



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
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(800) 451-6027  
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TO: Interested Parties / Applicant  
DATE: December 20, 2006  
RE: Reid MOB LLC / 177-23507-00111  
FROM: Nisha Sizemore  
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 03/23/06



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## NEW SOURCE REVIEW AND FEDERALLY ENFORCABLE STATE OPERATING PERMIT OFFICE OF AIR QUALITY

**Reid MOB, LLC  
1200 Reid Parkway,  
Richmond, Indiana 47374**

(herein known as the Permittee) is hereby authorized to construct and 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. 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.**

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

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 2-8 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: 177-23507-00111	
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: December 20, 2006  Expiration Date: December 20, 2011

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY .....</b>	<b>5</b>
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	FESOP Source Definition [326 IAC 2-8-1][326 IAC 2-7-1(22)]	
A.3	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.4	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]	
A.5	FESOP Applicability [326 IAC 2-8-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS .....</b>	<b>8</b>
B.1	Definitions [326 IAC 2-8-1]	
B.2	Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3	Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]	
B.4	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]	
B.5	Term of Conditions [326 IAC 2-1.1-9.5]	
B.6	Enforceability [326 IAC 2-8-6]	
B.7	Severability [326 IAC 2-8-4(4)]	
B.8	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.9	Duty to Provide Information[326 IAC 2-8-4(5)(E)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.13	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.14	Emergency Provisions [326 IAC 2-8-12]	
B.15	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.16	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.17	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.18	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.19	Permit Renewal [326 IAC 2-8-3(h)]	
B.20	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.21	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.22	Source Modification Requirement [326 IAC 2-8-11.1]	
B.23	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC13-14-2-2][IC 13-17-3-2][IC13-30-3-1]	
B.24	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.25	Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.26	Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]	
B.27	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>	<b>18</b>
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]	
	<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.9	Performance Testing [326 IAC 3-6]	

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

C.10 Compliance Requirements [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

C.12 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

C.13 Instrument Specifications [326 IAC 2-1.1-11]  
[326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]**

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

C.29 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Two (2) natural-gas fired boilers (OBA and OBC)..... 25**

**Emission Limitations and Standards [326 IAC 2-8-4 (1)]**

D.1.1 Particulate [326 IAC 6-2-4]

**SECTION D.2 FACILITY OPERATION CONDITIONS**

**One (1) diesel-fired emergency generator ..... 26**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

D.2.1 Emergency Generator

D.2.2 Sulfur Dioxide (SO<sub>2</sub>)

**Compliance Determination Requirements**

D.2.3 Sulfur Dioxide Emissions and Sulfur Content

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.2.2 Record Keeping Requirements

**Certification Form ..... 28**

**Emergency Occurrence Form ..... 29**

**Quarterly Deviation and Compliance Monitoring Report Form ..... 31**

**Affidavit of Construction ..... 33**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.4 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 2-8-3(b)]

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The Permittee owns and operates stationary combustion units at an outpatient health care center.

Authorized Individual:	Director of Engineering (Ted Sobol)
Source Address:	1200 Reid Parkway, Richmond, IN 47374
Mailing Address:	1200 Reid Parkway, Richmond, IN 47374
General Source Phone Number:	(765) 983-3034
SIC Code:	8093
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Nonattainment NSR Minor Source, Section 112 of the Clean Air Act

### A.2 FESOP Source Definition [326 IAC 2-8-1][326 IAC 2-7-1(22)]

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The health care provider, Reid Hospital and Health Care Services, consists of two (2) plants:

- (a) Reid Hospital and Health Care Services (Plant #: 177-00110 - Inpatient Care Center) is located at 1100 Reid Parkway, Richmond, Indiana 47374; and
- (b) Reid MOB, LLC (Plant #: 177-00111 - Outpatient Care Center) is located at 1200 Reid Parkway, Richmond, Indiana 47374.

Reid Hospital & Health Care Services, Inc. (Reid Hospital) is a not-for-profit corporation that owns and operates Reid Hospital. Reid MOB, LLC is a for-profit limited liability company that will own and operate an adjoining outpatient care center. Reid MOB's shareholders are Reid Hospital and a collection of physician groups. Reid Hospital currently owns approximately 60% of the shares of Reid MOB. Reid Hospital plans to sell shares to different tenants so that by the end of 2007 Reid Hospital will own 49% of the outstanding shares of Reid MOB. Eventually, Reid Hospital plans to reduce its ownership of Reid MOB to 15%.

Reid Hospital and the outpatient care center both have the two-digit Standard Industrial Classification (SIC) Code of 80, for health services.

Reid Hospital and the outpatient care center are located next to each other. The hospital's address is 1100 Reid Parkway. The outpatient care center will be located at 1200 Reid Parkway. Inpatients at the hospital would not routinely visit the outpatient care center for diagnostic procedures or medical treatment. Patients at the outpatient care center would not go to the hospital unless a diagnosis required admission as an inpatient.

326 IAC 2-7-1 (22) sets out the definition of the term "major source". In order for these two sources, Reid Hospital and the outpatient care center, to be considered one major source, they must meet all three of the following criteria:

- (1) the sources must be under common ownership or control;
- (2) the sources must have the same two digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and
- (3) the sources must be located on contiguous or adjacent properties.

IDEM, OAQ finds that Reid Hospital and the outpatient care center are under common control. Reid Hospital and Health Care Services owns Reid Hospital and has a majority ownership of Reid MOB. Reid MOB owns the outpatient care center. Reid Hospital has decision making authority over the operations of Reid MOB by virtue of its majority ownership of Reid MOB. Reid Hospital's majority ownership gives it sufficient voting interest to direct the management and policies of Reid MOB. Reid Hospital's majority ownership allows it to appoint the members of the governing body of Reid MOB.

IDEM, OAQ finds that Reid Hospital and the outpatient care center meet the criteria of 326 IAC 2-7-1 (22) and are one major source. Separate FESOPs will be issued to Plants #177-00111 and #177-00110 solely for administrative purposes. This permit (No.: F177-23507-00111) covers the outpatient care center, Reid MOB, LLC.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This portion of the stationary source (Reid MOB, LLC) does not have any emission units or pollution control devices. See Insignificant Activities below.

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This portion of the stationary source (Reid MOB, LLC) includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Two (2) natural-gas fired Cleaver Brooks boilers, with a maximum heat input capacity of 6.28 MMBtu/hr each, identified as OBA and OBB, exhausting to two (2) stacks, identified as OBA and OBB, respectively. Boilers OBA and OBB are scheduled to be installed upon issuance of the permit; [326 IAC 6-2-4]
- (b) One (1) diesel-fired Caterpillar internal combustion engine, with a maximum capacity of 1,186 horsepower, serving one (1) 800 kilowatt emergency generator, identified as OGA, exhausting to one (1) stack, identified as OGA. Emergency generator OGA has a vendor manufacturing date prior to April 1, 2006 and a displacement of less than 10 liters per cylinder. The emergency generator (OGA) is scheduled to be installed upon issuance of the permit;
- (c) Production of hot water for on-site personal use not related to any industrial or production process;
- (d) Water treatment activities used to provide potable and process water for the plant, excluding any activities associated with wastewater treatment;
- (e) Steam traps, vents, leaks and safety relief valves;
- (f) Boiler water treatment operations, not including cooling towers;
- (g) Steam cleaning operations and steam sterilizers;
- (h) Ventilation exhaust, central chiller water systems, refrigeration and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants;

- (i) Stack and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste;
- (j) Natural gas pressure regulator vents, excluding venting at oil and gas production facilities;
- (k) Air vents from air compressors;
- (l) Painting, including interior and exterior painting of buildings, and solvent use, excluding degreasing operations utilizing halogenated organic solvents;
- (m) Housekeeping and janitorial activities and supplies including the following:
  - (1) Vacuum cleaning systems used exclusively for housekeeping or custodial activities, or both;
  - (2) Rest rooms and associated cleanup operations and supplies;
  - (3) Alkaline or phosphate cleaners and associated equipment;
  - (4) Mobile floor sweepers and floor scrubbers;
  - (5) Pest control fumigation;
- (n) Office related activities including the following:
  - (1) Office supplies and equipment;
  - (2) Photocopying equipment and associated supplies;
  - (3) Paper shredding;
- (o) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP;
- (p) Storage tanks, reservoirs, and pumping and handling equipment of any size containing soap, wax, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized;
- (q) Storage of drums containing maintenance raw materials;
- (r) Emergency (backup) electrical generators at residential locations, such as dormitories, prisons and hospitals;
- (s) Safety and emergency equipment, except engine driven fire pumps, including fire suppression systems and emergency road flares;
- (t) Process safety relief devices installed solely for the purpose of minimizing injury to persons or damage to equipment which could result from abnormal process operating conditions, including the following:
  - (1) Rupture discs;
  - (2) Safety relief valves;

- (u) Activities and equipment associated with on-site medical care not otherwise specifically regulated;
- (v) Activities associated with production including the following:
  - (1) CO<sub>2</sub> lasers, used only on metals and other materials which do not emit HAPs in the process;
- (x) Miscellaneous equipment, but not emissions associated with the process for which the equipment is used, and activities including the following:
  - (1) Electric or steam heated drying ovens and autoclaves, including only the heating emissions and not any associated process emissions;
  - (2) Construction and demolition operations;
- (y) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than twelve thousand (12,000) gallons;
- (z) Closed loop heating and cooling systems;
- (aa) Heat exchanger cleaning and repair;
- (bb) Paved and unpaved roads and parking lots with public access;
- (cc) Blowdown for sight glass, boilers, compressors, pumps, and cooling tower.

A.5 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

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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 2-7) shall prevail.

### **B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4] [326 IAC 2-8]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### **B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, FESOP 177-23507-00111, 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, 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, until the renewal permit has been issued or denied.

### **B.5 Term of Conditions [326 IAC 2-1.1-9.5]**

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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.6 Enforceability [326 IAC 2-8-6]**

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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, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

**B.7 Severability [326 IAC 2-8-4(4)]**

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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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ 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.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.11 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

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- (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 an "authorized individual" 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (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, 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 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (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.

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 PMPs 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 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 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.14 Emergency Provisions [326 IAC 2-8-12]**

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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 except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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, 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 Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

- (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.

The notice fulfills the requirement of 326 IAC 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ 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 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) 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.
    - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
      - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
      - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.15** Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to FESOP 177-23507-00111 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

**B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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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 2-8-3(h) and 326 IAC 2-8-9.

**B.17 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(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 46204-2251

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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.18 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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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 Federally Enforceable State Operating 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, 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 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, 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 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.19 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (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, 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 2-8 until IDEM, OAQ 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 any additional information identified as being needed to process the application.

**B.20 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.21 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 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  
  
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 2-8-15(b) through (d). 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 in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).
- (b) **Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) 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.22 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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 FESOP 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 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, at reasonable times, 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, 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.24 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, 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, the applicable fee is due April 1 of each year.
- (b) 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, Licensing, and Training Section), to determine the appropriate permit fee.

B.26 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.3 and A.4.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.27 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit F177-23507-00111 and permit F177-23503-00110 is to limit this source's potential to emit, which included the potential to emit from Reid MOB, LLC and Reid Hospital and Health Care Services, to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two-hundred and fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit F177-23507-00111 and permit F177-23503-00110 contains independently enforceable provisions to satisfy this requirement.

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

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.4 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.

C.5 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.

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

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

C.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.

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 46204-2251

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 2-1.1-1(1).

- (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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 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. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 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.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 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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 (90) 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 46204-2251

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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.12 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.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.14 Risk Management Plan [326 IAC 2-8-4] [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 2-8-4] [326 IAC 2-8-5]**

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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 Federally Enforceable State Operating Permit**

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(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 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 that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
  - (c) IDEM, OAQ reserves 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (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.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (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, 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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.19 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:

#### Insignificant Activity

- (a) Two (2) natural-gas fired Cleaver Brooks boilers, with a maximum heat input capacity of 6.28 MMBtu/hr each, identified as OBA and OBB, exhausting to two (2) stacks, identified as OBA and OBB, respectively. [326 IAC 6-2-4]

(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 2-8-4 (1)]

#### D.1.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the boilers (OBA and OBB) each rated at 6.28 MMBtu per hour heat input shall be limited to 0.34 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26} \quad \text{where } Pt = \text{Pounds of particulate matter emitted per million Btu (lbs of PM/MMBtu) heat input.}$$

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### Insignificant Activity

- (b) One (1) diesel-fired Caterpillar internal combustion engine, with a maximum capacity of 1,186 horsepower, serving one (1) 800 kilowatt emergency generator, identified as OGA, exhausting to one (1) stack, identified as OGA. Emergency generator OGA has a vendor manufacturing date prior to April 1, 2006 and a displacement of less than 10 liters per cylinder. The emergency generator (OGA) is scheduled to be installed upon issuance of the permit.

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

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Emergency Generator

The hours of operation for the one (1) diesel-fired emergency generator, identified as OGA, shall be limited to less than five hundred (500) hours per twelve (12) consecutive month period.

#### D.2.2 Sulfur Dioxide (SO<sub>2</sub>)

The sulfur content of No. 2 fuel oil for the one (1) emergency generator (OGA) shall not exceed 0.3% by weight.

### Compliance Determination Requirements

#### D.2.3 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.2.2 shall be determined utilizing one of the following options:

- (a) The Permittee shall demonstrate that the sulfur content of the No. 2 fuel oil does not exceed 0.3% sulfur by weight:
- (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.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.2.4 Record Keeping Requirements**

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- (a) The Permittee shall record the total hours of operation for the one emergency generator (OGA) per twelve (12) consecutive month period with compliance determined at the end of each month.
  
- (b) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) 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.2.2.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period;

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (3) Fuel supplier certifications;
  - (4) The name of the fuel supplier; and
  - (5) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (c) 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

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Reid MOB, LLC  
Source Address: 1200 Reid Parkway, Richmond, IN 47374  
Mailing Address: 1200 Reid Parkway, Richmond, IN 47374  
FESOP No.: F177-23507-00111

**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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Reid MOB, LLC  
Source Address: 1200 Reid Parkway, Richmond, IN 47374  
Mailing Address: 1200 Reid Parkway, Richmond, IN 47374  
FESOP No.: F177-23507-00111

**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>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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 Describe:
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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Reid MOB, LLC  
Source Address: 1200 Reid Parkway, Richmond, IN 47374  
Mailing Address: 1200 Reid Parkway, Richmond, IN 47374  
FESOP No.: F177-23507-00111

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

Page 1 of 2

<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 ΔNo 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.

Mail to: Permit Administration & Development Section  
Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

Reid MOB, LLC  
1200 Reid Parkway  
Richmond, Indiana 47374

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)

3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)

4. I hereby certify that Reid MOB, LLC located at 1200 Reid Parkway, Richmond, Indiana, 47374, has constructed the boilers (OBA, and OBB) and the emergency generator/internal combustion engine (OGA), in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on August 14, 2006, and as permitted pursuant to **FESOP No.: 177-23507-00111, Plant ID No. 177-00111** issued on \_\_\_\_\_.

Further Affiant said not.  
I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_)

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana

on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.  
My Commission expires:

Signature

Name (typed or printed)

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

**Technical Support Document (TSD) for a New Source Review and a Federally  
Enforceable State Operating Permit (FESOP)**

**Source Background and Description**

<b>Source Name:</b>	Reid MOB, LLC
<b>Source Location:</b>	1200 Reid Parkway, Richmond, Indiana 47374
<b>County:</b>	Wayne
<b>SIC Code:</b>	8093
<b>Operation Permit No.:</b>	F177-23507-00111
<b>Permit Reviewer:</b>	Tanya White/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP application from Reid MOB, LLC relating to the construction and operation of combustion units at an outpatient care center.

**History**

On August 14, 2006 the Office of Air Quality (OAQ) received applications from Reid Hospital and Health Care Services and Reid MOB, LLC relating to the operation and construction of combustion units at an inpatient care center (Reid Hospital and Health Care Services) and an outpatient care center (Reid MOB, LLC). Upon further review, OAQ determined that these two health care centers should be considered as one source. Refer to the Source Definition below. Based on the combined emissions from these two hospital care centers, the potential to emit of sulfur dioxide is greater than Title V major source thresholds. The source has requested to limit emissions below major source thresholds. As requested by the source, the two health care centers will be given two separate FESOP permits for administrative purposes.

**Source Definition**

The health care provider, Reid Hospital and Health Care Services, consists of two (2) plants:

- (a) Reid Hospital and Health Care Services (Plant #: 177-00110 - Inpatient Care Center) is located at 1100 Reid Parkway, Richmond, Indiana 47374; and
- (b) Reid MOB, LLC (Plant #: 177-00111 - Outpatient Care Center) is located at 1200 Reid Parkway, Richmond, Indiana 47374.

Reid Hospital & Health Care Services, Inc. (Reid Hospital) is a not-for-profit corporation that owns and operates Reid Hospital. Reid MOB, LLC is a for-profit limited liability company that will own and operate an adjoining outpatient care center. Reid MOB's shareholders are Reid Hospital and a collection of physician groups. Reid Hospital currently owns approximately 60% of the shares of Reid MOB. Reid Hospital plans to sell shares to different tenants so that by the end of 2007 Reid Hospital will own 49% of the outstanding shares of Reid MOB. Eventually, Reid Hospital plans to reduce its ownership of Reid MOB to 15%.

Reid Hospital and the outpatient care center both have the two-digit Standard Industrial Classification (SIC) Code of 80, for health services.

Reid Hospital and the outpatient care center are located next to each other. The hospital's address is 1100 Reid Parkway. The outpatient care center will be located at 1200 Reid Parkway.

Inpatients at the hospital would not routinely visit the outpatient care center for diagnostic procedures or medical treatment. Patients at the outpatient care center would not go to the hospital unless a diagnosis required admission as an inpatient.

326 IAC 2-7-1 (22) sets out the definition of the term "major source". In order for these two sources, Reid Hospital and the outpatient care center, to be considered one major source, they must meet all three of the following criteria:

- (1) the sources must be under common ownership or control;
- (2) the sources must have the same two digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and
- (3) the sources must be located on contiguous or adjacent properties.

IDEM, OAQ finds that Reid Hospital and the outpatient care center are under common control. Reid Hospital and Health Care Services owns Reid Hospital and has a majority ownership of Reid MOB. Reid MOB owns the outpatient care center. Reid Hospital has decision making authority over the operations of Reid MOB by virtue of its majority ownership of Reid MOB. Reid Hospital's majority ownership gives it sufficient voting interest to direct the management and policies of Reid MOB. Reid Hospital's majority ownership allows it to appoint the members of the governing body of Reid MOB.

IDEM, OAQ finds that Reid Hospital and the outpatient care center meet the criteria of 326 IAC 2-7-1 (22) and are one major source. Separate FESOPs will be issued to Plants #177-00111 and #177-00110 solely for administrative purposes. This permit (No.: F177-23507-00111) covers the outpatient care center, Reid MOB, LLC.

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

This source does not currently have any permitted emission units and pollution control devices.

### **Insignificant Activities**

This portion of the stationary source (Reid MOB, LLC) includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Two (2) natural-gas fired Cleaver Brooks boilers, with a maximum heat input capacity of 6.28 MMBtu/hr each, identified as OBA and OBB, exhausting to two (2) stacks, identified as OBA and OBB, respectively. Boilers OBA and OBB are scheduled to be installed upon issuance of the permit; [326 IAC 6-2-4]
- (b) One (1) diesel-fired Caterpillar internal combustion engine, with a maximum capacity of 1,186 horsepower, serving one (1) 800 kilowatt emergency generator, identified as OGA, exhausting to one (1) stack, identified as OGA. Emergency generator OGA has a vendor manufacturing date prior to April 1, 2006 and a displacement of less than 10 liters per cylinder. The emergency generator (OGA) is scheduled to be installed upon issuance of the permit;
- (c) Production of hot water for on-site personal use not related to any industrial or production process;
- (d) Water treatment activities used to provide potable and process water for the plant, excluding any activities associated with wastewater treatment;
- (e) Steam traps, vents, leaks and safety relief valves;

- (f) Boiler water treatment operations, not including cooling towers;
- (g) Steam cleaning operations and steam sterilizers;
- (h) Ventilation exhaust, central chiller water systems, refrigeration and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants;
- (i) Stack and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at wastewater treatment plants or those handling any industrial waste;
- (j) Natural gas pressure regulator vents, excluding venting at oil and gas production facilities;
- (k) Air vents from air compressors;
- (l) Painting, including interior and exterior painting of buildings, and solvent use, excluding degreasing operations utilizing halogenated organic solvents;
- (m) Housekeeping and janitorial activities and supplies including the following:
  - (1) Vacuum cleaning systems used exclusively for housekeeping or custodial activities, or both;
  - (2) Rest rooms and associated cleanup operations and supplies;
  - (3) Alkaline or phosphate cleaners and associated equipment;
  - (4) Mobile floor sweepers and floor scrubbers;
  - (5) Pest control fumigation;
- (n) Office related activities including the following:
  - (1) Office supplies and equipment;
  - (2) Photocopying equipment and associated supplies;
  - (3) Paper shredding;
- (o) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP;
- (p) Storage tanks, reservoirs, and pumping and handling equipment of any size containing soap, wax, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized;
- (q) Storage of drums containing maintenance raw materials;
- (r) Emergency (backup) electrical generators at residential locations, such as dormitories, prisons and hospitals;
- (s) Safety and emergency equipment, except engine driven fire pumps, including fire suppression systems and emergency road flares;

- (t) Process safety relief devices installed solely for the purpose of minimizing injury to persons or damage to equipment which could result from abnormal process operating conditions, including the following:
  - (1) Rupture discs;
  - (2) Safety relief valves;
- (u) Activities and equipment associated with on-site medical care not otherwise specifically regulated;
- (v) Activities associated with production including the following:
  - (1) CO<sub>2</sub> lasers, used only on metals and other materials which do not emit HAPs in the process;
- (x) Miscellaneous equipment, but not emissions associated with the process for which the equipment is used, and activities including the following:
  - (1) Electric or steam heated drying ovens and autoclaves, including only the heating emissions and not any associated process emissions;
  - (2) Construction and demolition operations;
- (y) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than twelve thousand (12,000) gallons;
- (z) Closed loop heating and cooling systems;
- (aa) Heat exchanger cleaning and repair;
- (bb) Paved and unpaved roads and parking lots with public access;
- (cc) Blowdown for sight glass, boilers, compressors, pumps, and cooling tower.

### **Existing Approvals**

This is the first air approval issued to this source.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP 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 FESOP application for the purposes of this review was received on August 14, 2006.

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

### Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 4).

### Potential to Emit

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

#### Combined Emissions from Reid Hospital and Health Care Services and Reid MOB, LLC

Pollutant	Potential to Emit (tons/yr)
PM	17.71
PM-10	17.45
SO <sub>2</sub>	176.70
VOC	3.34
CO	44.00
NO <sub>x</sub>	99.00

HAPs	Potential to Emit (tons/yr)
Hexane	0.70
Total HAPs	0.73

#### Emissions from Reid MOB, LLC

Pollutant	Potential to Emit (tons/yr)
PM	0.31
PM-10	0.54
SO <sub>2</sub>	1.23
VOC	3.34
CO	6.39
NO <sub>x</sub>	12.62

HAPs	Potential to Emit (tons/yr)
Hexane	0.10
Total HAPs	0.10

- (a) The potential to emit of SO<sub>2</sub> for the two plants is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 (Part 70). The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

- (b) The potential to emit 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) tons per year.

**Potential to Emit After Issuance**

The source has opted to become a FESOP source. 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 this FESOP 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
<b>Reid Hospital and Health Care Services</b>							
NG and No. 2 Fuel Oil Boiler IBA <sup>(1)</sup>	4.93 <sup>(4)</sup>	4.93 <sup>(4)</sup>	92.13 <sup>(2)(4)</sup>	0.61	9.33	14.42 <sup>(4)</sup>	< 10
NG and No. 2 Fuel Oil Boiler IBB <sup>(1)</sup>	4.93 <sup>(4)</sup>	4.93 <sup>(4)</sup>		0.61	9.33	14.42 <sup>(4)</sup>	< 10
NG and No. 2 Fuel Oil Boiler IBC <sup>(1)</sup>	4.93 <sup>(4)</sup>	4.93 <sup>(4)</sup>		0.61	9.33	14.42 <sup>(4)</sup>	< 10
Emergency Generator (Diesel) IGA	0.38	0.22	1.31 <sup>(2)</sup>	0.34	3.21	8.20 <sup>(5)</sup>	< 10
Emergency Generator (Diesel) IGB	0.38	0.22	1.31 <sup>(2)</sup>	0.34	3.21	8.20 <sup>(5)</sup>	< 10
Emergency Generator (Diesel) IGC	0.38	0.22	1.31 <sup>(2)</sup>	0.34	3.21	8.20 <sup>(5)</sup>	< 10
<b>Reid MOB, LLC</b>							
NG Boiler OBA	0.05	0.21	0.02	0.15	2.31	2.75	< 10
NG Boiler OBB	0.05	0.21	0.02	0.15	2.31	2.75	< 10
Emergency Generator (Diesel) OGA	0.21	0.12	0.72 <sup>(2)</sup>	0.19	1.76	7.12	< 10
<b>Total Emissions</b>	<b>16.24</b>	<b>16.08</b>	<b>&lt; 100<sup>(3)</sup></b>	<b>3.34</b>	<b>44.00</b>	<b>80.48</b>	<b>&lt; 25</b>

- (1) PM, PM-10, SO<sub>2</sub>, and NO<sub>x</sub> are worst-case pollutants for No. 2 fuel oil (back-up); VOC and CO are worst-case pollutants for natural gas.  
 (2) The sulfur content of No. 2 fuel oil for Boilers IBA, IBB, and IBC and emergency generators OBA, OBB, OBC, and OGA are limited to 0.3% and the combined fuel usage for Boilers IBA, IBB, and IBC are limited such that the source-wide emissions of SO<sub>2</sub> are less than Title V major source thresholds.  
 (3) The potential to emit of SO<sub>2</sub> for the two plants is greater than 100 tons per year. The source will limit its emissions of SO<sub>2</sub> below Title V levels.  
 (4) Based on a combined limited fuel usage of 4,325 kgals of No. 2 fuel oil per year for the three Boilers (IBA, IBB, and IBC) in order to comply with 326 IAC 2-8 (FESOP).  
 (5) Based on NO<sub>x</sub> limit to comply with 40 CFR 60, Subpart IIII.

**County Attainment Status**

The source is located in Wayne County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.
- (b) Volatile organic compounds (VOC) and nitrogen oxides (NOx) 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. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Wayne County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 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 a surrogate for PM2.5 emissions.
- (d) Wayne County has been classified as attainment or unclassifiable for all other regulated pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Source Status**

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

Pollutant	Potential to Emit (tons/yr)
PM	16.24
PM-10	16.08
SO <sub>2</sub>	< 100
VOC	3.34
CO	44.00
NO <sub>x</sub>	80.46

Pollutant	Emissions (tons/yr)
Hexane	0.70
Total HAPs	0.73

This new 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 it is not in one of the 28 listed source categories.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit for Reid MOB, LLC.

- (b) Boilers OBA and OBB are not subject the requirements of the New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60, Subpart D, Subpart Da, Subpart Db, or Subpart Dc) because each boiler has a maximum heat input capacity of less than 10 MMBtu/hr. Therefore, the requirements of 40 CFR 60, Subpart D, Da, Db, and Dc are not included in this permit.
- (c) The emergency generator OGA is not subject to the requirements of the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (NSPS) (326 IAC 12 and 40 CFR Part 60, Subpart IIII) because the model year of the generator is prior to April 1, 2006 (March 28, 2006), and it is being constructed for the first time (no reconstruction or modification after July 11, 2005). As such, the requirements of 40 CFR 60, Subpart IIII are not included in the permit for the emergency generator OGA.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source.
- (e) Boilers OBA, and OBB are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) because this source is not a major source of hazardous air pollutants (HAPs).
- (f) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit. Generally, such requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, which meets 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.

As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not included in this permit.

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

#### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

This source is not subject to this rule because potential emissions of all regulated pollutants are less than 250 tons per year. This source is also not one of the 28 listed source categories. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

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

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. 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.

326 IAC 2-8-4 (FESOP)

- (a) This source is subject to the requirements of 326 IAC 2-8-4 (FESOP). Pursuant to 326 IAC 2-8, the combined SO<sub>2</sub> emissions from the three natural-gas fired boilers (with No. 2 fuel oil back-up) (IBA, IBB, and IBC) (permit F177-23503-00110) shall not exceed the following limits:

Facility	SO <sub>2</sub> emissions (tons per year)
Boilers IBA, IBB, and IBC	92.13

*FESOP Sulfur Dioxide Compliance Determination:*

Process/emission unit	SO <sub>2</sub> Emissions
NG and No. 2 Fuel Oil Boiler IBA	
NG and No. 2 Fuel Oil Boiler IBB	92.13
NG and No. 2 Fuel Oil Boiler IBC <sup>(1)</sup>	
Emergency Generator (Diesel) IGA	1.31
Emergency Generator (Diesel) IGB	1.31
Emergency Generator (Diesel) IGC	1.31
NG Boiler OBA	0.02
NG Boiler OBB	0.02
Emergency Generator (Diesel) OGA	0.72
<b>Total Emissions</b>	<b>96.82</b>

The source will comply with the SO<sub>2</sub> emission limits that follow:

- (1) The sulfur content of No. 2 fuel oil for the three (3) natural-gas fired boilers (with No. 2 fuel oil back-up) (IBA, IBB, and IBC) shall be limited to less than 0.3% by weight of sulfur; and

- (2) The usage of No. 2 fuel oil, with a limited sulfur content of 0.3%, in the three (3) 25.35 MMBtu per hour boilers (IBA, IBB, and IBC) shall be limited to 4,325,000 U.S. gallons per twelve (12) consecutive month period combined, with compliance determined at the end of each month, so that source-wide SO<sub>2</sub> emissions are limited to less than 100 tons per year; and
  - (3) The source has voluntarily agreed to limit the sulfur content of No. 2 fuel oil, for the one (1) emergency generator (OGA) and the three (3) emergency generators (IGA, IGB, and IGC) to less than 0.3% by weight.
- (b) As per the USEPA memorandum titled *Calculating Potential to Emit (PTE) for Emergency Generators*, the hours of operation for each of the three (3) diesel-fired emergency generators (permit F177-23503-00110), identified as IGA, IGB, and IGC, shall be limited to less than five hundred (500) hours per year.
  - (c) As per the USEPA memorandum titled *Calculating Potential to Emit (PTE) for Emergency Generators*, the hours of operation for the one (1) diesel-fired emergency generator (permit F177-23507-00111), identified as OGA, shall be limited to less than five hundred (500) hours per year.
  - (d) Combined with the SO<sub>2</sub> emissions limit above and the potential SO<sub>2</sub> emissions from Reid MOB, LLC (Plant ID: 177-00111), the SO<sub>2</sub> emissions from the entire source are limited to less than 100 tons per year. Therefore the requirements of 326 IAC 2-7(Part 70 Permits) and 326 IAC 2-2 (PSD) are not applicable.

**State Rule Applicability – Individual Facilities**

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

The operation of the source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

Pursuant to 326 IAC 6-2-4(a), the particulate from the each of the five (5) boilers (OBA, OBB, IBA, IBB, and IBC), which are scheduled to be installed upon issuance of the permit, shall be limited by the following equation:

$Pt = 1.09/Q^{0.26}$  where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.  
 Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (88.61 MMBtu/hr is the total source operating capacity for Boilers OBA, OBB, IBA, IBB, and IBC)

Emission Unit	Q (MMBtu/hr)	Pt (lbs PM per MMBtu)
Boilers OBA, OBB, IBA, IBB, and IBC	88.61	0.34

*Boilers OBA and OBB Compliance Determination using Natural Gas:*  
 (1.9 lbs/MMScf) \* (1/1,000 scf/btu) = 0.0019 lbs PM per MMBtu

The source is able to comply with the PM limit for the boilers.

#### 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The one (1) diesel-fired emergency generator OGA with a heat input capacity of (8.30) MMBtu per hour is not subject to the requirements of 326 IAC 7-1.1-1 because the potential emissions of sulfur dioxide (SO<sub>2</sub>) are less than 25 tons per year. Therefore, the requirements of this rule are not included in this permit for the emergency generator OGA.

### **Compliance Requirements**

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

There are no compliance monitoring requirements included in this permit for any facilities located at Reid MOB, LLC.

### **Air Quality Impacts from Minor Sources**

#### Modeling Overview

Pursuant to 326 IAC 2-1.1-5, IDEM, OAQ, has conducted a modeling analysis of the Limited Potential to Emit (PTE) criteria pollutants from this proposed combined source to estimate whether the Limited PTE criteria pollutants will cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS).

#### Modeling Results – Criteria Pollutants

The modeling results indicate that the Limited PTE criteria pollutants from this combined source will not exceed the National Ambient Air Quality Standards (NAAQS).

### **Conclusion**

The construction and operation of combustions units at an outpatient care center shall be subject to the conditions of the FESOP 177-23507-00111.

**Appendix A: Emission Calculations**  
**Emissions Summary**

**Company Name:** Reid MOB, LLC  
**Address City IN Zip:** 1200 Reid Parkway, Richmond, IN 47374  
**Permit Number:** F177-23507-00111  
**Plt ID:** 177-00111  
**Reviewer:** Tanya White / EVP  
**Date:** October-06

<b>Uncontrolled Potential to Emit (tons/year)</b>			
Emissions Generating Activity			
Pollutant	Boilers OBA and OBB (Natural Gas)	Emergency Generator (Diesel)	<b>TOTAL</b>
PM	0.10	0.21	0.31
PM10	0.42	0.12	0.54
SO <sub>2</sub>	0.03	1.20	1.23
NOx	5.50	7.12	12.62
VOC	0.30	0.19	0.49
CO	4.62	1.76	6.39
total HAPs	0.10	N/A	0.10
worst case single HAP	0.10	N/A	0.10

Total emissions based on rated capacity at 8,760 hours/year for the boilers and 500 hours/year for the emergency generators, without controls and limitations.

<b>Controlled/Limited Potential to Emit (tons/year)</b>			
Emissions Generating Activity			
Pollutant	Boilers OBA and OBB (Natural Gas)	Emergency Generator (Diesel)	<b>TOTAL</b>
PM	0.10	0.21	0.31
PM10	0.42	0.12	0.54
SO <sub>2</sub>	0.03	0.72	0.75
NOx	5.50	7.12	12.62
VOC	0.30	0.19	0.49
CO	4.62	1.76	6.39
total HAPs	0.10	N/A	0.10
worst case single HAP	0.10	N/A	0.10

Total emissions based on rated capacity at 8,760 hours/year for the boilers and 500 hours/year for the emergency generators, after enforceable controls and limitations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Small Boilers**

**Company Name:** Reid MOB, LLC  
**Address City IN Zip:** 1200 Reid Parkway, Richmond, IN 47374  
**Permit Number:** F177-23507-00111  
**Plt ID:** 177-00111  
**Reviewer:** Tanya White / EVP  
**Date:** October-06

Unit	Description	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
OBA	NG-fired boiler	6.28	55.01
OBB	NG-fired boiler	6.28	55.01
		<b>12.56</b>	<b>110.03</b>

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO <sub>2</sub>	NOx **see below	VOC	CO
Potential Emission in tons/yr	0.10	0.42	0.03	5.50	0.30	4.62

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
 See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Small Boilers**  
**HAPs Emissions**

**Company Name:** Reid MOB, LLC  
**Address City IN Zip:** 1200 Reid Parkway, Richmond, IN 47374  
**Permit Number:** F177-23507-00111  
**Plt ID:** 177-00111  
**Reviewer:** Tanya White / EVP  
**Date:** October-06

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.155E-04	6.602E-05	4.126E-03	9.902E-02	1.870E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.751E-05	6.051E-05	7.702E-05	2.090E-05	1.155E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations**  
**Internal Combustion Engines - Emergency Generator (Diesel Fuel)**  
**Turbine (>600 HP)**

**Company Name:** Reid MOB, LLC  
**Address City IN Zip:** 1200 Reid Parkway, Richmond, IN 47374  
**Permit Number:** F177-23507-00111  
**Plt ID:** 177-00111  
**Reviewer:** Tanya White / EVP  
**Date:** October-06

**A. Emissions calculated based on heat input capacity (MMBtu/hr)**

Unit	Description	Heat Input Capacity MM Btu/hr					S= <table border="1"><tr><td>0.5</td></tr></table> = WEIGHT % SULFUR	0.5
0.5								
OGA	Emergency Generator (Diesel)	8.30 <b>8.30</b>					S= <table border="1"><tr><td>0.3</td></tr></table> = LIMITED WEIGHT % SULFUR	0.3
0.3								
			Pollutant					
Emission Factor in lb/MMBtu			PM* 0.1	PM10* 0.0573	SO <sub>2</sub> 0.5 (1.01S)	NOx 3.2 **see below	VOC 0.1	CO 0.85
Potential Emission in tons/yr			0.21	0.12	1.05	6.64	0.19	1.76
Limited Emission in tons/yr					0.63			

\*\*NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

**B. Emissions calculated based on output rating (hp)**

Unit	Description	Heat Input Capacity Horsepower (hp)	Potential Throughput hp-hr/yr	S= <table border="1"><tr><td>0.5</td></tr></table> = WEIGHT % SULFUR	0.5
0.5					
OGA	Emergency Generator (Diesel)	1186.00 <b>1186.00</b>	<b>593000.0</b>	S= <table border="1"><tr><td>0.3</td></tr></table> = LIMITED WEIGHT % SULFUR	0.3
0.3					

			Pollutant			
Emission Factor in lb/hp-hr	PM* 0.0007	PM10* not provided	SO <sub>2</sub> 0.0040 (.00809S)***	NOx 0.024 **see below	VOC 0.00071	CO 0.00550
Potential Emission in tons/yr	0.21		1.20	7.12	0.21	1.63
Limited Emission in tons/yr			0.72			

\*\*\*Limited emission factor for sulfur dioxide is based on a sulfur content of 0.3% by weight.

\*\*NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr

Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.

An average conversion factor of 1hp-hr = 7,000Btu is provided below.

**Methodology**

Potential Throughput (hp-hr/yr) = hp \* 500 hr/yr for emergency generators per EPA memorandum (09/06/1995).

Emission Factors are from AP 42 (Supplement B 10/96) Table 3.4-1 and Table 3.4-2

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] \* 500 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

\*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.