



**NARRATIVE**

TO: Heather Brown  
FROM: Susan Jenkins  
DATE: August 29, 2017

Facility Name: **KPR U.S., LLC d/b/a Kendall Patient Recovery U.S., LLC**  
AIRS No.: 245-00109  
Location: Augusta, GA (Richmond County)  
Application #: 26133  
Date of Application: July 17, 2017

**Purpose of Application**

Application assigned number 26133 and dated July 17, 2017 is for a name and ownership change. Table 1 summarizes air permit information for AIRS # 245-00109 noted as follows:

<b>Table 1: Air Permit Information for AIRS # 245-00109</b>	
<u>Previous Source Name:</u> Covidien LP	<u>Current Source Name:</u> KPR U.S., LLC d/b/a Kendall Patient Recovery U.S., LLC Transaction was complete as of August 4, 2017
<u>Existing Air Permits:</u> 3842-245-0109-S-04-0 issued September 11, 2009 3842-245-0109-S-04-1 issued October 16, 2012	

**Updated Equipment List**

Tables 2A, 2B, and 2C summarize the equipment list at facility. This list is taken from the narrative for Application No. 19036 (2009) and is updated based recent inspection reports.

<b>Table 2A: Process Equipment List</b>				
<b>Emission Units</b>			<b>Associated Control Devices</b>	
<b>Source Code</b>	<b>Description</b>	<b>Installation Date</b>	<b>Source Code</b>	<b>Description</b>
SA	EtO Sterilization Chamber A	2008	RA CO	Recovery System A Catalytic Oxidizer <sup>+</sup>
SB	EtO Sterilization Chamber B	2009	RB CO	Recovery System B Catalytic Oxidizer <sup>+</sup>
S1	EtO Sterilization Chamber 1 <i>As of 2015, removed from service.</i>	1973	R1* CO	Recovery System 1 Catalytic Oxidizer <sup>+</sup>
S3	EtO Sterilization Chamber 3 <i>As of 2015, removed from service.</i>	1982	R3 CO	Recovery System 3 Catalytic Oxidizer <sup>+</sup>
S4	EtO Sterilization Chamber 4 <i>As of 2015, removed from service.</i>	1994	R4 CO	Recovery System 4 Catalytic Oxidizer <sup>+</sup>

Table 2A: Process Equipment List				
Emission Units			Associated Control Devices	
Source Code	Description	Installation Date	Source Code	Description
A2	Aerator Room 2 <i>As of 2015, removed from service.</i>	1983	CO	Catalytic Oxidizer <sup>+</sup>
A3	Aerator Room 3 <i>As of 2015, removed from service.</i>	1983	CO	Catalytic Oxidizer <sup>+</sup>
FE1	Ethylene Oxide Sterilization Fugitive Emissions	N/a	None	None
C2	Alcohol Prep Pad Machine	2004	N/a	N/a
C3 through C6, C9, C11, and C18 through C21	Alcohol Prep Pad Machines	1988	N/a	N/a
C24	Alcohol Prep Pad Machine	2004	N/a	N/a
C25 and L1	Alcohol Prep Pad Machines	2006	N/a	N/a

<sup>+</sup> Catalytic Oxidizer is equipped with 3.2 MMBtu/hr burner capable of firing natural gas or propane.

### Storage Tanks

Table 2B: Tank Equipment List				
Source Code	Capacity (gallons)	Contents	Installation Date	True Vapor Pressure (psia)
I2	5,000	Isopropyl Alcohol Tank 2	1968	0.925
I3	8,000	Isopropyl Alcohol Tank 3	1974	0.92

### Boilers

Table 2C: Boiler Equipment List				
Source Code	Input Heat Capacity (MMBtu/hr)	Description	Installation Date	Construction Date
B2	31.5	Industrial Boiler, natural gas and no. 2 fuel oil	1989	1989
B3	25.9 (gas) 25.3 (oil)	Clayton Industries, natural gas and no. 2 fuel oil	2009	2009
B4	25.9 (gas) 25.3 (oil)	Clayton Industries, natural gas and no. 2 fuel oil	2009	2009

## Regulatory Assessment

40 CFR 63 Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources: Boilers B2, B3, and B4 are potentially subject to this GACT standard. The boilers are permitted to burn natural gas and distillate fuel oil; however, the Permittee has not fired fuel oil in these boilers for the last several years. KPR has requested that these boilers be classified as *gas-fired* under the Boiler GACT. Therefore, these boilers are not subject to the Boiler GACT. KPR will operate the boilers per the definition of *gas-fired boiler* in 40 CFR 63.11237. The definition of *gas-fired boiler* in 40 CFR 63.11237 allows KPR to combust liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

Avoidance of 40 CFR 70

KPR’s existing air permit includes a distillate fuel oil usage limit on a consecutive twelve-month period for purposes of avoidance of 40 CFR 70. This requirement remains in KPR’s updated synthetic minor permit because the Boiler GACT allows for the combustion of liquid fuel in the facility boilers during certain time periods as part of the category of *gas-fired boiler*.

**Permit Conditions**

All existing permit conditions are carried over to new permit number 3842-245-0109-S-05-0 except those noted in Table 3:

<b>Table 3: Review of Permit Conditions</b>		
<b>New Permit Condition No.</b>	<b>Existing Permit Condition No.</b>	<b>Discussion</b>
1.1	1.1	No change – General Requirement.
1.2	1.2	No change – General Requirement.
1.3	1.3	No change – General Requirement.
1.4	1.4	No change – General Requirement.
1.5	1.5	No change – General Requirement.
2.1	2.6	No change – Avoidance of Part 70 requirement.
2.2	2.2	No change – Establishes 40 CFR 63 Subpart A as an applicable requirement.
2.3	2.1	No change – Establishes 40 CFR 63 Subpart O as an applicable requirement.
2.4	2.3	Modified – Removed reference to chambers S1, S3 and S4 because these units are no longer operational.
2.5	2.5	Modified – Removed reference to Aerator Room emission standard.
2.6	2.8	No change – Establishes 40 CFR 60 Subpart A as an applicable requirement.
2.7	2.7	No change – Establishes 40 CFR 60 Subpart Dc as an applicable requirement.
2.8	2.9	No change – Establishes the maximum fuel oil sulfur content.  Legal citation has been updated to include Avoidance of 40 CFR 70.
2.9	2.10	No change – Establishes NSPS Dc opacity standard for boiler B2.
2.10	2.11	No change – Establishes opacity standard for boilers B3 and B4.
2.11	2.12	No change – Establishes PM emission limit for boilers B2, B3, and B4 per Georgia Rule 391-3-1-.02(2)(d).
2.12	--	New Condition: Avoidance requirement for 40 CFR 63 Subpart JJJJJ
--	2.4	Deleted. Permittee does not operate any Aerator Rooms.
--	2.14	Deleted - This permit condition establishes the requirements of Georgia Rule 391-3-1-.02(2)(b) on Boiler B1. Boiler B1 is no longer at the site so this condition is not carried over to the new permit.
--	2.15	Deleted - This permit condition establishes the requirements of Georgia Rule 391-3-1-.02(2)(d) on Boiler B1. Boiler B1 is no longer at the site so this condition is not carried over to the new permit.

**Table 3: Review of Permit Conditions**

New Permit Condition No.	Existing Permit Condition No.	Discussion
--	2.16	Deleted - The requirements of this condition have been met upon startup of boilers B3 and B4.
3.1	3.1	No change to fugitive emissions requirement.
4.1	4.4	No change – General Requirement for Process & Control Equipment.
4.2	4.5	No change – General Requirement for Process & Control Equipment.
4.3	4.6	No change – General Requirement for Process & Control Equipment.
4.4	4.1	Modified– Definition of a deviation for purposes of 40 CFR 63 Subpart O. The phrase “24-hour” was replaced with “daily” per SSCP in accordance with 40 CFR 63.364(c).
4.5	4.2	Modified – Work Practice Standard requirement of 40 CFR 63 Subpart O. Removed reference to anticipated date of first replacement of the catalyst bed as this day was almost 20 years ago.
--	4.3	Deleted as this is redundant with Existing Permit Condition No. 5.7.
5.1	5.7	No change – Monitoring General Requirement.
5.2	5.8	No change – Monitoring General Requirement.
5.3	5.6	No change – Monitoring General Requirement.
5.4	5.1	No change – Monitoring requirement per 40 CFR 63 Subpart O.
5.5	5.2	No change – Monitoring requirement per 40 CFR 63 Subpart O.
5.6	5.3	No change – Monitoring requirement per 40 CFR 60 Subpart Dc.
5.7	5.4	Modified – Fuel Oil certifications. Replaced 40 CFR 60.42c(d) as legal citation with 40 CFR 60.48c(f) per SSCP.
5.8	5.5	No change – NSPS Dc site-specific monitoring plan. Replaced 40 CFR 60.47c(g) as legal citation with 40 CFR 60.47c(f)(3) per SSCP.
6.1	6.1	No change – General Performance Testing Requirement
--	6.2	Deleted - Testing for EtO Sterilization Chamber A (Source Code SA) <u>was conducted</u> on November 11, 2009 as required by this permit condition.
--	6.3	Deleted - Testing for EtO Sterilization Chamber B (Source Code SB) <u>was conducted</u> on December 3, 2010 as required by this permit condition.
7.1	7.1	No change – General Requirement
7.2	7.2	No change – General Requirement
7.3	7.3	No change – General Requirement
7.4	7.9	No change – NSPS Dc recordkeeping requirement
7.5	7.10	No change – Calculate monthly totals and 12-month totals of the amount of fuel oil fired at the facility.
7.6	7.4	No change – 40 CFR 63 Subpart O
7.7	7.5	Modified – 40 CFR 63 Subpart O, replaced “should” with “shall” per SSCP.
7.8	7.6	No change – 40 CFR 63 Subpart O
7.9	7.7	No change – 40 CFR 63 Subpart O
7.10	7.8	No change – 40 CFR 63.10(e)
7.11	7.11	No change – NSPS Dc

**Table 3: Review of Permit Conditions**

New Permit Condition No.	Existing Permit Condition No.	Discussion
7.12	7.12	Modified - This permit condition requires the development of a written site-specific monitoring plan for monitoring of opacity from boiler B2 within 90 days of permit issuance.  The language is modified in this condition to require the Permittee to maintain such a plan on-site and implement in accordance with NSPS Dc. The legal citation is corrected to read 40 CFR 60.47c(f)(3).
--	7.13	Specifies initial reporting requirements for the EtO Sterilization Chambers A and B (Source Codes SA and SB) per 40 CFR 63 Subpart O. The Permittee has met the requirements of this condition, thus this condition is removed from the new permit.
--	7.14	Deleted – Requirements have been met. NSPS Dc reporting per 40 CFR 60.48c(a) for boilers B3 and B4 <u>was completed</u> on September 27, 2009 (for B3) and January 19, 2010 (for B4).
--	7.15	Deleted – Requirements have been met. Notification of shutdown of boiler B1 <u>was completed</u> on September 27, 2009.
8.1	8.1	No change – Special Condition
8.2	8.2	No change – Special Condition
8.3	8.3	Updated to reference the permit numbers to be revoked.

**Summary & Recommendations**

No public advisory was issued based on this application. This application is solely for name and ownership change. I have incorporated comments made on the pre-draft documents made by SSCP. The facility agrees with the updated permit as written (per email from KPR dated August 28, 2017). I recommend issuance of Permit No. 3842-245-0109-S-05-0 based on this application.