April 29, 2013

Isaac Mallah
President & CEO
St. Joseph's Hospital
3001 W. Martin Luther King, Jr. Blvd.
Tampa, FL 33607

Re: REVISED DRAFT/PROPOSED Permit No. 0570089-016-AV
St. Joseph's Hospital
Title V Air Operation Permit Renewal

Dear Mr. Mallah:

Enclosed is the REVISED DRAFT/PROPOSED permit package to renew the Title V air operation permit for St. Joseph's Hospital, which includes the main hospital, St. Joseph's Women's Hospital, and St. Joseph's Children's Hospital. This facility is located in Hillsborough County at 3001 W. Martin Luther King, Jr. Blvd., Tampa, FL 33607. The permit package includes the following documents:

- The Statement of Basis, which summarizes the facility, the equipment, the primary rule applicability, and the changes since the last Title V renewal.
- The REVISED DRAFT/PROPOSED Title V air operation permit renewal, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permit, which provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the REVISED DRAFT/PROPOSED permit; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit, which is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Air Permit must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication. Because this Title V permit is being processed as a combined DRAFT/PROPOSED permit in order to reduce processing time, a duplicate copy of the proof of publication must also be transmitted by electronic mail within seven days of the date of publication to Ms. Ana Oquendo at EPA Region 4 at the following address: oquendo.ana@epamail.epa.gov.

The initial DRAFT/PROPOSED Permit No. 0570089-016-AV was issued on January 18, 2013. Comments were received from Philip Jung (St. Joseph's Hospital) on February 1, 2013 and Kenneth Given,

P.E. (Air Testing & Consulting) on March 12, 2013. Revisions were made to the initial DRAFT/PROPOSED permit based on the comments provided which resulted in significant changes that

required issuance of a REVISED DRAFT/PROPOSED permit. The comments and any resulting changes are noted as follows:

1. **COMMENT:** Item 9) on page 3 of the Statement of Basis references six new diesel engines to be constructed, when in fact there are only four diesel engines included as part of that project.

RESPONSE: The Statement of basis has been corrected as requested.

2. **COMMENT:** The gas fired chiller engine (EU 011) refers to an oxidation catalyst, even though this unit does not currently have one. Is a catalyst now required as part of the permit and will parameters for the engine be established during initial stack testing?

RESPONSE: For the category of engine applicable to EU 011 (4SLB SI engine located at an area source of HAP), the most recent changes to 40 CFR 63 – Subpart ZZZZ, effective April 1, 2013, do require that an oxidation catalyst be added and that initial stack testing be performed within 180 days of October 19, 2013 to demonstrate compliance with the CO percent reduction requirement or exhaust concentration requirement. If St. Joseph's elects to monitor the catalyst inlet temperature using a continuous parameter monitoring system (CPMS), then the temperature parameters will be established during the initial stack test for CO. Alternatively, St. Joseph's may elect to install a high-temperature shutdown device to immediately stop the engine if the catalyst inlet temperature exceeds 1350 ^{o}F. In addition, annual catalyst checks are required which consist of a minimum of one 15-minute run to demonstrate that the catalyst is still meeting the applicable emissions limitations for CO.

Notwithstanding the previous paragraph, if the chiller engine complies with the applicable emission limitations for CO without using an oxidation catalyst, St. Joseph's may petition the EPA for approval of operating limitations, or no operating limitations, during the initial compliance test for CO, in accordance with the Specific Conditions in the permit. In this case, the facility may not conduct the initial compliance test without prior approval from the EPA.

3. **COMMENT:** The permit specifies that the cogeneration plant (EU003) use of Method 25A to measure VOC during stack testing. Since only non-methane VOC should be included when determining compliance, Method 18 should be used since it can identify only the non-methane portion of VOC emissions collected, whereas Method 25A reports methane and non-methane VOC together.

RESPONSE: Since there is no stack test method specifically required to be used based on state or federal rules for this emission unit, Method 18 has been added to Specific Condition No. A.10 as an alternative method for measuring VOC emissions. However, if St. Joseph's elects to use EPA Method 18 in lieu of EPA Method 25A, only the direct interface or dilution interface (real time sampling) methods should be used, due to the potential for errors associated with sample collection, transport, and analysis as part of the Tedlar bag and absorption tube methods under Method 18. EPC staff recommends EPA Method 25A as the preferred test method due to its simplicity and reliability.

4. **COMMENT:** The conditions for operation of the gas fired chiller engine (EU011) were affected by changes to 40 CFR 63 – Subpart ZZZZ that became applicable after issuance of the DRAFT permit. Most notably, the updated rules require the addition of an oxidation catalyst, the performance of an initial compliance test, the performance of annual performance checks on the catalyst, and the installation of a high temperature shutdown device or the continuous monitoring of the catalyst inlet temperature. Periodic stack testing following the initial test are no longer required.

RESPONSE: Since the chiller engine (EU0 11) is a four-stroke lean-burn (4SLB) engine, the most recent changes to 40 CFR 63 – Subpart ZZZZ do require multiple changes to the language from the

DRAFT/PROPOSED permit. The changes made to the permit are summarized in the Statement of Basis.

If you have any questions, please contact the Project Engineer, Jeff Sims or Stephen Hathaway, by telephone at (813)627-2600 or by email at simsj@epchc.org or hathaways@epchc.org.

Sincerely,

_____ _____

Richard D. Garrity, Ph.D. Date
Executive Director

Enclosures

RDG /JDS/jds

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an
Application for Title V Air Operation Permit by:

St. Joseph's Hospital
3001 W. Martin Luther King, Jr. Blvd.
Tampa, FL 33607

Responsible Official:
Isaac Mallah

Permit No. 0570089-016-AV
Facility ID No. 0570089
St. Joseph's Hospital
Title V Permit Renewal
Hillsborough County, Florida

Facility Location: St. Joseph's Hospital is a group of medical facilities that includes several combustion sources to support the hospitals, and is located in Hillsborough County at 3001 W. Martin Luther King, Jr. Blvd., Tampa, FL 33607.

Project: The purpose of this project is to renew Title V air operation permit No. 0570089-014-AV for the above referenced facility. Details of the project are provided in the application and the enclosed Statement of Basis.

Permitting Authority: Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Environmental Protection Commission of Hillsborough County (EPC) is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical and mailing address is: 3629 Queen Palm Drive, Tampa, Florida 33619. The Permitting Authority's telephone number is 813/627-2600 (Fax: 813/627-2660).

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the DRAFT permits, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the DRAFT permits by visiting the following website: http://www.dep.state.fl.us/air/emission/apds/default.asp and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue a REVISED DRAFT/PROPOSED Title V air operation permit renewal to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a FINAL permit in accordance with the conditions of the REVISED DRAFT/PROPOSED permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the REVISED DRAFT/PROPOSED Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the REVISED DRAFT/PROPOSED permit, the Permitting Authority shall issue a second REVISED DRAFT/PROPOSED permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant 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, F.A.C.

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 EPC determination; (c) A statement of when and how each petitioner received notice of the EPC action or proposed 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 EPC's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the EPC'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 the petitioner wishes the EPC to take with respect to the EPC's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority'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, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application 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.

EPA Review: EPA has agreed to treat the REVISED DRAFT/PROPOSED Title V air operation permit as a PROPOSED Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: oquendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45–day review of this project and the deadline for submitting a citizen petition can be found at the following website address: http://www.epa.gov/region4/air/permits/Florida.htm.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at http://www.epa.gov/region4/air/permits/Florida.htm .

Executed in Tampa, Florida.

Richard D. Garrity, Ph.D.
Executive Director

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Title V Air Operation Permit (including the Public Notice, the Statement of Basis, and the REVISED DRAFT/PROPOSED Permit), or a link to these documents available electronically on a publicly accessible server, was sent by certified mail or electronic mail with received receipt requested before the close of business on _____ to the persons listed below.

Mr. Isaac Mallah, St. Joseph's Hospital: isaac.mallah@baycare.org
Mr. Kenneth E. Given, Air Testing & Consulting, Inc.: ken@airtest.fdn.com
Ms. Ana Oquendo, U.S. EPA Region 4: oquendo.ana@epamail.epa.gov
Ms. Natasha Hazziez, U.S. EPA Region 4: hazziez.natasha@epa.gov
Ms. Barbara Friday, DEP BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____
(Clerk) (Date)