

ADEQ MINOR SOURCE PERMIT

Permit #: 1960-A

IS ISSUED TO:

Baptist Health Medical Center
9601 Interstate 630
Little Rock, Arkansas 72205-7299
Pulaski County
CSN: 60-0308

THIS PERMIT IS YOUR AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND YOUR APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 ET SEQ.) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITEE: Baptist Health Medical Center

CSN: 60-0308

PERMIT NUMBER: 1960-A

FACILITY ADDRESS: 9601 Interstate 630
Little Rock, Arkansas 72205

COUNTY: Pulaski

CONTACT POSITION: Larry Whitt

TELEPHONE NUMBER: 501-202-2696

REVIEWING ENGINEER: Richard Nissen

UTM North-South(X): Zone: 15 3845.4
East-West (Y): 556.6

SECTION II: INTRODUCTION

Summary

Baptist Health Medical Center (BHMC) (CSN: 60-0308), 9601 Interstate 630, Little Rock, AR 72205, operates a Hospital Incinerator. BHMC is taking the Consumat Model C55OP/INF (SN-01 and SN-02) out of service. The facility will still be permitted to use four boilers and four emergency generators. This modification is in accordance with a Consent Administrative Order (LIS: 2000-186).

The incinerator , installed in June of 1988, was permanently shut down on or about 10 November 2000. No other changes or additions are being made.

Process Description

The facility operates a 50 MMBtu /hr dual fuel boiler (SN-03, Natural gas; SN-03B, fuel oil) for steam production and has a standby dual fuel unit of the same size. The facility operates a 2.5 MMBtu /hr boiler (SN-04, Natural gas; SN-04B, fuel oil) for steam production and has a standby unit of the same size. Both of the 2.5 MMBtu /hr boilers are dual fuel with natural gas as their primary fuel and fuel oil as the alternative fuel.

The facility has four emergency power generators, all of which use diesel fuel: a 1050 kW generator (SN-05), two 1100 kW generators (SN-06 and SN-07), and a 350 kW generator (SN-08).

Plantwide usage limits are established for oil, natural gas (the boilers are exclusively natural gas and oil), and diesel (the generators are exclusively diesel) fuels.

Baptist Health Medical Center

Permit #1960-A

CSN: 60-0308

Regulations

This facility is subject to the following regulations:

Regulation 18, Arkansas Air Pollution Control Code.

Regulation 19, Regulations of The Arkansas Plan of Implementation for Air Pollution Control.

The facility was constructed and/ or modified after June 9, 1989. The facility, therefor, is subject to the requirements of the New Source Performance Standards, 40 CFR Part 60, Subpart Dc-Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

The following table is a summary of the facility's total emissions:

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	12.6	3.5
PM ₁₀	12.6	3.5
SO ₂	64.5	10.7
VOC	13.5	2.9
CO	39.9	23.1
NO _x	168.3	40.8

Baptist Health Medical Center

Permit #1960-A

CSN: 60-0308

SECTION III: PERMIT HISTORY

Date

Permit Number

18 April 1990

443-IR-1

Initial permit for the incinerator only.

Baptist Health Medical Center

Permit #1960-A

CSN: 60-0308

SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
02	Removed			
03	50 MMBtu/hr Boiler (gas)	PM ₁₀	0.5	1.8
		SO ₂	0.2	0.3
		VOC	0.4	1.3
		CO	4.5	19.2
		NO _x	5.3	22.7
03b	50 MMBtu/hr Boiler (oil)	PM ₁₀	0.9	0.3
		SO ₂	53.5	9.0
		VOC	0.3	0.2
		CO	1.9	0.5
		NO _x	7.6	2.4
04	2.5 MMBtu/hr Boiler (gas)	PM ₁₀	0.1	Include d with 3
		SO ₂	0.1	
		VOC	0.1	
		CO	0.3	
		NO _x	0.3	
04b	2.5 MMBtu/hr Boiler (oil)	PM ₁₀	0.1	Include d with 3b
		SO ₂	0.1	
		VOC	0.1	
		CO	0.1	
		NO _x	0.4	

Baptist Health Medical Center**Permit #1960-A****CSN: 60-0308**

SN	Description	Pollutant	lb/hr	tpy
05	1050 kw Generator	PM ₁₀	11.2	1.4
		SO ₂	10.9	1.4
		VOC	12.9	1.4
		CO	33.6	3.4
		NO _x	156.2	15.7
06	1100 kw Generator	PM ₁₀	3.3	Include d with 5
		SO ₂	3.1	
		VOC	3.8	
		CO	9.9	
		NO _x	45.8	
07	1100 kw Generator	PM ₁₀	3.5	
		SO ₂	3.2	
		VOC	3.9	
		CO	10.4	
		NO _x	48.2	
08	350 kw Generator	PM ₁₀	1.1	
		SO ₂	1.1	
		VOC	1.3	
		CO	3.3	
		NO _x	15.4	

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table:

SN	Description	Pollutant	lb/hr	tpy
01, 02	Removed			
03	50 MMBtu/hr Boiler (gas)	PM	0.4	0.5
03b	50 MMBtu/hr Boiler oil)	PM	0.9	0.3
04	2.5 MMBtu/hr Boiler (gas)	PM	0.8	Included with 3

Baptist Health Medical Center**Permit #1960-A****CSN: 60-0308**

SN	Description	Pollutant	lb/hr	tpy
04b	2.5 MMBtu/hr Boiler (oil)	PM	0.1	Included with 3b
05	1050 kw Generator (diesel)	PM	3.3	11.2
06	1100 kw Generator (diesel)	PM		
07	1100 kw Generator (oil)	PM		
08	350 kw Generator (oil)	PM		

3. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
03 gas and 04 gas	5%	18.501
03b oil and 04 oil; 05, 06, 07, 08	20%	19.503

4. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.
5. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.
6. Pursuant to §19.705 of Regulation 19, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall not exceed the following for any twelve month rolling total (TMRT):

SN	Fuel	TMRT	Units
03, 03b, 04, 04b	Natural Gas	452	MMcf/yr
	#2 Fuel Oil	126,303	gal/yr

Baptist Health Medical Center

Permit #1960-A

CSN: 60-0308

05, 06, 07	Diesel Fuel	47,200	gal/yr
------------	-------------	--------	--------

7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 the permittee shall record and maintain records of the amounts of each fuel delivered monthly and shall maintain a rolling twelve month total (RTMT) for each fuel which demonstrate compliance with Specific Condition #6. Records shall be updated by the fifteenth day of the month following the month for which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.
8. Pursuant to §19.705 of Regulation 19, 40 CFR60 Subpart Dc and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, **the fuel for the Boiler (SN-03 and 03b) shall be accounted for by one of the two following methods:**
- The fuel used shall be metered to provide a monthly usage for each source subject to subpart Dc or
 - The monthly fuel usage may be prorated based on the maximum Btu rating for the source when compared to the total of the Btu ratings (maximum) for all equipment using the same type of fuel.

The permittee shall maintain records that demonstrate compliance. These records shall:

- Document the monthly meter readings or the prorated results accompanied with the calculations;
 - Be updated by the fifteenth day of the month following the month to which the records pertain;
 - Be maintained on or off site for a minimum of two years;
 - Be made available to Department personnel upon request.
9. Pursuant to §19.705 of Regulation 19, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the facility shall not exceed the following percent (by weight) of sulfur in the listed fuels used at the following sources:

SN	Fuel	Max. % Sulfur by Weight
Baptist Health Medical Center	Natural Gas	Pipe Line Quality
	#2 Fuel Oil	1.0%

Baptist Health Medical Center

Permit #1960-A

CSN: 60-0308

	Diesel Fuel	0.3%
--	-------------	------

10. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304, and §8-4-311, the permittee shall demonstrate compliance with Specific Condition #9 by collecting a fuel assay from the fuel provider showing the percent sulfur by weight of each delivery (excluding natural gas) to the facility. These records shall be maintained for a minimum of 24 months. Records shall be updated by the fifteenth day of the month following the month for which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request.
11. Pursuant to §19.304 of Regulation 19 and 40 CFR 60.40c, SN-03, SN-03b, SN-04, and SN-04b are subject to the provisions of 40 CFR, Part 60, Subpart Dc - Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units. A copy of Subpart Dc is provided in Appendix A of the permit.

Baptist Health Medical Center

Permit #1960-A

CSN: 60-0308

SECTION V: INSIGNIFICANT ACTIVITIES

The activities or emissions that are deemed insignificant on the basis of size, emission rate, production rate, or activity are described in Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A and the Operating Air Permit Program Update dated, April 1996.

Description	Category
BHMC has a total of 19 lab hoods. The lab hoods are as follows: 4 lab hoods in the Pharmacy, one lab hood in the NICU Pharmacy, one in lab hood in the OR Pharmacy, four lab hoods in the Tissue Lab, one lab hood in Cytology, two lab hoods in the Histology, one lab hood in the Mycology, one lab hood in the Microbiology, one lab hood in the lab sterilizer, one lab hood in the Toxicology and two lab hoods in the Central Supply.	A-5
Central supply uses an 8.5% Ethylene Oxide/91.5% Carbon Dioxide mixture which is vented. The ethylene oxide mixture is received in a liquid state in pressurized containers. The amount of ethylene oxide processed from May of 1999 to May of 2000 was 316.2 pounds. This represents typical operation. The facility would be unable to process in excess of 1 ton per year during normal operations.	A-13
BHMC operates a woodshop, where some sawdust is produced. This room has an in-house air filter that is cleaned annually and the shop disposes of about one cubic yard of sawdust per month. The facility uses about 100 gallons of paint, 150 gallons of lacquer and 60 gallons of mineral spirits annually in	B

Baptist Health Medical Center

Permit #1960-A

CSN: 60-0308

Description	Category
the wood shop.	
BHMC operates two small electrically fired boilers at the Eye Center. These boilers are insignificant activities because they do not emit any pollutants.	
Underground storage tanks located on site are a 15,000 gallon #2 diesel fuel tank, a 10,000 gallon JP-4 fuel tank and a 2,500 gallon #2 diesel fuel tank. The 15,000 gallon #2 diesel fuel tank and the 10,000 gallon JP-4 fuel tank are insignificant, because they would not emit 5 tpy of VOC under any type of normal operation at this facility. The 2,500 gallon diesel tank is insignificant. The 10,000 gallon JP-4 fuel tank is insignificant.	A-13

Baptist Health Medical Center
Permit #1960-A
CSN: 60-0308

SECTION VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, records must be kept for five years which will enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

Baptist Health Medical Center

Permit #1960-A

CSN: 60-0308

6. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an

Baptist Health Medical Center

Permit #1960-A

CSN: 60-0308

emission limit established by this permit, they shall be deemed in violation of said permit and shall be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met:

- a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and that all reasonable measures have been taken to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee shall submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, it need not be submitted again.
11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
- a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act
 - c. To inspect any monitoring equipment or monitoring method required in this permit
 - d. To sample any emission of pollutants
 - e. To perform an operation and maintenance inspection of the permitted source

Baptist Health Medical Center

Permit #1960-A

CSN: 60-0308

12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus.
13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.

APPENDIX A

APPENDIX B

APPENDIX C