

Statement of Basis For Title V Permit

Part I - General	
Company Name	Miami Valley Hospital
Premise Number	0857040180
What makes this facility a Title V facility?	The facility-wide emissions of nitrogen oxides and sulfur dioxide are over 100 tons.
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)

B001 - B006: OAC rule 3745-17-11(B)(5)(a) was revised 4/13/2003. Applicable emissions limitations was updated by removing the pre revision particulate emission rate value and listing only the post revision value.

B001 - B003: The erroneous TPY particulate emissions limitation listed in the Applicable Emissions Limitations/Control Measures was changed to reflect correct value listed in PTI 08-3403 for these units.

B007 - B013, B015 and B016: PTI 08-04392 issued 07/23/2002 placed federally enforceable restrictions (rolling 12 month emissions and fuel oil usage limitations) on these units. Terms and conditions were modified to reflect those of the PTI.

B018: This unit added to Title V permit. It was permitted under PTI 08-04392 issued 07/23/2002 with federally enforceable restrictions.

B014: OAC rule 3745-17-11(B)(5)(a) was revised 4/13/2003. Applicable emissions limitations were updated by removing the pre revision particulate emission rate value and listing only the post revision value.

B017: OAC rule 3745-17-11(B)(5)(a) was revised 4/13/2003. Applicable emissions limitations were updated by removing the pre revision particulate emission rate value and listing only the post revision value. The erroneous PTI number referenced in Applicable Rules/Requirements was corrected to PTI 08-04076.

B001-B018 : "Authority for Term:" citations added throughout for each emissions unit.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

C

Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B001, B002, B003, B004, B005, B006, B014, and B017	0.310 lb particulate/ actual heat input	17-11 (B)(5) (a)	n/a	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee shall burn only diesel fuel in these emissions units. ET: No emissions testing is required. Compliance is based upon the combustion of only diesel fuel.

B001, B002, B003, B004, B005, B006, B014, and B017	20% opacity visible emissions as a six-minute average, except as provided by rule	17-07 (A)	n/a	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee shall burn only diesel fuel in these emissions units. ET: No emissions testing is required. Compliance is based upon the combustion of only diesel fuel.
B001, B002, and B003	0.43 TPY sulfur dioxide, as a rolling, 12-month summation 6.50 TPY nitrogen oxides, as a rolling, 12-month summation	31-05(C)	PTI 08-3403	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee is restricted to an annual fuel usage limitation of 21,000 gallons as a rolling, 12-month summation. ET: No emissions testing is required. Compliance is based upon record keeping and the fuel usage limitation.
B001, B002, and B003	21,000 gallons fuel usage, as a rolling, 12-month period	31-05(C)	PTI 08-3403	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee is restricted to the fuel usage limitation as a rolling, 12-month summation. ET: No emissions testing is required. Compliance is based upon record keeping.

B001, B002, and B003	0.44 TPY particulate 1.71 lb/hr sulfur dioxide 26.02 lb/hr nitrogen oxides 5.6 lb/hr and 1.40 TPY carbon monoxide 2.54 lb/hr and 0.64 TPY organic compounds	31-05(A)	08- 3403	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: none. Static emissions factor calculation at maximum capacity demonstrates compliance.
B004, B005, B006, and B017	10.5 lb sulfur dioxide/ mmBtu actual heat input	18-06 (G)	n/a	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee shall burn fuel of a quality sufficient to comply with the SO2 emission limitation. ET: No emissions testing is required. Compliance is based upon the fuel oil analyses performed by the permittee or the oil supplier.
B004, B005, and B006	0.79 TPY sulfur dioxide, as a rolling, 12-month summation 11.97 TPY nitrogen oxides, as a rolling, 12- month summation	31-05(C)	PTI 08- 3403	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee is restricted to an annual fuel usage limitation of 38,500 gallons as a rolling, 12-month summation. ET: No emissions testing is required. Compliance is based upon record keeping and the fuel usage limitation.

B004, B005, and B006	38,500 gallons fuel usage, as a rolling, 12-month summation	31-05(C)	PTI 08-3403	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee is restricted to the fuel usage limitation as a rolling, 12-month summation. ET: No emissions testing is required. Compliance is based upon record keeping.
B004, B005, and B006	0.82 TPY particulate 47.9 lb/hr nitrogen oxides 10.32 lb/hr and 2.58 TPY carbon monoxide 4.7 lb/hr and 1.20 TPY organic compounds	31-05(A)	PTI 08-3403	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: None. Static emissions factor calculation at maximum capacity demonstrates compliance.
B007, B008, B009, B010, B011, B012, B013, B015, B016, and B018	0.020 lb particulate/ mmBtu actual heat input	17-10 (B)(1)	n/a	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee shall burn only natural gas or No. 2 fuel oil in these emissions units. ET: No emissions testing is required. Compliance is based upon the combustion of only natural gas and No. 2 fuel oil.

B007, B008, B009, B010, B011, B012, B013, B015, B016, and B018	<p>0.52 TPY particulate, the individual maximum for each unit, and 3.2 TPY particulate, combined as a rolling, 12-month summation</p> <p>4.26 lbs/hr and 18.6 TPY sulfur dioxide, the individual maximum for each unit, and 113 TPY SO2 combined as a rolling, 12-month summation</p> <p>1.20 lbs/hr and 5.62 TPY nitrogen oxides, the individual maximum for each unit, and 31.8 TPY NOx combined as a rolling, 12-month summation</p>	31-05(C)	PTI 08- 04392	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR: The permittee is restricted to an annual fuel usage limitation of 3,182,400 gallons as a rolling, 12-month summation.</p> <p>ET: No emissions testing is required. Compliance is based upon record keeping and the fuel usage limitation.</p>
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B007, B008, B009, B010, B011, B012, B013, B015, B016, and B018	3,182,400 gallons fuel usage, as a rolling, 12-month summation	31-05(C)	PTI 08-04392	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee is restricted to the fuel usage limitation as a rolling, 12-month summation. ET: No emissions testing is required. Compliance is based upon record keeping.
B007, B008, B009, B010, B011, B012, B013, B015, B016, and B018	0.5% by weight sulfur content of the fuel oil	31-05(C)	PTI 08-04392	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee is restricted to a maximum sulfur content of 0.5% by weight of the fuel oil. ET: No emissions testing is required. This emission limitation is reflective of the potential to emit for this emissions unit based upon the maximum hourly fuel usage, maximum sulfur content of 0.5% by weight and the AP-42 emission factor.
B007, B008, B009, B010, B011, B012, B013, B015, B016, and B018	20% opacity visible emissions, as a six-minute average, except as provided by rule	17-07 (A)	n/a	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee shall burn only natural gas or No. 2 fuel oil in these emissions units. ET: No emissions testing is required. Compliance is based upon the combustion of only natural gas and No. 2 fuel oil.
B007, B008, B009, B010, B011, B012, B013, B015, B016, and B018	0.67 lb/hr and 2.94 TPY carbon monoxide 0.09 lb/hr and 0.38 TPY organic compounds	31-05(A)	PTI 08-04392	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: None. Static emissions factor calculation at maximum capacity demonstrates compliance.

B014	0.65 TPY sulfur dioxide, as a rolling, 12-month summation 9.9 TPY nitrogen oxides, as a rolling, 12-month summation	31-05(C)	PTI 08-3573	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee is restricted to an annual fuel usage limitation of 31,500 gallons as a rolling, 12-month summation. ET: No emissions testing is required. Compliance is based upon record keeping and the fuel usage limitation.
B014	31,500 gallons fuel usage, as a rolling, 12-month summation	31-05(C)	PTI 08-3573	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The permittee is restricted to the fuel usage limitation as a rolling, 12-month summation. ET: No emissions testing is required. Compliance is based upon record keeping.

B014	0.67 TPY particulate 0.87 lb/hr sulfur dioxide 13.23 lb/hr nitrogen oxides 2.85 lb/hr and 2.14 TPY carbon monoxide 1.3 lb/hr and 0.98 TPY organic compounds	31-05(A)	PTI 08-3573	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: None. Static emissions factor calculation at maximum capacity demonstrates compliance.
B017	1.14 TPY sulfur dioxide, as a rolling, 12-month summation 17.29 TPY nitrogen oxides, as a rolling, 12-month summation	31-05(C)	PTI 08-4076	N	Y	Y	N	N	Y	N	N	Y	N	N	OR: The permittee is restricted to an annual fuel usage limitation of 38,500 gallons as a rolling, 12-month summation. ET: No emissions testing is required. Compliance is based upon record keeping and the fuel usage limitation.
B017	56,000 gallons fuel usage as a rolling, 12-month summation	31-05(C)	PTI 08-4076	N	Y	Y	N	N	Y	N	N	Y	N	N	OR: The permittee is restricted to the fuel usage limitation as a rolling, 12-month summation. ET: No emissions testing is required. Compliance is based upon record keeping.

B017	1.22 TPY particulate 69.15 lb/hr nitrogen oxides 14.9 lb/hr and 3.72 TPY carbon monoxide 5.49 lb/hr and 1.37 TPY organic compounds	31-05(A)	PTI 08-04076	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: None. Static emissions factor calculation at maximum capacity demonstrates compliance.
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EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

- C **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.