TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

St. Vincent's Medical Center
1 Shircliff Way
Jacksonville, Florida 32204
Facility ID No. 0310068

PROJECT

Modification of Title V Air Operation Permit No. 0310068-008-AV
Incorporation of the Terms and Conditions of Permit No. 0310068-009-AC

COUNTY

Duval, Florida

PERMITTING AUTHORITY

Neighborhoods Department
Environmental Quality Division
Ed Ball Building, 214 North Hogan Street, Suite 500
Jacksonville, Florida 32202
Telephone: (904) 255-7100
Fax: (904) 588-0518

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (FS). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (FAC), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring).

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, FAC.

Facility Description and Location

St. Vincent's Medical Center is a full care medical center including hospital, three (3) boilers, power generator and two (2) emergency diesel engines. St. Vincent's Medical Center is located at 1 Shircliff Way, Jacksonville, Duval County; Florida, 32204; UTM Coordinates: Zone 17, 433.75 km East and 3358.7 km North; Latitude: 30° 18' 26" North and Longitude: 81° 41' 20" West.

The facility is located in an area designated as unclassifiable for the air pollutants particulate matter less than or equal to ten (10) micrometers, sulfur dioxide, and lead; and in an air quality maintenance area for ozone, and in the area of influence of an air quality maintenance area for particulate matter pursuant to Chapter 62-204, FAC, and Rule 2.201, Jacksonville Environmental Protection Board (JEPB).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a synthetic minor non-Title V source of air pollution. **(The applicant has requested a limit of 1,000 hours per year in the operation of Emission Unit No. 006)**

Project Description

This permit is for purpose of modifying existing Title V Air Operation Permit No. 0310068-008-AV for St. Vincent's Medical Center by incorporating the applicable terms and conditions identified in Construction Permit No. 0310068-009-AC. Specifically, St. Vincent's Medical Center will be reclassified as a Synthetic Non-Title V Source of Air Pollution, Gas Turbine Cogenerator No. 1 (Emission Unit No. 005) will be decommissioned and Emission Unit No. 006, Power Generator No. 3, will be added to new Permit No. 0310068-010-AF. Note that in Construction Permit No. 0310068-009-AC, the power generator under Emission Unit No. 006 was designated Power Generator No. 1. Emission Unit No. 007 was created for two (2) existing emergency stationary compression ignition (CI) reciprocating internal combustion engines (RICE). These emergency engines, which were previously in Appendix I-1, List of Insignificant Emissions Units and/or Activities of St. Vincent's Medical Center's Title V Permit, shall be designated Power Generator No. 1 and 2 at the request of the consultant. The engines are subject to 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary RICE and Subpart A, General Provisions

Processing Schedule

March 8, 2013: Received the application for a synthetic minor source air operation permit.

2. APPLICATION REVIEW

Discussion of Emissions

NO_x emissions are associated with the burning of natural gas or back-up No. 2 diesel fuel in the 3 boilers (Emission Unit Nos. 2, 3 & 4), the burning of diesel fuel or a duel fuel composed of 25% diesel fuel & 75% natural gas in Power Generator No. 3 (Emission Unit No. 006) and the burning of diesel fuel in the 2 emergency generators (Emission Unit No. 7). Other pollutants associated with the burning of the above fuels include SO_2, CO, PM and TOC.

Local Requirements

This facility is subject to Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 365 [Hazardous Regulated Substance Program], Chapter 376 [Odor Control] of the Ordinance Code of the City of Jacksonville, Title X; and Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice], and Rule 2, Part Numbers I through III and Part Numbers X through XIV [Air Pollution Control], JEPB.

State Requirements

This facility is subject to the applicable sections of Chapter 403, F.S. and Rules 62-4, 62-204, 62-210, 62-296, and 62-297, F.A.C.

Federal NSPS Provisions

Power Generator No. 3 (Emission Unit No. 006) is subject to 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 60, Subpart A, General Provisions.

Federal NESHAP Provisions

Power Generator Nos. 1, 2 and 3 (Emission Unit Nos. 006 and 007) are subject to 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and 40 CFR 63, Subpart A, General Provisions shall apply to the engines of this emissions unit.

3. PRELIMINARY DETERMINATION

Based on the information provided by St. Vincent's Medical Center, the Permitting Authority makes a preliminary determination that facility will comply with all applicable state and federal air pollution regulations as conditioned by the DRAFT permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the DRAFT permit.