



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Governor Brad Little
Director John H. Tippetts

August 20, 2019

Timothy J. Wilcox, Manager Building Services
St. Luke's McCall
1000 State St.
McCall, Idaho 83638

RE: Facility ID No. 085-00006, St. Luke's McCall, McCall, Idaho
Final Permit Letter

Dear Mr. Wilcox:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2019.0026 Project 62245 to St. Luke's McCall located at McCall for its renovation and expansion project. 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 June 5, 2019.

This permit is effective immediately. This permit does not release St. Luke's McCall 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., 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with David Luft, Air Quality Manager, at (208) 373-0201 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 Chris Duerschner at (208) 373-0142 or Chris.Duerschner@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\cd

Permit No. P-2019.0026 PROJ 62245
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee St. Luke's McCall
Permit Number P-2019.0026
Project ID 62245
Facility ID 085-00006
Facility Location 1000 State Street
McCall, Idaho

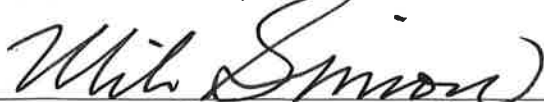
Permit Authority

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 August 20, 2019



Chris Duerschner, Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This PTC is for a new facility. The permittee has proposed to install three new boilers and one new emergency IC engine powering an electrical generator.

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	<u>Boiler 1:</u> Manufacturer: Fulton Model: VMP-130 Heat input rating: 5.18 MMBtu/hr Fuel: #2 Fuel Oil (0.0015% Sulfur)	No Control Device
2	<u>Boiler 2:</u> Manufacturer: Fulton Model: VMP-130 Heat input rating: 5.18 MMBtu/hr Fuel: #2 Fuel Oil (0.0015% Sulfur)	No Control Device
2	<u>Boiler 3:</u> Manufacturer: Fulton Model: VMP-130 Heat input rating: 5.18 MMBtu/hr Fuel: #2 Fuel Oil (0.0015% Sulfur)	No Control Device
3	<u>Emergency IC Engine:</u> Manufacturer: Caterpillar Model: C32 ATAAC Manufacture Date: 2019 Maximum Rating: 1,474 bhp Fuel: #2 Fuel Oil (0.0015% Sulfur)	No Control Device

2 Boilers

2.1 Process Description

The boilers will generate steam for space heating at the facility.

2.2 Control Device Descriptions

Table 2.1 Boiler Descriptions

Emissions Units / Processes	Control Devices	Emission Points
<u>Boiler 1:</u> Manufacturer: Fulton Model: VMP-130 Heat input rating: 5.18 MMBtu/hr Fuel: #2 Fuel Oil (0.0015% Sulfur)	No Control Device	Boiler 1 Stack
<u>Boiler 2:</u> Manufacturer: Fulton Model: VMP-130 Heat input rating: 5.18 MMBtu/hr Fuel: #2 Fuel Oil (0.0015% Sulfur)	No Control Device	Boiler 2 Stack
<u>Boiler 3:</u> Manufacturer: Fulton Model: VMP-130 Heat input rating: 5.18 MMBtu/hr Fuel: #2 Fuel Oil (0.0015% Sulfur)	No Control Device	Boiler 3 Stack

Emission Limits

2.3 Opacity Limit

Emissions from the boiler stacks, or any other stack, vent, or functionally equivalent opening associated with the boilers, 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. Compliance with this provision shall be achieved upon startup of each boiler.

2.4 Particulate Matter

The permittee shall not discharge into the atmosphere from any liquid fuel burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than ten (10) million BTU per hour, particulate matter in excess of 0.05 gr/dscf, corrected to 3% oxygen as required by IDAPA 58.01.01.677. Compliance with this provision shall be achieved upon startup of each boiler.

Operating Requirements

2.5 Fuel Oil Sulfur Content Limit

No fuel oil containing sulfur in excess of 0.0015% or 15 ppm shall be combusted in any boiler listed in Table 2.1.

2.6 Boiler Tune-up Requirement

In accordance with 40 CFR 63.11201, 63.11210, 63.11214, and 63.11223, the permittee shall conduct biennial tune-ups of the boilers. No initial tune-up is required; however, the biennial tune-up must be completed no later than 25 months after initial startup. The tune-up must be performed according to the following conditions:

- (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- (4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- (5) Measure the concentrations in the effluent stream of CO in the parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after adjustments are made). Measurements may be taken using a portable CO analyzer.
- (6) Maintain on-site and submit, if requested by the Administrator, a report containing:
 - (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
 - (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
 - (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- (7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

2.7 Good Air Pollution Control Practices Requirement

In accordance with 40 CFR 63.11205, the permittee shall at all times operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

Monitoring and Recordkeeping Requirements

2.8 Recordkeeping Requirements

In accordance with 40 CFR 63.11225, the permittee shall maintain records including:

- A copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.
- Documentation of conformance with the work practices, emission reduction measures, and management practices including identification of each boiler, the date of tune-up, the procedures followed for tune-up, the manufacturer's specifications to which the boiler was tuned, and reporting on a monthly basis of the type of fuel combusted.
- Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
- Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- On an as received basis, the ASTM grade and percent sulfur content by weight for each shipment of distillate fuel oil as verified and certified by the supplier.

2.9 Records Retention Requirement

In accordance with 40 CFR 63.11225, the permittee shall keep each record in a form suitable and readily available for expeditious review. The permittee shall keep each record for 5 years following the date of each recorded action. Each record must be kept on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years, after the date of each recorded action. Records may be kept off site for the remaining 3 years.

Reporting Requirements

2.10 Reporting Requirement

In accordance with 40 CFR 63.11225, the permittee shall prepare a biennial compliance report. This report must include the following:

- The company name and address
- A statement by a responsible official, with the official's name title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. This statement must include the following certifications of compliance, as applicable.
 - "This facility complies with the requirements in §63.11223 to conduct a biennial or five-year tune-up, as applicable, of each boiler."
 - For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

- “This facility complies with the requirement in 40 CFR §§63.11214(d) and 63.11223(g) to minimize the boiler’s time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer’s recommended procedures or procedures specified for a boiler of similar design if manufacturer’s recommended procedures are not available.”

3 Internal Combustion Engine Powering an Electrical Generator

3.1 Process Description

The emergency IC engine provides electrical power to SLMC in the event of a power interruption providing back up for all critical Life Safety Systems. The emergency IC engine will combust ultra-low sulfur diesel and will be routinely tested to ensure proper operation.

3.2 Control Device Descriptions

Table 3.1 Internal Combustion Engine Descriptions

Emissions Units / Processes	Control Devices	Emission Points
Emergency IC Engine	No control device	IC engine Stack

Emission Limits

3.3 Emission Limits

In accordance with 40 CFR 60.4205(b), the emissions from the emergency IC engine stack shall not contain NMHC+NO_x in excess of 6.4 g/kW-hr, CO in excess of 3.5 g/kW-hr, or PM in excess of 0.20 g/kW-hr. Furthermore, exhaust opacity must not exceed 20% during acceleration mode, 15% during lugging mode, and 50% during peaks in either the acceleration or lugging modes.

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.

3.5 Particulate Matter

The permittee shall not discharge into the atmosphere from any liquid fuel burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than ten (10) million BTU per hour, particulate matter in excess of 0.05 gr/dscf, corrected to 3% oxygen as required by IDAPA.58.01.01.677

3.6 Duration of Emission Limit Compliance

In accordance with 40 CFR 60.4206, the permittee shall operate and maintain the emergency IC engine to achieve all applicable emission standards over the life of the engine.

Operating Requirements

3.7 Engine Certification Requirement

The permittee shall purchase an engine that is certified to the emission standards in §60.4205(b). The engine must be installed and configured according to the manufacturer's emission-related specifications.

3.8 Emergency IC Engine Operation Limits

In accordance with 40 CFR 60.4211(e), any operation of the emergency engine other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. The following operating time limits apply:

- There is no time limit on the use of the emergency engine in emergency situations.
- The emergency engine may be operated for a maximum of 100 hours per calendar year for any combination of the following purposes:
 - Maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine.
 - Emergency demand response, for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies, or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-03.
 - Periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
- The emergency engine may be operated for up to 50 hours in non-emergency situations. This time is counted as part of the 100 hours per calendar year provided for maintenance checks and readiness testing, emergency demand response and deviations in voltage or frequency. The 50 hours per calendar year for non-emergency situations may be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
 - The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
 - The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - The power is provided only to the facility itself or to support the local transmission and distribution system.
 - The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

3.9 Fuel Requirement

In accordance with 40 CFR 60.4207, the permittee shall combust only ASTM Grade 2 fuel oil with maximum sulfur content of 0.0015%.

3.10 Adherence to Manufacturer Instruction Requirement

In accordance with 40 CFR 60.4211(a), the permittee shall operate and maintain the IC engine according to the manufacturer's written emission-related instructions. In addition, owners and operators may only change those emission-related settings that are permitted by the manufacturer. Finally, owners and operators must meet the requirements of 40 CFR parts 89, 94, and/or 1068, as applicable.

Monitoring and Recordkeeping Requirements

3.11 Annual Hours of Operation

In accordance with 40 CFR 60.4209(a), the permittee shall install a non-resettable hour meter prior to startup of the emergency IC engine. Furthermore, the owner or operator shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation and the reason the engine was in operation during that time.

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]