



Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: OP2011-048
Expiration Date: SEP 22 2016
Installation ID: 510-0200
Project Number: 2007-06-043

Installation Name and Address

St. Alexius Hospital - Jefferson Campus
2639 Miami
St. Louis, MO 63118
City of St. Louis

Parent Company's Name and Address

Doctors Community Health Corporation
6720 Scotts Dale Road
Scotts Dale, AZ 85253

Installation Description:

St. Alexius Hospital, formerly Alexian Brothers Hospital, is an acute-care facility located in St. Louis, Missouri. St. Alexius operates the Jefferson Campus on Miami Street. The Jefferson Campus is an urban hospital providing mental healthcare, family services and patient care. The Jefferson Campus has three boilers, two diesel emergency generators, a gas hospital sterilizer and six fuel oil tanks.

SEP 23 2011

Effective Date

Director or Designee

Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

St. Alexius Hospital, formerly Alexian Brothers Hospital, is an acute-care facility located in St. Louis, Missouri. St. Alexius operates the Jefferson Campus on Miami Street. The Jefferson Campus is an urban hospital providing mental healthcare, family services and patient care. The Jefferson Campus has three boilers, two diesel emergency generators, a gas hospital sterilizer and six fuel oil tanks.

St. Alexius Hospital – Jefferson Campus is a potential major source of criteria pollutants. The installation has accepted voluntary, federally enforceable emission limitations of criteria pollutants to less than major source levels limiting the amount of fuel combusted in the boilers and emergency generators to qualify for this permit.

The emissions for the past five years for the installation are listed below:

Reported Air Pollutant Emissions, tons per year					
Pollutants	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.00	0.03	0.03	0.03	0.05
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.00	0.00	0.00	0.00	0.02
Sulfur Oxides (SO _x)	0.01	0.01	0.01	0.01	0.02
Nitrogen Oxides (NO _x)	1.27	1.28	1.33	1.61	2.29
Volatile Organic Compounds (VOC)	0.26	0.26	0.03	0.22	0.23
Carbon Monoxide (CO)	0.32	0.32	0.33	0.40	0.57

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations.

Emission Unit #	EQ Reference #	Description of Emission Unit
EU0010	EP-1	Boiler #1
EU0020	EP-1	Boiler #2
EU0030	EP-1	Boiler #3
EU0040	EP-2	Emergency Generator #1, 250 kW
EU0050	EP-3	Emergency Generator #2, 205 kW
EU0060	EP-7	Solvent Degreaser (Petroleum Naptha)
EU0070	EP-9	Gas Sterilizer

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Description of Emission Unit
12,000 Gallon Fuel #2 Storage Tank
2,500 Gallon Fuel #2 Storage Tank
Two 250 Gallon (each) Oil Tanks
Two 100 Gallon (each) Day Tanks
General Cleaning and Strainer Cleaning

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

None

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

EU0010 through EU0030 – Boilers			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0010	Boiler #1 – Natural gas fired 20.92 million British thermal units per hour (MMBtu/hr) boiler with fuel oil as a back-up fuel; Installed - 1967	Erie City Model VL	EP-1
EU0020	Boiler #2 – Natural gas 20.92 MMBtu/hr boiler with fuel oil as a back-up fuel; Installed - 1967		
EU0030	Boiler #3 – Natural gas 20.92 MMBtu/hr boiler with fuel oil as a back-up fuel; Installed - 1967		

Permit Condition EU0010-001 through EU0030-001
10 CSR 10-6.065 Operating Permits
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

- 1) For Boilers #1, #2, and #3, the total natural gas usage shall be limited to 150 million cubic feet per any consecutive twelve (12)-month period.
- 2) For Boilers #1, #2, and #3, the total fuel oil usage shall be limited to 150,000 gallons per any consecutive twelve (12)-month period.

Operational Limitation:

The permittee shall only burn pipeline grade natural gas or Fuel Oil No. 2.

Monitoring/Record Keeping:

- 1) The permittee shall install and operate a meter through which natural gas is introduced to the boilers. A monthly and the consecutive 12-month total natural gas usage shall be monitored and recorded. (See Attachment A)
- 2) A monthly and the consecutive 12-month total Fuel Oil No. 2 usage shall be monitored and recorded. (See Attachment A)

Reporting:

- 1) The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, Missouri 63103, and to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen days after the end of each month, if the records show that permittee exceeded the 12-month fuel usage limitation.

- 2) Semi-annually the permittee shall submit records of fuel supplier certification with a certified statement that the records of fuel supplier certification submitted represent all of the fuel combusted during the reporting period.

Permit Condition EU0010-002 through EU0030-002

10 CSR 10-5.030 Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.37 pounds per million Btu of heat input from each of the emission units EU0010 through EU0030.

Operational Limitation:

The boilers (EU0010 through) shall be limited to burning pipeline grade natural gas and fuel oil with a sulfur content of no more than 0.5% by weight sulfur. The fuel oils known to be less than 0.5% by weight sulfur per Chapter 414 RSMo, Section 414.032, ASTM D396 - Table 1 and ASTM D975 - Table 1, are Fuel Oil No. 1 and No. 2 and diesel fuel oil Grade Low Sulfur No. 1-D, Grade Low Sulfur No. 2-D. However, the unit is not limited to the known fuel oils listed, above, but limited to fuel oils based solely on having percent sulfur by weight content of 0.5% or less.

Monitoring/Record Keeping:

The permit shall maintain documentation supporting the fuel used is pipeline grade natural gas and records on the premises of the fuel suppliers' analysis of distillate oil which shows weight percentage of sulfur in the fuel.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, Missouri 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.

Permit Condition EU0010-003 through EU0030-003

**10 CSR 10-6.260
Restriction of Emissions of Sulfur Compounds**

Emission Limitation:

No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(3)(B) & 10 CSR 10-6.010 Ambient Air Quality Standards]¹

Operational Limitation:

The boilers (EU0030 and EU0040) shall be limited to burning pipeline grade natural gas and fuel oil with a sulfur content of no more than 0.5% by weight sulfur. The fuel oils known to be less than 0.5% by weight sulfur per Chapter 414 RSMo, Section 414.032, ASTM D396 - Table 1 and ASTM D975 - Table 1, are Fuel Oil No. 1 and No. 2 and diesel fuel oil Grade Low Sulfur No. 1-D, Grade Low Sulfur No. 2-D. However, the unit is not limited to the known fuel oils listed, above, but limited to fuel oils based solely on having percent sulfur by weight content of 0.5% or less.

¹ 10 CSR 10-6.260(3)(B) is state-only requirement.

Monitoring/Record Keeping:

The permit shall maintain documentation supporting the fuel used is pipeline grade natural gas and records on the premises of the fuel suppliers analysis of distillate oil fired in Boiler 5 which shows weight percentage of sulfur in the fuel.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, Missouri 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.

Permit Condition EU0010-004 through EU0030-004

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20%.
- 2) Exception:
 - a) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40% opacity.
 - b) A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 40%.

Monitoring:

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a) Observations must be made once per month. If a violation is noted, then
 - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment B), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment C)

Reporting:

- 1) The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, Missouri 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU0040 and EU0050 – Emergency Generators		
Emission Unit	Description	2010 EIQ Reference #
EU0060	Emergency Generator #1 – Mental Health Building No. 2 fuel oil-fired, Cummins 250 kW, Model, Installed 2000	EP-2
EU0080	Emergency Generator #2 – Building 54 #5 – No. 2 fuel oil-fired, Caterpillar 205 kW , Installed 1976	EP-3

Permit Condition EU0040-001 and EU0050-001
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants
for Stationary Reciprocating Internal Combustion Engines

You must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. [§63.6595(a)]

Emission Limitation:

Owners or operators of an existing stationary CI RICE located at an area source of HAP emissions must comply with the requirements in Table 2d to Subpart ZZZZ of Part 63 which apply to you.
 [§63.6603(a)]

For each	You must meet the following requirement, except during periods of startup	During periods of startup you must
Emergency CI ²	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; ¹ b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

- ¹ Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of Subpart ZZZZ.

Pursuant to §63.6625(i), the oil analysis must be performed at the same frequency specified for changing the oil in Table 2d (see table above) to Subpart ZZZZ of Part 63. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil before continuing to use the engine. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

- ² If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

Monitoring, Operation and Maintenance Requirements:

- 1) If you own or operate an existing stationary emergency RICE, or an existing stationary RICE located at an area source of HAP emissions not subject to any numerical emission standards shown in Table 2d to Subpart ZZZZ of Part 63, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]
- 2) If you own or operate an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
- 3) If you operate a new or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to Subpart ZZZZ of Part 63 apply. [§63.6625(h)]
- 4) If you own or operate a stationary engine that is subject to the work, operation or management practices in items 1, 2, or 4 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is

not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil before continuing to use the engine. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

Compliance Requirements:

- 1) You must be in compliance with the emission limitations and operating limitations in Subpart ZZZZ of 40 CFR Part 63 that apply to you at all times. [§63.6605(a)]
- 2) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 2b and 2d to Subpart ZZZZ of 40 CFR Part 63 that apply to you according to methods specified below (from Table 6 to Subpart ZZZZ of 40 CFR Part 63). [§63.6640(a)]

For Each...	Complying with the requirements to ...	You must demonstrate continuous compliance by ...
Existing stationary CI RICE not subject to any numerical emission limitations	Work or Management practices	i Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

Recordkeeping:

- 1) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of §63.6655. [§63.6655(a)]
 - a) A copy of each notification and report that you submitted to comply with Subpart ZZZZ of 40 CFR Part 63, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
 - b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
 - c) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b). [§63.6655(a)(5)]
- 2) You must keep the records required in Table 6 of Subpart ZZZZ of 40 CFR Part 63 to show continuous compliance with each emission or operating limitation that applies to you. [§63.6655(d)]
- 3) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
- 4) As specified in §63.10(b)(1), you must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.6660(b)]
- 5) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

Reporting:

- 1) You must report each instance in which you did not meet each emission limitation or operating limitation in Table 2d to Subpart ZZZZ of 40 CFR Part 63 that apply to you. These instances are deviations from the emission and operating limitations in Subpart ZZZZ of 40 CFR Part 63. These deviations must be reported according to the requirements in §63.6650. [§63.6640(b)]
- 2) You must also report each instance in which you did not meet the requirements in Table 8 to Subpart ZZZZ of 40 CFR Part 63 — Applicability of General Provisions to Subpart ZZZZ that apply to you. [§63.6640(e)]
- 3) *Reporting requirements* [§63.6650]
 - a) You must submit each report in Table 7 of Subpart ZZZZ of 40 CFR Part 63 that applies to you. [§63.6650(a)]
 - b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date in Table 7 of Subpart ZZZZ of 40 CFR Part 63 and according to the requirements in paragraphs (b)(1) through (b)(9) of §63.6650. [§63.6650(b)]
 - i) For semi-annual Compliance Reports, the first Compliance Report must cover the period beginning on the compliance date that is specified for your affected source in §63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.6595. [§63.6650(b)(1)]
 - ii) For semi-annual Compliance Reports, the first Compliance Report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.6595. [§63.6650(b)(2)]
 - iii) For semi-annual Compliance Reports, each subsequent Compliance Report must cover the semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. [§63.6650(b)(3)]
 - iv) For semi-annual Compliance Reports, each subsequent Compliance Report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semi-annual reporting period. [§63.6650(b)(4)]
 - v) For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR Part 70 or 71, and if the permitting authority has established dates for submitting semi-annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), you may submit the first and subsequent Compliance Reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (b)(4) of §63.6650. [§63.6650(b)(5)]
 - vi) For annual Compliance Reports, the first Compliance Report must cover the period beginning on the compliance date that is specified for your affected source in §63.6595 and ending on December 31. [§63.6650(b)(6)]
 - vii) For annual Compliance Reports, the first Compliance Report must be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date that is specified for your affected source in §63.6595. [§63.6650(b)(7)]
 - viii) For annual Compliance Reports, each subsequent Compliance Report must cover the annual reporting period from January 1 through December 31. [§63.6650(b)(8)]
 - ix) For annual Compliance Reports, each subsequent Compliance Report must be postmarked or delivered no later than January 31. [§63.6650(b)(9)]

- c) The Compliance Report must contain the information in paragraphs (c)(1) through (6) of §63.6650. [§63.6650(c)]
 - i) Company name and address. [§63.6650(c)(1)]
 - ii) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. [§63.6650(c)(2)]
 - iii) Date of report and beginning and ending dates of the reporting period. [§63.6650(c)(3)]
 - iv) If you had a malfunction during the reporting period, the Compliance Report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. [§63.6650(c)(4)]
 - v) If there are no deviations from any emission or operating limitations that apply to you, a statement that there were no deviations from the emission or operating limitations during the reporting period. [§63.6650(c)(5)]
- d) For each deviation from an emission or operating limitation that occurs for a stationary RICE where you are not using a CMS to comply with the emission or operating limitations in Subpart ZZZZ of 40 CFR Part 63, the Compliance Report must contain the information in paragraphs (c)(1) through (4) of §63.6650 and the information in paragraphs (d)(1) and (2) of §63.6650. [§63.6650(d)]
 - i) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. [§63.6650(d)(1)]
 - ii) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.6650(c)(2)]
- e) Each affected source that has obtained a title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in Subpart ZZZZ of 40 CFR Part 63 in the semi-annual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance Report pursuant to Table 7 of Subpart ZZZZ of 40 CFR Part 63 along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance Report includes all required information concerning deviations from any emission or operating limitation in Subpart ZZZZ of 40 CFR Part 63, submission of the Compliance Report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a Compliance Report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. [§63.6650(f)]

Permit Condition EU0040-002 and EU0050-002

**10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for
Stationary Reciprocating Internal Combustion Engines
— §63.6665 General Provisions
40 CFR Part 63 Subpart A, General Provisions**

Table 8 to 40 CFR Part 63 Subpart ZZZZ shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

Permit Condition EU0040-003 and EU0050-003

10 CSR 10-6.260

Restriction of Emissions of Sulfur Compounds

Emission Limitation:

- 1) Emissions from Emergency Generator #1 and #2 shall not contain more than 2000 parts per million by volume (ppmv) of sulfur dioxide or more than 70 milligrams per cubic meter (mg/m^3) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3) hour time period.
- 2) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(3)(B) & 10 CSR 10-6.010 Ambient Air Quality Standards]²

Operational Limitation:

The emergency generators shall be limited to burning fuel oil with a sulfur content of no more than 0.5% by weight sulfur. The fuel oils known to be less than 0.5% by weight sulfur per Chapter 414 RSMo, Section 414.032, ASTM D396 - Table 1 and ASTM D975 - Table 1, are fuel oil No. 1 and No. 2 and diesel fuel oil Grade Low Sulfur No. 1-D, Grade Low Sulfur No. 2-D. However, the unit is not limited to the known fuel oils listed, above, but limited to fuel oils based solely on having a percent sulfur by weight content of 0.5% or less.

Monitoring/Record Keeping:

The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, Missouri 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.

Permit Condition EU0040-004 and EU0050-004

10 CSR 10-6.060 Construction Permits Required

City of St. Louis ACP Construction Permit No. 02-12-027

Operational Limitation:

- 1) The permittee shall be limited to 500 hours of operation for the Generator #1 and 500 hours of operation for the Generator #2 in any consecutive twelve (12)-month period.
- 2) The generators shall only burn number two fuel oil.
- 3) The emergency generators shall be restricted to usage during periods of interrupted power or for maintenance activities.
- 4) When weather conditions allow, the permittee shall monitor visible opacity each time the generators are in operation using EPA Method 22. Visible emissions (other than uncombined water) shall not continue for a period more than ten consecutive seconds at any time after a five-minute startup period.

² 10 CSR 10-6.260(3)(B) is state-only requirement.

Recordkeeping/Reporting:

- 1) The permittee shall keep monthly records fuel type, reason for operation, and hours of operation including all twelve-month for totals of hours of operation.
- 2) The permittee shall keep records of all Method 22 visual observations, noting any emissions (other than uncombined water) from the emergency generators that are visible for more than 10 consecutive seconds
- 3) The permittee shall record any instances of exceedance of the Construction Permit 02-12-027 limitations and conditions and report them to the City of St. Louis Air Pollution Control Program in writing within two business days.

EU0060 –Solvent Degreaser			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0060	Parts Washer - Miscellaneous Clean-up solvent using petroleum naphta (mineral sprits)	Not Available	EP-7

<p>Permit Condition EU0060-001</p> <p>10 CSR 10-5.300</p> <p>Control of Emissions from Solvent Cleaning</p>
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Emission Limitation:

- 1) The permittee shall not use cold cleaning solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)).
- 2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The Director and the U.S Environmental Protection Agency (EPA) must approve the alternative method.

Operational Limitation/Equipment Specification:

- 1) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
- 2) When one or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
 - a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8 degrees Celsius (37.8°C) (100 degrees Fahrenheit (100°F));
 - b) The solvent is agitated; or
 - c) The solvent is heated.
- 3) Each cold cleaner shall have a internal drainage facility so that parts are enclosed under the cover while draining.
- 4) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.

- 5) Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
- 6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
- 7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or is heated above 48.9°C (120°F), must use one of the following control devices:
 - a) A freeboard ratio of at least 0.75;
 - b) Water cover (solvent must be insoluble in and heavier than water); or
 - c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65%. These control systems must receive approval from the Director and EPA prior to their use.
- 8) Each cold cleaner shall be operated as follows:
 - a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
 - b) Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining, the parts shall be positioned so that the solvent drains directly back to the cold cleaner.
 - c) Whenever a cold cleaner fails to perform within the rule operating requirements, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the rule operating requirements.
 - d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down until the leaks are repaired.
 - e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the Director and EPA:
 - i) Reduction of the waste material to less than 20% VOC solvent by distillation and proper disposal of the still bottom waste; or
 - ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the Director and EPA.
 - f) Waste solvent shall be stored in covered containers only.
- 9) Operators must be trained as follows:
 - a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process shall operate this equipment;
 - b) The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operators; and
 - c) A procedural review shall be given to all solvent metal cleaning equipment operators at least once each 12 months.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment F):
 - a) Name and address of the solvent supplier.
 - b) Date of purchase.
 - c) Type of solvent purchased.
 - d) Vapor pressure of solvent in mm Hg at 20°C or 68°F.

- 2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (see Attachment D). The record also shall include maintenance and repair logs that occurred on the degreaser (Attachments E). These records shall be kept current and made available for review on a monthly basis. The Director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule.
- 3) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment G).
- 4) All records shall be retained for five years and be available to the Director upon request.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, Missouri 63103, and the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.

EU0070 - Ethylene Oxide Sterilizer			
Emission Unit	Description	Manufacturer/ Model #	2010 EIQ Reference #
EU0090	Gas Sterilizer - Ethylene Oxide Sterilizer Installed – July 29, 1987	3M Steri-VAC 4XL	EP-9

<p>Permit Condition EU0070-001</p> <p>40 CFR Part 63, Subpart WWWW National Emission Standards for Hospital Ethylene Oxide Sterilizers</p>
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Management Practice Standard:

You must sterilize full loads of items having a common aeration time, except under medically necessary circumstances, as that term is defined in §63.10448. [§63. 10390]

Monitoring:

Continuous compliance with the management practice requirement: [§63. 10420]

For each sterilization unit not equipped with an air pollution control device, you must demonstrate continuous compliance with the management practice standard in §63.10390 by recording the date and time of each sterilization cycle, whether each sterilization cycle contains a full load of items, and if not, a statement from a hospital central services staff, a hospital administrator, or a physician that it was medically necessary.

Recordkeeping:

- 1) You must keep the records specified below: [§63.10432]
 - a) A copy of the Initial Notification of Compliance Status that you submitted to comply with this subpart. [§63.10432(a)]
 - b) Records required by §63.10420 for each sterilization unit not equipped with an air pollution control device. [§63.10432(b)]
- 2) Your records must be in a form suitable and readily available for expeditious review. [§63.10434(a)]
- 3) You must keep each record for five years following the date of each record. [§63.10434(a)]

- 4) You must keep each record onsite for at least two years after the date of each record. You may keep the records offsite for the remaining three years. [§63.10434(a)]

Permit Condition EU0070-002

**40 CFR Part 63, Subpart WWWW—National Emission Standards for Hospital Ethylene
Oxide Sterilizers— §63.10440 General Provisions
40 CFR Part 63 Subpart A, General Provisions**

Table 1 to 40 CFR Part 63, Subpart WWWW 9 shows which parts of the General Provisions in 40 CFR 63.1 through 63.16 apply to you.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

City of St. Louis Ordinance 68657, §16 Open Burning Restrictions

- 1) No person shall cause, suffer, allow or permit the open burning of refuse.
- 2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
- 3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
- 4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
- 5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the City of St. Louis Air Pollution Control Program within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the City of St. Louis Air Pollution Control Program in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the City of St. Louis Air Pollution Control Program shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other

pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the City of St. Louis Air Pollution Control Program, the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the Department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the Director.
- 2) The permittee may be required by the Director to file additional reports.

- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the Director. The reports shall be submitted to the Director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;

- c) Application of dust-free surfaces;
- d) Application of water; and
- e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The Director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The Director may specify testing methods to be used in accordance with good professional practice. The Director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.

- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §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 §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.

- f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, Missouri 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid Part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

Boiler #1 (EU0010), Boiler #2 (EU0020) and Boiler #3 (EU0030) are normally fired on natural gas, with Fuel Oil No. 2 as a back-up fuel. The alternate operating scenario is to allow the boilers to use Fuel Oil No. 2 on any given occasion during which the supply of natural gas to the facility is halted for reasons beyond the control of the facility. This alternate scenario is also subject to 10 CSR 10-5.030, 10 CSR 10-6.220 and 10 CSR 10-6.260 as well as the core permit requirements 10 CSR 10-6.050, 10 CSR 10-6.110 and 10 CSR 10-6.165.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and

- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
- a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, and the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Johnny Watkins, Chief Financial Officer. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting

affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

**Attachment C - Method 9 Opacity Emissions Observation
 10 CSR 10-6.220 Compliance Demonstration**

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO _____ Signature of Observer

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid Part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a Part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a Part 70 operating permit.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received June 14, 2007;
- 2) 2010 Emissions Inventory Questionnaire, received May 6, 2011; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Explanation of this Operating Permit

To qualify for this permit the installation has voluntarily limited their potential to emit (PTE) by accepting the imposition of voluntarily agreed to federally-enforceable limitations on fuel usage (150 million cubic feet of natural gas per year and 150,000 gallons per year) in the boilers and 500 hours of operation for the emergency generators. Based on these limitations the following is summary of the potential to emit calculations for the entire installation.

Pollutant	Limited PTE (tons per year)
PM ₁₀	1.14
SO _x	10.89
NO _x	12.18
VOC	3.32
CO	69.57
HAPs	Insignificant

From the above table the limited PTE will be well below the major source levels.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

40 CFR Part 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

The installation operates emergency diesel generator whose operations are limited to emergency situations. Since, St. Alexius Hospital - Jefferson Campus is an affected area source of hazardous air pollutants, the emergency generator are subject to 40 CFR Part 63, Subpart ZZZZ. Therefore St. Alexius Hospital – Jefferson Campus will be required to comply with the requirements of 40 CFR Part 63, Subpart ZZZZ.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

- 1) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
This regulation defines process weight to “exclude liquids and gases used solely as fuels and air introduced for purposes of combustion” under 10 CSR 10-6.400(2)(A). For the internal combustion engines (ICEs) and the boilers at this installation, the throughputs only consist of liquid and gaseous fuels and combustion air. Therefore, there are no applicable throughputs for the ICEs/boilers and the other emission sources at this installation have no or insignificant particulate emissions. Therefore, no emission sources at this installation were considered to be subject to this regulation and it was not included in the operating permit.
- 2) 10 CSR 10-5.510, *Control of Emissions of Nitrogen Oxides*
 - a) The boilers are exempt (per Section (1)(C)1.) because the boilers are rated less than 50 MMBtu/hr each.
 - b) Additionally the internal combustion engines are exempt per Section (1)(C)4. because they are used for emergency back-up power only and are each operated less than 750 hours per year and less than 400 hours during the ozone season.
- 3) 10 CSR 10-5.570, *Control of Sulfur Emissions from Stationary Boilers*
The boilers combust only natural gas and Fuel Oil No. 2 with a sulfur content of less than 0.5% by weight. As such, they are exempt from this regulation per 10 CSR 10-5.570(1)(C)5.
- 4) 10 CSR 10-6.360, *Control of NO_x Emissions From Electric Generating Units and Non-Electric Generating Boilers*
This rule establishes an emission budget for large electric generating units and non-electric generating boilers. The boilers (non-electric generating) are rated less than 250 MMBtu/hr, each and according to 10 CSR 10-6.360(1)(B)2.,the boilers are not subject to this rule.
- 5) 10 CSR 10-6.390, *Control of NO_x Emissions From Large Stationary Internal Combustion Engines*
This rule applies to any large stationary internal combustion engine greater than one thousand three hundred (1,300) horsepower. Since the emergency generator engines each have a horsepower rating below 1,300 HP, this rule does not apply.
- 6) 10 CSR 10-5.220, *Control of Petroleum Liquid Storage, Loading and Transfer*
This regulation specifies in 10 CSR 10-5.220(3)(A) and (5)(A) that this rule does not apply to petroleum storage tanks of less than 40,000 gallons capacity and gasoline tanks of less than 500 gallons capacity. All the petroleum tanks are less than 40,000 gallons and a gasoline tank less than 500 gallons, therefore, this rule is not applicable to this installation.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

None

New Source Performance Standards (NSPS) Applicability

10 CSR 10-6.070, *New Source Performance Regulations*

- 1) 40 CFR Part 60, Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971.*

The provisions of this subpart apply to each fossil-fuel-fired steam generating unit of more than 73 megawatts heat input rate (250 million Btu per hour) constructed or modified after August 17, 1971 and not covered under Subpart Da.

None of the boilers are rated at greater than 73 megawatts heat input rate (250 million Btu per hour), therefore this subpart does not apply to this installation.

- 2) 40 CFR Part 60, Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units for Which Construction is commenced After September 18, 1978.*

The provisions of this subpart apply to each electric utility fossil-fuel (either alone or in combination with any other fuel) fired steam generating unit of more than 73 megawatts heat input rate (250 million Btu per hour) constructed or modified after September 18, 1978. None of the boilers are electric utility steam generating units as defined in this subpart nor are rated at greater than 73 megawatts heat input rate (250 million Btu per hour), therefore this subpart does not apply to this installation.

- 3) 40 CFR Part 60, Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.*

The provisions of this subpart apply to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu per hour). None of the boilers are rated at greater than 29 megawatts heat input rate (100 million Btu per hour), therefore this subpart does not apply to this installation.

- 4) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

Subpart Dc applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr). Boilers #1 (EU00100), #2 (EU0020), #3 (EU0030) and #6 (EU0120) have heat input capacities of less than 100 MMBtu/hr but greater than 10 MMBtu/hr and constructed in 1967 prior to the applicability date of the Subpart Dc, therefore these boilers are not subject to the provisions of this subpart.

- 5) 40 CFR Part 60, Subparts K, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction Or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.*

40 CFR Part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction Or Modification Commenced After May 19, 1978, and Prior to July 23, 1984*

The installation does not have any petroleum storage vessels as defined in these subparts that are subject to this regulation.

- 6) 40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction Or Modification Commenced After July 23, 1984.*

The diesel fuel storage tanks are not large enough for these regulations to apply.

- 7) 40 CFR 60 Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, is not applicable because the stationary compression ignition engines were installed prior to the applicability date of July 11, 2005.
- 8) 40 CFR 60 Subpart JJJJ, *Standards of Performance for Spark Ignition Internal Combustion Engines*, is not applicable because the stationary internal combustion engines are compression ignition engines not spark ignition.

Maximum Achievable Control Technology (MACT) Applicability

- 1) 40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*
The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than five percent (5%) by weight, as a cleaning and/or drying agent. Wipe cleaning activities, such as using a rag containing halogenated solvent are not covered under the provisions of this subpart. The permittee operates maintenance parts cleaner using stoddard (petroleum solvent) which is not a halogenated solvents as defined in 40 CFR 63.460, therefore the parts washer is not subject to the MACT standards for halogenated solvent cleaning.
- 2) 40 CFR Part 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*
The installation operates emergency diesel generator whose operations are limited to emergency situations. Since, St. Alexius Hospital is an affected area source of hazardous air pollutants, the emergency generator are subject to 40 CFR Part 63, Subpart ZZZZ
- 3) 40 CFR Part 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*
The subpart applies to a facility that owns or operates a industrial boilers, institutional boilers, commercial boilers, and process heaters that is a major source, or is located at a major source, or is part of a major source of HAP emissions. A process heater is defined as a unit in which the combustion gases do not directly come into contact with process material or gases in the combustion chamber (e.g., indirect fired). A boiler is defined as an enclosed device using controlled flame combustion and having the primary purpose of recovering thermal energy in the form of steam or hot water. St. Alexius Hospital is an area source HAPs and operates boilers. The provisions of 40 CFR Part 63, Subpart DDDDD do not apply to this installation.
- 4) 40 CFR Part 63, Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers - Area Sources*
This regulation applies to boilers at area source facilities that burn coal, oil, biomass, or non-waste materials. Boilers burning natural gas as defined in this regulation would not be affected by the rule. This regulation does not apply to the boilers because these boilers are natural gas fired boilers with Fuel Oil No. 2 as back-up. The rule exempts natural gas fired boilers with fuel oil as back-up fuel. According to this rule, gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M, *National Emission Standard for Asbestos*, §61.145(a), Standard for demolition and renovation, applies to the installation.

This regulation has been included in the operating permit because it applies to any demolition or renovation (as outlined in 40 CFR 61.145) of buildings containing asbestos at the installation.

Other Regulatory Determinations

1) 10 CSR 10-5.300, *Control of Emissions from Solvent Metal Cleaning*

This rule applies to all processes that use cold cleaners, open top vapor degreasers or conveyORIZED degreasers, using nonaqueous solvents to clean and remove soils from metal surfaces. Therefore, the above regulation was cited in the operating permit – see permit conditions EU0060-001.

2) 10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

For 10 CSR 10-5.030, emission limitations were calculated as follows.

The PM emission limitation for existing sources (before February 15, 1979) was calculated using the equation, $E = 1.09(Q)^{-0.259}$.

where $Q = 62.76 \text{ MMBtu/hr}$, the total heat input of all indirect heating sources at the installation, and E = the maximum allowable particulate emission rate in pounds per MMBtu of heat input, rounded off to two (2) decimal places. The installation operates the following fuel burning equipment used for indirect heating:

Existing Sources:

Boiler #1-1967	20.92 MMBtu/hr
Boiler #3-1954	20.92 MMBtu/hr
Boiler #4-1954	20.92 MMBtu/hr

$$Q = 62.76 \text{ MMBTU/hr}$$

The allowable particulate matter emission rate for Boilers #3 & #4, therefore, is as follows:

$$E (\text{lb/MMBtu}) = 1.09 \times Q^{-0.259}$$

$$E = 1.09 \times (62.76)^{-0.259}$$

$$E = 0.37 \text{ lb/MMBtu}$$

The following table demonstrates compliance with the emission limits:

$$Emission\ Rate_{(lb/MMBtu)} = \left[\frac{MHDR \times Emission\ Factor}{Heat\ Capacity} \right]$$

Emission Unit #	Heat Capacity	Fuel Type	Maximum Hourly Design Rate*	PM Emission Factor	Emission Factor Reference	Potential Emission Rate	Emission Rate Limit
EU0010 (Boiler #1 or #2 or #3)	20.92 (MMBtu/hr)	Natural Gas	0.02 10 ⁶ ft ³ /hr	7.6 lb/10 ⁶ ft ³	AP-42 Table 1.4-2	0.0073 (lb/MMBtu)	0.37 (lb/MMBtu)
		Fuel Oil No. 2	0.18 10 ³ gal/hr	2.00 lb/10 ³ gal	AP-42 Table 1.3-6	0.017 (lb/MMBtu)	

* Heat capacity divided by heating value of fuel; 1050 MMBtu/10⁶ft³ for natural gas, 140 MMBtu/1000gal for fuel oil (AP-42, Appendix A)

The maximum emission rate of particulate matter of 0.017 lb/MMBtu is much less than the allowable emission rate of 0.37 lb/MMBtu for Boilers #1, #2 and #3. The boilers will always be in compliance with the PM emission limitation based upon these calculations.

3) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule applies to the boilers and generators. These combustion sources use both Fuel Oil No. 2 and natural gas as fuel. Compliance with this rule is to be shown by proving the sulfur content is less than 0.5%.

4) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This rule does not apply to internal combustion engines operated outside the Kansas City or St. Louis metropolitan areas and stationary internal combustion engines operating in the Kansas City or St. Louis metropolitan areas. However, this rule applies to the boilers. At the time of issuance of this permit, the installation had already completed its weekly and bi-weekly observations, as required by the initial operating permit OP96006 conditions. The installation currently conducting monthly observations as required by the previously mentioned permit condition. As stated in the Region 7 Policy on Periodic Monitoring for Opacity, a Method 22 like observation will consist of a quick survey of the entire plant. In most cases, this “qualitative” assessment should take more than 10-15 minutes, even for complex sources. Detecting visible emissions is an indicator of operating problems and gives the permittee a chance to take corrective actions before exceeding the opacity limit. Conducting Method 9 observations after the observation of visible emissions determines whether the emissions exceed the opacity limit, or confirm that corrective action has restored proper operation. The installation had performed the initial monthly observations and has been performing semi-annual monitoring; therefore it will be required to continue visible emissions observation on a semi-annual basis unless a violation occurs. If a violation occurs, the monitoring frequency will revert to a monthly schedule. This tiered monitoring frequency of visible/no visible emissions observations using Method 22 like procedures is considered sufficient.

5) St. Louis City Ordinances Nos. 64749, 65108, 65488, 65442 and 65645

These ordinances were reviewed and considered at the time the application for this permit was submitted. Since that time, these ordinances have been repealed and replaced with St. Louis City Ordinance No. 68657. The only section of Ordinance 65645 that corresponds to a rescinded ordinance included in the State SIP and therefore federally enforceable is Section 16 - Open Burning

Restrictions. This section of the new ordinance is the only section included in the operating permit at this time.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Berhanu A. Getahun
Environmental Engineer

CERTIFIED MAIL: 70093410000190188391
RETURN RECEIPT REQUESTED

Mr. Johnny Watkins
St. Alexius Hospital - Jefferson Campus
2639 Miami
St. Louis, MO 63118

Re: St. Alexius Hospital - Jefferson Campus, 510-0200
Permit Number: **OP2011-048**

Dear Mr. Watkins:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2960. You may also contact me at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS/bgk

Enclosures

c: PAMS File: 2007-06-043