

**PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY**

**33 North Stone Avenue, Suite 700 • Tucson, AZ 85701 • Phone: (520) 243-7400**

**AIR QUALITY OPERATING PERMIT**

(As required by Title 17.12, Article II, Pima County Code)

**ISSUED TO**

**UNIVERSITY PHYSICIANS HEALTHCARE**

**2800 E. AJO WAY  
TUCSON, ARIZONA 85713**

*This air quality operating permit does not relieve applicant of responsibility for meeting all air pollution regulations*

THIS PERMIT ISSUED SUBJECT TO THE SPECIFIC CONDITIONS AND SECTIONS IDENTIFIED IN THIS PERMIT.

PERMIT NUMBER **641**

PERMIT CLASS **II**

ISSUED: **JANUARY XX, 2014**

EXPIRES: **JANUARY XX, 2019**

SIGNATURE

TITLE

***Rupesh Patel, Air Permit Manager, PDEQ***

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## Permit Summary

The University Physicians Healthcare Hospital at Kino Campus, (herein known as the facility) provides medical services to residents in the Tucson area. The facility operates several boilers and emergency generators in support of its operations. The boilers are capable of firing either natural gas (the primary fuel) or diesel fuel (a backup fuel). This permit allows the firing of either fuel in the facilities boilers. The emergency generators are fired exclusively with diesel fuel and are sufficiently large that uncontrolled emissions from them combined with the boilers would result in the facility being a major source of nitrogen oxides. Consequently, this permit limits the emergency generators to no more than 100 hours per year of operation each.

The following table summarizes the potential to emit of the source with the practically enforceable controls contained in the permit. These figures were calculated using the information contained in the submitted permit application, standard emission factors from the Arizona Department of Environmental Quality's (ADEQ) Hospital General Permit Application and AP-42. These numbers are for reference purposes only and are not intended for direct enforcement unless specified in the conditions of this permit as an enforceable emissions limitation by rule or as a voluntary accepted condition(s) by the Permittee.

<b>Pollutant</b>	<b>Potential Emissions (Tons per Year)</b>
Carbon Monoxide (CO)	4.54
Nitrogen Oxides (NOX)	7.79
Particulate Matter (as PM <sub>10</sub> )	0.67
Sulfur Oxides (SO <sub>x</sub> )	37.82
Volatile Organic Compounds (VOC)	0.35
Hazardous Air Pollutants (HAPs – total)	0.12

Potential combustion emissions of NO<sub>x</sub>, CO, PM and SO<sub>x</sub> are calculated using AP-42 emission factors for permitted equipment.

The federal restriction on hours of operation (100 hours/year) is treated as part of the generators design and thus is the maximum capacity of the generator to emit pollutants.

The source thus remains as a **True Minor source for all other regulated pollutants.**

## Emission Sources

The affected emission sources at the facility are grouped into the following emission limiting sections of this permit:

- Section A** New Source Performance Standards (NSPS) Compression Ignition Internal Combustion Engines (40 CFR Part 60 Subpart III).
- Section B** New and Existing Stationary Source Performance Standards for Fossil-Fuel Fired Industrial and Commercial Equipment
- Section C** Facility Wide Specific Conditions.

Proposed Permit

Section ANew Source Performance Standards for Post Model Year 2007  
Emergency Compression Ignition Engines

## I. Applicability

[40 CFR 60.4200(a)(1)(i)]

The standards contained in this Section apply to owners/operators of emergency stationary compression ignition engines (CI ICE) that are not certified National Fire Protection Association (NFPA) fire pump engines and are model year 2007 or later. Specific applicable units are identified in Table 2, Section 2 of the permit. **All conditions in this Section are Federally Enforceable Conditions.**

## II. Operational Limitations

[PCC 17.12.185.A.2]

## A. Emission Limitations

[40 CFR 60.4203, 40 CFR 4205(b) &amp; 40 CFR 60.4202(a) ]

## 1. Certified Emission Limits

- a. New CI ICE subject to this Section must be certified by the manufacturer at or below the applicable emission standards and shall continue to meet them for the certified emissions life of the engine.
- b. Modified or reconstructed CI ICE subject to this Section shall be certified by the entity that conducts the modification or reconstruction (via the appropriate testing according to 40 CFR 60.4212, if appropriate). This certification shall state that emissions will be at or below the applicable emission standards and the unit shall continue to meet them for the useful life of the engine.
- c. Applicable emission standards and the certified emissions life of the engine are identified in Section III of the ATO (Supplemental Requirements).
- d. The Permittee must operate and maintain applicable units that achieve the emission standards as required in II.A.1.c according to the manufacturer's written instructions or procedures developed by the Permittee that are approved by the engine manufacturer, over the entire life of the engine.

[40 CFR 60.4206]

## 2. Opacity Standards

[40 CFR 60.4202(a)(1) &amp; (a)(2), 40 CFR 89.113 &amp; 40 CFR 1039.105]

Except for constant-speed engines, opacity shall not exceed:

- a. 20 percent during the acceleration mode;
- b. 15 percent during the lugging mode; and
- c. 50 percent during the peaks in either the acceleration or lugging modes.

## B. Fuel Requirements

[40 CFR 60.4207]

Beginning October 1, 2010, stationary CI ICE subject to this Section that use diesel fuel must purchase diesel fuel that meets the following requirements on a per-gallon basis:

[40 CFR 60.4207(b) &amp; 80.510(b)]

1. Sulfur content: 15 ppm maximum;
2. Cetane index or aromatic content, as follows:
  - a. A minimum cetane index of 40; or
  - b. A maximum aromatic content of 35 volume percent.

## C. Installation Restrictions

[40 CFR 60.4208]

1. After December 31, 2008, the Permittee may not install stationary CI ICE (excluding fire pump engines) that do not meet the applicable requirements for 2007 model year. [40 CFR 60.4208(a)]
2. After December 31, 2009, the Permittee may not install stationary CI ICE with a maximum engine power of less than 25 HP (excluding fire pump engines) that do not meet the applicable requirements for 2008 model year. [40 CFR 60.4208(b)]
3. The requirements of II.C.1 and 2 of this Section do not apply to stationary CI ICE that have been modified or reconstructed, and do not apply to engines that were removed from one existing location and reinstalled at a new location. This provision does not extend to imported units which shall be treated as new sources. [40 CFR 60.4208(i) & (h)]

## D. Emergency Designation

[40 CFR 60.4211(f)]

Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The Permittee may petition the Control Officer for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Any operation other than emergency operation, and maintenance and testing as permitted in this Section, is prohibited. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section (II.D), is prohibited.

## E. Compliance

1. The Permittee must operate and maintain the applicable stationary CI ICE and control device (if applicable) according to the manufacturer's emission-related written instructions or procedures developed by the Permittee that are approved by the engine manufacturer. In addition, the Permittee may only change those settings that are permitted by the manufacturer.

[40 CFR 60.4211(a)]

2. With respect to 2007 model year and later stationary CI ICE subject to this Section, the Permittee shall demonstrate compliance with the emission standards specified in Section by purchasing an engine certified to those standards of the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications.

[40 CFR 60.4211(c)]

### III. Monitoring Requirements

[40 CFR 60.4209(a)] [PCC 17.12.185.A.3.d]

#### A. Hour Meter Installation

The Permittee of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines must install a non-resettable hour meter on each applicable stationary CI ICE prior to startup of each engine.

[40 CFR 60.4209(a)]

#### B. Opacity

[40 CFR 89.113(b)]

1. Opacity levels in II.A.2 of this Section are to be measured and calculated as set forth in 40 CFR part 86, subpart I. Notwithstanding the provisions of 40 CFR part 86, subpart I, two-cylinder nonroad engines may be tested using an exhaust muffler that is representative of exhaust mufflers used with the engines in use.
2. The following engines are exempt from the requirements of III.B.1 above of this section.

[40 CFR 89.113 (c)(1) &amp; (3)]

- i. Single-cylinder engines;
- ii. Constant-speed engines.

### IV. Recordkeeping Requirements

[PCC 17.12.185.A.4]

#### A. Hourly Operational Records

[40 CFR 60.4214(b)]

Starting with the model years in the following table, if the applicable engine(s) does not meet the standards applicable to a non-emergency engine for the same model year and maximum horsepower, the Permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The Permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. All records shall be maintained for five years.

[40 CFR 60.4214(b)]

Engine Power	Starting Model Year
$25 \leq \text{HP} < 75$	2013
$75 \leq \text{HP} < 175$	2012
$\text{HP} \geq 175$	2011

#### B. Diesel Fuel Recordkeeping

The Permittee shall maintain records that verify compliance with the diesel fuel requirements in II.B of this Section.

C. Opacity

The Permittee shall keep all records generated to show compliance with the opacity level measurement requirements of III.C of this Section.

V. Testing Requirements

[40 CFR 60.4212] [PCC 17.12.185.A.3.a]

Should the Permittee elect to or be required to conduct performance testing to demonstrate compliance with the applicable standards of this Section, the Permittee shall do so in accordance with 40 CFR 60.4212.

VI. Additional Requirements

[40 CFR 60.4218 & 60.4214(b)]

The General Provisions of 40 CFR 60.1 through 19 apply to applicable sources as indicated in Table 8 of 40 CFR Subpart IIII except that the Permittee is not required to submit an initial notification.

VII Facility Recordkeeping

[PCC 17.12.185.A.4]

All records required by, or generated to verify compliance with this Section shall be maintained for five years.

Proposed Permit

**Section B**

**New and Existing Stationary Source Performance Standards for  
Fossil-Fuel Fired Industrial and Commercial Equipment**

**(Locally Enforceable Conditions, unless otherwise stated)**

Unless otherwise stated, the provisions of this Section apply to the equipment identified in, Table 2, Attachment 1 of this permit.

**I. Emission Limitations and Standards**

[PCC 17.12.185.A.2]

A. Opacity Standard

The Permittee shall not cause or permit the effluent from any boiler to have an average optical density equal to or greater than twenty percent (20%) opacity. [PCC 17.16.040.A]

B. Fuel Limitation

1. The Permittee shall not fire a volume of diesel fuel in excess of the yearly volume allowed for each boiler in Attachment 1 of this permit. The total volume of fuel fired per year shall be calculated as a rolling twelve (12) month total.
2. For each boiler identified as having an operational limitation in Attachment 1 of this permit, the Permittee shall record the monthly volume of diesel fuel fired in each boiler at the close of each month and recalculate a rolling twelve (12) month total. If no diesel fuel is fired in any given month, the records shall state the fact. Recording and recalculation of fuel volume shall be completed within 5 business days of the close of each month. All records shall be maintained for five years.

**II. Monitoring Requirements**

[PCC 17.12.185.A.3]

A. Opacity

A demonstration to show compliance with the emission limitation for opacity in I.A of this Section shall not be required since the percent of opacity of visible emissions while combusting natural gas is inherently low. The Permittee shall operate and maintain the boilers and heaters at all times - including periods of startup, shutdown, and malfunction - in a manner consistent with good air pollution control practices and consistent with manufacturer's guidelines.

B. Fuel Limitation

1. The Permittee shall burn only the specified fuel allowed for the boilers in Attachment 2 of this Permit.
2. In order to demonstrate compliance with the fuel limitation required in II.B.1 of this Section, the Permittee shall maintain records of fuel oil supplier specifications which verify the fuel and sulfur content of the fuel, as delivered.

### III. Recordkeeping Requirements

[PCC 17.12.185.A.4]

#### Onsite Records

All records shall be retained on-site by the Permittee for at least five years from the date of generation and shall be made available for review upon the Control Officer's request.

### IV. Reporting Requirements

[PCC 17.12.185.A.5]

#### Excess Emissions

The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit in accordance with I.B of the Additional Permit Conditions. [PCC 17.12.185.A.5 & PCC 17.12.040]

### V. Testing Requirements

[PCC 17.12.045, PCC 17.12.050 & PCC 17.20.010]

For purposes of demonstrating compliance, these test methods shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any provision of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a facility would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed.

#### A. Opacity

When required, the Permittee shall perform visual determinations of the opacity of the boiler and heater emissions in accordance with EPA Reference Method 9, Appendix A in 40 CFR 60 to demonstrate compliance with the opacity standard in I.A of this Section. [PCC 17.12.040.B & PCC 17.20.010]

#### B. Fuel Limitation

When requested, the Permittee need only demonstrate that pipeline quality natural gas was fired since the sulfur content of pipeline quality natural gas is regulated by the Federal Energy Regulatory Commission. [PCC 17.12.185.A.3 & PCC 17.20.010]

#### C. Alternative Test Method

The Permittee may submit an alternate and equivalent test method(s) that is listed in 40 CFR Subpart 60, Appendix A, to the Control Officer in a test plan, for approval by the Control Officer. [PCC 17.12.045.D]

### VI. Facility Changes

Should the Permittee desire to change the facility or operations in any way (including, but not limited to, addition of new equipment, modification of current equipment or usage of fuels not specified within this Permit,) the Permittee will first submit the proper notification and follow the required permit revision procedure pursuant PCC 17.12.240, PCC 17.12.255, and PCC 17.12.260

## Section C

### General Facility-Wide Specific Standards

The provisions of this Section apply to all facility operations.

#### **I. General Facility-Wide Conditions**

##### **A. Facility Changes**

Before installing additional units, removing units, modifying existing emission equipment or switching fuels, the Permittee shall apply for the appropriate revision pursuant to PCC 17.12.230, PCC 17.12.255 or PCC 17.12.260. [PCC 17.12.180.A.2]

##### **B. Air Pollution Control Equipment**

Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the owner or operator thereof to a degree that will adequately reduce or eliminate the discharge of air pollution to adjoining property. [PCC 17.16.020.B]

##### **C. Odor Limiting Standard**

1. The Permittee shall not cause or permit emissions from malodorous matter to cross a property line between the source and a residential, recreational, institutional, educational, retail sales, hotel, or business premise without minimizing the emissions by applying good modern practices. [PCC 17.16.030]
2. Monitoring for odors at the facility to determine compliance with the standard in I.C.1 of this Section is not normally necessary as the use of good modern practices prevents the emission of odors beyond the property boundary. The Control Officer may ask the Permittee to test for odor emissions if the Control Officer has reasonable cause to believe a violation of a standard has been committed. [PCC 17.12.010]

#### **II. Recordkeeping Requirement**

- A. All records required by this permit shall be retained for at least five years. [PCC 17.12.180.A.4.b]
- B. The Permittee shall retain all records relating to this permit and a copy of the permit at the permit site. If it is not feasible to maintain a copy of the permit onsite, the Permittee may request, in writing, to maintain a copy of the permit at an alternate location. Upon written approval by the Control Officer, the Permittee must maintain a complete copy of the permit at the approved alternative location. [PCC 17.12.080]

#### **III. Reporting Requirements**

[PCC 17.12.180.A.5]

The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit according to the additional permit conditions of this permit [PCC 17.12.040]

#### **IV. Testing Requirements**

Specific testing requirements are listed within each Section of this permit.

## Additional Permit Requirements

### **I. Compliance with Permit Conditions**

[PCC 17.12.185.A.7.a and b]

- A. The Permittee shall comply with all conditions of this permit including all applicable requirements of Arizona air quality statutes and the air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
- B. The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. The report shall be in 2 parts as specified below: [PCC 17.12.185.A.5 and PCC 17.12.040]
  - 1. Notification by telephone or facsimile within 24 hours of the time the Permittee first learned of the occurrence of excess emission that includes all available information pursuant to PCC 17.12.040.B. To report excess emissions call **520-243-7400** or fax to **520-838-7432**.
  - 2. Detailed written notification by submission of an excess emissions report within 72 hours of the notification in I.B.1 above. Send to **PDEQ 33 N. Stone Ave, Ste 700, Tucson, Arizona 85701**.
- C. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- D. The permit does not convey any property rights of any sort, or any exclusive privilege to the permit holder.
- E. The Permittee shall pay fees to the Control Officer pursuant to PCC 17.12.510. [PCC 17.12.185.A.9 and PCC 17.12.510]

### **II. Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause**

[PCC 17.12.185.A.7.c]

The permit may be revised, reopened, revoked and reissued, or terminated for cause pursuant to PCC 17.12.270. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

### **III. Duty to Provide Information**

[PCC 17.12.165.G and PCC 17.12.185.A.7.e]

- A. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records to the Control Officer along with a claim of confidentiality.
- B. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

### **IV. Severability Clause**

[PCC 17.12.185.A.6]

The provisions of this permit are severable. If any provision of this permit is held invalid, the remainder of this permit shall not be affected thereby.

## Applicable Regulations

### Requirements Specifically Identified as Applicable

Compliance with the terms contained in this permit shall be deemed compliance with the following federally applicable requirements in effect on the date of permit issuance:

#### Code of Federal regulations (CFR)

40 CFR Part 60 Subpart III: New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines

#### Pima County Code (PCC) Title 17, Chapter 17.12 Permits and Permit Revisions

17.12.010 Statutory authority  
17.12.020 Planning, constructing, or operating without a permit  
17.12.040 Reporting requirements  
17.12.045 Test methods and procedures  
17.12.050 Performance tests  
17.12.080 Permit display or posting  
17.12.165 Permit application processing procedures for Class II and Class III permits  
17.12.185 Permit contents for Class II and Class III permits  
17.12.520 Fees related to Class II and Class III permits

#### Pima County Code (PCC) Title 17, Chapter 17.16 Emission Limiting Standards

17.16.010 Local rules and standards - Applicability of more than one standard  
17.16.020 Noncompliance with applicable standards  
17.16.030 Odor limiting standards  
17.16.040 Standards and applicability (Includes NESHAP)  
17.16.050 Visibility limiting standard  
17.16.165 Standards of performance for fossil-fuel fired industrial and commercial equipment  
17.16.430 Standards of performance for unclassified sources

The following Code of Federal regulations (CFR) are not applicable to the facility. (See TSD for detailed applicability review).

40 CFR 63 Subpart JJJJJ : National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Industrial, Commercial, and Institutional Boilers

40 CFR 60 Subpart Dc: Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units.

40 CFR Part 63 Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.

**Attachment 1**

**Table 1**

**NSPS Standards of Performance for Stationary Compression Ignition  
Internal Combustion Engines (40 CFR Part 60 Subpart IIII)**

Type of Equipment	Manufacture	Model	Serial Number/ ID number	Maximum Rated Capacity	Date of Manufacture <sup>1</sup>	Date of Installation	Allowable Hours of Operation <sup>2</sup>	Allowable Fuel(s)
Emergency Generator #1	Cummins	QST30-G5 NR2	E070061476	KVA Base Rate 1300.0 KW BR 1040.0	Jun 4 <sup>th</sup> 2007	Dec 16 <sup>th</sup> 2007	100 hrs	Diesel
Emergency Generator #2	Cummins	QST30-G5 NR2	E070061477	KVA Base Rate 1300.0 KW BR 1040.0	Jun 4 <sup>th</sup> 2007	Dec 16 <sup>th</sup> 2007	100 hrs	Diesel
Emergency Generator #3	Cummins	DQFAD	D100114714-B	KVA 1250 KW 1000	Apr 23 <sup>rd</sup> 2010	Aug 10 <sup>th</sup> 2010	100 hrs	Diesel
Emergency Generator #4	Cummins	DQFAD	D100114710-B	KVA 1250 KW 1000	Apr 23 <sup>rd</sup> 2010	Aug 10 <sup>th</sup> 2010	100 hrs	Diesel

<sup>1</sup> The most recent date of order, manufacture, reconstruction, or modification.

<sup>2</sup> Allowable hours of operation for emergency generators are limited to maintenance testing and readiness checks. There is no limit on hours of operation during true emergencies.

**Table 2**  
**Fossil Fuel Fired Industrial and Commercial Equipment**

<b>Type of Equipment</b>	<b>Equipment ID /Serial Number</b>	<b>Manufacturer</b>	<b>Model</b>	<b>Maximum Rated Capacity (Btu/hr)</b>	<b>Primary Fuel</b>	<b>Date of Manufacture</b>	<b>Date of Installation</b>
Boiler #1	75-1109	Trane	PBA-H-3B-G-2	12,600,000 (10,000 PPH)	Natural Gas/Diesel	1975	1975
Boiler # 2	75-1110	Trane	PBA-H-3B-G-2	12,600,000 (10,000 PPH)	Natural Gas/Diesel	1975	1975
Boiler #3	34213	Parker	115	4,830,000 (3,000 PPH)	Natural Gas	1975	1975
Water Heater	30888	Rite	300 W	3,000,000	Natural Gas	Feb 2010	March 2010
Water Heater	30889	Rite	300 W	3,000,000	Natural Gas	Feb 2010	March 2010

Proposed