FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803-3767

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

CLIFFORD D. WILSON III
INTERIM SECRETARY

Electronically Sent- Received Receipt Requested
John.elkins@flhosp.org

December 24, 2014

NOTICE OF PERMIT DETERMINATION AND CHANGE OF EXPIRATION DATE

Mr. John Elkins
Administrative Director of Facilities
Florida Hospital
1919 N. Orange Ave., Suite D
Orlando, Florida, 32804

Ms. Sara Greivell
Project Manager
Grove Scientific & Engineering Company
6140 Edgewater Drive, Suite F
Orlando, Florida 32810-4810

RE: Determination Whether Air Permit Required
Florida Hospital Altamonte (Air Program Facility ID 1170362)
Seminole County
SPCD AIR 14-1966

Dear Mr. Elkins,

A letter was received by the Department on December 19, 2014 from Grove Scientific & Engineering Company on behalf of Florida Hospital Altamonte to surrender the current air operation permit (No. 1170362-005-AO) and to continue operating under the exemption contained in Rule 62-210.300 of the Florida Administrative Code.

Determination: Based on the information provided to the Department, Florida Hospital Altamonte, located at 601 East Altamonte Drive, Altamonte Springs, Seminole County (Air Facility ID 1170362) is not required to have an air permit for the emission sources (boilers and emergency generators) on its property. The Department agrees that boilers and emergency

generators meet the air permit categorical and conditional exemption criteria contained in Rules 62-210.300(3)(a)34., F.A.C. and 62-210.300(3)(a)35., F.A.C., respectively.

This determination is based on the information provided in the letter dated December 19, 2014 and the corresponding supplemental information from Grove Scientific & Engineering Company on behalf of Florida Hospital Altamonte. The determination is null and void if it is discovered that the information was inaccurate or, if in the future, that information is no longer applicable.

Technical Evaluation in Support of the Determination: (see Attachment 1)

Change of Expiration Date:

The expiration date of Air Operation Permit No. 1170362-005-AO is changed as follows:

FROM: 03/30/2018

TO: 12/24/2014

If you have any questions, please contact Jeff Rustin at (407) 897-2930 or by e-mail at jeff.rustin@dep.state.fl.us.

Petition: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below, and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any of the parties below, must be filed within 14 days of receipt of this exemption from air permitting requirements. A petitioner shall mail a copy of the petition to the Thomas & Betts Corporation at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;
(b) The name, address, and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for

service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of when and how the petitioner received notice of the agency decision;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on permit exemption determination have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the Clerk of the Department, unless a petition is filed in accordance with the above paragraphs, or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

Judicial Review: Any party to this order (Permitting Determination) has the right to seek judicial review of it under section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department of Environmental Protection.

Executed in Orange County, Florida.

F. Thomas Lubozynski, P.E.
Waste & Air Resource Programs Administrator

Attachments:

1. Attachment 1 – Technical Evaluation in Support of Determination
2. Attachment 2 – Letter from Grove Scientific and Engineering dated December 19, 2014

CERTIFICATE OF SERVICE
The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Permit Exemption was sent by electronic mail with received receipt requested before the close of business on December 24, 2014 to the persons listed below.

Mr. John Elkins, Administrative Director of Facilities, Florida Hospital, John.elkins@flhosp.org
Ms. Sara Greivell, Project Manager, Grove Scientific and Engineering Company, sara@grovescientific.com
Mr. Aaron Watkins, Compliance Manager, FDEP – Central District, Aaron.Watkins@dep.state.fl.us
Mr. Jeff Rustin, P.E., Permit Engineer, FDEP – Central District, jeff.rustin@dep.state.fl.us

Clerk Stamp
FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department clerk, receipt of which is hereby acknowledged.

(Clerk) December 24, 2014
(Date)

Attachment 1: Technical Evaluation in Support of the Determination

Three Boilers at the Facility:

ID No.	Emission Unit Description
002	Three Steam Boilers. • Boiler No. 1 is manufactured by Johnston, has a maximum heat input rating of 12.5 million British thermal units per hour (MMBTU/hr) and was installed in May 1989. This boiler is fired by only natural gas. • Boiler No. 2 is manufactured by York Shipley, has a maximum heat input rating of 12.5 MMBTU/hr and was installed in 1984. This boiler is fired by only natural gas. • Boiler No. 3 is manufactured by Johnston and has a maximum heat input rating of 16.4 MMBTU/hr. This boiler was installed in 2007 and is fired by natural gas and diesel fuel as an emergency backup

Boiler No. 3 is subject to 40 CFR 60, Subpart Dc; however, it is subject only to recordkeeping requirements [§60.48c(g)(2), record and maintain records of the amount of fuel (natural gas) combusted during each calendar month]. Any subpart of 40 CFR. Part 60, 61, or 63 that imposes nothing more than recordkeeping or reporting requirements for an emission unit is not considered to be a unit-specific requirement.

The boilers are entitled to the categorical and conditional permit exemption criteria contained in Rule 62-210.300(3)(a)34., F.A.C., if each boiler burns no more than 150 MMCF per year of natural gas and the three boilers collectively burn no more than 375 MMCF per year of natural gas.

Three Emergency Generators at the Facility:

ID No.	Emission Unit Description
003	Three Emergency Generators • Generators 1 and 2 are both located at 601 East Altamonte Drive and are rated at 800 kilowatts (kW). • The third Generator (referred to by the applicant as Generator No. 5) is located at 661 East Altamonte Drive and is rated at 150-kW.

The emergency generators are entitled to the categorical and conditional permit exemption criteria contained in Rule 62-210.300(3)(a)35., F.A.C., if the collective diesel fuel usage does not exceed 64,000 gallons of diesel fuel per year.

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 Altamonte
Facility ID# 1170362

Dear Mr. Lubozynski,

This letter and supporting attachments are submitted on behalf of our client, Florida Hospital Altamonte. This facility is requesting to surrender their current air operating permit and continue operating under the exemption 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

6140 EDGEWATER DRIVE●SUITE F ●ORLANDO, FLORIDA32810-4810
PHONE (407)298-2282 ●FAX (407)290-9038

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 three steam boilers 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 is below the exemption criteria. The maximum natural gas usage is 316 MMCF per year and the exemption limit is 375 MMCF per year. 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 three emergency generators 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 three emergency generators operating 100 hours per year, meet the exemption criteria. The maximum diesel fuel usage in the generators is 12,449 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	73.99
2010	72.11
2011	78.63
2012	85.75
2013	81.27
5 year average	**78**
Exemption Limit	**375**

Emergency Generators - Historic Diesel Fuel Usage

Year	Usage (Gallons)
2009	2,335
2010	2,740
2011	2,846
2012	6,363
2013	7,285
5 year average	**4,314**
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 ALTAMONTE - Air Permit Exemption Analysis

BOILERS

1 boiler HP =	33,520 BTU/hr		
2-300 HP Boiler	(300 HP)(33,250 BTU/hr)=	10.06	MMBTU/hr each
	(10.06 MMBTU/hr)(8,760 hr/yr)=	88,126	MMBTU/yr each
	(88,126 MMBTU/yr)/(1020 BTU/cf) =	86.40	MMCF/yr each
	(86.40 MMCF/yr)(2 boilers) =	**172.80**	**MMCF/yr**
1-400 HP Boiler rated at 16,392 CF/hr			
	(16,392 CF/hr)(8,760 hr/yr) =	**143.59**	**MMCF/yr**
	Facility-Wide Potential MMCF/yr:	**316**	**MMCF/yr**
	Exemption Limit based on actual usage :	**375**	**MMCF/yr**

Actual Natural Gas Usage:

Year	MMCF/yr
2009	73.99
2010	72.11
2011	78.63
2012	85.75
2013	81.27
average for last 5 years:	**78.35** MMCF/yr

GENERATORS

2-800 kW Generators
1-150 kW Generator

2-800 kW generators	(56.91 gal/hr @100% load)(100 hr/yr) =	**5,691**	**gal/yr**
	(5,691 gal/yr)(2 generators) =	**11,382.00**	**gal/yr**
1-150 kW generator	(10.67 gal/hr @ 100% load)(100 hr/yr)=	**1,067**	**gal/yr**
	Facility-Wide Potential Diesel Usage/yr:	**12,449**	**gal/yr**
	Exemption Limit based on actual usage :	**65,000**	**gal/yr**

Calculated* Diesel Fuel Usage:

Year	gallons/year
2009	2,335
2010	2,740
2011	2,846
2012	6,363
2013	7,285
average for last 5 years:	**4,314** gallons/yr

*Calculated diesel fuel usage is based on the generators operating at 100% load, these engines are typically run under NO load one per week for readiness testing; therefore the calculated fuel usage is a conservative estimate each of the boilers is tested on diesel fuel for one hour per month for a maximum diesel fuel consumption of 1,980 gallons per year