

217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Veterans Administration
Edwards Hines Jr. Hospital
Attn: Darlene M. Weisman
P.O. Box 5000
Hines, Illinois 60141

<u>Application No.:</u> 95060044	<u>I.D. No.:</u> 031817AAL
<u>Applicant's Designation:</u>	<u>Date Received:</u> June 7, 1995
<u>Operation of:</u> Hospital	
<u>Date Issued:</u> November 23, 1998	<u>Expiration Date:</u> November 23, 2003
<u>Source Location:</u> 5th and Roosevelt, Hines, Cook County	
<u>Responsible Official:</u> Jacqueline I. Kuchyak	

This permit is hereby granted to the above-designated Permittee to OPERATE a hospital, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: October 30, 2000
Revision Date Issued:
Purpose of Revision: Minor Modification

This minor modification reflects removal of the medical waste incinerator from this location and decrease of total allowable emissions in Section 5 of this permit.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:jar

cc: Illinois EPA, FOS Region 1

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations

promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

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Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Veterans Administration
Edward Hines Jr. Hospital
5th and Roosevelt, P.O. Box 5000
Hines, Illinois 60141

708/343-7200 Ext. 5613

I.D. No.: 031817AAL

Standard Industrial Classification: 8062, General Hospitals

1.2 Owner/Parent Company

Veterans Administration
Edward Hines Jr. Hospital
5th and Roosevelt, P.O. Box 5000
Hines, Illinois 60141

1.3 Operator

Veterans Administration
Edward Hines Jr. Hospital
5th and Roosevelt, P.O. Box 5000
Hines, Illinois 60141

Contact Person's Name: Darlene M. Weisman
708/202-5613

1.4 General Source Description of Source

The Edward Hines Jr. Hospital is a Veteran Administration hospital located at 5th Avenue and Roosevelt Road in Hines. The hospital is a source of emissions from natural gas-fired boilers (with distillate fuel oil as backup), incinerator used for on-site disposal of pathological wastes, ethylene oxide sterilizers, gasoline dispensing operation, and emergency internal combustion engine.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ft ³	cubic foot
G	Grams
gal	Gallon
gr	Grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
HMIWI	Hazardous Medical Infectious Waste Incinerator
Hp	Horsepower
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
°F	degrees Fahrenheit
kg	kilogram
lb	pound
LEL	Lower Explosive Limit
m	meter
MBtu	Million Btus
Mg	Megagrams
mg	milligrams
MW	Megawatts
NSPS	New Source Performance Standards
NO _x	Nitrogen Oxides
OM	Organic Material
PIMW	Potentially Infectious Medical Wastes
PM	Particulate Matter
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
scf	standard cubic feet
scm	standard cubic meters
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency

VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
wt	weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Storage tanks of virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Addition of Insignificant Activities

- 3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

- 3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

- 3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Equipment	Description	Emission control Equipment
Group 1	Boilers #1 - #4	Natural Gas-Fired Boilers with Distillate Fuel Oil as Backup	None
Group 2	Pathological Waste Incinerator	Manufacturer: FC Industries, Inc. Model: P16-2GNT	A secondary combustion chamber with burner is an integral part of the unit.
Group 3	Ethylene Oxide Sterilizers/Aerator #1 and #2	Sterilization of Hospital Equipment	None
Group 4	Gasoline Storage Tank	3,000 Gallon Capacity	Submerged pipe and pressure vacuum relief valve.
Group 5	Internal Combustion Engine	Emergency Diesel Oil-Fired Engine	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of NO_x emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. Emissions of smoke or other particulate matter from any emission unit shall not exceed 30% opacity, except that opacity of greater than 30% but less than 60% shall be allowed for periods aggregating 8 minutes in any 60 minutes period provided that such more opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1,000 ft) radius from the center point of any such emission unit owned or operated by the Permittee and provided further that such more opaque emissions permitted from each such emission unit shall be limited to 3 times per 24 hour period pursuant to 35 IAC 212.123(a) and (b).
- c. No person shall cause or allow the emissions of sulfur dioxide into the atmosphere from any process emission unit in excess of 2,000 ppm [35 IAC 214.301].

5.2.3. The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

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

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	3.76
Sulfur Dioxide (SO ₂)	35.88
Particulate Matter (PM)	13.17
Nitrogen Oxides (NO _x)	138.7
TOTAL	191.51

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the Clean Air Act not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, or Section 502(b) (10) of the CAA.

5.6 General Recordkeeping Requirements

5.6.1 Emission records

The Permittee shall keep and maintain records of total emissions on a calendar year basis for the equipment covered by unit-specific conditions (Section 7) to demonstrate compliance with Condition 5.5.1.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA and USEPA, and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous year.

5.7.2 The Permittee shall promptly notify the Illinois EPA if the emissions exceed the limits in Condition 5.5.1 and appropriate unit-specific conditions of Section 7

5.8 General Operational Flexibility/Anticipated Operating Scenarios

None

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Allowable Emissions
Compliance with the source-wide emission limits specified in Condition 5.5.1 shall be based on the recordkeeping and reporting requirements, and Compliance Procedures in Section 7 (Unit-Specific Conditions) of this permit.

6.0 [NOT APPLICABLE TO THIS SOURCE]

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1: Natural Gas-Fired Boilers

7.1.1 Description

Boilers are used to produce steam for heating and air conditioning at the source. The boilers are also able to fire distillate fuel oil, as a backup fuel.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Boilers #1 - #4	Natural Gas-Fired Boilers with Distillate Fuel Oil as Backup. Maximum Heat Input Capacity: #1 50 MBtu/hr #2 50 MBtu/hr #3 50 MBtu/hr #4 50 MBtu/hr Construction Date: 1967	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected boiler" for the purpose of these unit specific conditions is a natural gas-fired boiler, which is used to produce steam for heating and air conditioning at the source.
- b. The emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 MBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].
- c. The emissions of particulate matter (PM) into the atmosphere in any one-hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/MBtu) of actual heat input from any fuel combustion emission unit using liquid fuel exclusively [35 IAC 212.206].
- d. The emission of sulfur dioxide (SO₂) into the atmosphere in any one-hour period from any existing fuel combustion emission unit, burning liquid fuel exclusively shall not exceed 0.46 kg of sulfur dioxide

per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lb/MBtu) [35 IAC 214.161(b)].

7.1.4 Non-Applicability of Regulations of Concern

- a. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units constructed, reconstructed, or modified after June 9, 1989. Boilers #1 - #4 were constructed prior to June 9, 1989, therefore, these rules do not apply.
- b. The affected boilers are not subject to 35 IAC 217.141, emissions of NO_x from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of each boiler is less than 73.2 MW (250 MBtu/hr).
- c. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material.

7.1.5 Operational and Production Limits and Work Practices

- a. Each boiler shall only be operated with natural gas or distillate fuel oil as the fuels.
- b. The Permittee shall not use distillate fuel oil (Grades No. 1 and 2 fuels) in these boilers with a sulfur content greater than the larger of the following two values:
 - i. 0.28 weight percent, or
 - ii. The wt percent given by the formula:

$$\text{Maximum Wt Percent Sulfur} = (0.000015) \times (\text{Gross Heating Value of Oil, Btu/lb})$$

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5.1, the boilers are subject to the following:

Total emissions and operation by combustion distillate fuel oil #2 shall not exceed the following limits:

Pollutant	Fuel Oil Usage		Emission	Emissions	
	(10 ³ gal/mo)	(10 ³ gal/yr)	Factor	(T/mo)	(T/yr)
			(lb/1,000 gal)		

NO _x	480	4,800	20	4.8	48
SO ₂	480	4,800	39.76	9.5	95.4

These limits are based on the maximum operating rate, 0.28% weight of sulfur content in the oil, and standard emission factors given by AP-42. Compliance with annual limits shall be determined from a running total of 12 months of data.

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items which allow to demonstrate compliance with Conditions 5.5.1, 7.1.5 and 7.1.6 pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage for the boilers (therms /mo or scf/mo and therms/yr or scf/yr).
- b. Total distillate fuel oil usage for the boilers (gallons/mo and gallons/year).
- c. For each shipment of distillate fuel oil used in the boilers:

The maximum sulfur content (wt. %)
- d. Annual aggregate NO_x, PM, SO₂, and VOM emissions from the boilers, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. If there is an exceedance of sulfur content of distillate fuel oil in excess of the limit specified

in Condition 7.1.5, the Permittee shall submit a report within 30 days after receipt of noncompliance shipment of distillate fuel oil.

- b. Emissions of NO_x, PM, SO₂, or VOM from the boilers in excess of the limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(a) is assumed to be achieved by work-practices inherent in operation of natural gas-fired and distillate oil-fired boilers, so that no compliance procedures are set in this permit addressing this regulation.
- b. Compliance with Condition 7.1.3(c) is assumed to be achieved by the work-practices in operation of distillate oil-fired boilers with a sulfur content meeting the specification of Condition 7.1.5(b), so that no compliance procedures are set in this permit addressing this regulation.
- c. Compliance with the emission limits in Conditions 5.5.1 and 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:
 - i. To determine compliance with Condition 5.5.1, emissions from the boilers burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/10⁶ ft³)</u>
PM	7
NO _x	100
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 MBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, March, 1998.

Boiler Emissions (lb) = Natural Gas Consumed
Multiplied by the Appropriate Emission Factor.

- ii. To determine compliance with Conditions 5.5.1 and 7.1.6, emissions from the boilers burning distillate fuel oil shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/10⁶ gal)</u>
PM	2
NO _x	20
SO ₂	142S
VOM	0.216

These are the emission factors for uncontrolled distillate fuel oil combustion in commercial/institutional/residential combustors, Tables 1.3-1 and 1.3-2, AP-42, Volume I, September, 1998. "S" indicates that the weight % of sulfur in the oil should be multiplied by the value given.

Boiler Emissions (lb) = Distillate Fuel Oil Consumed (gallons) Multiplied by the Appropriate Emission Factor

7.2 Group 2: Pathological Waste Incinerator

7.2.1 Description

Pathological waste incinerator is used for on-site disposal of the animal pathological waste. Incinerator is of "multiple-chamber" design, with a primary combustion chamber (into which waste is charged) followed by a secondary combustion chamber. Efficient combustion is maintained by natural gas fired supplementary burners installed in each chamber.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 2	Pathological Waste Incinerator	Manufacturer: FC Industries, Inc. Model: P16-2GNT Charging capacity: 60 lb/hr Construction Date: 1993	A secondary combustion chamber with burner is an integral part of the unit.

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected pathological waste incinerator" for the purpose of these unit specific conditions is an incinerator used for on-site disposal of the animal pathological waste.
- b. Emissions of PM from any incinerator, for which construction or modification commenced on or after April 14, 1972, shall not exceed 229 mg/scm (0.1 gr/scf) of effluent gases, corrected to 12 percent carbon dioxide [35 IAC 212.181(d)].
- c. Emissions of CO from any incinerator shall not exceed 500 ppm, corrected to 50 percent excess air [35 IAC 216.141].

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected pathological waste incinerator is not subject to requirements of 40 CFR Part 60, Subpart Ec "Standards of Performance for Hospital/Medical/Infectious Waste Incinerators" based on the following:

- i. All pathological waste incinerators are excluded from emission limitations established in Subpart Ec.
- ii. All pathological waste incinerators constructed before June 20, 1996 are excluded from any requirements established in Subpart Ec.
- b. The affected pathological waste incinerator is not subject to requirements and future state and federal regulations which will be based on requirements of 40 CFR 60, Subpart Ce "Emission Guidelines and Compliance Times for Hospital/Medical/Infectious Waste Incinerators" because this incinerator is burning only pathological waste is not regulated by above mentioned guidelines.

7.2.5 Operating Requirements and Work Practices

- a. The pathological waste only shall be charged at the rate not exceeding 60 lb/hr.
- b. i. The secondary combustion chamber of the incinerator shall be preheated to the 1400°F prior to introducing waste into the incinerator.
- ii. This temperature shall be maintained until burnout of waste in the primary chamber is completed.

7.2.6 Emission Limitations

In addition to Condition 5.2.2, the source wide limitations in Condition 5.5.1, and limitations in Condition 7.2.3 the incinerator is subject to the following:

Operation and emissions of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Hours of Operation (hr/yr)</u>	<u>E M I S S I O N S</u>			
		<u>PM</u>		<u>CO</u>	
		<u>(lb/hr)</u>	<u>(T/yr)</u>	<u>(lb/hr)</u>	<u>(T/yr)</u>
Incinerator	1,040	0.068	0.036	0.61	0.32

These limits are based on the allowable emissions, determined from the type of waste and hourly unit

capacity. This condition is originated from the Joint Construction/Operating Permit 93020065, issued on March 19, 1993.

7.2.7 Testing Requirements

N/A

7.2.8 Monitoring Requirements

The incinerator shall be equipped with a secondary combustion chamber temperature indicator with continuous recorder which allow verification of compliance with requirements of Condition 7.2.5(b).

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain the following records for the incinerator to demonstrate compliance with Conditions 5.5.1 , 7.2.5, 7.2.6 and 7.2.8, pursuant to Section 39.5(7)(b) of the Act:

- a. A secondary combustion chamber temperature prior and during the time of operation.
- b. Type and amount of waste charged (lb/hr and tons/yr).
- c. Hours of operation per year (hr/yr).
- d. Operating logs for each incinerator, which include time of operation and operating temperature of secondary chamber.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Emissions of PM and CO from the incinerator that may be in excess of the limits specified in Conditions 7.2.3 and 7.2.6 within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(b) is assumed to be achieved by the work-practices inherent in operation of the afterburner on the incinerator along with the procedures specifying a minimum combustion chamber temperature in Condition 7.2.5, so that no compliance procedures are set in this permit.
- b. Compliance with Condition 7.2.3(b) and (c) is assumed to be achieved by the work-practices inherent in operation of the incinerator, so that no compliance procedures are set in this permit addressing this regulation.
- c. Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:
 - i. To determine compliance with Condition 5.5.1, emissions from affected pathological waste incinerators shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/ton Burned)</u>
PM	4.67
NO _x	3.56
SO ₂	7.5

These are the emission factors of the pathological waste incineration for Solid Waste Disposal - Commercial/Institutional, FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants, SCC 50200505 Pathological Incineration, August, 1995.

Incinerator Emissions (Tons) = Waste Charged Multiplied by the Appropriate Emission Factor.

7.3 Group 3: Ethylene Oxide Sterilizers/Aerators #1 and #2

7.3.1 Description

These sterilizers are used for sterilization of medical equipment. The unsterilized items are placed inside the sterilization chamber, where the ethylene oxide is introduced.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 3	Two Ethylene Oxide Sterilizers	Sterilization of Hospital Medical Equipment	None

7.3.3 Applicable Regulations

None

7.3.4 Non-Applicability of Regulations of Concern

The sterilizers at this source are not subject to requirements of the following:

- a. The ethylene oxide sterilizers at this source are not subject to requirements of 40 CFR Part 63, Subpart Q "National Emission Standards for Hazardous Air Pollutants for Ethylene Oxide Commercial Sterilization and Fumigation Operations", because pursuant to paragraph 40 CFR 63.360(e) all hospitals, doctors offices, clinics are exempted from requirements of these rules.
- b. The ethylene oxide sterilizers at this source are not subject to requirements of 35 IAC Part 218, Subpart G "Use of Organic Material", because pursuant to paragraph 211.7150 chemical compounds used at these units are not photochemical reactive and excluded from definition of VOM.

7.3.5 Operational and Production Limits, and Work Practices

N/A

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5.1, the sterilizers are subject to the following:

N/A

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each sterilizer to demonstrate compliance with Condition 5.5.1:

- a. The composition of each sterilant mixture used, i.e., weight ETO, wt. non-VOM.
- b. Amount of each type of the sterilant used.
- c. Amount of ETO emitted.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control, operating requirements, and emissions of HAPs as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all).
- b. The total emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding year through January, for the month of February, the

emissions from March of the preceding calendar year through February, 12 months in all).

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

To determine compliance with Conditions 5.5.1 emissions from the sterilizers shall be calculated based on the following:

Sterilizer HAP Emissions = Sterilant ETO Consumption

7.4 Group 4: Gasoline Storage Tank

7.4.1 Description

The gasoline storage tank is associated with gasoline non-retail dispensing operations for hospital vehicles.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 4	Gasoline Storage Tank	3,000 Gallon Capacity. Used for Gasoline Dispensing Operations	Submerged pipe and pressure/vacuum relief valve.

7.4.3 Applicable Regulations

- a. No person shall cause or allow the loading of any organic material in any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe [35 IAC 218.122(b)].
- b. Pursuant to 35 IAC 218.583(a), the transfer of gasoline from any delivery vessel into the stationary storage tank at a gasoline dispensing operations shall include the following:
 - i. The tank is equipped with a submerged loading pipe.
 - ii. The vapors displaced from the storage tank during filling and processed by a vapor control system that includes one or more of the following:
 - A. A vapor collection system that meets the requirements of 218.583(d)(4).
 - B. A refrigeration-condensation system or any other system approved by the Illinois EPA and approved by the USEPA as a SIP revision, that recovers at least 90 percent by weight of all vaporized organic material from the equipment being controlled.

C. The delivery vessel displays the appropriate sticker pursuant to the requirements of Section 218.584(b) or (d).

iii. All tank vent pipes are equipped with pressure/vacuum relief valves and shall be set to resist a pressure of at least 3.5 inches water column and to resist a vacuum of no less than 6.0 inches water column.

7.4.4 Non-Applicability of Regulations of Concern

a. The gasoline storage tank is not subject to the requirements of 35 IAC 218.120, because this tank meets the following criteria pursuant to 35 IAC 218.119:

Does not have 151 cubic meters (40,000 gal) capacity.

b. The gasoline storage tank is not subject to the requirements of 35 IAC 218.121(b), because this tank meets the following criteria pursuant to 35 IAC 218.121:

Does not have 151 cubic meters (40,000 gal) capacity.

c. The gasoline storage tank is not subject to the limitation of 35 IAC 218.122(a), because this tank meets the following criteria pursuant to 35 IAC 218.122(a):

Does not have throughput of greater than 151 cubic meters per day (40,000 gal/day).

d. The gasoline storage tank is not subject to the requirements of 35 IAC 218.586(c), because this tank meets the following criteria pursuant to 35 IAC 218.586(b):

An average monthly volume of motor vehicle fuel dispensed is less than 10,000 gal/month.

7.4.5 Compliance Plan/Schedule of Compliance

N/A

7.4.6 Operational and Production Limits, and Work Practices

Pursuant to 218.583(d), the Permittee shall:

- a. Maintain and operate each vapor control system in accordance with the owner's instructions.
- b. Promptly notify the owner of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system.
- c. Maintain gauges, meters or other specified testing devices in proper working order.
- d. Operate the vapor collection system and delivery vessel unloading points in a manner that prevents:
 - i. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B incorporated by reference in Section 218.112 of this Part.
 - ii. Avoidable leaks of liquid during the filling of storage tanks.
- e. Within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, repair and retest a vapor collection system which exceeds the limits of Condition 7.4.6(d)(i).

7.4.7 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition the gasoline storage tank is subject to the following:

N/A

7.4.8 Testing Requirements

Pursuant to 218.583(a)(4), the Permittee shall demonstrate compliance with subsection 218.583(a)(3) after installation of each pressure/vacuum relief valve, and at least annually thereafter, by measuring and recording the pressure indicated by a pressure/vacuum gauge at each tank vent pipe. The test shall be performed on each tank vent pipe within two hours after product delivery into the respective storage tank. For manifold tank vent systems, observations at any point within the system shall be adequate. The Permittee shall maintain any records required by this subsection for a period of three years.

7.4.9 Monitoring Requirements

Pursuant to 218.583(c), the Permittee shall:

- a. Install all control systems and make all process modifications required by 218.583(a).
- b. Provide instructions to the operator of the gasoline dispensing operation describing necessary maintenance operations and procedures for prompt notification of the owner in case of any malfunction of a vapor control system.
- c. Repair, replace or modify any worn out or malfunctioning component or element of design.

7.4.10 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the storage tank to demonstrate compliance with Condition 5.5.1 and Condition 7.4.4(a) pursuant to Section 39.5(7)(b) of the Act and 35 IAC 218.129(f):

- a. Readily accessible records of dimensions and analysis of the capacity of the storage tank.
- b. Monthly and annual gasoline throughput (gallons/month and gallons/year).

7.4.11 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

N/A

7.4.12 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.13 Compliance Procedures

To determine compliance with Conditions 5.5.1 emissions from the storage tank shall be calculated based on the following:

For the purpose of calculating VOM emissions from the storage tank, the current version of the TANKS program is acceptable.

7.5 Unit 5: Internal Combustion Engine

7.5.1 Description

Internal combustion engine is used as an emergency generator for generation of electricity for hospital's needs.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 6	Internal Combustion Engine	Diesel Oil-Fired Engine (1,875 KW or 10.4 mmBtu/hr) Construction Date: 1967	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected engine" for the purpose of these unit specific conditions, is a diesel oil fired internal combustion engine which provides an electricity for hospital's needs during emergency for hospital's needs during emergency outages of electricity supply.
- b. The emission of VOM into the atmosphere shall not exceed 3.6 kg/hour (8 lb/hour) from an affected engine, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].
- c.
 - i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.
 - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period, provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1,000 ft) radius from the

center point of any other such emission unit owned or operated by such person, and provided further that such emission unit shall be limited to 3 times in any 24 hours [35 IAC 212.123].

7.5.4 Non-Applicability of Regulations of Concern

The affected engine at this source is not subject to requirements of the following:

An affected engine is not subject to the requirements of 35 IAC 212.322 because it does not have a process weight rate as defined in 35 IAC 211.5250.

7.5.5 Operational and Production Limits and Work Practices

Diesel fuel oil shall be the only fuel used for the affected engine.

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, emissions from the affected engine are subject to the following limitations:

None

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected utility units to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Hours of operation (hr/year).
- b. Annual emissions of air pollutants from the affected engine based on the hours of operation and standard emission factors, as established by the compliance procedures of Condition 7.5.12.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of affected internal combustion engines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

- a. Compliance with Conditions 7.5.3(b) and (c) is assumed to be achieved by the work-practices inherent in operation of affected engine, so that no compliance procedures are set in this permit addressing this regulation; and.
- b. Compliance with the emission limits in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.5.9 and calculated based on the emission factors listed below:

<u>Pollutant</u>	<u>Emission Factor (lb/mmBtu/hr gas)</u>
CO	0.95
NO _x	4.41
PM ₁₀	0.31
SO ₂	0.29

These emission factors are based on the uncontrolled emissions from the diesel industrial engines (SCC 2-02-001-02 and 2-03-001-01) as established in the Table 3.3-1 of AP-42.

8.0 General Permit Conditions

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements as of the date the proposed permit for this source was issued. This shield is granted based on the Illinois EPA's review of the permit application for this source and its determination that all applicable requirements are specifically identified in this permit. If the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after January 27, 1998 unless the permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not

constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

- a. Describe the physical or operational change.
- b. Identify the schedule for implementing the physical or operational change.
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply.
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification.
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other process, emissions, or composition parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period

Report Due Date

January - June

September 1

July - December

March 1

All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in the permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s).
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests.
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined.
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations.
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods.
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
- g. Any proposed use on an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in the permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum:

- a. The name and identification of the affected unit(s).

- b. The date and time of the sampling or measurements.
- c. The date any analyses were performed.
- d. The name of the company that performed the tests and/or analyses.
- e. The test and analytical methodologies used.
- f. The results of the tests including raw data, and/or analyses including sample calculations.
- g. The operating conditions at the time of the sampling or measurements.
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency (MC 40)
Bureau of Air
Compliance Section
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016
 - iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Divisions of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506
 - iv. USEPA - Air Branch

United States EPA (AR - 18J)

Air & Radiation Branch (Illinois - Indiana)
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

9.0 Standard Permit Conditions

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in the permit and as allowed by law and rule. [Section 39.5(7)(j)(iv) of the Act]

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the Clean Air Act, including USEPA's authority under that Section.
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of the permit. Any permit noncompliance constitutes a violation of the Clean Air Act and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition. [Section 39.5(6)(c) of the Act]

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi)] The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of the permit.

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, operations regulated or required under the permit.
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or this Act.
- e. Obtain and remove samples of any discharge or emission of pollutants.
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes.

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [Section 39.5(7)(e)(ii) of the Act]
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certifications shall include descriptions on means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. The certification shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications must be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by a CAAPP permit shall contain certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(k) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defenses to Enforcement Action

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-

based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operation logs, or other relevant evidence:

- i. An emergency occurred as provided in Subsection 7(k) of Section 39.5 of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency.
 - ii. The permitted source was at the time being properly operated.
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working day of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in the permit.
- b. This provision is in addition to any emergency or upset provisions contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless the permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on the permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

The permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

9.12.2 Reopening and Revision

The permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.
- c. The Illinois EPA or USEPA determines that the permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of the permit.
- d. The Illinois EPA or USEPA determines that the permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(a)(iii) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such

records directly to USEPA along with a claim of confidentiality. [Section 39.5(7)(o)(v) of the Act]

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if the permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions. [Section 39.5(5)(1) and (n) of the Act]

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

AB:jar

10.2 Attachment 2 Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
- Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

- Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on

applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC
270.305.



Illinois Environmental Protection Agency
 Division Of Air Pollution Control -- Permit Section
 P.O. Box 19506
 Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

22. Technical contact person for application:	23. Contact person's telephone number:
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This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.
 Authorized Signature:

BY: _____

AUTHORIZED SIGNATURE TITLE OF SIGNATORY
 _____ / _____ / _____
 TYPED OR PRINTED NAME OF SIGNATORY DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

217/782-2113

CERTIFIED MAIL

REQUEST FOR ADDITIONAL INFORMATION
CAAPP PERMIT APPLICATION

January 22, 2001

Edward Hines Jr. Hospital
Attn: Darlene Weisman
5th and Roosevelt Road
Hines, Illinois 60141

Application No.: 95060044
I.D. No.: 031817AAL
Date Received: October 30, 2000
Source Location: 5th and Roosevelt Road, Hines

The application for the above-referenced Clean Air Act Permit Program (CAAPP) permit lacks information necessary to evaluate the source and to take final action on the CAAPP application. Therefore, pursuant to Section 39.5(5)(g) of the Illinois Environmental Protection Act (Act) and 35 Ill. Adm. Code 270.305, the Illinois EPA requests the following information:

The application must be amended to contain the necessary information to allow the Illinois EPA to reopen the permit for revision under the appropriate revision classification in accordance with 39.5(13) and (14) of the Act and 35 IAC 270.302. The application does not specify the type of revision being requested for the CAAPP permit. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative permit amendment;
2. Minor permit modification; and
3. Significant permit modification.

The applicant must determine, request, and supply the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

I. Administrative Permit Amendment

- Corrects typographical errors;
- Changes name, address, or phone number of any person identified in the permit, or similar change at the source;
- Requires more frequent monitoring or reporting;
- Changes ownership or operational control of source, provided that a written agreement containing a specific date for transfer of

permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the Illinois EPA;

- Incorporates construction permits, provided conditions meet requirements of CAAPP permits;

- Incorporates economic incentives rule, marketable permits rule, or generic emissions trading rule conditions.

II. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 1. A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the Clean Air Act; and
 2. An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act.
- Are not modifications under any provision of Title I of the Clean Air Act; and
- Are not required to be processed as a significant modification.

An application for minor permit modifications shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

III. Significant Permit Modification

- Applications not qualifying as either minor permit modifications or administrative permit amendments;

- Applications requesting significant change in existing monitoring permit conditions;
- Applications requesting relaxation of reporting or record keeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

The Illinois EPA requires the information on the following appropriate form be submitted in accordance with the proper classification:

- Form 271-CAAPP, Minor Modification;

Applications forms can be obtained from the Illinois EPA website at www.epa.state.il.us/air/forms.

A preliminary assessment by the Illinois EPA indicates that the appropriate classification is Administrative Permit Amendment one of the three types of permit revisions.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Failure to submit the requested information by February 9, 2001, may require the Illinois EPA to deny this application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on the above-referenced application pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.

If you have any questions regarding this matter, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permits Section
Division of Air Pollution Control

DES:AB:FEM:psj

cc: Region 1
Julie Armitage, DLC

Enclosure: Form 271-CAAPP, Minor Modification

