



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL

CUYAHOGA COUNTY

Application No: 13-02233

Fac ID: 1318003059

DATE: 9/8/2005

Medical Center Company (the)
Todd Gadawski
2250 Circle Dr
Cleveland, OH 44106-2664

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 500** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CLAA

PA

**CUYAHOGA
COUNTY**

**PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 13-02233 FOR AN AIR CONTAMINANT SOURCE FOR
Medical Center Company (the)**

On 9/8/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Medical Center Company (the)**, located at **2250 Circle Drive, Cleveland, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-02233:

Administrative Modification of PTI 13-02233 issued March 9, 1995 to remove the use of No.2 oil as a standby fuel and the installation requirement for a continuous opacity monitor.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 13-02233

Application Number: **13-02233**
APS Premise Number: **1318003059**
Permit Fee: **\$ To be entered upon final issuance**
Name of Facility: **Medical Center Company (the)**
Person to Contact: **Todd Gadawski**
Address: **2250 Circle Dr
Cleveland, OH 44106-2664**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2250 Circle Drive
Cleveland, OHIO**

Description of modification:

Administrative Modification of PTI 13-02233 issued March 9, 1995 to remove the use of No.2 oil as a standby fuel and the installation requirement for a continuous opacity monitor.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Medical Center Company (the)
PTI Application: 13-02233
Modification Issued: To be entered upon final issuance

Facility ID: 1318003059

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

Medical Center Company (the)

Facility ID: **1318003059**

PTI Application: 13-02233

Modification Issued: To be entered upon final issuance

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

6

Medical Center Company (the)

PTI Application: 13-02233

Modification Issued: To be entered upon final issuance

Facility ID: **1318003059**

Medical Center Company (the)
PTI Application: 13-02233
Modification Issued: To be entered upon final issuance

Facility ID: **1318003059**

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Medical Center Company (the)** located in **CUYAHOGA** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
B014	100,000 lbs/hr (Maximum Output) Natural gas-fired boiler for space Heat 120.4 mmbtu/hr	**	3745-31-05 3745-17-10 3745-17-07	**

** Particulate - 0.02 lb/MMBTU and no VEs >5% opacity except one 6 min. period every hour; (See additional special terms and conditions)

Sulfur Dioxide - 0.0006 lb/MMBTU (for gas)

Nitrogen Oxides - 0.0375 lb/MMBTU (gas)

This PTI supercedes PTI 13-2233 Issued on June 7, 1991.

SUMMARY TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Medical Center Company (the)

PTI Application: 13-02233

Modification Issued: To be entered upon final issuance

Facility ID: **1318003059**

	<u>Tons/Year</u>
Particulate	
Sulfur Dioxide	
Nitrogen Oxides	10.55
	0.32
	19.77

Medical Center Company (the)
PTI Application: 13-02233
Modification Issued: To be entered upon final issuance

Facility ID: **1318003059**

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B014	100,000 lbs/hr natural gas-fired boiler to produce space heat.	Db

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and

Cleveland Division of Air Quality
1925 St. Clair Ave
Cleveland, Ohio 44114

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

Medical Center Company (the)

Facility ID: **1318003059**

PTI Application: 13-02233

Modification Issued: To be entered upon final issuance

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutant(s):

Source

Pollutant(s)

B014

Nitrogen Oxides Federal RM 7

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Cleveland air Pollution Control, 1925 St. Clair Ave, Cleveland, Ohio 44114.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control

Medical Center Company (the)

Facility ID: **1318003059**

PTI Application: 13-02233

Modification Issued: To be entered upon final issuance

system(s) shall be reported immediately to the **Cleveland Air Pollution Control, 1925 St. Clair Ave, Cleveland, Ohio 44114.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Total suspended particulate emissions in any exhaust gases from this boiler is limited to a maximum of 0.02 pound per million BTU of heat input and there shall be no visible emissions in any exhaust gases from this boiler in excess of 5% (five percent) opacity (six minute average) except a 6 minute "exception" period every 60 minutes when visible emissions are limited to a maximum of 27% (twenty seven percent) opacity and periods of boiler startups, shutdowns and/or reported malfunctions.

Sulfur Dioxide emissions in any exhaust gases from this boiler is limited to a maximum of 0.0006 pound per million BTU of heat input (when natural gas is fired in this boiler). Nitrogen Oxide emissions in any exhaust gases from this boiler is limited to a maximum of 0.0375 pound per million BTU of heat input (when natural gas is fired in this boiler). The applicant shall conduct, or have conducted, performance testing on this boiler in accordance with procedures approved by the Agency. Two copies of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- a. A completed Intent to Test form shall be submitted to the Cleveland Division of Air Pollution Control. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures and the time, date, place and person (s) conducting such

Medical Center Company (the)

Facility ID: **1318003059**

PTI Application: 13-02233

Modification Issued: To be entered upon final issuance

test.

- b. Two copies of the test results shall be submitted within 30 days after completion of the performance test.
- c. Tests shall be performed for the following sources and pollutants:

<u>Source</u>	<u>Pollutant (s)</u>
B014	Nitrogen Oxides (Federal Reference Method No. 7)

- d. Tests shall be conducted within 90 days of utilizing the specified fuel (natural gas).
 - e. The permittee performed a compliance test on April 3, 1992 which satisfied the above testing requirement. Consequently, a performance test is not required for this permit modification.
3. Upon the installation of this boiler, boiler number 3 and 4 (existing sources - Ohio EPA Source No. B009 and B010) shall be equipped with burner systems equivalent to those installed on this boiler (Ohio EPA Source No. B014) and this boiler allowable emission rate will be lowered to those specified for B014 in Paragraph "2" of the Additional Special Terms and Conditions.
 4. Upon the installation of this boiler (Ohio EPA Source No. B014), boilers 5N and 6N (Ohio EPA Source Nos. B007 and B008) must be permanently removed from service.

NOx Monitoring Terms

1. Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Central Office.
2. Within 60 days of installing the NOx monitor, the permittee shall conduct certification tests of such equipment pursuant to ORC section 3704.03 (I) and 40 CFR Part 60, Appendix B, Performance Specification 2. Personnel from the Ohio EPA Central Office and the Cleveland Division of Air Quality shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification test. In accordance with ORC rule 3745-15-04, all copies of the test results shall be submitted to the Ohio EPA Central Office and the Cleveland Division of Air quality within 30 days after the test is completed.
3. Certification of the continuous NOx monitoring system shall be granted upon determination by the Ohio EPA, Central Office that system meets all requirements of ORC section 3704.03 (I) and 40 CFR Part 60, Appendix B, Performance Specification 2.
4. The permittee shall operate and maintain equipment to continuously monitor and record NOx emissions from this emissions unit pursuant to 40 CFR Part 60 Subpart Db.

Medical Center Company (the)

Facility ID: **1318003059**

PTI Application: 13-02233

Modification Issued: To be entered upon final issuance

5. The permittee shall install, calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring nitrogen oxides emissions discharged to the atmosphere.

The continuous monitoring system required under paragraph (b) of 40 CFR part 60.48b shall be operated and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Data shall be recorded during calibration checks, and zero and span adjustments.
7. The 1-hour average nitrogen oxides emission rates measured by the continuous nitrogen oxides monitor required by paragraph (b) of 40 CFR Part 60.48b and required under 40 CFR part 60.13(h) shall be expressed in ng/J or lb/million Btu heat input and shall be used to calculate the average emission rates. The 1-hour averages shall be calculated using the data points required under 40 CFR Part 60.13(b). At least 2 data points must be used to calculate each 1-hour average.
8. For natural gas usage the analyzer span value for nitrogen oxides is 500 ppm.
9. When nitrogen oxides emissions data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.
10. Except as provided under paragraph (p) of 40 CFR Part 60.49b, the permittee shall maintain records of the following information for this steam generating unit operating day:
 - a. Calendar date
 - b. The average hourly nitrogen oxides emissions rates (expressed as NO₂) (ng/J or lb/million Btu heat input) measured.
 - c. The 30-day average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.
 - d. Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under 40 CFR Part 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.
 - e. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.
 - f. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.

Medical Center Company (the)

Facility ID: **1318003059**

PTI Application: 13-02233

Modification Issued: To be entered upon final issuance

- g. Identification of "F" factor used for calculations, method of determination, and type of fuel combusted.
 - h. Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system.
 - i. Description of any modification to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specification 2 or 3.
 - j. Results of daily CEMS drift tests and quarterly accuracy assessments as required under 40 CFR Part 60 appendix F, Procedure 1.
11. The permittee shall submit to the Administrator the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable performance specifications in appendix B of 40 CFR Part 60.
12. The permittee shall submit quarterly excess emission reports to the Cleveland Division of Air Quality containing the information record under paragraph (g) of 40 CFR Part 60.49b. For any excess emissions which occurred during the reporting period. Excess emissions are defined as any calculated 30-day rolling average nitrogen oxides emission rate, as determined under 40 CFR Part 60.46b(e), which exceeds the applicable emission limits.

Miscellaneous Requirements

1. The use of natural gas as fuel for burning in this emissions unit is required to satisfy the BAT requirements in OAC 3745-31-05. The emissions unit is also equipped with a low NOx burner.
2. The permittee shall burn only natural gas in this emissions unit.
3. The permittee shall record and maintain records of the amount of fuel combusted each day.
4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.