



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON, BOISE, ID 83706 • (208) 373-0502

C. L. "BUTCH" OTTER, GOVERNOR
JOHN H. TIPPETS, DIRECTOR

August 15, 2016

VIA EMAIL

Russ Harbaugh, Director of Operations Building Services
St. Luke's Nampa Medical Center
190 East Bannock Street
Boise, ID 83712

RE: Facility ID No. 027-00152, St. Luke's Nampa Medical Center (SLNMC), Nampa
Draft Permit to Construct for Public Comment

Dear Mr. Harbaugh:

The Department of Environmental Quality (DEQ) has prepared a proposed Permit to Construct No.P-2016.0011 for SLNMC for medical center expansion located at Nampa. A public comment period has been requested, and DEQ is scheduling a 30-day public comment period in accordance with IDAPA 58.01.01.209.01.c. Rules for the Control of Air Pollution in Idaho. To find the exact dates and all other information concerning this public comment period please go to our website: <http://www.deq.idaho.gov>

Enclosed is proposed PTC No. P-2016.0011 for your review. You may submit comments during the public comment period if you so choose. Please email them to Name AQ Public Comment@deq.idaho.gov or directly to me at tom.burnham@deq.idaho.gov.

If you have any questions regarding the terms or conditions of the proposed permit, or about the public comment period, please contact me at (208) 373-0502 or tom.burnham@deq.idaho.gov.

Sincerely,

Tom

Tom Burnham
Permit Writer
Air Quality Division

Permit No. P-2106.0011 PROJ 61684

Air Quality

PERMIT TO CONSTRUCT

Permittee St. Luke's Nampa Medical Center
Permit Number P-2016.0011
Project ID 61684
Facility ID 027-00152
Facility Location 16850 Midland Avenue
Nampa, ID 83687

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued Choose DRAFT or month Choose day, Choose year

Tom Burnham, Permit Writer

Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is the initial permit to construct (PTC) for an expansion of the medical center in Nampa ID.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Emergency Generators GEN1-GEN4 IC Engines * Caterpillar Model C27 *Rated at 800kW (1,214 hp) *Allowable fuel type: diesel fuel *Manufactured:2016	None
3	Boilers 1-3 *Hurst Model 350 hp – Series 500 *Rated at 14.25 MMBtu/hr *Allowable fuel type(s): natural gas with diesel backup *Manufactured: 2016	None

2 Emergency Generators GEN1-GEN4 IC Engines

2.1 Process Description

The facility operates four diesel-fired IC engines which are used to power electrical generators during emergency situations.

2.2 Control Device Descriptions

Table 2.1 Emergency Generators IC Engines Descriptions

Emissions Units / Processes	Control Devices	Emission Points
Emergency Generator GEN1 IC Engine	None	GEN1 Exhaust Stack
Emergency Generator GEN2 IC Engine	None	GEN2 Exhaust Stack
Emergency Generator GEN3 IC Engine	None	GEN3 Exhaust Stack
Emergency Generator GEN4 IC Engine	None	GEN4 Exhaust Stack

Emission Limits

2.3 Emission Limits

The emissions from the Emergency Generator stacks shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Emergency Generators IC Engine Emission Limits^(a)

Source Description	PM ₁₀ ^(b)		SO ₂		NO _x	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
GEN1 IC Engine	0.12	0.01	0.012	0.001	16.63	0.83
GEN2 IC Engine	0.12	0.01	0.012	0.001	16.63	0.83
GEN3 IC Engine	0.12	0.01	0.012	0.001	16.63	0.83
GEN4 IC Engine	0.12	0.01	0.012	0.001	16.63	0.83

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.

2.4 Opacity Limit

Emissions from any stack, vent, or functionally equivalent opening, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Monitoring and Recordkeeping Requirements

2.5 Emergency IC Engine Fuel Specifications Recordkeeping

On an as-received basis for each shipment of distillate fuel oil for the emergency IC engines, the permittee shall maintain records of supplier verified and certified percent sulfur content by weight.

40 CFR 60 Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

2.6 40 CFR 60, Subpart III - Emissions Standards for Stationary CI Internal Combustion Engines - Emergency Engines

The permittee shall comply with all applicable emissions and operating standards of 40 CFR 60, Subpart III - New Source Performance Standards (NSPS) Compression-ignition (CI) Internal combustion engines (ICE). The permittee shall refer to following sections of the rule:

- The owner or operator shall not discharge exhaust opacity from the CI ICE to exceed 20 percent during acceleration mode, 15 percent during lugging mode, and 50 percent during the peaks in either the acceleration or lugging modes in accordance with 40 CFR 89.113, 40 CFR 60.4202(a)(1) and 40 CFR 60.4205(b).
- The owner or operator shall operate the CI ICE in accordance with manufacturer's certification: 40 CFR 89.112 Table 2, 40 CFR 60.4202(a)(1) and 40 CFR 60.4205(b).

2.7 40 CFR 60, Subpart III - Fuel Requirements for Owners and Operators

The permittee shall comply with all applicable fuel requirements for owners and operators of 40 CFR 60, Subpart III. The permittee shall refer to following section of the rule:

- Beginning October 1, 2010, the permittee shall use diesel fuel with a maximum sulfur content of 15 ppm and a minimum of Cetane index of 40 or a maximum aromatic content of 35 volume percent in accordance with 40 CFR 80.510(b), 40 CFR 60.4207(b).

2.8 40 CFR 60, Subpart III - Compliance, Testing and Other Requirements for Owners and Operators

The permittee shall comply with all applicable compliance, testing and other requirements for owners and operators specified by 40 CFR 60, Subpart III. The permittee shall refer to following sections of the rule:

- The owner or operator shall install a non-resettable hour meter prior to startup of the engine in accordance with 40 CFR 60.4209(a).
- The owner or operator shall operate and maintain the stationary CI ICE and control device in accordance to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition the owner and operator may only change those setting that are permitted by the manufacturer in accordance with 40 CFR 60.4211(a).
- The owner or operator shall demonstrate compliance with emission standards by purchasing an engine certified to the emission standards of 40 CFR 60.4205(b) for the same model year and maximum engine power; the engine must be installed and configured according to the manufacturer's specifications in

accordance with 40 CFR 60.4211(c).

- Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations: 40 CFR 60.4211(e).

2.9 40 CFR 60, Subpart IIII -Notification, Reports, and Records for Owners and Operators

The permittee shall comply with all applicable notification, reports, and records for owners and operators of 40 CFR 60, SubpartIII. The permittee shall refer to the following sections of 40 CFR 60, Subpart IIII:

- The owner or operator must keep records of the operation of the engine in emergency and non- emergency service that is recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time in accordance with 40 CFR 60.4214(b).

3 Boilers #1 - #3

3.1 Process Description

The three boilers are used to provide steam for processes at the hospital. Each boiler is dual-fuel rated and allowed to combust natural gas and low sulfur diesel fuel.

3.2 Control Device Descriptions

Table 2.1 Boilers #1 - #3 Description

Emissions Units / Processes	Control Devices	Emission Points
Boiler #1	None	Boiler #1 Exhaust Stack
Boiler #2	None	Boiler #2 Exhaust Stack
Boiler #3	None	Boiler #3 Exhaust Stack

Emission Limits

3.3 Emission Limits

The emissions from the Boiler #1-#3 exhaust stacks shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Boilers #1 - #3 Emission Limits^(a)

Source Description	PM ₁₀ ^(b)		SO ₂		NO _x	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Boiler #1	0.105	0.3	0.022	0.098	1.76	2.09
Boiler #2	0.105	0.3	0.022	0.098	1.76	2.09
Boiler #3	0.105	0.3	0.022	0.098	1.76	2.09

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.

3.4 Boiler #1 through Boiler #3 Fuel-Burning Equipment Emission Limits

The permittee shall not discharge PM into the atmosphere from the Boiler #1 through Boiler #3 stacks in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen (O₂) by volume for gas, and 0.050 gr/dscf of effluent gas corrected to 3% O₂ by volume for liquid, in accordance with IDAPA 58.01.01.676.

Operating Requirements

3.5 Primary and Backup Fuel Use

- Boiler #1 through Boiler #3 shall primarily combust natural gas as fuel.
- Boiler #1 through Boiler #3 may combust diesel fuel as backup during a natural gas curtailment and testing.

3.6 Boiler #1 through Boiler #3 Annual Backup Fuel Testing Requirements

To demonstrate compliance with the Emissions Limits permit condition operation of Boiler #1 through Boiler #3 shall not exceed the following operational requirements:

- 48 hours (per each boiler) per consecutive 12-months when combusting diesel as fuel for testing purposes
- Boiler #1 through Boiler #3 shall only be tested for diesel fuel backup one unit at a time.

3.7 Boilers Fuel Specifications

The boilers shall combust only diesel fuel with a maximum sulfur content 0.05% (500 ppm) by weight.

Monitoring and Recordkeeping Requirements

3.8 Boiler #1 through Boiler #3 Operation Recordkeeping

Each day that a boiler is operated for testing on diesel fuel, the permittee shall monitor and record Boiler #1 through Boiler #3 operation in hours per day to demonstrate compliance with the Boiler #1 through Boiler #3 Annual Backup Fuel Testing Limit permit condition. Monthly operation of Boiler #1 through Boiler #3 shall be determined by summing daily operation over the previous calendar month. Consecutive 12-months operation of Boiler #1 through Boiler #3 shall be determined by summing the monthly operation over the previous consecutive 12 month period to demonstrate compliance with the consecutive 12-months Boiler #1 through Boiler #3 Annual Backup Fuel Testing Limit permit condition.

3.9 Boiler #1 through Boiler #3 Fuel Specifications Recordkeeping

On an as-received basis for each shipment of distillate fuel oil for the boilers, the permittee shall maintain records of the supplier verified and certified percent sulfur content by weight.

40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

3.10 40 CFR 60.44c - Compliance and Performance Test Methods and Procedures for Sulfur Dioxide

- Performance testing of the boilers will be conducted within 30 days after reaching maximum production, but within 180 days of initial startup in accordance with 40 CFR 60.44c (b),
or,
- In accordance with 60.44c (a), exception (g), the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less in accordance with 40 CFR 60.44(g),
or,
- In accordance with 60.44c (a), exception (h), compliance with the SO₂ standards shall be based on fuel supplier certification and consist of the certification from the fuel supplier to demonstrate that the oil contains 0.5 weight percent sulfur or less in accordance with 40 CFR 60.44(h).

3.11 40 CFR 60.46c - Emission monitoring for sulfur dioxide

The permittee shall demonstrate that the fuel sulfur content is less than or equal to 0.5 percent by weight in accordance with 40 CFR 60.46c by:

- Conduct ongoing shipment fuel sampling, including an initial performance test of the oil in the first fuel tank to be fired in the steam generating unit, and fuel sampling analyses conducted after each shipment of oil is received and prior to its use in the boiler in accordance with 40 CFR 60.46c (d),
or,
- As described in 40 CFR 60.44c (h), the permittee shall obtain fuel supplier certifications for all fuel supplied to the boiler, and maintain certified statements that the fuel certifications represent all of the fuel combusted during the reporting period.

3.12 40 CFR 60.48c - What records are to be kept and what are the reporting requirements?

The permittee shall report and maintain records of their operations in accordance with 40 CFR 60.48c:

- Records shall be maintained for at least two years.
- Records shall include notification of the date of boiler construction or reconstruction, and anticipated and actual startup dates.
- Records of the amounts of each fuel combusted during each day shall be kept for each Boiler#1-Boiler#3.
- Reports of SO₂ emission limits shall be submitted to DEQ on a semi-annually (every 6 months) as described in 60.48c (d).

3.13 Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- Applicable requirements of Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60
- Applicable requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS and NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

4 General Provisions

General Compliance

4.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the “Rules for the Control of Air Pollution in Idaho.” The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the “Rules for the Control of Air Pollution in Idaho,” and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)

[Idaho Code §39-101, et seq.]

4.2 The permittee shall at all times (except as provided in the “Rules for the Control of Air Pollution in Idaho”) maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

4.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

4.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

4.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

4.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

4.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

4.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

4.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

- 4.11** The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 4.12** All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

- 4.13** No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

- 4.14** No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

- 4.15** This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

- 4.16** The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]