



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
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TO: Interested Parties / Applicant  
DATE: January 09, 2006  
RE: St. Vincent Mercy Hospital, Inc. / 095-21685-00103  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot 1/10/05



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## NEW SOURCE CONSTRUCTION AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**St. Vincent Mercy Hospital, Inc.  
1331 South A Street  
Elwood, Indiana 46036**

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

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

Operation Permit No.: MSOP 095-21685-00103	
Issued by: Original signed by  Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: January 09, 2006  Expiration Date: January 09, 2011

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates stationary heating boilers at a hospital.

Authorized Individual:	Plant Engineer
Source Address:	1331 South A Street, Elwood, Indiana 46036
Mailing Address:	1331 South A Street, Elwood, Indiana 46036
General Source Phone:	(765) 552-4600
SIC Code:	8062
County Location:	Madison
Source Location Status:	Nonattainment area for 8-hour ozone standard Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

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

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

- (a) Two (2) 16.8 MMBtu/hr natural gas fired boilers, identified as B-1 and B-2, constructed in 1978, using No. 2 fuel oil as back up fuel, and exhausting to stack S1.
- (b) One (1) fuel oil storage tank, with a maximum capacity of 5,000 gallons.
- (c) One (1) emergency generator, rated at 700 kilowatts, and using #2 fuel oil.

## **SECTION B GENERAL CONDITIONS**

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

### **B.1 Permit No Defense [IC 13]**

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

### **B.2 Definitions**

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

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

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

### **B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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

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

### **B.5 Modification to Permit [326 IAC 2]**

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All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46204-2251
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**B.7 Preventive Maintenance Plan [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 emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) 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, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (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, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) 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, at reasonable times, 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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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

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

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

**B.11 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section (BLT)), to determine the appropriate permit fee.

**B.12 Credible Evidence [326 IAC 1-1-6]**

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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

### 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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

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

### C.3 Opacity [326 IAC 5-1]

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

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

### C.4 Stack Height [326 IAC 1-7]

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the

provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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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**

#### **C.8 Compliance Monitoring [326 IAC 2-1.1-11]**

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

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

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

#### **C.10 Response to Excursions or Exceedances**

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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.11 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit 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 that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

#### **Record Keeping and Reporting Requirements**

##### C.12 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, 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.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-6.1]:

- (a) Two (2) 16.8 MMBtu/hr natural gas fired boilers, identified as B-1 and B-2, constructed in 1978, using No. 2 fuel oil as back up fuel, and exhausting to stack S1.

(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 2-6.1]

#### D.1.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the boilers shall be limited to 0.6 pounds per MMBtu heat input.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from each boiler shall not exceed five tenths (0.5) pounds per MMBtu heat input when burning distillate fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

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

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

### Compliance Determination Requirements

#### D.1.4 Sulfur Dioxide Emissions and Sulfur Content

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

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pound per million Btu heat input by:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

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

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

### **D.1.5 Visible Emissions Notations**

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- (a) Visible emission notations of the boiler's stack exhaust (S1) shall be performed once per day during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) 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 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

### **D.1.6 Record Keeping Requirements**

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

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
  - (5) The name of the fuel supplier; and
  - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the boiler's stack exhaust (S1) while combusting fuel oil.
  - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.7 Reporting Requirements**

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The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being

reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	<b>St. Vincent Mercy Hospital, Inc.</b>
<b>Address:</b>	<b>1331 South A Street</b>
<b>City:</b>	<b>Elwood, Indiana 46036</b>
<b>Phone #</b>	<b>(765) 552-4600</b>
<b>MSOP #:</b>	<b>095-21685-00103</b>

I hereby certify that St. Vincent Mercy Hospital, Inc. is  still in operation.  
 no longer in operation.

I hereby certify that St. Vincent Mercy Hospital, Inc. is  in compliance with the requirements of MSOP 095-21685-00103  
 not in compliance with the requirements of MSOP 095-21685-00103

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERM LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: \_\_\_\_\_ PHONE NO. ( ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

**SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: St. Vincent Mercy Hospital, Inc.  
Source Address: 1331 South A Street, Elwood, Indiana 46036  
Mailing Address: 1331 South A Street, Elwood, Indiana 46036  
Permit No.: 095-21685-00103

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

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

A certification by an authorized individual as defined by 326 IAC 2-1.1-1(1) is required for this report.

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

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

**Source Background and Description**

Source Name:	St. Vincent Mercy Hospital, Inc.
Source Location:	1331 South A Street, Elwood, Indiana 46036
County:	Madison
SIC Code:	8062
MSOP Permit No.:	M095-21685-00103
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed an application from St. Vincent Mercy Hospital, Inc. relating to the operation of heating boilers at a hospital.

**Unpermitted Emission Units and Pollution Control Equipment**

The following existing emission units at this source were issued Registration 095-7761-00103 on June 24, 1997:

- (a) Two (2) 16.8 MMBtu/hr natural gas fired boilers, identified as B-1 and B-2, constructed in 1978, using No. 2 fuel oil as back up fuel, and exhausting to stack S1.
- (b) One (1) fuel oil storage tank, with a maximum capacity of 5,000 gallons.
- (c) One (1) emergency generator, rated at 700 kilowatts, and using #2 fuel oil.

**New Emission Units and Pollution Control Equipment**

There are no new emission units or pollution control equipment at this source.

**Existing Approvals**

The source has been operating under Registration 095-7761-00103, issued on June 24, 1997.

All conditions from previous approvals were incorporated into this permit.

**Enforcement Issue**

The two (2) boilers at this source were registered under 095-7761-00103, issued on June 24, 1997. In Appendix A of the Technical Source Document for that Registration, the potential to emit (PTE) of sulfur dioxide was calculated using an incorrect emission factor, which resulted in a PTE for sulfur dioxide of 7.46 tons per year. The source claimed that they were using a low sulfur fuel with a sulfur content of 0.05% sulfur. However, a Registration cannot include any limit on fuel sulfur content. Using the correct emission factor, the PTE of sulfur dioxide is actually 74.6 tons per year. Since the PTE for sulfur dioxide for this source is greater than 25 tons per year but less than 100 tons per year, pursuant to 326 IAC 2-6.1-2, the source should have applied for an MSOP permit. IDEM is reviewing this matter and will take appropriate action.

## Recommendation

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

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

A complete application for the purposes of this review was received on August 24, 2004.

## Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 2).

## Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/year)
PM	2.3
PM10	2.3
PM2.5	2.3
SO <sub>2</sub>	75.5
VOC	1.0
CO	13.7
NO <sub>x</sub>	26.6

HAPs	Potential to Emit (tons/year)
Total HAP	0.3

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1 (16)) of PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub>, VOC, and CO are less than 100 tons per year and the potential to emit of SO<sub>2</sub> is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6-1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) ton per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program).
- (c) 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 nonattainment New Source Review applicability.

## County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM10	Attainment
PM2.5	Unclassifiable or Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

- (a) Madison County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability - Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) emissions 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 NOx emissions are considered when evaluating the rule applicability relating to ozone. Madison County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review. See the State Rule Applicability – Entire Source section.
- (c) Madison County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source Section.

**Source Status**

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

Pollutant	Emissions (tons/year)
PM	2.1
PM10	2.1
PM2.5	2.1
SO <sub>2</sub>	74.6
VOC	0.8
CO	12.4
NO <sub>x</sub>	21
Total HAPs	0.3

This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source and the calculations included in Appendix A.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The requirements of the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971 (326 IAC 12, 40 CFR 60, Subpart D) are not included in this permit for the two (2) boilers B-1 and B-2. The maximum heat input of these boilers is less than 250 MMBtu/hr.
- (c) The requirements of the New Source Performance Standards for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 (326 IAC 12, 40 CFR 60, Subpart Da) are not included in this permit for the two (2) boilers B-1 and B-2. These boilers are not electric utility steam generating units.
- (d) The requirements of the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units, (326 IAC 12, 40 CFR 60, Subpart Db) are not included in this permit for the two (2) boilers B-1 and B-2. These boilers have a heat input capacity less than 100 MMBtu/hr.
- (e) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12, 40 CFR 60, Subpart Dc), are not included in this permit for the two (2) boilers B-1 and B-2. These boilers were constructed prior to June 9, 1989, and have not been modified or reconstructed since that time.
- (f) The requirements of the New Source Performance Standards for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced After June 20, 1996 (326 IAC 12, 40 CFR 60, Subpart Ec) are not included in this permit for the hospital. There is no hospital/medical/infectious waste incinerator located at this source.
- (g) The requirements of the New Source Performance Standards for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60, Subpart Kb) are not included in this permit for the fuel oil storage tanks. The fuel oil storage tanks have a maximum capacity less than 75 cubic meters.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD) are not included in this permit for the two (2) 16.8 MMBtu/hr natural gas-fired boilers using fuel oil as backup fuel (B1 and B2). This source is not a major source of hazardous air pollutants
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) are not included in this permit. This source is not a major source of hazardous air pollutants.

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

#### **326 IAC 1-7 (Stack Height Provisions)**

The boilers have an exhaust gas stack (S1) through which a potential of twenty-five (25) tons per year or more of sulfur dioxide is emitted. Therefore, the requirements of 326 IAC 1-7 apply.

**326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset)**

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980. Therefore, fugitive emissions of PM and VOC are not counted towards applicability of PSD and Emission Offset.

The boilers at this source were constructed in 1978 and no modifications occurred at this source after 1978. The potential to emit of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, SO<sub>2</sub>, NO<sub>x</sub>, and VOC from these boilers is less than 250 tons per year. Therefore, this source is a minor source under PSD.

This source is located in Madison County. Madison County was designated as a nonattainment area for the 8-hour ozone standard on June 15, 2004. The potential to emit of VOC and NO<sub>x</sub> of this source is less than 100 tons per year. Therefore, this source is a minor source under Emission Offset.

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

The boilers at this source were constructed prior to July 19, 1997 and no modifications were made after this date. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

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

This source is located in Madison County and is not required to operate under a Part 70 permit. Therefore, 326 IAC 2-6 does not apply.

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

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

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

**State Rule Applicability – Individual Facilities**

**326 IAC 6-2-3 (Particulate Emissions for Sources of Indirect Heating)**

The two (2) 16.8 MMBtu/hr boilers (B-1 and B-2) were constructed after June 8, 1972 and prior to September 21, 1983. Pursuant to 326 IAC 6-2-3(c) and 326 IAC 6-3-2(e), the particulate emissions from boilers which began operation after June 8, 1972 and were in operation before September 21, 1983 shall be limited by the following equation or by 0.6 lbs per MMBtu, whichever is more stringent:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = \frac{50 \times 0.67 \times 42}{76.5 \times (16.8 \times 2)^{0.75} \times 1^{0.25}} = \frac{1.32 \text{ lbs PM}}{\text{MMBtu heat input}}$$

Where

C = max ground level concentration (= 50 F m/m<sup>3</sup>)

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr) = 33.6

N = number of stacks = 1

a = plume rise factor = 0.67

h = stack height (ft) = 42

The more stringent PM emission limit for these boilers is 0.6 lbs/MMBtu heat input.

The boilers are in compliance with this limit. See TSD Appendix A for calculations.

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

The potential to emit of SO<sub>2</sub> from each of the two (2) 16.8 MMBtu/hr boilers B-1 and B-2 is greater than 25 tons per year when burning No. 2 distillate fuel oil. Pursuant to 326 IAC 7-1.1-2(a)(3), the emissions of sulfur dioxide (SO<sub>2</sub>) from these boilers shall be limited to five-tenths (0.5) pound per MMBtu of heat input.

$$\text{Allowable SO}_2 = 0.5 \text{ lb SO}_2/\text{MMBtu}$$

$$\begin{aligned} \text{Calculated SO}_2 &= 1 \text{ gal fuel oil}/0.14\text{MMBtu} \times \text{Emission Factor (142} \times 0.5\% \text{ sulfur content)} \\ &= 0.5 \text{ lb SO}_2/\text{MMBtu} \end{aligned}$$

The boilers are in compliance with this limit when burning fuel oil with a sulfur content less than 0.5%.

## Compliance Requirements

Permits issued under 326 IAC 2-6.1 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 in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. 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 requirements applicable to this source are as follows:

1. The boilers have applicable compliance monitoring conditions as specified below:
  - (a) Visible emission notations of the boiler's stack exhaust (S1) shall be performed once per day during normal daylight operations when burning fuel oil. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. 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 – Response to Excursions or Exceedances, 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 6-2-3 (Particulate Emissions for Sources of Indirect Heating), 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) and 326 IAC 2-6.1 (MSOP).

## **Conclusion**

The operation of these heating boilers located at the St. Vincent Mercy Hospital shall be subject to the conditions of Minor Source Operating Permit 095-21685-00103.

**Appendix A: Emissions Calculations**  
**Fuel Oil-fired Boilers: B1 and B2**

**Company Name:** St. Vincent Mercy Hospital, Inc.  
**Address:** 1331 South A Street, Elwood, Indiana 46036  
**MSOP:** M095-21685-00103  
**Reviewer:** ERG/ST  
**Date:** October 3, 2005

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
33.6	2102	0.5

Emission Factor in lb/kgal	Pollutant					
	PM/PM10	SO2	NOx	VOC	CO	HAPs
	2.0	71 (142.0S)	20.0	0.34	5.0	6.86E-03
<b>Potential to Emit (tons/yr)</b>	<b>2.10</b>	<b>74.6</b>	<b>21.0</b>	<b>0.36</b>	<b>5.26</b>	<b>0.007</b>

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

**Methodology**

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 (see erata file)  
PM/PM10 emission factor is filterable and condensable PM/PM10 combined.  
Potential to Emit (tons/yr) = Potential Throughput (kgals/yr) x Emission Factor (lb/kgal)/2,000 lb/ton

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion: Boilers B-1 and B-2**

**Company Name:** St. Vincent Mercy Hospital, Inc.  
**Address:** 1331 South A Street, Elwood, Indiana 46036  
**MSOP:** M095-21685-00103  
**Reviewer:** ERG/ST  
**Date:** October 3, 2005

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

33.6

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Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	SO2	NOx **	VOC	CO	HAPs
7.6	7.6	0.6	100.0	5.5	84.0	1.89	
Potential to Emit (tons/yr)	1.12	1.12	0.09	14.7	0.81	12.4	0.28

\* PM and PM10 emission factor are for condensable and filterable PM and PM10 combined.

\*\* Emission Factor for NOx: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

**Methodology**

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

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1 ton/2,000 lbs

**Appendix A: Emission Calculations**  
**Internal Combustion Engine - One (1) Diesel Emergency Generator**

**Company Name:** St. Vincent Mercy Hospital, Inc.  
**Address:** 1331 South A Street, Elwood, Indiana 46036  
**MSOP:** M095-21685-00103  
**Reviewer:** ERG/ST  
**Date:** October 3, 2005

Power Output Kilowatts	Power Output Horse Power (HP)	Operation Limit hr/yr	S = Weight % Sulfur
700	939	500	0.5

Emission Factor in lb/HP-hr (>600 hp)	PM*	PM10*	SO <sub>2</sub> 4.05E-03 (8.09E-03*S)	NO <sub>x</sub>	**VOC	CO
	7.00E-04	7.00E-04		2.40E-02	7.05E-04	5.50E-03
<b>Potential to Emit (tons/year)</b>	<b>0.16</b>	<b>0.16</b>	<b>0.95</b>	<b>5.63</b>	<b>0.17</b>	<b>1.29</b>

\*Assume PM10 emissions are equal to PM emissions.

\*\* Assume TOC (total organic compounds) emissions are equal to VOC emissions.

Emission factors are from AP-42, Table 3.4-1, SCC #2-02-004-01 (AP-42, 10/96).

Note: As defined in the September 6, 1995 memorandum from John S. Seitz of US EPA on the subject of "Calculating Potential to Emit for Emergency Generators", an emergency generator's sole function is to provide back-up power when power from the local utility is interrupted. The only circumstances under which an emergency generator would operate when utility power is available are during operator training or brief maintenance checks. The generator's potential to emit is based on an operating time of 500 hours per year as set forth in the EPA memo.

**Methodology**

Potential to Emit (tons/year) = Power Output (HP) x Emission Factor (lbs/HP-hr) x Operation Limit (hours/year) x 1 ton/2000 lbs