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Facility Name: **Allegiance Healthcare Corporation**

Application Number: **08-3885**

Date: **August 19, 1998**

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

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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.

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

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule

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3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

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.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Allegiance Healthcare Corporation** located in **Preble** 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P017	Gas chlorination process, with ejector - venturi wet scrubber	*	3745-31-05	0.02 lb/hour and 0.09 TPY chlorine

- * BAT is compliance with applicable OAC rule and specified allowable emission limitations through the use of an ejector-venturi wet scrubber control device; compliance with Ohio EPA Air Toxics Policy; monitoring and recordkeeping of ejector-venturi wet scrubber control equipment operating parameters; and reporting.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

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Chlorine	<u>Tons/Year</u>
	0.09

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Regional Air Pollution Control Agency, 451 West Third Street, P. O. Box 972, Dayton, Ohio 45422.**

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 system(s) shall be reported immediately to the **Regional Air Pollution Control Agency, 451 West Third Street, P. O. Box 972, Dayton, Ohio 45422.**

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.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification

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(see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Additional Terms and Conditions

1. The 0.02 lb/hour chlorine limit reflects the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The pH of the scrubber liquor shall be continuously maintained between 12 and 14.
2. The scrubber water supply pressure shall be continuously maintained at a value of not less than 40 pounds per square inch (gauge) at all times while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.
2. The permittee shall properly install, operate and maintain equipment to monitor and record the pH of the scrubber liquor and the scrubber water supply pressure while the emissions unit is in operation. The monitoring devices and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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3. The permittee shall collect and record the following information each day:
 - a. the pH of the scrubber liquor, on a once per shift basis;
 - b. the scrubber water supply pressure, in pounds per square inch (gauge), on a once per shift basis; and,
 - c. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. the pH of the scrubber liquor; and,
 - b. the scrubber water supply pressure.
2. These quarterly deviation (excursion) reports shall be submitted in the following manner:
 - a. reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency; and,
 - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and controlled device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and © any corrective actions or preventative measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control Agency. If no deviations occurred during a calendar quarter, the permittee shall

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submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31,

and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

E. Testing Requirements and Compliance Method Determinations

1. Compliance with the emission limitation(s) for emissions unit P017, in this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation - 0.02 lb/hour chlorine
Applicable Compliance Method - Compliance shall be determined by multiplying the maximum hourly chlorine gas usage of 2 lbs/hour by the scrubber control efficiency of 99% (1 - 0.99). If required, compliance shall be demonstrated through stack testing.
 - b. Emission Limitation - 0.09 TPY chlorine
Applicable Compliance Method - The 0.09 TPY limitation was developed by multiplying the 0.02 lb/hour allowable emission rate by a maximum operating schedule of 8760 hours/year, and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

F. Miscellaneous Requirements

1. This permit allows the use of the materials specified by the permittee in the application for PTI number 08-3885. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the chlorine emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on

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both the formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant

based on the SCREEN3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Chlorine

TLV (ug/m3): 1,500

Maximum Hourly Emission Rate (lbs/hr): 0.02

Predicted 1 Hour Maximum Ground-Level

Concentration at the Fenceline (ug/m3): 5.605

Maximum Acceptable Ground-Level Concentration
(MAGLC) (ug/m3): 15

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the **Regional Air Pollution Control Agency** are required, including the possible issuance of modifications to PTI number 08-3885 and the operating permit:
 - a. any changes in the composition of the chlorination process materials, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
 - c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this

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permit or would otherwise be considered a
"modification" as defined in OAC rule 3745-31-01;

- d. any change in the composition of the chlorination process materials, or use of new materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,
 - e. any change in the composition of the chlorination process materials, or use of new materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).
3. The permittee shall not store more than 16 tanks of chlorine (2,500 pounds of chlorine) at any time unless a risk management plan is in place.