services  
Source Address: 2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240  
Mailing Address: 2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240  
Part 70 Permit No.: T097-19419-00129

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____
--

<b>This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.</b>		
<u>Report period</u>		
Beginning: _____		
Ending: _____		
<u>Boiler Affected</u>	<u>Alternate Fuel Burned</u> From To	<u>Days burning alternate fuel</u>
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I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature: _____
Printed Name: _____
Title/Position: _____
Phone: _____
Date: _____

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

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

**Part 70 Usage Report**

Submit Report Semi-Annually

Source Name: Saint Vincent Hospitals and Health Services  
 Source Address: 2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240  
 Mailing Address: 2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240  
 Part 70 Permit No.: T097-19419-00129  
 Facility: Boilers EU-01, EU-02, and EU-03  
 Parameter: Natural gas and #2 fuel oil consumption  
 Limit: 184.2 million cubic feet of natural gas or 700.0 kilogallons of #2 fuel oil; 1,000 gallons (1 kilogallon) of #2 fuel oil shall be equivalent to 0.2632 million cubic feet of natural gas.

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Usage this month	Previous 11 Months	12 month Usage Total
	Natural Gas or Equivalent burned, MMcf	Natural Gas or Equivalent burned, MMcf	Natural Gas or Equivalent burned, MMcf
Month 1			
Month 2			
Month 3			
Month 4			
Month 5			
Month 6			

No deviation occurred in this month.

Deviation/s occurred in this month.  
 Deviation has been reported on:

Submitted by:  
 Title/Position:  
 Signature:  
 Date:  
 Phone:

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT**

**QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Saint Vincent Hospitals and Health Services  
 Source Address: 2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240  
 Mailing Address: 2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240  
 Part 70 Permit No.: T097-19419-00129

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

## Appendix A

The following State rules have been adopted by reference by the Indianapolis Air Pollution Control Board and are enforceable by the Indianapolis Office of Environmental Services (OES) using local enforcement procedures.

- (1) 326 IAC 1;
- (2) 326 IAC 2-3-1 through 326 IAC 2-3-5;
- (3) 326 IAC 2-4-1 through 326 IAC 2-4-6;
- (4) 326 IAC 2-6-1 through 326 IAC 2-6-4;
- (5) 326 IAC 2-7-1 through 2-7-18; 2-7-20 through 2-7-25;
- (6) 326 IAC 2-8-1 through 2-8-15, 2-8-17;
- (7) 326 IAC 2-9-1 through 2-9-14;
- (8) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-10-1);
- (9) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-11-1);
- (10) 326 IAC 3-1.1-1 through 3-1.1-5;
- (11) 326 IAC 3-2.1 through 3-2.1-5;
- (12) 326 IAC 3-3-1 through 3-3-5;
- (13) 326 IAC 4-2-1 through 4-2-2;
- (14) 326 IAC 5-1-1(a), (b) and (c)(5), 5-1-2(1), (2)(A), (2)(c)(4), 5-1-3 through 5-1-5, 5-1-7;
- (15) 326 IAC 6;
- (16) 326 IAC 7-1.1-1 and 7-1.1-2;
- (17) 326 IAC 7-2-1;
- (18) 326 IAC 7-3-1 and 7-3-2
- (19) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted);
- (20) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
- (21) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2-5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
- (22) 326 IAC 8-3-1 through 8-3-7;
- (23) 326 IAC 8-4-1 through 8-4-5, 8-4-6(a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6 c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) KiloPascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
- (24) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
- (25) 326 IAC 8-6-1 and 8-6-2;
- (26) 326 IAC 9-1-1 and 9-1-2;
- (27) 326 IAC 10 (adopted January 8, 2004);
- (28) 326 IAC 11-1-1 through 11-1-2
- (29) 326 IAC 11-2-1 through 11-2-3;
- (30) 326 IAC 11-3-1 through 11-3-6;
- (31) 326 IAC 14-1-1 through 14-1-4;
- (32) 326 IAC 14-2-1 except 40 CFR 61.145;
- (33) 326 IAC 14-3-1;
- (34) 326 IAC 14-4-1;
- (35) 326 IAC 14-5-1;
- (36) 326 IAC 14-6-1;
- (37) 326 IAC 14-7-1;
- (38) 326 IAC 14-8-1 through 14-8-5;
- (39) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
- (40) 326 IAC 20;
- (41) 326 IAC 21;
- (42) 326 IAC 21-1-1 (The adoption state that "or the administrator of OES" is added in (b));
- (43) 326 IAC 22-1-1 (The adoption state that "or the administrator of OES" is added in (b));

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Indianapolis Office of Environmental Services**

**Addendum to the  
Technical Support Document (TSD) for a Part 70 Operating Permit Renewal**

<b>Source Name:</b>	<b>Saint Vincent Hospital and Health Services</b>
<b>Source Location:</b>	<b>2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>8062</b>
<b>Operation Permit No.:</b>	<b>T097-7469-00129</b>
<b>Operation Permit Issuance Date:</b>	<b>May 24, 2000</b>
<b>Permit Renewal No.:</b>	<b>097-19419-00129</b>
<b>Permit Reviewer:</b>	<b>Boris Gorlin</b>

On August 23, 2005, the Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that on July 27, 2004, Saint Vincent Hospital and Health Services, applied for a Part 70 Operating Permit Renewal relating to the operation of a General Medical and Surgical Hospital, located at 2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana. The notice also stated that the OES proposed to issue a Part 70 Operating Permit Renewal 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.

The TSD will remain as it originally appeared when published. Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and OES prefer that the Technical Support Document reflects the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision (bolded language has been added, the language with a line through it has been deleted). The Table of Contents and conditions numbering have been revised, as needed.

No comments were received during the Public Notice period.

On September 23, 2005, the 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove paragraph (a) which contained these requirements, and since the requirements of the 326 IAC 6-3-2(d) that were effective June 12, 2002 are now federally enforceable, the last statements from Condition C.1 has been removed. The following changes were made to the Permit:

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, particulate matter emissions 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), particulate emissions 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. ~~This condition is not federally enforceable.~~

On Sept. 1, 2005 (Indiana Register, Volume 28, Number 12) rule 326 IAC 6-1 (County Specific PM Limitations) was repealed, and Marion County sources requirements were placed in added rule 326 IAC 6-5. The following changes were made to the Permit:

**D.1.1 Particulate Rules; Marion County [326 IAC ~~6-4-12~~ 6.5-6]**

- (a) Pursuant to 326 IAC ~~6-4-12~~ 6.5-6 (Particulate Rules), the particulate (PM) emissions from the three (3) Zurn natural gas and Number 2 fuel oil fired boilers identified as EU-01, EU-02, and EU-03 shall not exceed 0.011 pounds per million Btu (lbs/MMBtu) heat input, and combined PM emissions shall not exceed 0.7 tons per year.
- (a) Fuel consumption in boilers EU-01, EU-02, and EU-03 combined shall be limited to less than 700,000 gallons per year of #2 fuel oil or less than 184.2 million cubic foot per year of natural gas. These limits are equivalent to 326 IAC ~~6-4-12~~ 6.5-6 limit of 0.7 tons PM per year.
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**Compliance Response Plan**

IDEM and OES have reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition C.15:

**C.15 ~~Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (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 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 timeframe 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 and the Permittee documents such response in accordance with subsection (c) below, 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, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~
- ~~(4) Failure to take reasonable response steps shall be considered a deviation from 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) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- ~~(f) 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.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
- (1) initial inspection and evaluation;**
- (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**

- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
  - (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
    - (1) monitoring results;**
    - (2) review of operation and maintenance procedures and records;**
    - (3) inspection of the control device, associated capture system, and the process.**
  - (d) Failure to take reasonable response steps shall be considered a deviation from the permit.**
  - (e) The Permittee shall maintain the following records:**
    - (1) monitoring data;**
    - (2) monitor performance data, if applicable; and**
    - (3) corrective actions taken.**
- 

Upon further review, IDEM and OES have determined that once per day visible emission notations is generally sufficient to ensure proper operation of the boilers. IDEM and OES have also determined that monitoring visible emissions once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6.

The following changes were made to the Condition D.1.7:

#### D.1.7 Visible Emissions Notations

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- (a) Visible emission notations of the of the six (6) boilers identified as EU-01, EU-02, EU-03, EU-04, EU-05, and EU-09 stack exhausts ID 01 to 05 and 09, when combusting #2 fuel oil, shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. 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~~ **If abnormal emissions is are observed, the Permittee shall take**

**reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C **Condition C.15** - ~~Compliance Response Plan Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

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IDEM and OES have determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM and OES have deleted paragraph (b) of Section B Condition B.10 – Preventive Maintenance Plan, and have amended the Section B Condition B.11 – Emergency Provisions as follows:

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (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 facility:-
  - (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.
- ~~(b)~~ The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- ~~(e)~~ **(b)** A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- ~~(d)~~ **(c)** To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.11 Emergency Provisions [326 IAC 2-7-16]**

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- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded

due to the emergency.

- .....
- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.**
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IDEM and OES have clarified the Section B Operational Flexibility condition as follows:

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the ~~emissions allowable~~ **under limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
and  
  
Indianapolis OES  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions trading ~~trades~~ **trades** that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes~~ **The Permittee shall make** such records available, upon reasonable request, for

public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ **at** the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- .....

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

**and**

**Indianapolis Office of Environmental Services**

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Saint Vincent Hospital and Health Services</b>
<b>Source Location:</b>	<b>2001 W. 86<sup>th</sup> Street, Indianapolis, Indiana 46240</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>8062</b>
<b>Operation Permit No.:</b>	<b>T097-7469-00129</b>
<b>Operation Permit Issuance Date:</b>	<b>May 24, 2000</b>
<b>Permit Renewal No.:</b>	<b>097-19419-00129</b>
<b>Permit Reviewer:</b>	<b>Boris Gorlin</b>

The Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) have reviewed a Part 70 Operating Permit Renewal application from Saint Vincent Hospital and Health Services relating to the operation of General Medical and Surgical Hospital.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) 29.2 MMBtu Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1971, identified as EU-01, exhausting to stack/vent ID 01 with a production capacity of 24,000 pounds per hour of steam.
- (b) One (1) 29.2 MMBtu/hr Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1971, identified as EU-02, exhausting to stack/vent ID 02 with a production capacity of 24,000 pounds per hour of steam.
- (c) One (1) 35.5 MMBtu/hr Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1987, identified as EU-03, exhausting to stack/vent ID 03 with a production capacity of 30,000 pounds per hour of steam.
- (d) One (1) steam boiler, constructed in 2003, identified as EU-04, capable of burning natural gas and #2 fuel oil, with a maximum heat input capacity of 34.8 MMBtu/hr when burning #2 fuel oil and 36.5 MMBtu/hr when burning natural gas, with a low NOx burner, and exhausting to stack 04.
- (e) One (1) 35.5 MMBtu/hr Zurn natural gas and Number 2 fuel oil fired boiler, constructed in 1993, identified as EU-05, exhausting to stack/vent ID 05 with a production capacity of 30,000 pounds per hour of steam.

- (f) One (1) 11.33 MMBtu/hr Caterpillar Number 2 fuel oil fired emergency generator, constructed in 1992, identified as Emergency Generator #1 (EU-06), exhausting to stack/vent ID 06.
- (g) One (1) 11.33 MMBtu/hr Caterpillar Number 2 fuel oil fired emergency generator, constructed in 1992, identified as Emergency Generator #2 (EU-07), exhausting to stack/vent ID 07.
- (h) One (1) fuel 13.6 MMBtu/hr Number 2 fuel oil fired emergency generator, constructed in 2002, identified as Emergency Generator #3 (EU-08), exhausting to stack/vent ID 08.
- (i) One (1) 5.3 MMBtu/hr H.B. Smith natural gas and Number 2 fuel oil fired boiler, constructed in 1985, identified as EU-09, exhausting to stack/vent ID 09.

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 2-7-1(21):

- (j) One (1) 2.96 MMBtu/hr (1,160 HP) Caterpillar Number 2 fuel oil fired emergency generator, constructed in 1985, identified as Emergency Generator #4 (EU-10), exhausting to stack/vent ID 10.

### **Existing Approvals**

The source has constructed or has been operating under the following previous approvals:

- (a) T 097-7469-00129, issued on May 24, 2000;
- (b) 097-115085-00129, Administrative Amendment, issued on November 16, 2001;
- (c) 097-17256-00129 and 097-17919-00129, issued on December 2, 2003; combined Significant Source Modification and Significant Permit Revision: construction of one (1) new boiler EU-04 replacing an old waste heat boiler EU-04, and one (1) new emergency generator #4, (EU-10); removal of medical waste incinerator EU-07 and insignificant units: boiler EU-05, emergency generators #3 (EU-11), #1 (EU-09), and #2 (EU-12).

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

All construction conditions from all previously issued permits have been determined no longer applicable; therefore, they were not incorporated into this Part 70 permit.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit renewal be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on July 27, 2004.

There was no notice of completeness letter mailed to the Permittee.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations (pages 1 through 3).

**Potential to Emit of the Source**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source 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 source was issued a Part 70 Operating Permit on May 24, 2000. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Boilers EU-01, EU-02, EU-03, EU-04, EU-05, and EU-09 burning Fuel Oil or Natural Gas (worst case)	10.61	10.61	192.8	3.491	53.32	55.48	0.0438
Emergency Generators EU-06, EU-07, EU-08, EU-10 burning fuel oil	3.040	3.040	2.843	3.432	9.315	43.24	0.0241
Total PTE (worst case)	13.65	13.65	195.6	6.923	62.63	98.72	0.0679

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of SO<sub>2</sub> is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (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

The following table shows the actual emissions from the source. This information reflects the 2004 OES emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.094
PM-10	0.094
SO <sub>2</sub>	0.0417
VOC	0.167
CO	2.55
NO <sub>x</sub>	3.09
HAP (Lead)	1.69x10 <sup>-5</sup>

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	non-attainment
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
8-hour Ozone	basic nonattainment
1-hour Ozone	maintenance attainment
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. Marion 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 Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Marion County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, SO<sub>2</sub>, CO, and Lead. 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.

## Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (a) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

## Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart Dc) are not included in the permit for the boilers EU-01, 02, 03. Construction of these units commenced prior to June 9, 1989.
- (b) Boiler EU-09 (5.3 MMBtu/hr) is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart Dc) due to size, because its maximum heat input capacity is less than 10 MMBtu/hr.
- (b) The two boilers: Boiler EU-04, capable of burning natural gas and #2 fuel oil, with a maximum heat input capacity of 34.8 MMBtu/hr when burning #2 fuel oil and 36.5 MMBtu/hr when burning natural gas, with a low NOx burner, constructed in 2003, and Boiler EU-05, capable of burning natural gas and #2 fuel oil, with a maximum heat input capacity of 35.5 MMBtu/hr, constructed in 1993, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc), because they were constructed after the rule applicability date of June 1989, and each of the boilers is rated at less than 100 MMBtu/hr but greater than 10 MMBtu/hr. As such, the following shall apply:
  - (1) Pursuant to 40 CFR Part 60.43c(c), boilers EU-04 and EU-05 shall not discharge into the atmosphere any gases that exceed 20% opacity.
  - (2) Pursuant to 40 CFR Part 60.42c(d), SO<sub>2</sub> emissions from boilers EU-04 and EU-05 shall not exceed five tenths (0.5) pounds per million Btu heat input; or the sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight.
  - (3) Pursuant to 40 CFR Part 60.42c(i), the SO<sub>2</sub> emission limit and fuel oil sulfur content limit apply to boilers EU-04 and EU-05 at all times, including periods of startup, shutdown, and malfunction.

The Permittee shall demonstrate compliance utilizing one of the following options:

- (1) Providing vendor analysis of fuel delivered, if accompanied by a 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.
  - (i) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

- (ii) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (3) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boilers EU-04 and EU-05, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.
- (c) The boilers EU-01, EU-02, EU-03, EU-04, EU-05, and EU-09 are not subject to National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD, because this source is not a major source of Hazardous Air Pollutants (HAPs).
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (f) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source, because this Part 70 source does not involve pollutant-specific emission units (PSEU), as defined in 40 CFR 64.1, that meet the following criteria:
  - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
  - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
  - (3) the unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

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

326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset)  
Pursuant to 326 IAC 6-1-12 (Particulate Emissions, Marion County), boilers EU-01, EU-02, and EU-03 combined PM emissions are limited to less than 0.7 tons per year; to comply with this limit, boilers EU-01, EU-02, and EU-03 combined number 2 fuel oil consumption is limited to less than 700,000 gallons per year; these limits result in sourcewide SO<sub>2</sub> emissions of less than 250 tons per year (PSD major source threshold) and NO<sub>x</sub> emissions of less than 100 tons per year (Emission Offset major source threshold). Therefore, requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) are not applicable to this source.

#### 326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on February 10, 2005. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

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

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3(a)(2) and (b)(2), an emission statement must be submitted triennially by July 1, starting in 2005 and every 3 years thereafter.

#### 326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.

### State Rule Applicability – Individual Facilities

#### 326 IAC 2-4.1-1 (Major Sources of Hazardous Air Pollutants (HAP))

There are no facilities at this source that emit greater than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs, respectively. Therefore, 326 IAC 2-4.1-1 does not apply.

#### 326 IAC 6-1-12 (Particulate Matter)

Since this source is located in Marion County and is specifically listed under 326 IAC 6-1-12, the following rule applies:

Pursuant to 326 IAC 6-1-12 (Particulate Rules), the PM emissions from each of the three (3) Zurn natural gas and Number 2 fuel oil fired boilers identified as EU-01, EU-02, and EU-03 shall not exceed 0.011 pounds per million Btu (lbs/MMBtu) heat input and 0.7 tons per year.

To assure compliance with the 326 IAC 6-1-12, fuel consumption in boilers EU-01, EU-02, and EU-03 combined shall be limited to less than 700,000 gallons per year of Number 2 fuel oil or less than 184.2 million cubic foot per year of natural gas. These limits are equivalent to IAC 326 6-1-12 limit of 0.7 tons PM per year.

For purposes of determining compliance based on PM emissions, pursuant to 326 IAC 6-1-12 (see calculations, Appendix A), each 1,000 gallons of Number 2 fuel oil shall be equivalent to 0.2632 million cubic feet of natural gas.

#### 326 IAC 6-1-2 (Particulate Rules)

Boilers identified as EU-04, EU-05, and EU-09 are not specifically listed in sections 8.1 through 18 of 326 IAC 6; this source does not have potential to emit one hundred (100) tons or more, or has actual emissions of ten (10) tons or more of particulate matter per year. Therefore, this source is not subject to 326 IAC 6-1-2.

#### 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Since the boilers identified as EU-04, EU-05, and EU-09 are located in Marion County and were installed after 1983, they are subject to 326 IAC 6-2-4.

Pursuant to 326 IAC 6-2-4, indirect heating units constructed after September 21, 1983 shall be limited using the following equation:

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

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input  
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

For boiler EU-04 Q = 171.2 MMBtu/hr (see Appendix A, Page 4 of 4 emission limits calculation), and

$$Pt = \frac{1.09}{171.2^{0.26}} = 0.286 \text{ lb/MMBtu.}$$

For boiler EU-05 Q = 134.7 MMBtu/hr and

$$Pt = \frac{1.09}{134.7^{0.26}} = 0.305 \text{ lb/MMBtu.}$$

For boiler EU-09  $Q = 63.7$  MMBtu/hr and

$$Pt = \frac{1.09}{63.7^{0.26}} = 0.370 \text{ lb/MMBtu.}$$

Particulate matter (PM) emissions from the 34.8/36.5 MMBtu/hr boiler, identified as EU-04, shall be limited to 0.287 pounds per million Btu of heat input; particulate matter (PM) emissions from the 35.5 MMBtu/hr boiler, identified as EU-05, shall be limited to 0.305 pounds per million Btu of heat input, and particulate matter (PM) emissions from the 5.3 MMBtu/hr boiler, identified as EU-09, shall be limited to 0.370 pounds per million Btu of heat input.

Based on Appendix A emission limits calculations (Page 4 of 4), the worst case (fuel oil) PM potential emission rate of boiler EU-04 is 0.00293 lb/MMBtu, EU-05 - 0.00376 lb/MMBtu, and EU-09 - 0.00119 lb/MMBtu, which is less than the limits pursuant to 326 IAC 6-2-4. Therefore, the three (3) boilers, identified as EU-04, EU-05, and EU-09, will comply with this rule.

#### 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

- (a) Pursuant to 326 IAC 7-1.1-1, boilers EU-01, EU-02, EU-03, EU-04, and EU-05 are subject to 326 IAC 7-1.1-2 because each of their potential to emit  $SO_2$  is greater than 25 tons. Pursuant to 326 IAC 7-1.1-2(a)(3), the  $SO_2$  emissions from each of the five (5) natural gas and Number 2 fuel oil fired boilers identified as EU-01, EU-02, EU-03, EU-04, and EU-05 shall not exceed five tenths (0.5) pounds per million Btu heat input. This equates to a fuel oil sulfur content limit of 0.5% by weight. The source shall use natural gas or No. 2 fuel oil with a maximum sulfur content five-tenths percent (0.5%) by weight to be in compliance with 326 IAC 7-1.1-2.
- (b) Natural gas and Number 2 fuel oil fired boiler identified as EU-09 and Number 2 fuel oil fired emergency generators identified as EU-06, EU-07, EU-08, and EU-10 are not subject to 326 IAC 7-1.1-2 because each of their potential  $SO_2$  emission is less than 25 tons per year or 10 pounds per hour.

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

Pursuant to 326 IAC 7-2 (Compliance), the source shall demonstrate compliance with the 326 IAC 7-1.1  $SO_2$  emission limitation by recording and submitting, to the IDEM, OAQ and OES upon request, the information as specified, including fuel sulfur content, heat content, fuel consumption, and sulfur dioxide emission rates, based on a calendar-month average

#### 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, the following condition was added to the permit to make the limit on the number of operating hours enforceable.

Operation of each emergency generator EU-06, EU-07, EU-07, EU-08, and EU-10 shall in no case exceed 500 hours of operation per twelve (12) consecutive month period. Any changes to the source that would require operating any of the emergency generators for more than 500 hours per year shall require prior approval from IDEM, OAQ and OES.

#### Testing Requirements

Testing is not required for the six (6) boilers because there are no control devices, and emissions were based on AP-42 emission factors.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs, IDEM, OAQ, and OES in conjunction with the source must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring and reporting requirements applicable to this source are as follows:

- (a) When burning Number 2 fuel oil, visible emission notations of the six (6) boilers stack exhausts ID 01 to 05 and 09 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. 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, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the boilers must operate properly to ensure compliance with 326 IAC 6-1-12 (Marion County), 326 IAC 6-2-4 (Particulate Matter), and 326 IAC 2-7 (Part 70).

## Conclusion

The operation of this General Medical and Surgical Hospital shall be subject to the conditions of this attached **Part 70 permit T097-19419-00129**.

Company Name: Saint Vincent Hospital  
 Address City IN Zip: 2001 West 86th Street  
 TV Permit No.: T97-19419-00129  
 Plant ID #: 097-00129  
 Reviewer: Boris Gorlin

**Boilers (Unrestricted PTE)**

Emission Unit	Fuel	Capacity MMBtu/hr	Potential Throughput kgal/yr or MMcf/yr	Emission, ton/yr									
				PM/PM10		SO2		NOx		VOC		CO	
				Em. Factor*	Emission	Em. Factor*	Emission	Em. Factor*	Emission	Em. Factor*	Emission	Em. Factor*	Emission
EU-01 (Boiler)	fuel oil	29.2	1,827	2.0	1.827	71	64.86	20	18.271	0.34	0.311	5	4.568
	natural gas		255.8	7.6	0.972	0.6	0.077	100	12.790	5.5	0.703	84	10.74
EU-02 (Boiler)	fuel oil	29.2	1,827	2.0	1.827	71	64.86	20	18.271	0.34	0.311	5	4.568
	natural gas		255.8	7.6	0.972	0.6	0.077	100	12.790	5.5	0.703	84	10.74
EU-03(Boiler)	fuel oil	35.5	2,221	2.0	2.221	71	78.86	20	22.213	0.34	0.378	5	5.553
	natural gas		311.0	7.6	1.182	0.6	0.093	100	15.549	5.5	0.855	84	13.06
<b>Boilers EU-01, EU-02, EU-03 (Fuel Oil):</b>					<b>5.875</b>		<b>208.6</b>		<b>58.75</b>		<b>0.999</b>		<b>14.69</b>
<b>Boilers EU-01, EU-02, EU-03 (Natural Gas):</b>					3.126		0.247		41.128		2.262		34.55
EU-04 (Boiler)	fuel oil	34.8	2,177	2.0	2,177	71	77.301	20	21.775	0.34	0.370	5	5.444
	natural gas	36.5	319.7	7.6	1,215	0.6	0.096	<b>50</b>	7.994	5.5	0.879	84	13.429
EU-05 (Boiler)	fuel oil	35.5	2,221	2.0	2,221	71	78.856	20	22.213	0.34	0.378	5	5.553
	natural gas		311.0	7.6	1.182	0.6	0.093	100	15.549	5.5	0.855	84	13.061
EU-09 (Boiler)	fuel oil	5.3	331.6	2.0	0.332	71	11.773	20	3.316	0.34	0.056	5	0.829
	natural gas		46.4	7.6	0.176	0.6	0.014	100	2.321	5.5	0.128	84	1.950
<b>Boilers EU 04, 05, 09 (Fuel Oil):</b>			4,730		<b>4.730</b>		<b>167.9</b>		<b>47.30</b>		<b>0.804</b>		<b>11.83</b>
<b>Boilers EU 04, 05, 09 (Natural Gas):</b>			677.1		2.573		0.203		25.864		1.862		28.44
<b>Total Boilers, Fuel Oil:</b>		<b>169.5</b>	<b>10,606</b>		<b>10.61</b>		<b>376.5</b>		<b>106.1</b>		<b>1.803</b>		<b>26.51</b>
<b>Total Boilers, Natural Gas:</b>		<b>171.2</b>	<b>1,500</b>		<b>5.699</b>		<b>0.450</b>		<b>66.99</b>		<b>4.124</b>		<b>62.99</b>

**Emergency Generators**

Emission Unit	Fuel	Capacity MMBtu/hr	Potential Throughput kgal/yr or MMcf/yr	Emission, ton/yr									
				PM/PM10		SO2		NOx		VOC		CO	
				Em. Factor*	Emission	Em. Factor*	Emission	Em. Factor*	Emission	Em. Factor*	Emission	Em. Factor*	Emission
EU-06 (Em. Generator)	fuel oil	11.33	708.9	0.31	0.878	0.29	0.821	4.41	12.491	0.35	0.991	0.95	2.691
EU-07 (Em. Generator)	fuel oil	11.33	708.9	0.31	0.878	0.29	0.821	4.41	12.491	0.35	0.991	0.95	2.691
EU-08 (Em. Generator)	fuel oil	13.6	851.0	0.31	1.054	0.29	0.986	4.41	14.994	0.35	1.190	0.95	3.230
EU-10 (Em. Generator)	fuel oil	2.96	185.2	0.31	0.229	0.29	0.215	4.41	3.263	0.35	0.259	0.95	0.703
<b>Total, Em. Generators:</b>		<b>39.22</b>	<b>2,454</b>		<b>3.040</b>		<b>2.843</b>		<b>43.24</b>		<b>3.432</b>		<b>9.315</b>

\* Emission Factors: for fuel oil - lb/kgal; for natural gas: lb/MMcf.

Boilers EU 01-03 Limited Emissions (pursuant to 326 IAC 6-1-12 - PM limit) of 0.7 ton/yr	Capacity MMBtu/hr	Potential Throughput MMcf/yr	Emission, ton/yr				
			PM/PM10	SO2	NOx	VOC	CO
Boilers EU 01-03 (Fuel Oil)	93.9	5,875	0.70	24.85	7.00	0.12	1.75
Boilers EU 01-03 (Nat. Gas)		823	0.70	0.18	29.62	1.63	24.88

Fuel Equivalency Factors for boilers EU-01, EU-02, and EU-03, based on boilers PM emission:

PM	1 MMcf Nat. Gas 7.6 lb PM	1 kgal Fuel Oil 2.0 lb PM	1 kgal Fuel Oil = 0.2632 MMcf Nat. Gas
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Boilers EU-01-03 Limited Fuel consumption (IAC 6-1-12 PM emission limit)	Capacity MMBtu/hr	Potential Throughput MMcf/yr	PM Limit ton/yr			
Boilers EU 01-03 (Fuel Oil)	93.9	5,875	0.7	Limited Fuel Oil	700.0	kgal/yr
Boilers EU 01-03 (Nat. Gas)		823	0.7	fuel usage: Nat. Gas	184.2	MMcf/yr

Boilers EU 01-09 limited Emissions	Capacity MMBtu/hr	Potential Throughput MMcf/yr	Emission, ton/yr				
			PM/PM10	SO2	NOx	VOC	CO
Boilers EU 01-09 (Fuel Oil)	169.5	10,606	5.43	192.779	54.304	0.923	13.576
Boilers EU 01-09 (Nat. Gas)	171.2	1,500	3.27	0.381	55.483	3.491	53.320

	Emission, ton/yr				
	PM/PM10	SO2	NOx	VOC	CO
Source total, <u>unrestricted</u> (Fuel Oil):	13.65	379.4	149.3	5.2	35.8
Source total, <u>unrestricted</u> (Natural Gas):	8.738	3.293	110.232	7.556	72.303
Source total, <u>limited</u> (Fuel oil):	8.470	195.6	97.54	4.355	22.89
Source total, <u>limited</u> (Natural Gas), :	6.313	3.224	98.72	6.923	62.63

HAPs - Metals

Boilers - Fuel Oil

	Arsenic	Copper	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/MMBtu	4.0E-06	6.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	0.003	0.004	0.002	0.002	0.002	0.007

HAPs - Metals (continued)

	Mercury	Zinc	Manganese	Nickel	Selenium	
Emission Factor in lb/mmBtu	3.0E-06	4.0E-06	6.0E-06	3.0E-06	1.5E-05	
Potential Emission in tons/yr	2.25E-03	3.00E-03	4.50E-03	2.25E-03	1.12E-02	<b>Total, ton/yr</b> 4.42E-02

**Appendix A (Emission Calculation)**

**T97-19419-00129**

**Emergency Generators - Fuel Oil**

	Arsenic	Copper	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/MMBtu	4.0E-06	6.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	1.6E-04	2.4E-04	1.2E-04	1.2E-04	1.2E-04	3.5E-04

**HAPs - Metals (continued)**

	Mercury	Zinc	Manganese	Nickel	Selenium	
Emission Factor in lb/mmBtu	3.0E-06	4.0E-06	6.0E-06	3.0E-06	1.5E-05	
Potential Emission in tons/yr	2.25E-03	3.00E-03	4.50E-03	2.25E-03	1.12E-02	<b>Total, ton/yr</b>

**Total Metals: 6.86E-02 ton/yr**

**Methodology**

**Emergency Generators (fuel oil)**

Potential Emissions (tons per year) = Heat input capacity (MMBtu/hr) \* Emission Factor (lb/MMBtu) \* 500 hours per year \* 1 ton / 2000 pounds

No emission factor for PM, therefore, the PM10 emission factor was used.

AP-42, 10/96 Edition; Table 3.3-1

**Boilers (natural gas)**

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32

Emission Factors for CO: uncontrolled = 84, Low NOx Burner = 84, Flue gas recirculation = 84

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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

**Boilers (fuel oil)**

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

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

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

SO<sub>2</sub> Emission Factor: 142xS; Weight % Sulfur S =0.5.

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

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

**Appendix A: Emission Calculations**  
**TV Permit No.: T97-19419-00129**

**Boilers PM Emission Limits Calculation (326 IAC 6-2-4)**

EU ID	MMBtu/hr	Year	Applic. Rule	Total source maximum operating capacity, MMBtu/hr				
EU-01	29.2	1971	326 IAC 6-1-12	58.4	<b>63.7</b>	99.2	<b>134.7</b>	<b>171.2</b>
EU-02	29.2	1971	326 IAC 6-1-12					
EU-09	5.3	1985	<b>326 IAC 6-2-4</b>					
EU-03	35.5	1987	326 IAC 6-1-12					
EU-05	35.5	1993	<b>326 IAC 6-2-4</b>					
EU-04	36.5	2003	<b>326 IAC 6-2-4</b>					

				PTE	
		Q, MMBtu/hr	PT = 1.09/Q <sup>0.26</sup> , lb/MMBtu	ton/yr	lb/MMBtu
EU-09	1985	<b>63.7</b>	Pt = <b>0.370</b>	0.3316	<b>0.00119</b>
EU-05	1993	<b>134.7</b>	Pt = <b>0.305</b>	2.2213	<b>0.00376</b>
EU-04	2003	<b>171.2</b>	Pt = <b>0.286</b>	2.1775	<b>0.00290</b>