December 19, 2014

Mr. Tom Lubozynski, P.E.
Program Administrator
Waste & Air Resource Management
Florida Department of Environmental Protection - Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Subject: Air Permit Exemption Request
Florida Hospital Celebration
Facility ID# 0970068

Dear Mr. Lubozynski,

This letter and supporting attachments are submitted on behalf of our client, Florida Hospital Celebration. This facility is requesting to allow their current air operating permit to expire and continue operating under the exemptions contained in §62-210.300 of the Florida Administrative Code.

Historically this facility did not meet the exemption limits contained in the categorical and conditional exemption criteria, however this facility's fuel usage has not been re-evaluated since the fuel usage contained in these exemptions was increased a few years ago. Based on the increased fuel limits contained in the categorical and conditional exemption, this facility meets both sets of exemption criteria for their boilers and emergency generators.

The regulated emission units at this facility consist of boilers and emergency generators. The boilers meet the categorical and conditional exemption criteria

contained in §62-210.300(3)(a)34. The emergency generators meet the categorical and conditional exemption criteria contained in §62-210.300(3)(a)35. The exemption limits are based on actual fuel usage and not potential. The actual fuel usage for each category for the past five years is summarized in this analysis.

Boilers

There are eight steam boilers and hot water heaters at this facility that are fired on a rotating cycle. The Air Permit Exemption Analysis included with this letter shows the calculated potential natural gas usage for the three boilers operating 8,760 hours per year slightly above the exemption criteria, however the actual natural gas usage is well below the exemption limits. The maximum natural gas usage is 387 MMCF per year and the exemption limit is 375 MMCF per year. The exemption is based on actual fuel usage and not potential. The boilers meet the exemption criteria as outlined below:

§62-210.300(3)(a) 34. Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity less than 100 million Btu per hour, provided all the following conditions are met with respect to each such unit.
a. The unit is not subject to any unit-specific limitation or requirement.
There are no unit-specific limitations or requirements for the boilers
b. The rated heat input capacity of the unit is less than 100 million Btu per hour and, collectively, the total rated heat input capacity of all units claiming this exemption at the same facility is less than 250 million Btu per hour.
Each boiler is rated less than 100 MMBtu/hr and collectively the total rated heat input capacity is less than 250 MMBtu/hr for all three boilers
c. The unit shall not burn more than the maximum annual amount of a single fuel, as given in sub-subparagraph e., or equivalent maximum annual amounts of multiple fuels, as addressed in sub-subparagraph f.
d. Collectively, all units claiming this exemption at the same facility shall not burn more than the collective maximum annual amount of a single fuel, as given in sub-subparagraph g., or equivalent collective maximum annual amounts of multiple fuels, as addressed in sub-subparagraph h.
e. If burning only one (1) type of fuel, the annual amount of fuel burned by the unit shall not exceed 150 million standard cubic feet of natural gas, one million gallons of propane, one

million gallons of fuel oil with a sulfur content not exceeding 0.05 percent, by weight, 290,000 gallons of fuel oil with a sulfur content not exceeding 0.5 percent, by weight, or 145,000 gallons of fuel oil with a sulfur content not exceeding 1.0 percent, by weight.

Each boiler is limited to 150 MMCF per year of natural gas

g. If burning only one (1) type of fuel, the collective annual amount of fuel burned by all units claiming this exemption at the same facility shall not exceed 375 million standard cubic feet of natural gas, 2.5 million gallons of propane, 2.5 million gallons of fuel oil with a sulfur content not exceeding 0.05 percent, by weight, 290,000 gallons of fuel oil with a sulfur content not exceeding 0.5 percent, by weight, or 145,000 gallons of fuel oil with a sulfur content not exceeding 1.0 percent, by weight.

The boilers, combined are limited to 375 MMCF of natural gas per year and the facility will maintain records to demonstrate they continue to remain under this limit.

Emergency Generators

There are four emergency generators at this facility, two of which are included in the current air permit for this facility. The Air Permit Exemption Analysis included with this letter shows the calculated potential diesel fuel usage for the four emergency generators operating 100 hours per year is below the exemption criteria. The maximum diesel fuel usage is 21,380 gallons per year and the exemption limit is 64,000 gallons per year. These engines are limited to 100 hours per year of operation for maintenance and readiness testing. The emergency generators meet the exemption criteria as outlined below:

*§62-210.300(3)(a)*35. *Stationary Reciprocating Internal Combustion Engines, provided all the following conditions are met with respect to each such engine.*

a. The engine is not subject to the Acid Rain Program, CAIR Program, or any other unit-specific limitation or requirement other than any such limitation or requirement that may apply pursuant to 40 C.F.R. Part 60, Subpart IIII or JJJJ, or 40 C.F.R Part 63, Subpart ZZZZ, all adopted and incorporated by reference at Rule 62-204.800, F.A.C.

There are no unit-specific limitations or requirements for the generators other than the RICE regulations

b. The engine shall not burn used oil or any fuels other than natural gas, propane, gasoline, and diesel fuel.

The generators burn diesel fuel only

c. Collectively, all engines claiming this exemption at the same facility shall not burn more than the collective maximum annual amount of a single fuel, as given in sub-subparagraph d., or

equivalent collective maximum annual amounts of multiple fuels, as addressed in sub-subparagraph e.
d. If burning only one type of fuel, the collective annual amount of fuel burned by all engines claiming this exemption at the same facility shall not exceed 5,400 gallons of gasoline, 64,000 gallons of diesel fuel, 288,000 gallons of propane, or 8.8 million standard cubic feet of natural gas.
The generators, combined are limited to 64,000 gallons of diesel fuel per year and the facility will maintain records to demonstrate they continue to remain under this limit.
f. If the engine is a stationary compression ignition internal combustion engine that is subject to 40 C.F.R. Part 60, Subpart IIII, adopted and incorporated by reference at Rule 62-204.800, F.A.C., or by virtue of modification or reconstruction becomes subject to such subpart, the owner or operator shall comply with all limitations and requirements of Subpart IIII that apply to the engine.

Below is a summary table of the natural gas and diesel usage in the boilers and generators over the past five years:

Boilers - Historic Natural Gas Usage

Year	Usage (MMCF)
2009	52.78
2010	55.91
2011	55.23
2012	55.91
2013	56.78
5 year average	**56**
Exemption Limit	**375**

Emergency Generators - Historic Diesel Fuel Usage

Year	Usage (Gallons)
2009	7,719
2010	3,062
2011	4,715
2012	3,723
2013	2,328
5 year average	**4,309**
Exemption Limit	**64,000**

If you have any questions concerning this exemption request, please call me at (407) 298-2282 or e-mail me at sara@grovescientific.com.

Sincerely,
Grove Scientific & Engineering Company

Sara Greivell
Project Manager

cc: John Elkins - Florida Hospital

FLORIDA HOSPITAL CELEBRATION - Air Permit Exemption Analysis

BOILERS

2- Teledyne water heaters @ 5 MMBTU/hr each

(5 MMBTU/hr)(8,760 hr/yr)=	43,800	MMBTU/yr each
(43,800 MMBTU/yr)/(1020 BTU/cf) =	42.94	MMCF/yr each
(42.94 MMCF/yr)(2 boilers) =	**85.88**	**MMCF/yr**

2- Lochinvar water heaters @ 0.2 MMBTU/hr each

(0.2 MMBTU/hr)(8,760 hr/yr)=	1,752	MMBTU/yr each
(1,752 MMBTU/yr)/(1020 BTU/cf) =	1.72	MMCF/yr each
(1.72 MMCF/yr)(2 boilers) =	**3.44**	**MMCF/yr**

2- Camus Dynaforce water heaters @ 0.6 MMBTU/hr each

(0.6 MMBTU/hr)(8,760 hr/yr)=	5,256	MMBTU/yr each
(5,256 MMBTU/yr)/(1020 BTU/cf) =	5.15	MMCF/yr each
(5.15 MMCF/yr)(2 boilers) =	**10.30**	**MMCF/yr**

2 Superior-400 HP Boiler rated at ~16,392 CF/hr

(16,392 CF/hr)(8,760 hr/yr) =	143.59	MMCF/yr
(143.59 MMCF/yr)(2boilers) =	**287.18**	**MMCF/yr**
Facility-Wide Potential MMCF/yr:	**387**	**MMCF/yr**
Exemption Limit based on actual usage :	**375**	**MMCF/yr**

Actual Natural Gas Usage:

Year	MMCF/yr
2009	52.78
2010	55.91
2011	55.23
2012	55.91
2013	56.78
average for last 5 years:	**55.322** MMCF/yr

GENERATORS

2-1,250 kW Generators
1-130 kW Generator
1-200 kW Generator

2-1,250 kW generators	(88 gal/hr @100% load)(100 hr/yr)(2 generators) =	**17,600**	**gal/yr**
1-200 kW generator	(28 gal/hr @ 100% load)(100 hr/yr)=	**2,800**	**gal/yr**
1-130 kW generator	(9.8 gal/hr @ 100% load)(100 hr/yr)=	**980**	**gal/yr**
	Facility-Wide Potential Diesel Usage/yr:	**21,380**	**gal/yr**
	Exemption Limit based on actual usage :	**65,000**	**gal/yr**

Calculated* Diesel Fuel Usage:

Year	gallons/year
2009	7,719
2010	3,062
2011	4,715
2012	3,723
2013	2,328
average for last 5 years:	**4,309** gallons/yr

*Calculated diesel fuel usage is based on the generators operating at 100% load, these engines are typically run under NO load once per week for readiness testing; therefore the calculated fuel usage is a conservative estimate each of the boilers are tested on diesel fuel for two hours per month for a maximum diesel fuel consumption of 5,280 gallons per year

boilers and hot water heaters are run on a rotating cycle, not at the same time.