



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

May 24, 2018

Russ Harbaugh, Director of Operations
St. Luke's Meridian Medical Center
520 South Eagle Road
Meridian, Idaho 83642

RE: Facility ID No. 001-00182, St. Luke's Meridian Medical Center, Meridian
Final Permit Letter

Dear Mr. Harbaugh:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2012.0057 Project 61991 to St. Luke's Meridian Medical Center (SLMMC) located at Meridian for a PTC modification. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received January 16, 2018.

This permit is effective immediately and replaces PTC No. P-2012.0057, issued on August 25, 2017. This permit does not release SLMMC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard, Boise, ID 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, AQ Compliance Officer, at (208) 373-0419 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Rakael Pope at (208) 373-0502 or Rakael.Pope@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is written in a cursive, flowing style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\rp

Permit No. P-2012.0057 PROJ 61991

Enclosures

Air Quality

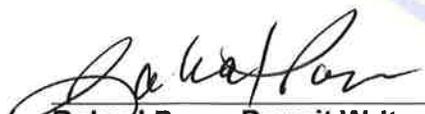
PERMIT TO CONSTRUCT

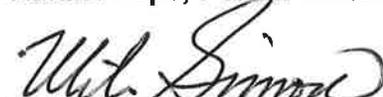
Permittee St. Luke's Meridian Medical Center
Permit Number P-2012.0057
Project ID 61991
Facility ID 001-00182
Facility Location 520 S. Eagle Road
Meridian, ID 83642

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 May 24, 2018


Rakaël Pope, Permit Writer


Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a modified permit to construct (PTC) to increase the load of plant diesel-fired internal combustion (IC) engine powering electrical generators GEN01 and GEN02 to 100% during testing, increase test time allowed to five hours, and remove fuel flow meter requirement.
[5/24/2018]
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2012.0057 Project No. 61888 issued on August 25, 2017.
[5/24/2018]

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 | Boiler No. 1 Manufacturer: Hurst Rated steam rate (lb/hr): 12,075 Manufacturer's Serial No.: S1750-150-15 Model No.: S4-GA2-350-150 Burner Type: Industrial Combustion Burner No.: AM-913-165 ULSD fuel oil flow (gallons per hour): 105 Heat input rating: 15 MMBtu/hr Fuel: Natural gas and ULSD | None |
| | Boiler No. 2 Manufacturer: Hurst Rated steam rate (lb/hr): 12,075 Manufacturer's Serial No.: S1750-150-16 Model No.: S4-GA2-350-150 Burner Type: Industrial Combustion Burner No.: AM-913-166 ULSD fuel oil flow (gallons per hour): 105 Heat input rating: 15 MMBtu/hr Fuel: Natural gas and ULSD | |
| | Boiler No. 3 Manufacturer: Kewanee Model: M-505-KG Installation Date: 1996 Rating: 150 HP Heat input rating: 6.3 MMBtu/hr Fuel: Natural gas | |
| | Boiler No. 4 Manufacturer: Kewanee Model: M-505-KG Installation Date: 1996 Rating: 150 HP Heat input rating: 6.3 MMBtu/hr Fuel: Natural gas | |
| | Boiler No. 5 Manufacturer: Kewanee Model: M-505-KG Installation Date: 1998 Rating: 150 HP Heat input rating: 6.3 MMBtu/hr Fuel: Natural gas | |
| | Boiler No. 6 Manufacturer: Kewanee Model: M-505-KG Installation Date: 1998 Rating: 150 HP Heat input rating: 6.3 MMBtu/hr Fuel: Natural gas | |

| Permit Section | Source | Control Equipment |
|----------------|---|-------------------|
| | Boiler No. 7 Manufacturer: Hurst Model: VIX-G-100-150 Serial No.: VIX217-150-32 Installation Date: 2013 Heat input rating: 4.2 MMBtu/hr Fuel: Natural gas | None |
| | Boiler No. 8 Manufacturer: Hurst Model: VIX-G-100-150 Serial No.: VIX217-150-33 Installation Date: 2013 Heat input rating: 4.2 MMBtu/hr Fuel: Natural gas | |
| | Boiler No. 9 Manufacturer: Lochinvar Model: FBN2500 Installation Date: 2013 Heat input rating: 2.5 MMBtu/hr Fuel: Natural gas | |
| | Boiler No. 10 Manufacturer: Lochinvar Model: FBN2500 Installation Date: 2013 Heat input rating: 2.5 MMBtu/hr Fuel: Natural gas | |
| | Boiler No.11 Manufacturer: Lochinvar Model: FBN2500 Installation Date: 2013 Heat input rating: 2.5 MMBtu/hr Fuel: Natural gas | |
| 3 | Office Generator IC Engine, GEN01 Manufacturer: Detroit Diesel Rated power: 1,231 hp Model No.: R163-7K08 Fuel: ULSD | |
| | Plant Generator IC Engine, GEN02 Manufacturer: Caterpillar Rated Power: 2520 hp Model No.: 3516 Serial No.: 7GM00824 Fuel: ULSD | |

[5/24/2018]

2 Boilers 1 through 11

2.1 Process Description

There are 11 boilers existing at St. Luke's Meridian Medical Center (SLMMC). Two identical Hurst boilers (Nos. 1 and 2) located in the heat plant building are each rated at heat input capacity of 15 MMBtu/hr. The stack parameters are the same for each boiler. Each boiler may operate using either natural gas fuel or Ultra Low Sulfur Diesel (ULSD) fuel oil.

Boilers Nos. 1 and 2 are subject to New Source Performance Standard (NSPS), Subpart Dc.

The facility also operates four existing Kewanee natural gas-fired boilers (Nos. 3-6) located in the hospital basement. Each boiler has a heat input rating of 6.313 MMBtu/hr. The Kewanee boilers operate exclusively on natural gas and are hot water boilers used to supply building heat for the hospital. The Kewanee boilers exhaust to a common stack.

Also, SLMMC has five existing boilers (Nos. 7-11) that are fired exclusively on natural gas and located in a room on the roof of the surgery center building. Three of the boilers are Lochinvar condensing boilers each with a rated heat input capacity of 2.5 MMBtu/hr. The other two boilers are Hurst steam boilers each with a rated heat input capacity of 4.2 MMBtu/hr. Each of these boilers has its own stack.

The primary purpose of the boilers is to generate steam for space heating at the hospital.

[8/25/2017]

2.2 Control Device Descriptions

Emissions from the boilers are uncontrolled.

Emission Limits

2.3 Visible Emission Limits

The permittee shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.4 Fuel-Burning Equipment

The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas or 0.05 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel, as required by IDAPA 58.01.01.676-677.

Operating Requirements

2.5 Operation on Diesel Fuel and MACT Subpart JJJJJJ for Boilers Nos. 1 & 2

- Allowable Fuel Types for Boilers Nos. 1 and 2

The primary fuel for Boilers Nos. 1 and 2 shall be natural gas. The secondary fuel shall be ULSD fuel oil.

[4/12/2013]

- **40 CFR 63 Subpart JJJJJJ, Hour of operation limits when burning No. 2 fuel oil**

In accordance with 40 CFR 63.11237, any periodic operation testing on diesel fuel oil shall not exceed a combined total of 48 hours for each boiler per any consecutive 12-month period.

[5/19/2015]

2.6 Allowable Fuel Type for Boilers Nos. 3 through 11

Boilers Nos. 3 through 11 shall combust natural gas exclusively.

[5/19/2015]

2.7 ULSD Fuel Oil Limit Sulfur Content

Any ULSD fuel oil combusted in Boilers Nos. 1 and 2 shall not contain sulfur in excess of 0.0015% sulfur by weight.

[4/12/2013]

2.8 ULSD Fuel Oil Throughput Limit

The maximum amount of ULSD fuel oil combusted in Boilers Nos. 1 and 2 shall not exceed 84 gallons per hour each.

[4/12/2013]

2.9 Fuel Type and Hours of Operation Limits

- Boiler 1 and Boiler 2 are allowed to be fired on ULSD up to four hours for each boiler every other month between the hours of 7:00 AM and 6:00 PM. During other times, the boilers shall operate exclusively on natural gas.

[4/12/2013]

Monitoring and Recordkeeping Requirements

2.10 Monitoring Natural Gas Fuel Combusted in the Boilers

- The permittee shall monitor and maintain records of the monthly amount of natural gas combusted in Boilers Nos. 1 and 2, in accordance with 40 CFR 60.48c (g) unless otherwise approved by EPA.
- The permittee shall monitor and maintain monthly records of the total natural gas consumption of Boilers Nos. 1 and 2 in scf per any consecutive 12-month period.

All monitoring and recordkeeping documentation required by this permit shall be maintained in accordance with the Monitoring and Recordkeeping General Provisions.

[5/19/2015]

2.11 ULSD Fuel Oil Hours of Operation

The permittee shall monitor and record the hours of operation and the times of operation of Boilers Nos. 1 and 2 in hours per day and for any consecutive 12-month period (hr/yr) when combusting ULSD fuel oil.

All monitoring and recordkeeping documentation required by this permit shall be maintained in accordance with the Monitoring and Recordkeeping General Provisions.

[4/12/2013]

2.12 ULSD Fuel Oil Consumption

The permittee shall monitor and record the date, time, and consumption of ULSD fuel oil for Boilers Nos. 1 and 2 in gallons per hour and gallons per any consecutive 12-month period.

All monitoring and recordkeeping documentation required by this permit shall be maintained in accordance with the Monitoring and Recordkeeping General Provisions.

[4/12/2013]

2.13 New Source Performance Standards

The permittee shall operate Boilers Nos. 1 and 2 in accordance with the applicable sections in 40 CFR Part 60.40c.

2.14 Monitoring Sulfur Content in ULSD Fuel Oil

The permittee shall maintain purchase records, or equivalent, from the manufacturer or distributor that shows the sulfur content of the ULSD fuel oil delivered to the facility on as-received basis.

All monitoring and recordkeeping documentation required by this permit shall be maintained in accordance with the Monitoring and Recordkeeping General Provisions.

[4/12/2013]

Reporting Requirements

2.15 NSPS Reporting Requirements

In accordance with 40 CFR 60.48c, the permittee shall submit to DEQ an annual report (as long as only one shipment of distillate oil per year is received, as approved by EPA Region 10 in a letter dated April 2, 2007) that shall be postmarked by the last day of January each year. The report shall include records of fuel supplier certification containing 1) the name of the oil supplier, and 2) a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c. The report shall include a statement, signed by the permittee, that the records of fuel supplier certifications submitted represent all the fuel oil combusted during the period.

- As required by the EPA reporting reduction approval letter, each annual report shall also include a certified statement signed by the owner or operator of SLMMC's facility that the fuel supplier certifications attached to the report represent all of the distillate oil received by SLMMC for the purposes of fueling Boilers Nos. 1 and 2.
- If any additional shipments of fuel are received during the year, the fuel supplier certification will be submitted to DEQ within 30 days.

[5/19/2015]

2.16 Reports and Certifications

All periodic reports and certification required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period unless otherwise specified in this permit.

Excess emissions reports and notification shall be submitted in accordance with IDAPA 58.01.01.130-136. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, ID 83706-2239

[4/12/2013]

3 IC Engines for Emergency Generator Nos. 1 and 2

3.1 Process Description

SLMMC has two diesel-fired IC engines powering emergency electrical generators. The engines' model numbers, rated output capacities and serial numbers are shown in Table 1 of the Statement of Basis for this PTC. The primary purpose of the emergency generator is to provide electrical power to the hospital in the event of a power interruption. The permit conditions pertain to the internal combustion (IC) engine associated with each of the generators.

3.2 Emissions Control Description

Emissions from the IC engines are uncontrolled.

Emission Limits

3.3 Visible Emission Limits

A person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

3.4 ULSD Fuel Oil Limit Sulfur Content

Any ULSD fuel oil burned in the generator engines shall not contain sulfur in excess of 0.0015% sulfur by weight.

[4/12/2013]

3.5 Testing Requirements

- The emergency generator engines may be tested each month for a combined total time of up to 5 hours for each generator engine.
- The emergency generator engines may operate concurrently during maintenance or testing.

[5/24/2018]

Monitoring and Recordkeeping Requirements

3.6 Hours of Operation Monitoring for the IC Engines

- The permittee shall monitor and record the calendar date and hours of operation per month when each of the IC engines is operated that month to demonstrate compliance with the Limits on Maintenance or Testing Hours.

[5/19/2015]

- Notation shall be made for time periods of operation that an IC engine is used for emergency use and for the time periods of operation that an IC engine is being operated for testing and maintenance purposes.

All monitoring and recordkeeping documentation required by this permit shall be maintained in accordance with the Monitoring and Recordkeeping General Provisions.

Reporting Requirements

3.7 Reporting Requirement

All periodic reports and certification required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period unless otherwise specified in this permit. Excess emissions reports and notification shall be submitted in accordance with IDAPA 58.01.01.130-136. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, ID 83706-2239

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; and
 - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- 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.

[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 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]