

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

C570447360

|  |                               |                           |
|--|-------------------------------|---------------------------|
| FACILITY: Lakeland Medical Center (Former Memorial Hospital) |                               | SRN / ID: C5704           |
| LOCATION: 1234 NAPIER AVE, SAINT JOSEPH                      |                               | DISTRICT: Kalamazoo       |
| CITY: SAINT JOSEPH   |                               | COUNTY: BERRIEN           |
| CONTACT: Gary Priebe, Mechanic                               |                               | ACTIVITY DATE: 12/19/2018 |
| STAFF: Matthew Deskins                                       | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT  |
| SUBJECT: Unannounced Scheduled Inspection                    |                               |                           |
| RESOLVED COMPLAINTS:   |                               |                           |

On December 19, 2018 AQD staff (Matt Deskins) went to conduct an unannounced scheduled inspection of the Lakeland Regional Medical Center (SRN: N3747) located in St. Joseph, Berrien County. The hospital has two permits issued to them by the AQD and one is an opt-out permit (PTI No. 161-09) for their boilers and the other is a general permit (PTI No. 555-97A) for their ethylene oxide (EtO) sterilizers. Staff departed for the facility at approximately 10:45 a.m.

Staff arrived at the hospital at approximately 12:35 p.m. after travel time and having lunch. Staff proceeded to the back of the hospital to the shipping and receiving area where they have entered before to conduct prior inspections. Prior to entering the building, staff had observed the stack that services the boilers and it appeared to meet the 48-inch maximum diameter and the minimum 118 foot height distance above ground level. Staff did not observe any visible emissions coming from it. Staff then proceeded to the shipping and receiving area. Upon entering the building, staff couldn't remember which direction the Building Services Department was so staff asked someone (Dan) that they met up with in the loading bay. That person led staff to where it was located and to the office of Gary Priebe who staff had met with during previous inspections. Staff re-introduced them self to Gary and stated the purpose of the visit. Gary then asked what staff needed to see and staff explained to him about the permits issued for the sterilizers and the boilers. Gary then pulled out a binder that he keeps all the records in so staff could look at them. Gary stated that effective back on October 1, 2018 the Eto Sterilizers are no longer in use and they will be contracting out their sterilization. He said that they are still in place but they will be removing them eventually. Gary went on to state that they are also constructing a new building and he doesn't know what will come of the existing one down the road. Staff then started a review of records and the following is a summary of staff's inspection broken down into the EtO Sterilizers permit conditions followed by the permit conditions for the Boilers along with compliance comments.

**NOTE:** During the previous inspection staff had given Gary the Boiler MACT Brochure that included information on new regulations for certain boilers that could apply to the hospital's boilers. Since the hospital is an area source, the 40 CFR Part 63 Subpart JJJJJJ might apply to them but staff did not make any compliance determination regarding it since the AQD is not delegated by the EPA to enforce this regulation to date.

As mentioned above, the hospital is no longer using the sterilizers but when they were, the two used were Steris Model 3017 sterilizers that had replaced their other sterilizer back in February of 2006. Back then the hospital didn't need to apply for a new general permit because the capacity of each sterilizer did not exceed the 30 cubic foot (They are each approximately 36" x 36" x 40") maximum listed under the allowed modifications of that permit. However, they had to apply for a new permit in August 2013 because they changed out the catalytic oxidizer that they originally had with an air scrubber. The air scrubber had a destruction efficiency of 99.5% and the older general permits required a minimum of 99.9%. The air scrubber consisted of a high-volume dry resin bed filter with a chemical reactant which had controlled EtO emissions from both sterilizers. The sterilizers had strictly used EtO that didn't contain any HCFC. The EtO came packaged in 100-gram (~3.53 ounces) canisters and each sterilizer used one of them per cycle. The following lists the pertinent requirements/conditions of the general permit that apply to the EtO sterilizers and staff's comments regarding them up until they were shutdown.

**EMISSION UNIT SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

| Emission Unit ID   | Emission Unit Description<br>(Process Equipment & Control Devices)   | Flexible Group ID |
|--|--|-------------------|
| EU-1S  | One Steris Amsco® Eagle®, Model 3017, 100% ethylene oxide (EtO) sterilizer/aerator. The sterilizer is controlled by a common AAT Safe-Cell II™ DR50 Air Scrubber.* | FGSTERILIZERS     |
| EU-2S  | One Steris Amsco® Eagle®, Model 3017, 100% ethylene oxide (EtO) sterilizer/aerator. The sterilizer is controlled by a common AAT Safe-Cell II™ DR50 Air Scrubber.* | FGSTERILIZERS     |
| <p>*This is a high-volume dry resin bed filter with a chemical reactant which controls both EtO sterilizers.</p> <p>Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.</p> |  |                   |

**FLEXIBLE GROUP SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

| Flexible Group ID | Flexible Group Description  | Associated Emission Unit IDs | The following conditions apply to: |
|-------------------|---|------------------------------|------------------------------------|
| FGSTERILIZERS     | Two EtO sterilizers, each with an air ejector system to prevent the discharge of any EtO to a wastewater stream and which are both controlled by one AAT Safe-Cell II™ DR50 Air Scrubber. | EU-1S, EU-2S                 |                                    |

**FGSTERILIZERS**

**DESCRIPTION:** Two EtO sterilizer/aerators which use 100 percent EtO as a sterilant. Both are controlled by a dry resin bed scrubber.

Emission Units: EU-1S, EUE-2S

**POLLUTION CONTROL EQUIPMENT:** One AAT Safe-Cell II™ DR50 Air Scrubber which controls both sterilizers.

**I. EMISSION LIMITS**

| Pollutant | Limit | Time Period/<br>Operating Scenario | Equipment | Testing /<br>Monitoring Method | Underlying<br>Applicable Requirements |
|-----------|-------|------------------------------------|-----------|--------------------------------|---------------------------------------|
|           |       |                                    |           |                                |                                       |

| Pollutant | Limit       | Time Period/<br>Operating<br>Scenario   | Equipment  | Testing /<br>Monitoring<br>Method | Underlying<br>Applicable<br>Requirements |
|-----------|-------------|---|--|-----------------------------------|--|
| 1. EtO    | 0.0022 pph  | Test Protocol   | Both sterilizers<br>exhausting at one<br>time          | GC 13                             | R 336.1225(1)                            |
| 2. EtO    | 0.0011 pph  | Test Protocol   | One individual<br>sterilizer exhausting<br>at one time | GC 13                             | R 336.1225(1)                            |
| 3. EtO    | 0.8 lb/year | 12-month rolling time<br>period as determined<br>at the end of each<br>calendar month | FGSTERILIZERS<br>(both sterilizers<br>combined)        | SC VI.2                           | R 336.1225(1),<br>R 336.1702(a)          |

AQD Comment: Will consider them to be in Compliance. The AQD has not requested testing to show compliance with #1 and #2 above, but the facility wasn't tracking EtO monthly emissions in a 12-month rolling format as required by #3. However, they did have all the monthly emissions calculated so staff was able to calculate that the most recent 12-month rolling time period (September 2018 back to October 2017) emissions at 0.089 pounds.

## II. MATERIAL LIMITS

1. The permittee shall not use more than 100 grams of EtO per cycle/load in each EtO sterilizer within FGSTERILIZERS. (R 336.1225, R 336.1702(a))

AQD Comment: Appears to be in Compliance. The EtO cannisters that were used for each sterilizer cycle are 100 grams.

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate either sterilizer associated with FGSTERILIZERS unless the dry resin bed scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the dry bed scrubber includes a minimum EtO destruction efficiency of 99.5 percent by weight. (R 336.1225, R 336.1702(a), R 336.1910)

AQD Comment: Appears to be in Compliance. The manufacturer guarantees 99.5 percent EtO destruction as long as the resin bed is maintained. The resin bed is rated to be effective for 205 cycles of 100-gram EtO cannisters. The facility tracks the cycles and has documented when the media has been changed out.

2. The permittee shall not operate any sterilizer associated with FGSTERILIZERS unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 60 days of permit issuance, and is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)

**AQD Comment:** Appears to be in Compliance. The facility has a MAP that was submitted and is kept in their records binder. It has not had to be amended to date.

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate any sterilizer associated with FGSTERILIZERS unless each respective closed loop recirculating-fluid vacuum pump, air ejector system, or other method of drawing a vacuum and evacuating each sterilizer chamber and which prevents the discharge of any EtO to a wastewater stream is installed, maintained, and operated in a satisfactory manner on each sterilizer associated with FG-STERILIZERS. (R 336.1225, R 336.1702(a))

**AQD Comment:** Appears to be in Compliance. The sterilizers are each equipped with an air ejector system.

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1225, R 336.1702(a))

**AQD Comment:** Appears to be in Compliance.

2. The permittee shall keep a separate monthly record of the following information:
  - a. The amount of EtO used in each sterilizer per cycle/load.
  - b. The number of cycles/loads processed in each sterilizer per calendar day and per calendar month.
  - c. EtO mass emission calculations determining the monthly emission rate, in pounds per calendar month, from each sterilizer, and for both sterilizers combined.
  - d. EtO mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month, for each sterilizer and for both sterilizers combined.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702(a))

**AQD Comment:** Will consider them to be in Compliance with all the above although the facility didn't have emissions totals in a 12-month rolling format. However, staff was able to calculate them with the monthly emissions data that they record.

3. The permittee shall monitor a parameter of the dry resin bed scrubber, based on either the manufacturer's specifications or a performance test, which assures at least 99.5 percent reduction of EtO emissions. A copy of the manufacturer's specifications for the control device shall be maintained on file. (R 336.1225, R 336.1910)

**AQD Comment:** Appears to be in Compliance. The facility has a copy of the manufacturer's specifications on file and they are tracking the resin bed by the number of sterilization cycles the manufacturer says can be treated.

- The permittee shall keep the following in a satisfactory manner: records of the date, duration, and description of any malfunction of the control equipment; any maintenance performed; replacement of the dry resin bed; and any testing results for FGSTERILIZERS. All records shall be kept on file and made available to the Department upon request. (R 336.1225, R 336.1910)

AQD Comment: Appears to be in Compliance. The facility is documenting any of the above items as required. No malfunctions have been reported.

#### VII. REPORTING

NA

#### VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged to the ambient air unless otherwise noted:

| Stack & Vent ID | Maximum Exhaust Diameter/Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|-----------------|--|------------------------------------|------------------------------------|
| 1. SV-2         | 8  | 30                                 | R 336.1225, 40 CFR 52.21 (c) & (d) |
| 2. SV-1Bypass   | NA   | NA                                 | R 336.1225, 40 CFR 52.21 (c) & (d) |

AQD Comment: Appears to be in Compliance with the above dimensions.

#### IX. OTHER REQUIREMENTS

- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart WWWW for Hospital Ethylene Oxide Sterilizers by the initial compliance date. (40 CFR Part 63, Subpart A and Subpart WWWW)

AQD Comment: Will assume to be in Compliance since the AQD is not delegated to enforce this regulation. The Initial Notification had been submitted after a previous inspection.

#### BOILERS (PTI No. 161-09)

The hospital had obtained a new air permit in November of 2009 for the installation of (3) new Bryan Steam Boilers to replace (originally in a staged process) the current (3) Cleaver – Brooks Boilers. The new boilers were rated at 25.2 MMBtu/hr and can fire on natural gas or No. 2 fuel oil and were to be equipped with low NOx burners. According to Gary, still only one of the Bryan Boilers has been installed to date. Gary had said during the last inspection that they didn't install the other two due to budget cuts and because the (2) Cleaver-Brooks are still running so good. The (2) Cleaver-Brooks are rated at 33.975 MMBtu/hr and Gary had said previously that they are used either for stand-by or back up units to the Bryan Boiler. The Bryan Boiler is also equipped with a Continuous Emissions Monitor (CEMs) even though there are no PTI conditions pertaining to it. The following lists the permit requirements/conditions regarding the boilers:

### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

| Emission Unit ID   | Emission Unit Description<br>(Process Equipment & Control Devices)   | Installation Date /<br>Modification Date                             | Flexible<br>Group ID |
|--|--|--|----------------------|
| EUBOILER1  | Cleaver-Brooks boiler model D-42,<br>burner model 400-BR, unit #WL-<br>2472<br>Heat Input Capacity: 33.975<br>MMBtu/hour<br>Fuel: Natural Gas and No. 2 Fuel<br>Oil<br>Oil Fire Rate: 242 gallons/hour     | 1975/<br>November 25,<br>2002/ June 8,<br>2006/ November<br>17, 2009 | FGBOILERS            |
| EUBOILER2  | Cleaver-Brooks boiler model D-42,<br>burner model 400-BR, unit #WL-<br>2473<br>Heat Input Capacity: 33.975<br>MMBtu/hour<br>Fuel: Natural Gas and No. 2 Fuel<br>Oil<br>Oil Fire Rate: 242 gallons/hour     | 1975/<br>November 25,<br>2002/ June 8,<br>2006/ November<br>17, 2009 | FGBOILERS            |
| EUBOILER3  | Bryan Steam LLC - RW 2100 Boiler<br>low-NOx burners and flue gas<br>recirculation<br>Heat Input Capacity: 25.2<br>MMBtu/hour<br>Fuel: Natural Gas and No. 2 Fuel<br>Oil<br>Oil Fire Rate: 180 gallons/hour | November 17,<br>2009   | FGBOILERS            |
| EUBOILER4  | Bryan Steam LLC - RW 2100 Boiler<br>low-NOx burners and flue gas<br>recirculation Heat Input Capacity:<br>25.2 MMBtu/hour<br>Fuel: Natural Gas and No. 2 Fuel<br>Oil<br>Oil Fire Rate: 180 gallons/hour    | November 17,<br>2009   | FGBOILERS            |
| EUBOILER5  | Bryan Steam LLC - RW 2100 Boiler<br>low-NOx burners and flue gas<br>recirculation Heat Input Capacity:<br>25.2 MMBtu/hour<br>Fuel: Natural Gas and No. 2 Fuel<br>Oil<br>Oil Fire Rate: 180 gallons/hour    | November 17,<br>2009   | FGBOILERS            |
| Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290. |  |  |                      |

### FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

| Flexible Group ID | Flexible Group Description   | Associated Emission Unit IDs   |
|-------------------|--|--|
| FGBOILERS         | Five natural gas and No. 2 fuel oil fired boilers. Only three boilers may run at the same time.<br>NOTE: EUBOILER1 and EUBOILER2 are currently operating at the LRMC facility. LRMC intends to maintain and operate three boilers. They will accomplish this by shutting down EUBOILER1 when EUBOILER4 is installed and EUBOILER2 when EUBOILER5 is installed. | EUBOILER1,<br>EUBOILER2,<br>EUBOILER3,<br>EUBOILER4 and<br>EUBOILER5 |

The following conditions apply to: FGBOILERS

#### I. EMISSION LIMITS

| Pollutant            | Limit         | Time Period / Operating Scenario   | Equipment                                   | Testing / Monitoring Method | Underlying Applicable Requirements  |
|----------------------|---------------|--|---|-----------------------------|---|
| 1. NOx               | 47.3 tpy      | 12-month rolling time period as determined at the end of each calendar month | FGBOILERS                                   | GC 13 and SC VI. 1. & 2.    | R 336.1205(1)(a) & (3),<br>R 336.2803,<br>R 336.2804,<br>40CFR52.21(c) &(d) |
| 2. NOx – natural gas | 0.03 #/MM Btu | Test Protocol  | EUBOILER3,<br>EUBOILER4<br>and<br>EUBOILER5 | GC 13                       | R 336.1205(1)(a) & (3),<br>R 336.2803,<br>R 336.2804,<br>40CFR52.21(c) &(d) |
| 3. NOx – fuel oil    | 0.14 #/MM Btu | Test Protocol  | EUBOILER3,<br>EUBOILER4<br>and<br>EUBOILER5 | GC 13                       | R 336.1205(1)(a) & (3),<br>R 336.2803,<br>R 336.2804,<br>40CFR52.21(c) &(d) |
| 4. SO2               | 33.6 tpy      | 12-month rolling time period as determined at the end of each calendar month | FGBOILERS                                   | GC 13 and SC VI. 1. & 3.    | R 336.1205(1)(a) & (3)  |

AQD Comment: Appears to be in COMPLIANCE. The AQD hasn't requested any testing to demonstrate compliance with 2 and 3 above and the facility is well below the NOX and SO2 limits

in 1 and 4 since they hardly ever combust fuel oil. Also, the boiler unit that they mainly run is the Bryan which is equipped with Low-NOx burners and flue gas recirculation.

## II. MATERIAL LIMITS

1. The permittee shall only burn natural gas or No. 2 fuel oil in FGBOILERS. (R 336.1205(1)(a) & (3))

AQD Comment: Appears to be in COMPLIANCE. The boilers only use the above fuels although fuel oil is hardly ever used.

2. The fuel usage for FGBOILERS shall not exceed 4,730,400 gallons of fuel oil per 12-month rolling time period as determined at the end of each calendar month, or as determined by the following equation. (R 336.1205(1)(a) & (3))

$$\frac{(\text{FO usage} \times \text{FO Heating Value} \times \text{FO Emission Factor}) + (\text{NG usage} \times \text{NG Heating Value} \times \text{NG Emission Factor})}{2000 \text{ lb/ton}} \leq 47.3 \text{ TPY NOx}$$

Where,

FO usage = amount of fuel oil used in gallons per 12-month rolling time period

FO Heating Value = 140,000 Btu/gallon

FO Emission Factor = 0.14 lb/MMBtu

NG Usage = amount of natural gas used in cubic feet per 12-month rolling time period

NG Heating Value = 1020 Btu/scf

NG Emission Factor (EUBOILER1 and EUBOILER2) = 0.14 lb/MMBtu

NG Emission Factor (EUBOILER3, EUBOILER4 and EUBOILER5) = 0.03 lb/MMBtu

AQD Comment: Appears to be in COMPLIANCE. The hospital hardly ever uses fuel oil and it is well below the amount allowed above. They aren't using the equation above to demonstrate compliance because they use fuel oil delivery records.

3. The sulfur content of the fuel oil shall not exceed 0.10 percent by weight. (R 336.1205(1)(a) & (3), R 336.1401)

AQD Comment: Appears to be in Compliance. The fuel oil sulfur content is 15 ppm or 0.0015% by weight.

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate more than three boilers at any one time in FGBOILERS. (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))

AQD Comment: Appears to be in COMPLIANCE. They only have three boilers so that is the most that they could run at one time. Typically, only one is running but they may have to run two if it gets extremely cold outside.

2. The permittee shall obtain the following information from the fuel oil supplier for each shipment of fuel oil for EUBOILER3, EUBOILER4 and EUBOILER5:
  - a. The name of the oil supplier;
  - b. A certification from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41(c); and
  - c. The sulfur content of the oil.

(R 336.1205(1)(a) and (3), 40 CFR 60.42(c)(h))

**AQD Comment:** Appears to be in Compliance. Staff did not look at the most recent Bill of Lading / fuel oil receipt but had in previous inspections and they contained all the above information. The fuel oil manufacturer they use is Citgo Petroleum and staff had been told that their product meets ASTM D396 specifications under NSPS Subpart Dc.

3. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and SUBPART Dc, as they apply to EUBOILER3, EUBOILER4 and EUBOILER5. (40 CFR Part 60 Subparts A & SUBPART Dc)

**AQD Comment:** Appears to be in Compliance. Only the Bryan Boiler is currently subject to the NSPS Dc and the facility has submitted their Initial Notification, has the certification of the fuel oil sulfur content requirements, and they are keeping track of the individual fuel use (whether natural gas or fuel oil) combusted in it that boiler. The NSPS Dc applies to any boiler with a maximum designed heat capacity greater than 10 Million BTU/Hr and less than 100 Million BTU/Hr and was constructed, modified, or reconstructed after June 9, 1989. The two Cleaver-Brooks boilers were installed in 1975 and to AQD knowledge, it doesn't appear that they have been modified or reconstructed since installation.

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate EUBOILER3, EUBOILER4 and EUBOILER5 unless the low-NOx burners and flue gas recirculation systems are installed, maintained, and operated in a satisfactory manner. (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1702, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d), 40 CFR Part 60 Subpart Dc)

**AQD Comment:** Appears to be in Compliance. Only EUBOILER3 (Bryan Boiler) has been installed to date and they appear to be meeting the requirements above. The boiler is also equipped with a CEMS which is not a requirement of the PTI.

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. N/A

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years and made available to the Department upon request. (R 336.1201(3))

1. The permittee shall keep monthly natural gas and fuel oil usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of natural gas used, in cubic feet, and fuel oil used, in gallons, on a calendar month basis. The records must indicate the total amount of natural gas and fuel oil used in each boiler in FGBOILERS. (R 336.1205(3))

**AQD Comment:** Appears to be in Compliance. The hospital is keeping records of monthly fuel usage and it is broken down between the individual boilers now.

2. The permittee shall calculate the NO<sub>x</sub> emission rates from FGBOILERS for each calendar month and 12-month rolling time period, using fuel usage records and an emission factor (AP-42, manufacturer's or test data) that is approved by the AQD District Supervisor. (R 336.1205(3))

**AQD Comment:** Appears to be in Compliance. The facility is calculating emissions using AP-42 Emissions Factors.

- The permittee shall calculate the SO<sub>2</sub> emission rates from FGBOILERS for each calendar month and 12-month rolling time period, using fuel usage records, sulfur content records and an emission factor (AP-42, manufacturer's or test data) that is approved by the AQD District Supervisor. (R 336.1205(3))

AQD Comment: Appears to be in Compliance. The facility is calculating emissions using AP-42 Emissions Factors.

- The permittee shall maintain a complete copy of the sulfur content, as supplied by the fuel oil vendor, for each shipment of fuel used in each boiler in FGBOILERS. (R 336.1205(3))

AQD Comment: Appears to be in Compliance. The facility maintains the Bill of Lading / Receipts with this information for all fuel deliveries now.

**VII. REPORTING**

- The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. (40 CFR 60.7, 40 CFR 60.48c (a))

AQD Comment: Appears to be in Compliance. The facility is required to submit notification within 30 days (postmarked) of the start of construction of the new boiler(s) and within 15 days (postmarked) of initial start-up of the new boiler(s). They submitted this information after one of staff's previous inspections for the first Bryan Boiler and they haven't installed the other two boilers to date.

**VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

| Stack & Vent ID | Maximum Exhaust Diameter/Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements                                 |
|-----------------|--|------------------------------------|--|
| 1. SVBOILERS    | 48   | 118                                | R 336.1225<br>R 336.2803,<br>R 336.2804,<br>40CFR52.21(c) &<br>(d) |

AQD Comment: Appears to be in Compliance. The stack for the boilers appears to meet the above dimensions.

**IX. OTHER REQUIREMENTS**

- N/A

**INSPECTION CONCLUSION:**

The facility appears to be in Compliance with the terms and conditions of PTI No. 161-09 and PTI No. 555-97A at the present time. Staff departed the facility at approximately 2:05 p.m.

NAME Matt DL

DATE 12-20-18

SUPERVISOR MA 12/21/2018

