

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

NOV 18 2015

Mr. Tim Tripp
Environmental Protection Specialist
Veteran's Administrative St. Louis Healthcare System
#1 Jefferson Barracks Drive
Mail Stop: 001S/JB
St. Louis, MO 63125

RE: Return Receipt of the Basic Operating Permit Notification/Application
Project No. 2015-06-006, Installation ID No. 189-1052

Dear Mr. Tripp:

Attached is your stamped copy of the notification (application) that you submitted on June 1, 2015. You must keep this copy of the notification at the installation for inspection purposes. Please note the expiration date on the notification. You must submit your renewal notification six (6) months prior to the expiration date of May 31, 2020. This notification (application) is the operating permit until, and unless, you are notified otherwise. It is very important that you read and understand this legal document.

Your original basic operating permit notification has been modified to include plantwide conditions, and special conditions from your construction permits, together with applicable regulations. If you do not have the construction permit referenced in this permit, please contact the Air Pollution Control Program for a copy.

If you concur with these modifications, no further action is necessary. If you disagree with these changes, or need further information regarding these changes, please do not hesitate to contact Daronn Williams at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale

Kendall B. Hale
Permit Section Chief

KBH/dwl

c: PAMS File 2015-06-006

Enclosure(s)

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STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM

AIR POLLUTION
CONTROL PGH

BASIC OPERATING PERMIT NOTIFICATION

| OFFICE USE ONLY | |
|--------------------------------|--------------------------------|
| FILING FEE AMOUNT \$ 100.00 | PROJECT NUMBER 2015-06-006 |
| CHECK NO. CC10047029 | CHECK RECEIVED DATE 6-24-15 |
| CHECK AMOUNT \$ 100.00 | CHECK DATE 6-24-15 |

SECTION A: GENERAL NOTIFICATION INFORMATION

SECTION A-1: General Installation Information

| | | | | | | |
|---|--|--|-----------------------|---|--|--|
| 1. INSTALLATION NAME Veteran's Administration St. Louis Healthcare System | | 2. COUNTY NAME St. Louis | | 3. PLAN T ID 189-1052 | | |
| 4. INSTALLATION TELEPHONE NUMBER WITH AREA CODE (314) 652-4100 | | 5. INSTALLATION FAX NUMBER WITH AREA CODE (314) 845-5056 | | DATE STAMP (OFFICE USE ONLY) RECEIVED Date: <u>6 / 1 / 15</u> Expires: <u>5 / 31 / 20</u> Staff: <u>J. Williams</u> MDNR-APCP | | |
| 6. INSTALLATION MAILING ADDRESS #1 Jefferson Barracks Drive Mail Stop: 001S/JB | | | | | | |
| 7. CITY St. Louis | | STATE MO | 8. ZIP CODE 63125 | | | |
| 9. INSTALLATION STREET ADDRESS #1 Jefferson Barracks Drive | | | | | | |
| 10. CITY St. Louis | | STATE MO | 11. ZIP CODE 63125 | | 12. MO SENATORIAL DISTRICT NUMBER 001 | |
| 13. INSTALLATION CONTACT PERSON Tim Tripp | | | | 14. MO REPRESENTATIVE DISTRICT NUMBER 094 | | |
| 15. INSTALLATION CONTACT TELEPHONE NUMBER (314) 652-4100 | | 16. INSTALLATION CONTACT EMAIL ADDRESS timothy.tripp@va.gov | | | | |
| 17. PARENT COMPANY NAME VASTLHCS | | 18. PARENT COMPANY MAILING ADDRESS #1 Jefferson Barracks Drive Mail Stop: 001S/JB | | | | |
| 19. CITY St. Louis | | 20. STATE Mo | | 21. ZIP CODE 63125 | | |
| 22. PARENT COMPANY CONTACT PERSON Tim Tripp | | 23. PARENT COMPANY CONTACT TELEPHONE NUMBER WITH AREA CODE (314) 652-4100 | | | | |
| 24. PARENT COMPANY CONTACT EMAIL ADDRESS timothy.tripp@va.gov | | | | | | |

SECTION A-2: Type of Basic Operating Permit Notification

25. Initial Renewal Modification Administrative Amendment

SECTION A-3: Installation Description

26. The Veteran's Health Administration Hospital at Jefferson Barracks provides healthcare for Veteran's of the Armed Forces.

27. Has your installation ever submitted a full EIQ?
 Yes No If answer is "No", submit a full EIQ packet

SECTION A-4: Compliance Status

28. Will your installation be in compliance with all applicable requirements at the time of notification submittal and continue to comply with these requirements for the duration of the notification?
 Yes No If not, submit a compliance plan for items not in compliance.

29. Will your installation be in compliance with all applicable requirements promulgated prior to this notification that contain a compliance deadline within the term of this notification?
 Yes No If not, submit a compliance plan for those items not meeting compliance deadline.

SECTION A-5: Compliance Plan If applicant answers "No" to items 28 and/or 29, use *Section C: Comment Form* to identify the applicable regulations the installation will not be in compliance with, including how the installation shall meet compliance and the enforceable measures leading to compliance. The applicant shall include dates for the measure completions and final compliance

SECTION A-6: Certification of compliance with all applicable requirements and applicant's certification statement for operating permit notification. Note: All notifications MUST be in duplicate, and accompanied by a single \$100 filing fee.

I hereby certify that, based on information and belief formed after reasonable inquiry, the air contaminant source identified in this application is in compliance with all applicable requirements, except as noted in compliance plan (Section A-5 above), if applicable. I certify, based on information formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.

| | | | |
|---|--|--|--|
| 30. SIGNATURE OF RESPONSIBLE OFFICIAL OF INSTALLATION | | 31. DATE 5/21/2015 | |
| 32. TYPE OR PRINT NAME OF RESPONSIBLE OFFICIAL Tripp, Timothy L. | | 33. TITLE OF RESPONSIBLE OFFICIAL Environmental Protection Specialist | |

BASIC OPERATING PERMIT NOTIFICATION (CONTINUED)

SECTION B: APPLICABLE REQUIREMENTS

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. Refer to the associated instructions to understand fully what your obligations are under this section.

| REGULATION OR CONSTRUCTION PERMIT REFERENCE | EMISSION UNIT AS LABELED IN THE EIQ | APPLICABLE EMISSION LIMITATION OR STANDARD | METHOD OF COMPLIANCE DETERMINATION |
|--|-------------------------------------|--|--|
| 10 CSR 10-6.045 Open Burning Requirements | Plantwide | The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited. Refer to the regulation for a complete list of allowances. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute. | The installation may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if the installation fails to comply with the provisions or any condition of the open burning permit. In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method. |
| 10 CSR 10-6.050, Start-up, Shutdown and Malfunction Conditions | Plantwide | Submit a report to the director within 2 days with the information specified in 10 CSR 10-6.050(3)(A)1-10. The permittee shall submit the information specified in 10 CSR 10-6.050(3)(A)1.-10 to the director at least 10 days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceeds 1 hour. | In the event of a malfunction, which results in excess emissions that exceed 1 hr, the permittee shall implement corrective action and submit reports. |
| 10 CSR 10-6.060, Construction Permits Required | Plantwide | Shall not commence construction or modification of any installation subject to this rule; begin operation after construction or modification; or begin operation of any installation which has been shut down longer than 5 years without first obtaining a permit. | The permittee shall apply for and obtain a construction permit as required by 10 CSR 10-6.060. The permittee shall maintain copies of all issued construction permits on-site. |
| 10 CSR 10-6.065, Operating Permits | Plantwide | The permittee shall comply with all applicable requirements identified in the operating permit (OP); file for renewal of this OP at least 6 months prior to the expiration date of this OP; and retain a copy of the OP on-site and make available to any MDNR personnel upon request. | The permittee shall maintain a current equipment list on-site with the date of installation of the equipment. |
| 10 CSR 10-6.080, Emission Standards for HAPs, 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos | Plantwide | Shall follow the procedures and conduct monitoring according to the requirements of 40 CFR Part 61, Subpart M for any affected activities. | As stated in the procedures and monitoring according to the requirements of 40 CFR Part 61, Subpart M. |
| 10 CSR 10-6.100, Alternate Emission Limits | Plantwide | Alternate emission limits on a case-by-case basis. | Obtain an alternate emission limits permit in accordance with 10 CSR 10-6.100 prior to the limits becoming effective. |
| 10 CSR 10-6.110, Submission of Emission Data, Emission Fees and Process Information | Plantwide | Submission of Emissions Inventory Questionnaire (EIQ) by frequency noted in 10 CSR 10-6.110. | The permittee shall complete and submit an EIQ in accordance with 10 CSR 10-6.110. In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates. |

BASIC OPERATING PERMIT NOTIFICATION (CONTINUED)

SECTION B: APPLICABLE REQUIREMENTS (CONTINUED)

| REGULATION OR CONSTRUCTION PERMIT REFERENCE | EMISSION UNIT AS LABELED IN THE EIQ | APPLICABLE EMISSION LIMITATION OR STANDARD | METHOD OF COMPLIANCE DETERMINATION |
|---|--|--|---|
| 10 CSR 10-6.130, Controlling Emissions During Episodes of High Air Pollution Potential | Plantwide | This rule specifies the conditions that establish an air pollution alert or emergency and the associated procedures. | The permittee shall submit an appropriate emergency plan if required by the director. |
| 10 CSR 10-6.150, Circumvention | Plantwide No | circumvention. | The permittee shall not conceal or dilute any emission that violates a rule of the Missouri Air Conservation Commission. |
| 10 CSR 10-6.165, Restriction of Emission of Odors | Plantwide | No person may cause, permit or allow the emission of odorous matter in concentrations & frequencies or for durations that odor can be perceived when one (1) volume of odorous air is diluted with seven (7) volumes of odor-free air for two (2) separate trials not less than fifteen (15) minutes apart within the period of one (1) hour. | No odor violations noted, if and when readings are taken. |
| 10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin <i>(does not apply when there are no fugitive emission points)</i> | Plantwide | 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director. 2) The permittee shall not cause nor allow any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin. | If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation. A log shall be kept of all such violations and corrective action taken. |
| 10 CSR 10-6.180, Measurement of Emissions of Air Contaminants | Plantwide | The director may conduct or require tests to determine the quantity and/or nature of emission of air contaminants from a source. | The installation shall conduct or allow tests to be conducted upon request of the director. |
| 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants <i>(does not apply when there are no visible emission points)</i> | Plantwide <i>(does not apply to equipment subject to New Source Performance Standard (NSPS) Subpart OOO)</i> | No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units. (you must check the specific regulation) | The permittee shall determine compliance with this regulation using the procedures contained in this rule. If the permittee observes no violation using these procedures, then no further observations are required. For emission units with visible emissions believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation. A record shall be kept of any such Method 9 observations; such records shall be retained for a period of five years. |
| 10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, & Business Exemption Requirements | Plantwide | The procedures for certification and accreditation of 10 CSR 10-6.250. | The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. |

BASIC OPERATING PERMIT NOTIFICATION (CONTINUED)

SECTION B: APPLICABLE REQUIREMENTS (CONTINUED)

| REGULATION OR CONSTRUCTION PERMIT REFERENCE | EMISSION UNIT AS LABELED IN THE EIQ | APPLICABLE EMISSION LIMITATION OR STANDARD | METHOD OF COMPLIANCE DETERMINATION |
|--|-------------------------------------|--|---|
| 10 CSR 10-6.280 Compliance Monitoring Usage | Plantwide | The permittee is not prohibited from using the method specified in 10 CSR 10-6.280(3)(A)1-3 in addition to any specified compliance methods for the purpose of submission of compliance certifications. | Any credible evidence may be used to establish whether a requirement has been violated. |
| Title VI – 40 CFR Part 82, Protection of Stratospheric Ozone | Plantwide | Labeling of products with ozone-depleting substances – Subpart E; Recycling & emission reduction – Subpart F, except as provided in Subpart B; Class I or II substances – Subpart A; Servicing of Motor Vehicle Air Conditioners – Subpart B | As stated in the procedures and monitoring according to the respective subparts. |
| 40CFR Part 60 Subpart IIII | All affected Units | Per subpart for affected emission units | As stated in subpart. |
| Permit to Construct; Project # AP201309033, effective 12/5/2015. | All affected Units | VASTLHCS, Jefferson Barracks shall emit less than 40 tons of NOx during a 12-month period for the entire installation from boilers and emergency generators. | 12 month rolling period record keeping log. |
| Permit to Construct; Project # AP201309033, effective 12/5/2015. | All affected Units | VASTLHCS, Jefferson Barracks shall emit less than 40 tons of SOx during a 12-month period for the entire installation from boilers and emergency generators. | 12 month rolling period record keeping log. |
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BASIC OPERATING PERMIT NOTIFICATION (CONTINUED)

SECTION C: COMMENT FORM

Use for supplying additional information. Also, use this form to supply the information required by Section A-5: Compliance Plan (related to items 29 and 30).

INSTALLATION NAME

FIPS - Plant ID

