

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 1, 2012.

Permit Number: **R30-03900057-2012**

Application Received: **2-10-2014**

Plant Identification Number: **03-54-039-00057**

Permittee: **Charleston Area Medical Center**

Facility Name: **General Hospital**

Mailing Address: **3200 MacCorkle Avenue SE, Charleston, WV 25304**

Permit Action Number: *MM01* Revised: *May 2, 2016*

Physical Location:	Charleston, Kanawha County, West Virginia
UTM Coordinates:	445.19 km Easting • 4244.56 km Northing • Zone 17
Directions:	From Interstate 64, take exit 100 at Leon Sullivan Way toward Capital Street. From Leon Sullivan Way, turn left onto Lee Street. Turn left onto Brooks Street and right onto Washington Street to stay on U.S. Route 60 East. Turn left onto Morris Street and end at 501 Morris Street.

Facility Description

Charleston Area Medical Center – General Hospital is a hospital that is covered by Standard Industrial Classification (SIC) 8062. The hospital has a 1000 lb/hr Hospital Medical Infectious Waste Incinerator (HMIWI) with a dry injection fabric filter and packed tower wet scrubber. It incinerates medical infectious waste from these CAMC hospitals: CAMC General Hospital, CAMC Memorial Hospital, CAMC Teays Valley Hospital, CAMC Cancer Center, and CAMC Women’s and Children’s Hospital, as well as from other health organizations associated with CAMC. The HMIWI has an annual feed rate of 1,700,000 pounds.

This permit modification is for the installation of a packed bed scrubber (Control Device ID: 2C) and to incorporate the latest emission standards of Subpart Ce to 40 C.F.R. Part 60 which were adopted by the State of West Virginia in 45CSR§18-7.1.

Emissions Summary

The proposed changes result in a 14.5 ppmv decrease in the Hydrogen Chloride (HCl) emission concentration.

Title V Program Applicability Basis

This facility operates a Hospital/Medical/Infectious Waste Incinerator (HMIWI). In accordance with 45 CSR§ 18-7.2.i, this facility is required to have an operating permit pursuant to Title V of the Federal Clean Air Act. Furthermore, in accordance with 45 CSR§ 30-3.3.b., for any non-major source subject to 45CSR30, the Secretary shall include in the permit all applicable requirements for emission unit(s) that cause the source to be subject to this rule.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13 45CSR18 45CSR30 40 C.F.R. Part 62, Subpart XX	NSR permit Requirements and limits for HMIWI. Operating permit requirement. Approval and Promulgation of State Plans for Designated Facilities and Pollutants.
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit <i>(if any)</i>
R13-1772J	January 5, 2016	

*Note: R13-1772H, issued on 10/20/2015, for installation of packed bed scrubber 2C on HMIWI.
 R13-1772I, issued on 11/20/2015, for the replacement of an existing boiler with three new boilers.
 R13-1772J, issued on 1/5/2016, for the replacement of two existing emergency generators with a new generator.*

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made to the Title V Permit to incorporate the current R13 requirements for the HMIWI:

1.1 Emission Units

- The Emission Point ID of the Medical Waste Incinerator (HMIWI) was changed from 1S to IMWI to maintain consistency between the Title V and R13 Permits.
- A Control Devices table was created containing the Control Device IDs and a description of each control device.

3.0. Facility-Wide Requirements

- Removed 3.7.2.a 45CSR13 from the Permit Shield, since the facility now has a control device other than a dry scrubber this permit shield would no longer apply.

4.0. Medical Waste Incinerator

4.1. Limitations and Standards

- The old 4.1.1 – 4.1.4 conditions that were cited as requirements from 45CSR6 and R13-1772 were removed since HMIWI are exempt from 45CSR6 (45CSR§6-10.1.a). Due to the removal of these conditions all other conditions were renumbered.
- Condition 4.1.5. was removed because it was removed from the R13 permit and the other cited regulation 45CSR§18-6.1 is for a new HMIWI (constructed after December 1, 2008 or modified after April 6, 2010). The HMIWI at CAMC General was constructed in 1995 and is not subject to 45CSR§18-6.1.
- Updated the language used in conditions 4.1.1. (previously 4.1.6), 4.1.2 (previously 4.1.7) and 4.1.3 (previously 4.1.8) to be consistent with the language used in the R13 Permit.
- Condition 4.1.4 (previously 4.1.9) contains the emission limits for the HMIWI. CAMC's HMIWI is subject to the standards of Table 18-1B, which is presented in Table 4.1.4. of the Title V permit.
- Condition 4.1.5 (previously 4.1.10) establishes operating parameters for the HMIWI and associated control equipment.
- Renumbered previous condition 4.1.11 as condition 4.1.6.
- Previous conditions 4.1.12 and 4.1.13 were not included in the R13 permit, and therefore were removed from the Title V permit.
- Added Condition 4.1.7 which requires the permittee to conduct annual inspections of the HMIWI and associated control devices and gives a list detailing what must be inspected.
- Added Condition 4.1.8 for the Operation and Maintenance of Air Pollution Control Equipment.

4.2. Monitoring Requirements

- The old Condition 4.2.1 was updated and divided into three separate conditions: 4.2.1, 4.2.2, 4.2.3.

- Old Condition 4.2.2 is no longer included in the R13 permit and therefore was removed from the Title V permit.
- Updated the language used in conditions 4.2.4 (previously 4.2.3) and 4.2.5 (previously 4.2.4) to be consistent with the language used in the current R13 permit.
- Deleted old condition 4.2.5 since it is no longer included in the R13 permit.
- Added condition 4.2.6 which details the use of CO CEMS to comply with the CO emission limit of Condition 4.1.4.
- Added condition 4.2.7 to include requirements for the continuous opacity monitoring system.

4.3. Testing Requirements

- Updated the language used in conditions 4.3.1 and 4.3.2 to be consistent with the language used in the R13 permit.

4.4. Recordkeeping Requirements

- The content in the old Condition 4.4.1 was divided into three separate conditions (4.4.5, 4.5.1, 4.5.2) to reflect changes made in the R13 permit.
- The old Conditions 4.4.2 - 4.4.7 were removed from the Title V permit since their cited R13 conditions no longer exist in R13-1772H.
- Added new conditions 4.4.1 – 4.4.3 which contain standard language for: Record of Monitoring, Record of Maintenance of Air Pollution Control Equipment, and Record of Malfunction of Air Pollution Control Equipment.
- Added new condition 4.4.4 which requires the permittee to maintain records of the annual equipment inspections as required by Condition 4.1.7.

4.5. Reporting Requirements

- The old Condition 4.5.1 was removed from the Title V permit since its cited R13 condition no longer exists.
- The new Condition 4.5.1 includes content that was cited in the previous conditions 4.4.1 and 4.5.2.
- The new Condition 4.5.2 includes content that was cited in the previous condition 4.4.1.

Attachments

- All attachments were removed since the current R13 permit no longer contains recordkeeping forms for the HMIWI.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR part 60, subpart Ec

CAMC - General Hospital's HMIWI was constructed before the June 20, 1996 applicability date. However, 45CSR18 makes several references to Subpart Ec of Part 60.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable for minor modifications.

Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478
Robert.A.Mullins@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.