



State of Ohio Environmental Protection Agency

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June 15, 2007

Ronald R. Stull
Director, Building Services
Knox Pavilion Owner's Representative
Knox Community Hospital
1330 Coshocton Road
Mount Vernon, OH 43050

Re: Notice of Violation based upon the Title V Full Compliance Evaluation conducted on April 17, 2007, and subsequent review of submitted information (facility premise # 01 42 01 0014)

Mr. Stull:

Ohio EPA, Central District Office (CDO), Division of Air Pollution Control (DAPC), appreciates Knox Community Hospital's courtesy and cooperation extended during the April 17, 2007, Full Compliance Evaluation (FCE) of your facility located at 1330 Coshocton Road in Mount Vernon, Ohio. The purpose of this FCE was to assure compliance with the applicable Title V permit along with state and federal rules and regulations. I also appreciate the facility tour and follow-up information that you, Scott Clayton and Bette Elder provided.

The compliance status of emissions unit N002 with applicable permits and regulations was determined based upon a review of facility records, discussions with plant personnel and review of data requested in follow-up correspondence. Below is a summary of the FCE findings, violations and action items that need to be addressed:

1. **Finding: Visible Particulate Emissions (PE) Testing**

Annual testing to determine compliance with the Visible PE limitation set forth in the Title V permit, Section A.V.2.a and 40 Code of Federal Regulations (CFR) Part 62.14451(b)(1) was not performed as required.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Violation

Failure to comply with this testing requirement of the Title V permit and 40 CFR 62.14451(b)(1) is a violation of both the applicable Title V permit and federal regulations. Violation of the Title V permit terms and conditions is also a violation of Ohio Revised Code (ORC) § 3704.05(C) which states:

"No person who is a holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."

Action Item

Ohio EPA requests that Knox Community Hospital (KCH) submit corrected Title V Compliance Certifications indicating non-compliance with the above-referenced permit requirement for all years that the testing was not performed. These corrections should be submitted to Ohio EPA - Central District Office, Division of Air Pollution Control and US EPA Region V - Air and Radiation Division.

2. **Finding: Scrubber pH operational restriction violation**

Investigation of the wet scrubber associated with this emissions unit indicated that it was operating below its minimum operational pH range as established during the performance testing conducted on May 31 and June 1, 2006. The minimum operating pH level of 5.44 was established during that test event based on the data provided in the performance test report. Scrubber pH data recorded by the emissions unit operator was utilized for this determination due to the issues uncovered with the Teloger pH monitoring system (see Finding 3 below).

Violation

The Title V permit, Section A.II.16 requires:

"The scrubber pH for this emissions unit shall be maintained at a minimum pH in accordance with the minimum operating parameters established during the performance test to determine compliance with the emission limits."

Information provided by the facility indicates the following:

The wet scrubber operating pH on April 16, 2007, was below the Title V minimum operating pH level of 5.44 from 08:12 until 15:10 (end of operating day).

The wet scrubber operating pH on April 17, 2007, was below the Title V minimum operating pH level of 5.44 from 08:21 until 15:35 (end of operating day).

The wet scrubber operating pH on April 18, 2007, was below the Title V minimum operating pH level of 5.44 from 09:01 until 15:10 (end of operating day).

The wet scrubber operating pH on April 19, 2007, was below the Title V minimum operating pH level of 5.44 from 09:30 until 14:56 (end of operating day).

The wet scrubber operating pH on April 20, 2007, was below the Title V minimum operating pH level of 5.44 from 09:15 until 15:00 (end of operating day).

40 Code of Federal Regulations (CFR) Part 62.14453(a)(1) and (2) requires:

"(1) You must establish the appropriate maximum and minimum operating parameters, indicated in Table 3, as site-specific operating parameters during the initial performance test to determine compliance with the emission limits; and

(2) After the date on which the initial performance test is completed or is required to be completed under §62.14470, whichever comes first, your HMIWI must not operate above any of the applicable maximum operating parameters or below any of the applicable minimum operating parameters listed in Table 3 and measured as 3-hour rolling averages (calculated each hour as the average of the previous 3 operating hours), at all times except during startup, shutdown, malfunction, and performance tests."

The wet scrubber 3-hour rolling average operating pH level calculated from the information provided by Bette Elder according to 40 CFR Part

62.14453(a)(1) was below the minimum wet scrubber rolling, 3-hour average operating pH level required under 40 CFR Part 62.14453(a)(2) after the first three hours of operation on April 16, 17, 18, 19 and 20, 2007

Failure to comply with the requirements of Title V permit and 40 CFR Part 62.14453(a)(1) and (2) are violations of the applicable Title V permit and 40 CFR Part 62.14453(a)(1) and (2). Violation of the Title V permit terms and conditions is also a violation of ORC § 3704.05(C).

Action Item

Ohio EPA requests that Knox Community Hospital immediately bring the pH of the scrubber into the proper operating range (pH level of greater than 5.44) or schedule a performance test to demonstrate compliance with the applicable emissions limitations at the lower wet scrubber operating pH level.

Ohio EPA requests that Knox Community Hospital investigate the duration of this violation, and if necessary submit corrected Title V Compliance Certifications indicating non-compliance with the above-referenced permit requirement. These corrections (if applicable) should be submitted to Ohio EPA - Central District Office, Division of Air Pollution Control and US EPA Region V - Air and Radiation Division. These permit violations should also be included in the 2007 Title V Compliance Certification and reported as required by the applicable Title V permit.

3. **Finding: Failure to monitor and record scrubber pH**

Facility records and conversations with Mr. Ron Stull on May 31, 2007, and June 12, 2007, indicate that the pH meter utilized by the Teloger system (Knox Community Hospital's Continuous Parametric Monitoring System) is not reading correctly, therefore the pH of the scrubber is not being accurately monitored and recorded on a per minute basis.

Violation

Required monitoring and recordkeeping for this emissions unit includes the following specific requirements:

Section A.III.6.c of the Title V permit specifies that the pH of the scrubber be monitored continuously:

"The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the static pressure drop across the scrubber or the horsepower or amperage to the scrubber, the scrubber liquid flow rate and the scrubber liquid pH while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals."

The wet scrubber pH level is not being monitored due to a malfunction of the Teloger pH meter, resulting in erroneous readings.

Section A.III.9.g of the Title V permit specifies that the pH of the scrubber be recorded once every minute:

"The permittee shall maintain the following records, along with the date of each record: the pH at the inlet to the wet scrubber during each minute of operation"

This record is not being maintained because the pH meter used to measure the pH on a "per minute" basis is not reading correctly.

Failure to comply with these monitoring and record keeping requirements is a violation of the Title V permit and 40 CFR Parts 62.14460(b)(12). Violation of the Title V permit terms and conditions is also a violation ORC § 3704.05(C).

Action Item

Ohio EPA requests that Knox Community Hospital correct the pH meter within fourteen (14) days of receipt of this letter and provide written confirmation that this repair has been made.

In addition, this violation is a deviation from a federally-enforceable recordkeeping requirement according to section A.I.c.iii of the Title V permit and should be reported accordingly in the next semi-annual report and 2007 Title V Compliance Certification.

Ohio EPA requests that Knox Community Hospital investigate the duration of this deviation and if necessary re-submit any affected Title V semi-annual deviation reports or Title V Compliance Certification.

4. **Finding: Failure to maintain records of control device operational limits**

Records required to be maintained at the facility include the following specific requirements:

Section A.III.2.f of the Title V permit requires that a record of the procedures outlined below be maintained at the facility:

"Procedures for operating this emissions unit and associated air pollution control systems within the standards established under 40 CFR 62 Subpart HHH."

The maintenance of the records at the facility was intended to facilitate operator training about emissions unit and control device operation and operational parameters by establishing information reviews at monthly intervals as specified in the Title V permit section A.III.15:

"The permittee shall maintain and make available to Ohio EPA inspectors records showing the names of HMIWI operators who have completed review of the documentation required in section A.III.2, including the date of the initial review and all subsequent monthly reviews."

Also, section A.III.11 of the Title V permit requires that:

"The permittee shall maintain and make available to Ohio EPA inspectors a log that identifies each calendar day for which data on emission rates or operating parameters specified above exceeded the applicable limits, with a description of the exceedances, reasons for such exceedances, and a description of corrective actions taken."

Violation

Records kept on file at the facility during the inspection pursuant to the Title V permit section A.III.2.f were not updated with the operating parameters established during the 2006 performance testing.

Procedures for operating the emissions unit and associated air pollution control systems within the standards required by the Title V permit section A.III.15 and 40 CFR Part 62 Subpart HHH cannot be established if the

operating parameters for the air pollution control device are not updated with information from the most recent performance test.

Facility logs as outlined in the Title V permit section A.III.11 cannot be maintained if the operational parameters of the control device were not updated based on the 2006 performance testing.

Failure to comply with these record keeping requirements is a violation of the Title V permit and 40 CFR Parts 62.14424(6). Violation of the Title V permit terms and conditions is also a violation ORC § 3704.05(C).

Action Item

Ohio EPA requests that Knox Community Hospital update their facility records to reflect the operational parameters for the emissions unit and emissions control device to reflect the operational parameters established during the 2006 performance testing.

Ohio EPA requests that Knox Community Hospital (KCH) submit corrected Title V Compliance Certifications indicating non-compliance with the above-referenced permit requirement for 2006. This correction should be submitted to Ohio EPA - Central District Office, Division of Air Pollution Control and US EPA Region V - Air and Radiation Division. This permit violation should also be included in the 2007 Title V Compliance Certification.

Additional Information

Ohio EPA recognizes that Knox Community Hospital completed the required visible PE testing for 2007 on May 2, 2007.

Ohio EPA recognizes that Knox Community Hospital continues to maintain operator records of the scrubber pH independent of the Teloger system. After being informed of the operational restriction violation, Knox Community Hospital increased the pH of the wet scrubber to fall within the operational pH range established by the May 2006 emissions testing.

Criteria for compliance with permitted emissions limits are outlined in the Title V permit section A.II.19 through A.II.23, and are based on 3-hour rolling averages. The Teloger files (Knox Community Hospital's Continuous Parametric Monitoring System) are updated on a per minute basis and these records are maintained at the facility. From the information submitted, it does not appear that the emissions limits were exceeded for the

week of April 16, 2007, based on the criteria outlined in the Title V permit and 40 CFR Part 62 Subpart HHH, since the 3-hour rolling average of the waste charge rate was less than the permitted waste charge rate of 275 lb waste / hour.

Knox Community Hospital was issued a Notice of Violation in 2005 for violations of recordkeeping and reporting. These violations appear to have been corrected to the extent possible. Data from the electronic monitoring system proved to be unrecoverable.

Summary

Ohio EPA requests that Knox Community Hospital submit a compliance plan and schedule (see below) within thirty (30) days of receipt of this letter in order to address the identified issues with compliance monitoring, recordkeeping and reporting.

<u>Milestone</u>	<u>Milestone Date</u>
1. Correct issues with Teloger pH monitoring and recording system.	_____
2. Update facility records to reflect current operating parameters for emissions unit and control device established during the May 2006 emissions testing.	_____
3. Update facility operating procedures to reflect the changes in Milestone 4, above.	_____
4. Update preventative maintenance procedures for pH meter to minimize further occurrences of parametric monitoring deviations.	_____
5. Submit any corrected deviation reports and Title V Compliance Certifications.	_____
6. Submit any updated facility procedures from Milestones 3 and 4 (above) for Ohio EPA records.	_____

The completion and submission of the compliance plan and schedule (above), submission of requested documents and information, updating of facility records, maintenance of the monitoring system and operating the emissions unit and control device within the acceptable operational range will resolve these violations.

Ronald R. Stull
Knox Community Hospital
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Please note that the Ohio EPA has the authority to seek civil penalties as provided in section 3704.05 of the ORC. This letter or information pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by the Ohio EPA at a later date.

If you have any questions please contact John McGreevy at (614) 728-3818.

Sincerely,



Mike Riggleman
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

Enclosures: Inspection Form
Method 9 Form

c: John McGreevy, DAPC/CDO
Isaac Robinson, Manager, DAPC/CDO

EPA
VISIBLE EMISSION OBSERVATION FORM 1

Form Number	00001	Page	1	Of	1
Continued on VEO Form Number					

Method Used (Circle One)
 Method 9 203A 203B Other

Company Name Knox Community Hospital
 Facility Name
 Street Address 1330 Cochrane Dr
 City Mt. Vernon State OH Zip 42050

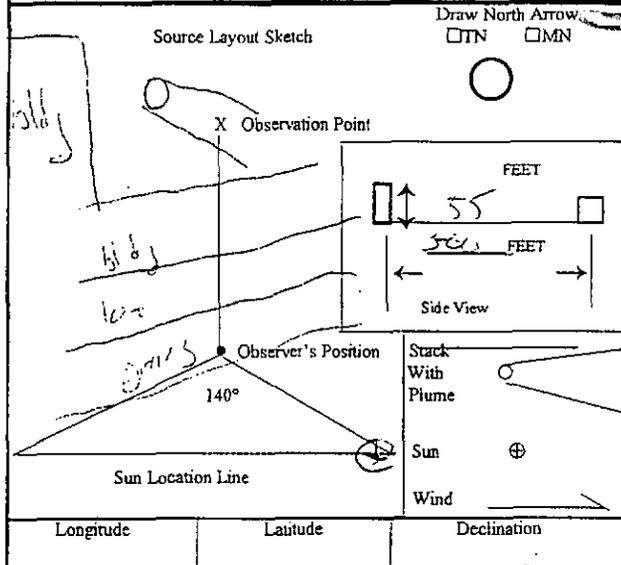
Process hospital waste incinerator Unit # N/A Operating Mode normal
 Control Equipment wash scrubber Operating Mode normal

Describe Emission Points
Stack on roof of incinerator building
 Height of Emission Point Start 65' End 65' Height of Emiss. Pt. Rel. to Observer Start 55' End 55'
 Distance to Emission Point Start End Direction to Emiss. Pt. (Degrees) Start End

Vertical Angle to Observation Point Start 77.5° End 71.5° Direction to Obs. Pt. (Degree) Start End
 Distance and Direction to Observation Point from Emission Unit Start End

Describe Emissions
 Start attached plume, white thin End same
 Emission Color Water Droplet Plume
 Start End Attached Detached None

Describe Plume Background
 Start blue sky End same
 Background Color Start blue End same Sky Conditions Start clear End clear
 Wind Speed Start 5-10 End 5-10 Wind Direction Start End
 Ambient Temp. Start 60 End 60 Wet Bulb Temp. RH Percent 27/65



Additional Information
lead us plume dissipated; area - built by emergency room entrance

Observation Date	Time Zone	Start Time	End Time	Comments			
Sec	0	15	30	45			
4/17/2007	EST	1057	1103				
1	0	0	0	0			
2	0	0	0	0			
3	0	0	0	0			
4	0	0	0	0			
5	0	0	0	0			
6	0	0	5	0			
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Observer's Name (Print) John McLean
 Observer's Signature [Signature] Date 4/17/2007
 Organization Ohio EPA - CDO
 Certified By EIA Date 3/29/2007

Evaluator(s): John McGreevy

PCE Date(s): _____ Arrival Time: _____ Departure time: _____ Announced Yes No
_____ Arrival Time: _____ Departure time: _____ Announced Yes No
_____ Arrival Time: _____ Departure time: _____ Announced Yes No

FCE Date: 4/17/2007

OHIO EPA - CDO: Facility Evaluation Form

Facility Information:

Facility Name: Knox Community Hospital Facility ID: 01 42 01 0014
Facility Address: 1330 Coshocton Road Facility County: Knox
Facility City: Mt. Vernon Phone Number: 740-393-9945
Facility zip code: 43050
Facility Contact(s): Ron Stull Title(s): Director, Building Services
Other representative(s): _____ Title(s): _____

Facility Classification:

Facility Type: (circle all that apply) MegaTV TitleV SMPTI FESOP Non-HP
Applicable Programs: (circle) PSD SHAP NSPS MACT
Pollutant(s) regulated at facility: PE fluorides (excluding hydrogen fluoride)
(Circle all that apply) OC/VOC sulfuric acid mist
 SO₂ hydrogen sulfide
 CO total reduced sulfur
 NO_x NMOCs
 Pb mercury
 HAP(s) beryllium
Vinyl chloride

Facility Evaluation:

Fee reports submitted? Yes No (Due April 15 of preceding year for HP facilities)
TV Compliance Cert (if applicable): Submitted? Yes No
Compliant? Cont Int Comply No Pending
Has there been enforcement against company in past 10 years? Yes No
Did facility comply with facility-wide operational, record keeping & reporting requirements? Yes No N/A

Memo: records in files, all control in accessible central location.
not able to print records from telegraph site 9/19/2006
no annual VE test ordered

FCE Summary on back..

Full Compliance Evaluation (FCE) Summary

(To be completed when FCE is finished)

Based on PCE and FCE evaluation findings, does it appear that the facility is in compliance with applicable requirements?

Yes

No If no, were non-compliant issues discussed with the permittee?

Yes

No (list issues not discussed)

Memo: _____

Inspector(s) Signature: _____

Date: 6/18/2007

Reviewer Signature: _____

Date: _____

Points to Remember:

- A full compliance evaluation (FCE) has been completed when all non-insignificant units have been fully evaluated at Title V facilities or all non-registration units have been fully evaluated at non-Title V facilities.
- A follow-up letter is required for all FCEs and for all PCEs during which serious violations were discovered. The follow-up letter should identify all non-compliance situations and cite all applicable rules and regulations which have been violated. The follow-up letter(s) should be attached to this evaluation form.
- Each permit that is needed to fully evaluate an emissions unit is considered part of the evaluation form and should be returned to the appropriate file folder when the evaluation is complete. It may be helpful to attach a copy of the permit(s) to this evaluation form.
- When entering data into CETA, be aware that **Bold** section titles directly correspond to rows on CETA's Compliance Monitoring page. If there are any questions when entering the data, feel free to contact appropriate supervisor.
- VE observations need to be taken for any unit that is subject to a VE limitation per OAC rule 3745-17-07, 3745-31(BAT) or NSPS. The minimum amount of time to take a VE reading is 13 minutes. When no VE reading was taken during a PCE, indicate the reason why VEs were not conducted at the time of inspection and estimate when VEs will be taken in the future to confirm compliance with the applicable requirement. The VE form(s) should be attached to this evaluation form.

Possible reasons not to take a VE during a site visit are:

- 1 weather prohibited readings at the time of the inspection (follow up readings are necessary)
- 2 lack of daylight prohibited readings during time of inspection (follow up readings are necessary)
- 3 not enough time (follow up readings are necessary)
- 4 inspector not certified to read Method 9 (follow up readings are necessary)
- 5 unit not operating (follow up readings are necessary)
- 6 EU located in area of facility where building or other obstructions prohibit proper positioning for Method 9
- 7 inherently clean emissions unit
- 8 facility personnel conducted the Method 9 observations
- 9 facility hired outside consultants to observe Method 9 readings
- 10 no VEs observed during past inspections
- 11 safety issues prohibit reading of Method 9
- 12 emissions unit is a spray booth equipped with properly maintained filters
- 13 unit has a continuous opacity monitoring (COMS) system
- 14 review of facility daily record checks or parametric monitoring of the EU and APCE indicates compliance
- 15 moisture in the plume
- 16 stack(s) vents inside the building
- 17 other, please specify above