



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 herein.

Intermediate Operating Permit Number: OP2012-027A
Expiration Date: July 2, 2017
Installation ID: 510-1505
Project Number: 2013-05-039

Installation Name and Address

St. Louis University Hospital and Energy Center
3628 Rutger Street
St. Louis, MO 63110
City of St. Louis

Parent Company's Name and Address

Tenet Healthcare dba St. Louis University Hospital
P.O. Box 15250
St. Louis, MO 63110

Installation Description:

St. Louis University Hospital and Energy Center provides space heat to Saint Louis University Hospital. Four dual-fired (natural gas and fuel oil #2 backup) boilers are used for space heat at the hospital. Coal, limestone, and flyash handling and storage equipment exist, but are no longer used. In addition, there are five diesel-fired emergency generators on-site. Ethylene oxide sterilizers, located in the hospital, are also included in this permit as an area source of HAP.

St. Louis University Hospital and Energy Center is synthetic minor source of Greenhouse Gases (GHG), Sulfur Oxides (SO_x), and Nitrogen Oxides (NO_x).

This is an amended operating permit to include the conditions of Construction Permit Project 2013-02-012.

DEC 05 2013

Effective Date


Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

St. Louis University Hospital and Energy Center provides space heat to Saint Louis University Hospital. Four dual-fired (natural gas and fuel oil #2 backup) boilers are used for space heat at the hospital. Coal, limestone, and flyash handling and storage equipment exist, but are no longer used. In addition, there are five diesel-fired emergency generators on-site. Ethylene oxide sterilizers, located in the hospital, are also included in this permit as an area source of HAP.

St. Louis University Hospital and Energy Center is synthetic minor source of GHG, SO_x, and NO_x.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2012	2011	2010	2009	2008
Condensable Particulates (PM CON)	0.63	0.66	0.62	0.60	
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.21	0.23	0.21	3.42	0.37
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.21	0.23	0.21	0.20	0.39
Sulfur Oxides (SO _x)	0.07	0.08	0.07	0.06	0.92
Nitrogen Oxides (NO _x)	11.01	11.77	10.83	10.54	11.64
Volatile Organic Compounds (VOC)	0.61	0.65	0.60	0.58	0.70
Carbon Monoxide (CO)	9.24	9.77	9.09	8.85	9.43
Ammonia (NH ₃)	0.35	0.37	0.35	0.34	-
Hazardous Air Pollutants (HAP)	-	-	0.0001	-	0.05
Lead Compounds (20-11-1)	-	-	0.0001	-	0.05

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	Description
EP-02	Boiler #2
EP-03	Boiler #3
EP-04	Boiler #4
EP-05	Boiler #5
EP-12	Maintenance Cold Cleaner
EP-13	Emergency Generator #1
EP-13B	Emergency Generator #2
EP-14A	Emergency Generators #3 & #4
EP-14B	Emergency Generator #5
EP-16	Ethylene Oxide Sterilizers (2)

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.

Emission Unit	Description
EP-15	Facility Cooling Towers (6)
	One 10 gallon, two 100 gallon, and one 275 gallon Diesel Day Tanks
	One 12,000 gallon, one 10,000 gallon, and one 6,000 gallon Underground Diesel Storage Tanks

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 CFR and 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.

EP-02 & EP-05 – Boiler 2 and Boiler 5		
Emission Unit	Description	Manufacturer/ Model #
EP-02	Boiler 2 – 60 MMBtu/hr dual fired boiler (natural gas with fuel oil #2 backup), Installed - 1972	E. Keeler Company
EP-05	Boiler 5 – 60 MMBtu/hr dual fired boiler (natural gas with fuel oil #2 backup), Installed - 1965	

Permit Condition (EP-02 & EP-05) - 001
 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 40 percent.

Monitoring:

1. The permittee shall conduct opacity readings on these emission units using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If no visible emissions are observed using Method 22, then no further observations would be required. For emission units with visible emissions, the permittee representative would then conduct a Method 9 observation.
2. The following monitoring schedule shall be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachments B & C, or equivalent forms generated by the permittee), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units and
 - b) All emission units from which visible emissions occurred.
2. The permittee shall maintain records of any equipment malfunctions and maintenance using Attachment D.

3. The permittee shall maintain records of any Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records must be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

Permit Condition (EP-02 & EP-05) - 002

10 CSR 10-6.020(2)(I)23 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart JJJJJ – National Emission Standards for HAP for Industrial, Commercial,
and Institutional Boilers Area Sources

Applicability:

The types of boilers in §63.11195(e) are not subject to 40 CFR Part 63, Subpart JJJJJ: [§63.11195]

1. A gas-fired boiler as defined at §63.11237. [§63.11195(e)]

Operational Limitation:

The gas-fired boilers shall burn natural gas not combined within any solid fuels and burn fuel oil #2 only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on fuel oil #2. Periodic testing of fuel oil #2 shall not exceed a combined total of 48 hours during any calendar year.

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of the number of hours fuel oil #2 is combusted each year using Attachment A.
2. Attachment A contains emissions calculations demonstrating that the 48 hour per year fuel oil #2 combustion operational limitation reduces potential emissions of GHG, SO_x, and NO_x below the major source levels.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

Permit Condition (EP-02 & EP-05) - 003

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Operational Limitation:

The permittee shall not combust fuel oil #2 with a sulfur content in excess of two percent sulfur by weight.

Monitoring/Recordkeeping:

1. The permittee shall maintain fuel purchase receipts and/or fuel supplier certifications indicating the sulfur content of the fuel oil #2 purchased.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EP-03 & EP-04 – Boiler 3 and Boiler 4		
Emission Unit	Description	Manufacturer/ Model #
EP-03	Boiler 3 – 25 MMBtu/hr dual fired boiler (natural gas with fuel oil #2 backup), Installed - 1954	Combustion Engineering
EP-04	Boiler 4 – 25 MMBtu/hr dual fired boiler (natural gas with fuel oil #2 backup), Installed - 1954	

Permit Condition (EP-03 & EP-04) - 001

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent.
2. Exceptions:
 - a) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than 25 lb/hr of PM shall be limited to 40 percent opacity.
 - b) The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 40 percent.

Monitoring:

1. The permittee shall conduct opacity readings on these emission units using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If no visible emissions are observed using Method 22, then no further observations would be required. For emission units with visible emissions, the permittee representative would then conduct a Method 9 observation.
2. The following monitoring schedule shall be maintained:

- a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachments B & C, or equivalent forms generated by the permittee), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units and
 - b) All emission units from which visible emissions occurred.
2. The permittee shall maintain records of any equipment malfunctions and maintenance using Attachment D.
3. The permittee shall maintain records of any Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records must be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

Permit Condition (EP-03 & EP-04) - 002

10 CSR 10-6.020(2)(I)23 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart JJJJJ – National Emission Standards for HAP for Industrial, Commercial,
and Institutional Boilers Area Sources

Applicability:

The types of boilers in §63.11195(e) are not subject to 40 CFR Part 63, Subpart JJJJJ: [§63.11195]

1. A gas-fired boiler as defined at §63.11237. [§63.11195(e)]

Operational Limitation:

The gas-fired boilers shall burn natural gas not combined within any solid fuels and burn fuel oil #2 only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on fuel oil #2. Periodic testing of fuel oil #2 shall not exceed a combined total of 48 hours during any calendar year.

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of the number of hours fuel oil #2 is combusted each year using Attachment A.
2. Attachment A contains emissions calculations demonstrating that the 48 hour per year fuel oil #2 combustion operational limitation reduces potential emissions of GHG, SO_x, and NO_x below the major source levels.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

Permit Condition (EP-03 & EP-04) - 003

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Operational Limitation:

The permittee shall not combust fuel oil #2 with a sulfur content in excess of two percent sulfur by weight.

Monitoring/Recordkeeping:

1. The permittee shall maintain fuel purchase receipts and/or fuel supplier certifications indicating the sulfur content of the fuel oil #2 purchased.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EP-12 – Maintenance Cold Cleaner	
Emission Unit	Description
EP-12	Maintenance tool and parts cleaner (10 gallon capacity)

Permit Condition (EP-12) - 001

10 CSR 10-5.300 Control of Emissions from Solvent Cleaning

Equipment Specifications:

1. The permittee shall not use, sell, or offer for sale a cold cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at 20 °C (68 °F) unless used for carburetor cleaning.

2. Each cold cleaner shall have a cover which prevents 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.
3. The permittee may use an alternate method for reducing cold cleaning emissions if the permittee shows the level of emission control is equivalent to or greater than the requirements of 10 CSR 10-5.300(3)(A)1.A of this rule. This alternate method shall be approved by the director and the EPA.
4. 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 10 ft², 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 °C (100 °F);
 - b) The solvent is agitated; or
 - c) The solvent is heated.
5. Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining.
6. 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.
7. 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.
8. 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.
9. 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 heated above 48.9 °C (120 °F) shall use one of the following control devices:
 - a) A freeboard ratio of at least 0.75;
 - b) Water cover (solvent shall 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 percent. These control systems shall receive approval from the director and EPA prior to their use.

Operating Procedure Requirements:

1. Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent shall drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
2. 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. During the draining, tipping or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner.
3. 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.
4. Solvent leaks shall be repaired immediately or the cold cleaner shall be shut down until the leaks are repaired.
5. 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:

- a) Reduction of the waste material to less than 20 percent VOC solvent by distillation and proper disposal of the still bottom waste; or
- b) Stored in closed containers for transfer to—
 - i) A contract reclamation service; or
 - ii) A disposal facility approved by the director and EPA.
- 6. Waste solvent shall be stored in closed containers only.

Operator and Supervisor Training:

- 1. Only persons trained in at least the operational and equipment requirements specified in this rule for their particular solvent metal cleaning process shall be permitted to operate the equipment.
- 2. The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operator.
- 3. A procedural review shall be given to all solvent metal cleaning equipment operators at least once each 12 months.

Reporting and Recordkeeping:

- 1. 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. The records also shall include maintenance and repair logs for both the degreaser and any associated control equipment. 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.
- 2. The permittee shall maintain records which include for each purchase of cold cleaning solvent:
 - a) The name and address of the solvent supplier;
 - b) The date of purchase;
 - c) The type of solvent; and
 - d) The vapor pressure of the solvent in mmHg at 20 °C (68 °F).
- 3. A record shall be kept of solvent metal cleaning training required by this rule.
- 4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 5. All records must be maintained for five years.
- 6. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EP-13A, EP-13B, EP-14A & EP-14B – Emergency Generators	
Emission Unit	Description
EP-13A	Emergency Generator 1 – diesel-fired, Cummins 200 KW (268 hp), Installed 1966
EP-13B	Emergency Generator 2 – diesel-fired, Cummins 200 KW (268 hp), Installed 1968
EP-14A	Emergency Generator 3 – diesel-fired, Caterpillar 810 KW (1,090 hp), Installed 1973
EP-14A	Emergency Generator 4 – diesel-fired, Cummins 640 KW (858 hp), Installed 1986
EP-14B	Emergency Generator 5 – diesel-fired, Caterpillar 520 KW (697 hp), Installed 1984

Permit Condition (EP-13A, EP-13B, EP-14A, & EP-14B) -001
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for HAP for Stationary Reciprocating
 Internal Combustion Engines

Applicability:

The emergency stationary RICE listed in §63.6585(f)(3) are not subject to 40 CFR Part 63, Subpart ZZZZ. The stationary RICE shall meet the definition of an emergency stationary RICE in §63.6675, which includes operating according to the provisions specified in §63.6640(f). [§63.6585(f)]

1. Existing institutional emergency stationary RICE located at an area source of HAP emissions that do not operate or are not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) and that do not operate for the purpose specified in §63.6640(f)(4)(ii). [§63.6585(f)(3)]

Operational Limitations:

1. The permittee shall operate the emergency stationary RICE according to the requirements in §63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under 40 CFR Part 63, Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §63.6640(f)(1) through (4), is prohibited. If the permittee does not operate the engine according to the requirements in §63.6640(f)(1) through (4), the engine will not be considered an emergency engine under 40 CFR Part 63, Subpart ZZZZ and shall meet all requirements for non-emergency engines. [§63.6640(f)]
 - a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
 - b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified in §63.6640(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(3) and (4) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
 - i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
 - ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. [§63.6640(f)(2)(ii)]
 - iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of five percent or greater below standard voltage or frequency. [§63.6640(f)(2)(iii)]
 - c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). Except as provided in §63.6640(f)(4)(i) and (ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or

non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]

- i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system. [§63.6640(f)(4)(i)]
- ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)]
 - (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator. [§63.6640(f)(4)(ii)(A)]
 - (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§63.6640(f)(4)(ii)(B)]
 - (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§63.6640(f)(4)(ii)(C)]
 - (4) The power is provided only to the facility itself or to support the local transmission and distribution system. [§63.6640(f)(4)(ii)(D)]
 - (5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§63.6640(f)(4)(ii)(E)]

Permit Condition (EP-13A) – 002

10 CSR 10-6.260 Restriction of Emissions of Sulfur Compounds

Emission Limitation:

The permittee shall not emit more than 2,000 ppmv of SO₂ or more than 70 mg/m³ of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation:

The permittee shall not combust diesel with a sulfur content in excess of 0.2 percent sulfur by weight.

Monitoring/Recordkeeping:

1. The permittee shall maintain fuel purchase receipts and/or fuel supplier certifications indicating the sulfur content of the diesel purchased.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

Permit Condition (EP-13B, EP14A, and EP-14B) – 002

10 CSR 10-6.260 Restriction of Emissions of Sulfur Compounds

Emission Limitation:

The permittee shall not emit more than 500 ppmv of SO₂ or more than 35 mg/m³ of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation:

The permittee shall not combust diesel with a sulfur content in excess of 0.05 percent sulfur by weight.

Monitoring/Recordkeeping:

1. The permittee shall maintain fuel purchase receipts and/or fuel supplier certifications indicating the sulfur content of the diesel purchased.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

Permit Condition (EP-14B) - 003

10 CSR 10-6.060 Construction Permits Required
Construction Permit 01-06-121A, Issued April 24, 2012

Operational Limitation:

1. Special Condition 2.A: The permittee shall not exceed 100 annual operating hours for maintenance checks and readiness testing the emergency generator.
2. Special Condition 2.B: The permittee shall only operate the emergency generator for the sole function of providing back-up power when electric power from the local utility is interrupted.
3. Special Condition 2.C: The permittee shall only operate the emergency generator during emergency situations and for short periods of time to perform maintenance and operational readiness testing.
4. Special Condition 2.D: The permittee shall equip the emergency generator with a non-resettable meter.

Recordkeeping/Reporting:

1. Special Condition 2.E: The permittee shall keep monthly and 12-month rolling total records of the hours of operation and the reason for operating using Attachment E or other electronic forms approved by the Air Pollution Control Program.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records must be maintained for five years.
4. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
5. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EP-16 - Ethylene Oxide Sterilizers (2)		
Emission Unit	Description	Manufacturer/Model #
EP-16	Ethylene Oxide Sterilizers, Each Installed on July 29, 1992	3M Health Care 5XL 701272 & 701273

Permit Condition (EP-16) - 001
10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 63, Subpart WWWW - National Emission Standards for Hospital Ethylene Oxide Sterilizers

Management Practice Standard:

The permittee shall 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]

Continuous Compliance Requirements:

The permittee shall 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. [§63.10420]

General Provisions:

The permittee shall refer to Table 1 to 40 CFR Part 63, Subpart WWWW for 40 CFR Part 63, Subpart A applicability.

Recordkeeping:

1. The permittee shall keep the following records:
 - a) A copy of the Initial Notification of Compliance Status that the permittee submitted to comply with 40 CFR Part 63, Subpart WWWW. [§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. Records shall be in a form suitable and readily available for expeditious review. [§63.10434(a)]
3. The permittee shall keep each record for five years following the date of each record. [§63.10434(b)]

4. The permittee shall keep each record onsite for at least two years after the date of each record. The permittee may keep the records offsite for the remaining three years. [§63.10434(c)]

Reporting:

The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the CFR, 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.

10 CSR 10-6.045 Open Burning Requirements

1. General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
2. Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exception:
 - i) The open burning of household refuse is prohibited.
 - b) Yard waste, with the following exception:
 - i) The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed 16 ft². Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities.
3. Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the permittee fails to comply with the conditions or any provisions of the permit.
4. The permittee may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least 200 yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if the permittee fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020(2)(N)5., the director shall not issue an open burning permit unless the permittee can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
5. Reporting and Recordkeeping. 40 CFR Part 60, Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in §60.2245 - §60.2260. The provisions of 40 CFR Part 60, Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with §60.2245 - §60.2260, sources shall conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.

6. Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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 director 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 director 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 director 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 §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 §643.080 or §643.151, RSMo.
4. Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under §§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 18 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)] 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)]

10 CSR 10-6.080 Emission Standards for HAP 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. The permittee shall 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 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. In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060(5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
6. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
7. 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.

8. 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 12-month period immediately preceding the end of the reporting period.
9. 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 PM to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

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 PM emissions to go beyond the premises of origin in quantities that the PM may be found on surfaces beyond the property line of origin. The nature or origin of the PM 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 PM 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.

Monitoring:

1. The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.
2. The permittee shall maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance.

- b) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once every two weeks for a period of eight weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- c) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

- 1. The permittee shall document all readings on Attachment F, or its equivalent, noting the following:
 - a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
 - b) Whether equipment malfunctions contributed to an exceedance.
 - c) Any violations and any corrective actions undertaken to correct the violation.

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

1. 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:
 - a) Areas in which there are one or more existing sources and/or proposed new sources of PM 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.
 - b) Areas in which there are one or more existing sources and/or proposed new sources of SO₂ in any circular area with a diameter of two miles from which the sum of SO₂ 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 Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the 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 40 CFR Part 82, 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 recordkeeping 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 MVACs. The term "motor vehicle" as used in 40 CFR Part 82, Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in 40 CFR Part 82, 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 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
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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 CFR and 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 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 General Recordkeeping and Reporting Requirements

1. Recordkeeping
 - 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 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, recordkeeping, 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 10 CSR 10-6.065(5)(C)1 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 Risk Management Plan Under §112(r)

1. 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 §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:
 - a) June 21, 1999;
 - b) Three years after the date on which a regulated substance is first listed under §68.130; or
 - c) 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

This permit was written based upon a maximum of 48 hours of fuel oil combustion by each boiler in a year. If the installation decides to exceed 48 hours of fuel oil combustion, the permittee shall:

- ◆ Comply with the existing oil-fired boiler standards of 40 CFR Part 63, Subpart JJJJJ
- ◆ Emit less than 100,000 tpy of GHG:
 - The permittee shall calculate their monthly and 12-month rolling total GHG emissions using the emission factors in Attachment A.
- ◆ Emit less than 100 tpy of SO_x:
 - The permittee shall calculate their monthly and 12-month rolling total SO_x emissions using the emission factors in Attachment A.
- ◆ Emit less than 100 tpy of NO_x:
 - The permittee shall calculate their monthly and 12-month rolling total NO_x emissions using the emission factors in Attachment A.
- ◆ Apply for an Intermediate Operating Permit amendment.

This permit was written based on EP-12 Maintenance Cold Cleaner using a non-aqueous solvent. The installation will no longer be required to comply with Permit Condition (EP-12) – 001 if they permanently switch to an aqueous solvent.

10 CSR 10-6.065(5)(B)4, (C)1, and (C)3 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 semiannually (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. 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 Emergency Provisions

1. An emergency or upset as defined in 10 CSR 10-6.065(5)(C)1 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 recordkeeping 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, 11201 Renner Blvd., Lenexa, KS 66219, 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 Gary Kelley, Director of Facilities. 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 permittee 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 permittee 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 Reopening-Permit for Cause

1. This permit may be reopened for cause if:
 - a) The Missouri Department of Natural Resources 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,
 - b) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - i) The permit has a remaining term of less than three years;
 - ii) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - iii) 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,
 - c) 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 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.

NO_x Conditioned PTE Calculations

Emission Unit(s)	Description	MHDR	Fuel	Conditioned Annual Usage	Emission Factor	Source	PTE (tpy)
EP-02 EP-03 EP-04 EP-05	Boilers 2, 3, 4, & 5	170 MMBtu/hr	Fuel Oil #2	8,160 MMBtu	20 lb/Mgal	FIRE 10300502	0.59
Natural Gas			1,481,040 MMBtu	100 lb/MMscf	FIRE 10300602	72.60	
EP-13A EP-13B	Emergency Generators 1 & 2	30.8 gal/hr	Diesel	15.4 Mgal	604 lb/Mgal	FIRE 20300101	4.65
EP-14A EP-14B	Emergency Generators 3, 4, & 5	19.44 MMBtu/hr	Diesel	9,722 MMBtu	3.2 lb/MMBtu	AP-42 Table 3.4-1	15.56
Plantwide NO_x Conditioned PTE (tpy):							93.40
NO_x Major Source Level (tpy):							100

The PTE of the boilers was evaluated based on 48 hours of fuel oil #2 combustion and 8,712 hours of natural gas combustion. The PTE of the emergency generators was evaluated based on 500 hours of annual operation per EPA guidance document *Calculating PTE for Emergency Generators* (September 1995). An average heat content of 138 MMBtu/1,000 gal for fuel oil #2 and 1,020 MMBtu/MMscf for natural gas was obtained from AP-42 Appendix A.

Attachment C Method 9 Opacity Observations

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 18 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 OP2012-027, issued July 3, 2012
2. Intermediate Operating Permit Amendment Application, received May 20, 2013
3. 2012, 2011, 2010, 2009, and 2008 Emissions Inventory Questionnaires
4. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
5. St. Louis City Air Pollution Control Program Construction Permit dated November 4, 1986
6. St. Louis City Air Pollution Control Program Construction Permit dated August 23, 1988
7. St. Louis City Air Pollution Control Program Construction Permit dated January 28, 1993
8. St. Louis City Air Pollution Control Program Construction Permit 01-06-021 dated July 19, 2001
9. Construction Permit 01-06-121A, Issued April 24, 2012
10. Construction Permit Project 2013-02-012

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-5.220 *Control of Petroleum Liquid Storage, Loading, and Transfer* is not applicable to the installation and has not been applied within this permit. The installation only handles diesel/fuel oil #2 which has a maximum true vapor pressure below 4.0 psia at 90°F and is exempt from this regulation per 10 CSR 10-5.220(1)(C)1.B.

10 CSR 10-5.500 *Control of Emissions From Volatile Organic Liquid Storage* is not applicable to the installation and has not been applied within this permit. All of the tanks at the installation are below the 40,000 gallon applicability threshold of this regulation.

10 CSR 10-5.510 *Control of Emissions of NO_x* is not applicable to the installation and has not been applied within this permit. The installation has accepted voluntary limits to reduce their NO_x PTE below 100 tons per year and obtain this Intermediate Operating Permit; therefore, the installation does not meet the applicability threshold of this regulation.

10 CSR 10-5.570 *Control of Sulfur Emissions from Stationary Boilers* is not applicable to the installation and has not been applied within this permit. EP-02 Boiler 2 and EP-05 are exempt from this regulation per 10 CSR 10-5.570(1)(C)5 as they exclusively combust natural gas and/or fuel oil #2 with a sulfur content of less than 0.5 percent by weight.

10 CSR 10-6.360 *Control of NO_x Emissions From Electric Generating Units and Non-Electric Generating Boilers* is not applicable to the installation and has not been applied within this permit. All of the boilers at the installation are smaller than the 250 MMBtu/hr applicability threshold of this regulation.

10 CSR 10-6.390 *Control of NO_x Emissions From Large Stationary Internal Combustion Engines* is not applicable to the installation and has not been applied within this permit. All of the generators at the installation are smaller than the 1,300 HP applicability threshold of this regulation.

10 CSR 10-6.400 *Restriction of Emission of PM from Industrial Processes* is not applicable to the installation and has not been applied within this permit. EP-15 Facility Cooling Towers are exempt from this regulation per 10 CSR 10-6.400(1)(B)12 as they have potential PM emissions below 0.5 lb/hr.

10 CSR 10-6.6.405 *Maximum Allowable Emission of PM from Fuel Burning Equipment Used for Indirect Heating* is not applicable to the installation and has not been applied within this permit. The installation is exempt from this regulation per 10 CSR 10-6.405(1)(E) as they exclusively combust fuel oil #2 and natural gas.

Construction Permits

St. Louis City Air Pollution Control Program Construction Permit dated November 4, 1986:

- ◆ This permit allowed for the combustion of coal in EP-02 and EP-05 Boilers.
- ◆ These boilers no longer combust coal.
- ◆ The conditions of this permit were superseded by Construction Permit Project 2013-02-012 Special Condition 1.A.

St. Louis City Air Pollution Control Program Construction Permit dated August 23, 1988:

- ◆ This permit revised the conditions of the 1986 permit.
- ◆ The conditions of this permit were superseded by Construction Permit Project 2013-02-012 Special Condition 1.B.

St. Louis City Air Pollution Control Program Construction Permit dated January 28, 1993:

- ◆ This permit allowed for the construction of a 12,000 gallon Fuel Oil #2 Storage Tank
- ◆ This is a St. Louis City registration construction permit and is not state or federally enforceable.

St. Louis City Air Pollution Control Program Construction Permit 01-06-021 dated July 19, 2001:
Construction Permit 01-06-121A, Issued April 24, 2012:

- ◆ This permit allowed for the construction of EP-14B Emergency Generator 5 and an additional 500 kW generator.
- ◆ The second generator is no longer located at the installation.
- ◆ The amendment to this permit modifies the special conditions.
- ◆ The conditions of this permit were included in Permit Condition (EP-14B) – 003.

Construction Permit Project 2013-02-012:

- ◆ This project clarifies that the special conditions of the 1986 and 1988 permits are no longer applicable as EP-02 and EP-05 Boilers no longer combust coal.

New Source Performance Standards Applicability

40 CFR Part 60, Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* is not applicable to the installation and has not been applied within this permit. EP-02, EP-03, EP-04, and EP-05 Boilers were installation prior to June 9, 1989 and do not meet the applicability requirements of §60.40c(a).

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* is not applicable to the installation and has not been applied within this permit. All of the tanks at the installation are smaller than the 75 m³ (19,812 gallons) capacity threshold of §60.110b(a).

40 CFR 60 Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* is not applicable to the installation and has not been applied within this permit. All of the emergency generators at the installation were installed prior to the July 11, 2005 applicability date of §60.4200(a)(2).

Maximum Achievable Control Technology Applicability

40 CFR Part 63, Subpart O – *Ethylene Oxide Emissions Standards for Sterilization Facilities* is not applicable to the installation and has not been applied within this permit. This regulation does not apply to ethylene oxide sterilization operations at hospitals per §60.360(e).

40 CFR Part 63, Subpart T - *National Emission Standards for Halogenated Solvent Cleaning* is not applicable to the installation and has not been applied within this permit. EP-12 Maintenance Cold Cleaner does not use any solvent containing methylene chloride (75-09-2), perchloroethylene (127-18-4), trichloroethylene (79-01-6), 1,1,1-trichloroethane (71-55-6), carbon tetrachloride (56-23-5), or chloroform (67-66-3) and thus does not meet the applicability requirements of §63.460(a).

40 CFR Part 63, Subpart Q - *National Emission Standards for HAP for Industrial Process Cooling Towers* is not applicable to the installation and has not been applied within this permit. The installation is not a major source of HAP and; therefore, does not meet the applicability requirements of §63.400(a).

40 CFR Part 63, Subpart ZZZZ - *National Emissions Standards for HAP for Stationary Reciprocating Internal Combustion Engines* is not applicable to the installation per §63.6585(f) provided they meet the emergency engine operating requirements of §63.6640(f). The requirements of §63.6640(f) were applied within Permit Condition (EP-13A, EP-13B, EP-14A & EP-14B) - 001 to ensure the generators meets the conditional exemption.

40 CFR Part 63, Subpart DDDDD - *National Emission Standards for HAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* is not applicable to the installation and has not been applied within this permit. The installation is not a major source of HAP

and; therefore, does not mee the applicability threshold of §63.7485.

40 CFR Part 63, Subpart WWWW – *National Emission Standards for Hospital Ethylene Oxide Sterilizers* is applicable to the installation and has been applied within this permit (see Permit Condition (EP-16) – 001).

40 CFR Part 63, Subpart JJJJJ - *National Emission Standards for HAP for Industrial, Commercial, and Institutional Boilers Area Sources* is not applicable to the installation per §63.11195(e) provided they meet the definition of gas-fired boiler. EP-02, EP-03, EP-04, and EP-05 Boilers were limited to 48 hours of fuel oil combustion to ensure each boiler meets the conditional exemption.

National Emission Standards for Hazardous Air Pollutants Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

Updated Potential to Emit (PTE) for the Installation

Pollutant	Conditioned PTE (tpy)	Unconditioned PTE (tpy)
CO	65.97	66.15
GHG	88,958.96	122,787.37
NO _x	93.40	128.12
PM	40.74	52.93
PM ₁₀	40.65	47.91
PM ₂₅	6.18	12.10
SO _x	9.50	1,554.50
VOC	4.97	4.98
HAP	1.46	1.47

Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted:

- In the Conditioned PTE EP-02, EP-03, EP-04, and EP-05 were evaluated at 48 hours of fuel oil combustion each and 8,712 hours of natural gas combustion per Permit Conditions (EP-02 & EP-05) – 002 and (EP-03 & EP-04) – 002.
- In the Unconditioned PTE EP-02, EP-03, EP-04, and EP-05 were evaluated at 8,760 hours of operation for the worst-case fuel (fuel oil #2 or natural gas) for each pollutant.
- In both PTEs EP-13A, EP-13B, EP-14A, and EP-14B Emergency Engines was evaluated at 500 hours of annual operation per EPA guidance document *Calculating PTE for Emergency Generators* (September 1995).

Other Regulatory Determinations

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation and has been applied within this permit (see Permit Conditions (EP-02 & EP-05) – 001 and (EP-03 & EP-04) – 001). EP-13 and EP-14 Emergency Generators are exempt from this regulation per 10 CSR 10-6.220(1)(A). EP-15 Facility Cooling Towers are subject to this regulation, but visible emissions observations are infeasible due to the quantity of water vapor; therefore, no monitoring, recordkeeping, or reporting is required 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:

Alana L. Rugen, EIT
Environmental Engineer II

Mr. Gary Kelley
St. Louis University Hospital and Energy Center
3628 Rutger Street
St. Louis, MO 63104

Re: St. Louis University Hospital and Energy Center, 510-1505
Permit Number: **OP2012-027A**

Dear Mr. Kelley:

Enclosed with this letter is your amended 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 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 Alana Rugen. You may also contact me with 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/ark

Enclosures

c: St. Louis Regional Office
PAMS File: 2013-05-039

MEMORANDUM

DATE: November 7, 2013

TO: 2013-05-039 St. Louis University Hospital and Energy Center (510-1505)

FROM: Alana L. Rugen, EIT
Environmental Engineer II

SUBJECT: Response to Public Comments

The draft Intermediate Operating Permit amendment for St. Louis University Hospital and Energy Center (Project 2013-05-039, County-Plant ID: 510-1505) was placed on public notice as of October 7, 2013, for a 30-day comment period. The public notice was published on the Department's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm> on Monday, October 7, 2013. The Air Pollution Control Program did not receive any comments from either the public or the applicant during the 30-day comment period.

ALR/kjc