

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2343-AR-1 AFIN: 23-01198

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Conway Community Services
1555 Exchange Avenue
Conway, Arkansas 72032

3. PERMIT WRITER:

Kyle Crane

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
1/16/2019	Deminimis	Installing diesel fired electric generator as SN-07

6. REVIEWER'S NOTES:

Conway Community Service (CCS) operates a hospital at 1555 Exchange Avenue, Conway, AR. This modification adds a 2180 kW diesel-fired emergency generator as SN-07 to the permit and adds a Belly Tank as an A-3 insignificant activity. Annual permitted emissions increase by 0.3 tpy (tons per year) of PM/PM₁₀, 0.1 tpy of SO₂, 0.6 tpy of VOC, 4.3 tpy of CO, 7.7 tpy of NO_x, and 0.02 tpy of Total HAP.

7. COMPLIANCE STATUS:

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

The facility does not have any previous inspections and EPA ECHO shows “Unknown” for Clean Air Act compliance.

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

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)
01, 02, and 07	HAPs	NESHAP Subpart ZZZZ
01, 02, and 07	PM, CO, NO _x , HC	NSPS Subpart IIII

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

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

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N
If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
N/A		

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

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:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards Y
 If exempt, explain: The facility does not emit H₂S

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01 02	AP-42 Section 3.4 Table 3.4-1 Table 3.4-2 Table 3.4-3 Table 3.4-4	<u>lb/MMBtu</u> PM ₁₀ = 0.0573 <u>lb/hp-hr</u> PM = 0.0007 SO ₂ = 4.05E-04 VOC = 7.05E-04 CO = 5.50E-03 NO _x = 0.024			
03,04, and 5	AP-42 Section 1.4 Tables 1.4-1 & 1.4-2 Tables 1.4-3 & 1.4-4	<u>lb/MMscf</u> PM/PM ₁₀ = 7.6 VOC = 5.5 SO ₂ = 0.6 CO = 84 NO _x = 100			3.75 MMBtu/hr <u>Natural Gas</u> 8760 hrs/yr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		<u>lb/Mgal</u> PM/PM ₁₀ = 3.3 VOC = 0.556 SO ₂ = 07.1 CO = 5 NO _x = 25			<u>Diesel</u> 48 hrs/yr 26.79 gal/hr
06	Tanks 4.0.9d	Diesel Tank = 20,000 gals Diameter = 11 ft Turnovers = 10/yr			
07	AP-42 Section 3.4 Table 3.4-1 Table 3.4-3 Table 3.4-4 Tier II Standards	<u>g/kWh</u> PM/PM ₁₀ = 0.200 CO = 3.50 NO _x = 6.40 <u>lb/hp-hr</u> SO ₂ = 1.21E-05 VOC = 7.05E-04 <u>lb/MMBtu</u> Total HAP = 1.57E-03			

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

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)
N/A				

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)
01, 02, 07	Hours of operation	500 hrs/yr	Monthly	N
03, 04, 05	Fuel Oil/diesel	1,300 gallon per year	Daily	N
03 04, 05	Diesel Fuel Usage	Not to exceed 48 hours per year	Monthly	N

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 07	20%	§19.501 and A.C.A.	Method 9
03-05 (Natural Gas)	5%	§18.501 and A.C.A.	Method 9
03-05 (No. 2 Fuel)	20%	§19.503 and A.C.A.	Method 9

18. DELETED CONDITIONS:

Former SC	Justification for removal
	None

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
Belly Tank (3,130 gal)	A-3			1.31E-03				
Day Tank 1 (1,350 gal)	A-3			6.1E-04				
Day Tank 2 (1,350 gal)	A-3			6.1E-04				

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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 #
2343-A

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Conway Community
 Services
 Permit Number: 2343-AR-1
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			Old Permit	New Permit
\$/ton factor	23.93	Permit Predominant Air Contaminant	33.9	41.6
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	7.7	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	<u>400</u>	
		Annual Chargeable Emissions (tpy)	<u>41.6</u>	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	1.6	1.9	0.3
PM ₁₀	1.2	1.5	0.3
PM _{2.5}	0	0	0
SO ₂	0.9	1	0.1
VOC	1.4	2	0.6
CO	10.8	15.1	4.3
NO _x	33.9	41.6	7.7
Total HAP	0.14	0.16	0.02