

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1955-AR-2 AFIN: 23-00084

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Conway Regional Medical Center
2302 College Avenue
Conway, Arkansas 72032

3. PERMIT WRITER:

Derrick Brown

4. NAICS DESCRIPTION AND CODE:

NAICS Description: General Medical and Surgical Hospitals
NAICS Code: 622110

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
10/31/2017	Modification	Permit six diesel fired emergency generators.

6. REVIEWER'S NOTES:

Conway Regional Medical Center (Conway Regional; AFIN: 23-00084)) is a medical hospital located at 2302 College Avenue, Conway, Faulkner County, Arkansas. This permit modification permits six emergency engines: SN-05 (2,010 Hp), SN-06 (1,005 Hp), SN-07 (804 Hp), SN-08 (603 Hp), SN-09 (201 Hp), and SN-10 (3,058 Hp). Also, Section VI: General Conditions were updated. This permit modification increases permitted emissions by 1.2 tpy of PM/PM₁₀, 1.2 tpy of SO₂, 0.6 tpy of VOC, 7.6 tpy of CO, 36.9 tpy of NO_x, and 0.06 tpy of HAPs.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

Executed Consent Administrative Order (CAO dated September 12, 2017) LIS No. 17-059 addressed the facility's permitting of their emergency generators. This permit modification permits those emergency generators.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? N/A

b) Is the facility categorized as a major source for PSD? N

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-10	HC, NO _x , CO, PM	NSPS, Subpart IIII
		NESHAP, Subpart ZZZZ

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N/A

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

Based on Department procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H₂S Modeling: N/A

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
02, 03, 04 Nat. Gas	AP-42	Previously permitted (2002).			
02, 03, 04 Fuel Oil	AP-42	Previously permitted (2002).			
05, 06, 07, 08, 09	AP-42, Table 3.4-1	7.0E-4 lb PM/PM ₁₀ /hp-hr 1.21E-5 lb SO ₂ /hp-hr 0.024 lb NO _x /hp-hr 5.5E-3 lb CO/hp-hr 7.05E-4 lb VOC/hp-hr HAPs (varies)			
10	Vendor data, Appendix E	0.074 g PM/PM ₁₀ /kWh			
	Vendor data, Appendix E				
	AP-42, Table 3.4-1	1.21E-5 lb SO ₂ /hp-hr			
	Vendor data, Appendix E	6.93 g NO _x /kWh			
	Vendor data, Appendix E	0.799 g CO/kWh			
	Vendor data, Appendix E	0.134 g VOC/kWh			

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
10	NMHC+NO _x , CO, PM	As specified.	One-time.	Reg.19.304 and 40 C.F.R. §60.4212(c)]

15. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
No monitoring or CEMS required this permit.				

16. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
02, 03, 04	#2 Fuel Oil	160,000 gallons	Rolling twelve month period.	N

Permit #: 1955-AR-2

AFIN: 23-00084

Page 4 of 4

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
05, 06, 07, 08, 09, 10	Total hours each engine	500 hours each calendar year for each engine	Calendar year	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02, 03, 04	5%	Reg.18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Inspector observation
05, 06, 07, 08, 09, 10	20%	Reg.19.503 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311	Inspector observation

18. DELETED CONDITIONS:

Former SC	Justification for removal
No conditions were deleted this application.	

19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
No insignificant activities were requested with this application.								

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1955-AR-1

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Revised 03-11-16

Check if Administrative Amendment ☐[illegible]