



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 21, 2018

Jeff Hull, Owner's Representative
St. Luke's MOB – 27th Development
190 East Bannock St.
Boise, ID 83712

RE: Facility ID No. 001-00350, St. Luke's MOB – 27th Development, Boise
Final Permit Letter

Dear Mr. Hull:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2018.0003 Project 61987 to St. Luke's MOB – 27th Development located at Boise for an initial PTC to construct a medical office building (including installation of 2 boilers, an emergency IC engine and a cooling tower). 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 5, 2018.

This permit is effective immediately. This permit does not release St. Luke's MOB – 27th Development 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 St., Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Thomas Krinke, Air Quality 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 Will Tiedemann at (208) 373-0502 or William.Tiedemann@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\wt

Permit No. P-2018.0003 PROJ 61987

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee St. Luke's MOB – 27th Development
Permit Number P-2018.0003
Project ID 61987
Facility ID 001-00350
Facility Location SE corner of S 27th St. and W Fairview Ave
Boise, ID 83702

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 21, 2018



Will Tiedemann, Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is an initial permit to construct (PTC) for St. Luke's Health System (SLHS) construction of a new orthopedic Medical Office Building (MOB) in Boise.

Regulated Sources

Table 1.11 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	<u>Emissions Unit Name:</u> Boiler 1 Manufacturer: Cleaver Brooks Model: CBEX Elite Manufacture Date: 2018 Heat input rating: 20.22 MMBtu/hr Fuel: Natural Gas (primary) Distillate fuel oil: Ultra Low Sulfur Diesel (backup)	None
	<u>Emissions Unit Name:</u> Boiler 2 Manufacturer: Cleaver Brooks Model: CBEX Elite Manufacture Date: 2018 Heat input rating: 20.22 MMBtu/hr Fuel: Natural Gas (primary) Distillate fuel oil: Ultra Low Sulfur Diesel (backup)	None
3	<u>Emissions Unit Name:</u> Emergency IC Engine Manufacturer: Caterpillar Model: C32 Manufacture Date: 2017 Rating: 1,474 bhp Fuel: Distillate fuel oil: Ultra Low Sulfur Diesel	Tier 2 technologies
4	<u>Emissions Unit Name:</u> Cooling Tower 1 Manufacturer: Evapco Model: USS 224-4M18 Max Flow Rate: 2400 gpm TDS Content: 2,400 mg/L	Drift eliminators

2 Boilers 1 and 2

2.1 Process Description

The primary purpose of the two boilers will be to generate steam for space heating at the facility. The Orthopedic MOB boilers are required to be dual-fired per hospital code requirements. The primary fuel source will be natural gas with ultra-low-sulfur diesel (ULSD) as a backup. Air emissions from these sources are those associated with natural gas or ULSD combustion. Boilers 1 and 2 are identical to each other with a rated capacity of 20.22 MMBtu/hr.

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

2.2 Control Device Descriptions

Table 2.1 Boilers 1 and 2 Description

Emissions Units / Processes	Control Devices	Emission Points
Boiler 1	None	BLR 1 exhaust stack
Boiler 2	None	BLR 2 exhaust stack

Emission Limits

2.3 Emission Limits

The emissions from the Boiler 1 and 2 exhaust stacks shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Boilers 1 and 2 Emission Limits^(a)

Source Description	PM ₁₀ / PM _{2.5} ^(b)		NO _x	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Boiler 1 and 2 (Natural Gas)	0.15	0.68	0.71	3.2
Boiler 1 and 2 (ULSD)	0.46		2.24	

- In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers and two and a half (2.5) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- 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.
- Tons per any consecutive 12-calendar month period.

2.4 Opacity Limit

Emissions from Boiler 1 and 2 stacks, or any other stack, vent, or functionally equivalent opening associated with Boiler 1 and 2, 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.

2.5 Boilers 1 and 2 Fuel-Burning Equipment Emission Limits

The permittee shall not discharge PM into the atmosphere from the Boilers 1 and 2 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

2.6 Primary and Backup Fuel Use

- Boilers 1 and 2 shall only combust natural gas or ULSD as fuel.
- Boilers 1 and 2 shall only combust ULSD fuel as backup during a natural gas curtailment and for testing purposes.
- Only one Boiler may operate at one time, except when one Boiler is combusting ULSD as fuel for testing purposes the other Boiler may combust natural gas.

2.7 Boilers 1 and 2 Annual Backup Fuel Testing Requirements

To demonstrate compliance with the Emissions Limits permit condition operation of Boiler 1 and 2 shall not exceed the following operational requirements:

- 48 hours (per each boiler) per consecutive 12-months when combusting ULSD as fuel for testing purposes.
- 4 hours (for both boilers total) per 24 hour day when combusting ULSD as fuel for testing purposes.

2.8 Boilers Fuel Specifications

Boilers 1 and 2 shall combust only ULSD fuel with a maximum sulfur content 0.0015% by weight.

Monitoring and Recordkeeping Requirements

2.9 Boilers 1 and 2 Operation Recordkeeping

Each day that a boiler is operated on ULSD fuel, the permittee shall monitor and record Boiler 1 and 2 operation in hours per day to demonstrate compliance with the Boilers 1 and 2 Annual Backup Fuel Testing Limit permit condition. Monthly operation of Boilers 1 and 2 shall be determined by summing daily operation over the previous calendar month. Consecutive 12-months operation of Boilers 1 and 2 shall be determined by summing the monthly operation over the previous consecutive 12 month period to demonstrate compliance with the consecutive 12-months Boilers 1 and 2 Annual Backup Fuel Testing Limit permit condition.

2.10 Boilers 1 and 2 Fuel Specifications Recordkeeping

On an as-received basis for each shipment of ULSD fuel 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

2.11 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).

2.12 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.

2.13 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 Boilers 1 and 2.
- Reports of SO₂ emission limits shall be submitted to DEQ on a semi-annually (every 6 months) as described in 60.48c (d).

NSPS General Provisions

2.14 NSPS 40 CFR 60, Subpart A-General Provisions

The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A-“General Provisions”-in accordance with 40 CFR 60.1. A summary of requirements for affected facilities is provided in Table 2.3.

Table 2.3 NSPS 40 CFR 60, Subpart A - Summary of General Provisions

Section	Subject	Summary of Section Requirements
60.4	Address	<ul style="list-style-type: none"> All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart(s) shall be submitted to: Boise Regional Office 1445 N. Orchard St. Boise, ID 83706
60.7(a), (b), and (f)	Notification and Recordkeeping	<ul style="list-style-type: none"> Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date. Notification shall be furnished of initial startup postmarked within 15 days of such date. Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made. Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative. Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.
60.8	Performance Tests	<ul style="list-style-type: none"> At least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present. Within 60 days of achieving the maximum production rate, but not later 180 days after initial startup, performance test(s) shall be conducted and a written report of the results of such test(s) furnished. Performance testing facilities shall be provided as follows: Sampling ports adequate for test methods applicable to such facility. Safe sampling platform(s). Safe access to sampling platform(s). Utilities for sampling and testing equipment. Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f)
60.11(a), (d), (f), and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8. At all times, including periods of startup, shutdown, and malfunction, the owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
60.11(b), (c), and (e)	Compliance with Standards and Maintenance Requirements (Opacity)	<ul style="list-style-type: none"> Compliance with opacity standards shall be determined by Method 9 in Appendix A of 40 CFR 60. The permittee may elect to use COM measurements in lieu of Method 9, provided notification is made at least 30 days before the performance test. The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided. Opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 in accordance with the requirements and exceptions in 40 CFR 60.11(e).

Table 2.3 NSPS 40 CFR 60, Subpart A – Summary of General Provisions (continued)

Section	Subject	Summary of Section Requirements
60.12	Circumvention	<ul style="list-style-type: none"> No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.
60.13	Monitoring Requirements (CMS)	<ul style="list-style-type: none"> All CMS and monitoring devices shall be installed and operational prior to conducting performance tests required by 40 CFR 60.8. A performance evaluation of the COMS or CEMS shall be conducted before or during any performance test and a written report of the results of the performance evaluation furnished. Reporting requirements include submitting performance evaluations reports within 60 days of the evaluations required by this section, and submitting results of the performance evaluations for the COM within 10 days before a performance test, if using a COM to determine compliance with opacity during a performance test instead of Method 9. The zero and span calibration drifts must be checked at least once daily and adjusted in accordance with the requirements in 40 CFR 60.13(d). The zero and upscale (span) calibration drifts of a COMS must be automatically, intrinsic to the opacity monitor, checked at least once daily. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CMS shall be in continuous operation and shall meet minimum frequency of operation requirements as specified in 40 CFR 60.13(e). All CMS or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. CMS shall be located and installed in accordance with the requirements in 40 CFR 60.13(f) and (g). Data shall be reduced and computed in accordance with the procedures in 40 CFR 60.13(h), (i), and (j).
60.14	Modification	<ul style="list-style-type: none"> A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14. Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.
60.15	Reconstruction	<ul style="list-style-type: none"> An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.

[40 CFR 60, Subpart A]

Incorporation by Reference

2.15 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 Subpart, Dc.
- Applicable requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63 Subpart, JJJJJ.

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.

3 Emergency IC Engine

3.1 Process Description

One emergency engine generator is used to provide electrical power to the Orthopedic MOB in the event of a power interruption and for backing up all critical Life Safety Systems. The emergency generator will combust ULSD and will be routinely tested to ensure proper operation. For permitting purposes, air emissions are limited to periods when the emergency equipment is tested and maintained.

3.2 Control Device Descriptions

Table 3.1 Emergency IC Engine Description

Emissions Units / Processes	Control Devices	Emission Points
Emergency IC Engine	None	GEN 1 exhaust stack

Emission Limits

3.3 Emission Limits

The emissions from the Emergency IC Engine exhaust stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Emergency IC Engine Emission Limits ^(a)

Source Description	PM ₁₀ /PM _{2.5} ^(b)		NO _x	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Emergency IC Engine	0.13	0.006	19.40	0.97

- 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 and two and a half (2.5) 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 Opacity Limit

Emissions from the Emergency IC Engine stack, or any other stack, vent, or functionally equivalent opening associated with the Emergency IC Engine, 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.

Operating Requirements

3.5 Daily and Annual Operation Limits

For use in allowable non-emergency situations (i.e. maintenance checks and readiness testing), the Emergency IC Engine may operate for no more than 5 hours per 24-hr day and for no more than 100 hours per consecutive 12- months.

3.6 Emergency IC Engine Fuel Specifications

The Emergency IC Engine shall combust only ULSD fuel with a maximum sulfur content 0.0015% by weight.

Monitoring and Recordkeeping Requirements

3.7 Emergency IC Engine Fuel Specifications Recordkeeping

On an as-received basis for each shipment of ULSD fuel 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

3.8 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)(2) 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)(2) and 40 CFR 60.4205(b).

3.9 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.SIO(b), 40 CFR 60.4207(b).

3.10 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 60.421 l(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 60.421 I(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 60.421 I(e).

3.11 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, Subpart IIII. 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).

NSPS General Provisions

3.12 NSPS 40 CFR 60, Subpart A-General Provisions

The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A-“General Provisions”-in accordance with 40 CFR 60.1. See Permit Condition 2.14 Table 2.3.

Incorporation by Reference

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 Subpart, IIII.
- Applicable requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63 Subpart, ZZZZ.

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 Cooling Tower 1

4.1 Process Description

One wet cooling tower is operated that includes two mechanically induced fans to dissipate large heat loads generated by the Orthopedic MOB and to condition the incoming air to the correct temperature. The water source for the cooling tower is the City of Boise.

4.2 Control Device Descriptions

Table 4.1 Cooling Tower 1 Description

Emissions Units / Processes	Control Devices	Emission Points
Cooling Tower 1	Drift eliminators	Cooling Tower 1A exhaust stack and Cooling Tower 1B exhaust stack

Emission Limits

4.3 Emission Limits

The combined emissions from Cooling Tower 1A exhaust stack and Cooling Tower 1B exhaust stack shall not exceed any corresponding emissions rate limits listed in Table 4.2.

Table 4.2 Cooling Tower 1 Emission Limits ^(a)

Source Description	PM ₁₀ ^(b)	
	lb/hr ^(c)	T/yr ^(d)
Cooling Tower 1	0.33	1.44

- 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.

Operating Requirements

4.4 Solids Content and Flow Rate

- The total dissolved solids (TDS) content of the cooling tower water shall not exceed 2,400 milligrams per liter (mg/L).
- The circulating flow rate of the cooling tower water shall not exceed 2,400 gallons per minute.

Monitoring and Recordkeeping Requirements

4.5 Solids Content and Flow Rate Monitoring

In order to show compliance with the Solids Content and Flow Rate Permit Condition, for each day the Cooling Tower is operated, the facility shall demonstrate the TDS concentration and flow rate of the Cooling Tower do not exceed, or are operationally incapable of exceeding 2,400 mg/L or 2,400 gal/min, respectively. In addition, the facility shall operate and maintain the Cooling Tower in accordance to the manufacturer's written instructions.

5 General Provisions

General Compliance

5.1 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.]

5.2 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]

5.3 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

5.4 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

5.5 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]

5.6 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

- 5.7 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.
- 5.8 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.
- 5.9 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

- 5.10 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

- 5.11 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

- 5.12** 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

- 5.13** 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

- 5.14** 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

- 5.15** 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

- 5.16** 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]