Fact Sheet

For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: R30-03900057-2022
Application Received: March 21, 2022
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

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.
Emissions Summary

Plantwide Emissions Summary [Tons per Year]

<table>
<thead>
<tr>
<th>Regulated Pollutants</th>
<th>Potential Emissions</th>
<th>2021 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>13.01</td>
<td>9.60</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOₓ)</td>
<td>32.94</td>
<td>11.01</td>
</tr>
<tr>
<td>Lead (Pb)</td>
<td>&lt;0.01</td>
<td>&lt;0.01</td>
</tr>
<tr>
<td>Particulate Matter (PM₂.₅)</td>
<td>2.78</td>
<td>0.77</td>
</tr>
<tr>
<td>Particulate Matter (PM₁₀)</td>
<td>2.78</td>
<td>0.77</td>
</tr>
<tr>
<td>Total Particulate Matter (TSP)</td>
<td>2.80</td>
<td>1.32</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>5.82</td>
<td>0.21</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>1.72</td>
<td>0.73</td>
</tr>
<tr>
<td>Dioxin</td>
<td>&lt;0.01</td>
<td>&lt;0.01</td>
</tr>
</tbody>
</table>

*PM₁₀ is a component of TSP.*

Hazardous Air Pollutants | Potential Emissions | 2021 Actual Emissions |
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<tr>
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<tbody>
<tr>
<td>Hydrogen Chloride (HCl)</td>
<td>1.87</td>
<td>0.14</td>
</tr>
<tr>
<td>Mercury (Hg)</td>
<td>0.02</td>
<td>&lt;0.01</td>
</tr>
<tr>
<td>Cadmium</td>
<td>&lt;0.01</td>
<td>&lt;0.01</td>
</tr>
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</table>

*Some of the above HAPs may be counted as PM or VOCs.*

Title V Program Applicability Basis

This facility operates a Hospital/Medical/Infectious Waste Incinerator (HMIWI). In accordance with 45 CSR§ 18-7.2.f, 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.

This facility has been found to be subject to the following applicable rules:

Federal and State: 45CSR6 45CSR11 45CSR13

Open burning prohibited.

Standby plans for emergency episodes.

Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Admin. Updates, Temporary Permits, General Permits, Permission to
Commence Construction and Procedures for Evaluation
Requirements and limits for HMIWI
The Secretary can request any pertinent information such as annual emission inventory reporting.
Operating permit requirement.
HMIWI emission guidelines
Asbestos inspection and removal
Ozone depleting substances

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

<table>
<thead>
<tr>
<th>Permit or Consent Order Number</th>
<th>Date of Issuance</th>
<th>Permit Determinations or Amendments That Affect the Permit (if any)</th>
</tr>
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<tbody>
<tr>
<td>R13-1772K</td>
<td>April 14, 2017</td>
<td></td>
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</table>

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
This is the fourth Title V renewal for this facility. In accordance with 45 CSR§ 30-3.3.b, only the applicable requirements for the Medical Waste Incinerator have been included in the Title V permit.

Section 3.0 Facility Wide Requirements
- Updated the boiler plate language to the most recent version.

Section 4.0 Medical Waste Incinerator Requirements [Emission Unit: 1S]
- Fixed typo in condition 4.1.1.c.2. Changed “administrated” to “administered.”
- Due to minor changes in 45CSR18, the citation of condition 4.1.4 needed to be updated to reflect the name change of the cited Table.
- There were no other changes to the applicable requirements of 45CSR18 or the underlying R13 permit (R13-1772K) since the last permit renewal in 2017. There were also no changes made to 40
C.F.R. 60 Subpart Ec which is referenced by 45CSR18 since the last permit renewal. Therefore, no other changes were made to this permit section.

Non-Applicability Determinations
The following requirements have been determined not to be applicable to the subject facility due to the following:

a. 45CSR20 - CAMC General Hospital’s HMIWI stack is less than 213 feet high, which is below the Good Engineering Practice stack height limit in Section 2.4.a.

b. 45CSR§21-40.1. - The aggregate maximum theoretical VOC emissions are less than the 100 tons per year threshold.

c. 40 CFR part 60, subpart Ec - CAMC General Hospital’s HMIWI was constructed before the June 20, 1996 applicability date.

d. 40 CFR part 64 - CAMC General Hospital’s HMIWI is subject to 45 CSR§18-7.7a which requires the owner to comply with the requirements for compliance and performance testing listed in 40 CFR §60.56c which includes continuous compliance determination methods, therefore this facility is exempt from CAM in accordance with 40 CFR §§ 64.2(b)(1)(i) and (vi).

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: September 17, 2022
Ending Date: October 17, 2022

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
304-926-0499 ext. 41286
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)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.