

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1955-AR-1

IS ISSUED TO:

Conway Regional Medical Center
2302 College Avenue
Conway, Arkansas 72032
Faulkner County
CSN: 23-0084

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: Conway Regional Medical Center

CSN: 23-0084

PERMIT NUMBER: 1955-AOP-RO

FACILITY ADDRESS: 2302 College Avenue

COUNTY: Faulkner

CONTACT POSITION: Tom Waller, Director of Maintenance

TELEPHONE NUMBER: 501 450 2139

REVIEWING ENGINEER: Richard Nissen

| | | |
|--------------|-------------|---------|
| UTM Zone: 15 | North/South | 3962.63 |
| | East/West | 548.44 |

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SECTION II: INTRODUCTION

Summary

The previous Title V permit was the result of the United States Environmental Protection Agency (USEPA) final rule (40 CFR 62 §62.14480) concerning the Federal Plan Requirements for Hospital Medical/Infectious Waste Incinerators (HMIWI). The USEPA Final Rule, dated August 15, 2000, stated that HMIWI owners/operators had to submit an administratively complete Title V air permit application no later than September 15, 2000. This permit is the result of Conway Regional Medical Center permanently discontinuing the operation of their HMIWI incinerator as of August 15, 2001.

Process Description

CRMC maintains three 250 BHP Kewanee Steam Boilers (SN-02, SN-03, and SN-04) located within the main building. The boilers provide atmospheric heat and humidity control and are normally fired with natural gas. In emergency situations, the boilers are fired with No.2 distillate oil. The boilers, each have a maximum fuel consumption of 8.37 MMBtu/hr. Using a heating value for natural gas of 1,000 Btu/scf (0.001 MMBtu/scf) the maximum annual natural gas consumption for each boiler is 73.32 MMBtu/hr.

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.

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The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table.

Emission Summary

| Source No. | Description | Pollutant | Emission Rates | |
|---------------------------|-------------|------------------|----------------|------|
| | | | lb/hr | tpy |
| Total Allowable Emissions | | PM | 0.6 | 1.5 |
| | | PM ₁₀ | 0.6 | 1.5 |
| | | SO ₂ | 26.1 | 9.3 |
| | | VOC | 0.3 | 0.6 |
| | | CO | 1.2 | 2.7 |
| | | NO _x | 4.5 | 12.0 |

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SECTION III: PERMIT HISTORY

Permit 349-I was issued to Conway Regional Hospital on August 27, 1980. This permit allowed the installation of a Helms Model 3AC incinerator to dispose of approximately one thousand pounds per day of pathological and general waste.

Permit 349-IR-1 was issued to Conway Regional Hospital on March 18, 1992. This permit allowed the installation of a Consumat Model C-125P-2 incinerator to dispose of approximately two thousand eight hundred and twenty pounds per day of pathological and general waste.

Permit 1955-AOP-R0 was issued to Conway Regional Hospital on September 4, 2001. The Title V permit was the result of the United States Environmental Protection Agency (USEPA) final rule (40 CFR 62 §62.14480) concerning the Federal Plan Requirements for Hospital Medical/Infectious Waste Incinerators (HMIWI). The USEPA Final Rule, dated August 15, 2000, stated that HMIWI owners/operators had to submit an administratively complete Title V air permit application no later than September 15, 2000.

SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

- Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table.

| SN | Pollutant | lb/hr | tpy |
|----|-----------------------|-------|------------------------|
| 01 | Permanently Shut Down | | |
| 02 | PM ₁₀ | 0.2 | 1.5 |
| | SO ₂ | 8.7 | 9.3 |
| | VOC | 0.1 | 0.6 |
| | CO | 0.4 | 2.7 |
| | NO _x | 1.5 | 12.0 |
| 03 | PM ₁₀ | 0.2 | Included with SN-02 |
| | SO ₂ | 8.7 | |
| | VOC | 0.1 | |
| | CO | 0.4 | |
| | NO _x | 1.5 | |
| 04 | PM ₁₀ | 0.2 | |
| | SO ₂ | 8.7 | |
| | VOC | 0.1 | |
| | CO | 0.4 | |
| | NO _x | 1.5 | |

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2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, 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 | Pollutant | lb/hr | tpy |
|----|-----------|-------|-----|
| 02 | PM | 0.2 | 0.5 |
| 03 | PM | 0.2 | 0.5 |
| 04 | PM | 0.2 | 0.5 |

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 |
|------------|-------|-----------------------------|
| 02, 03, 04 | 5 % | 18.501 While Using Nat. Gas |
| | 20 % | 18.501 While Using Fuel Oil |

4. 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 |
|------------|-------------|---------|--------|
| 02, 03, 04 | #2 Fuel Oil | 162,000 | gal/yr |

5. 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 fuel oil combusted (collectively) each month at SN-02, 03, and 04. The permittee shall calculate and maintain a rolling twelve month total (RTMT) to demonstrate compliance with Specific Condition #4. 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.

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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 percent (by weight) of sulfur in the listed fuels used at the following sources:

| SN | Fuel | Maximum % Sulfur by Weight |
|------------|-------------|----------------------------|
| 02, 03, 04 | Natural Gas | Pipe Line Quality |
| | #2 Fuel Oil | 0.3% |

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 maintain records to demonstrate compliance with SC #6 for a minimum of 24 months and 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.

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SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 . Insignificant activity determinations rely upon the information submitted by the permittee in an application dated September 11, 2000.

CRMC has a Onan, Cummins, and three Caterpillar emergency generators located within the facility. The diesel engines are equipped with external load units rated to deliver a maximum of 1,500kwh, 750 kwh, 600 kwh , 450 kwh, and 150 kwh of power output, respectively. Each generator is tested weekly for thirty minutes. These generators are being identified as an insignificant activity, pursuant to Group A-12 of the Insignificant Activities list found in Regulation 18 and 19 Appendix A.

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix B, have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

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.

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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.

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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 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
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.

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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

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APPENDIX D