

Predraft Review for Mt. Sinai Hospital 0250245-002-AV
Emailed to Malika on 1/4/01. J.H.

- [D1]Remember to complete page numbers. Currently "Page x of y"
- [D2]This should be Appendix I-1, not 1-1. Are there any unregulated emissions units?
- [D3]This should be TV-3, version dated 4/3/99.
- [D4]Is it major for HAPs? There is typically a statement here whether the facility is major or minor for HAPs.
- [D5]It would be clearer if these units each had their own emission unit number. They can still be combined into one subsection, but compliance and limitation information will be easier to track in ARMS if they are separate.
- [D6]The statement of compliance form was final today (1/3/01). Its due date is within 60 days of the end of the year (not by March 1 as with the AOR) in order to be consistent with the Acid Rain requirement.
- [D7]These units should not be in subsection A. Their limits will not change as the incinerators limits will. These are contained in subsection C. They should be three different emissions units, not one.
- [D8]When this section is used, are these conditions in addition to Section II, above, or are they in place of section II? If they are I place of section II, the conditions in section II need to be repeated here. This numbering format is quite confusing, it would be helpful if you could do this differently or at least add some permitting notes to explain what is required.
- [D9]Are these in addition to Appendix TV-3? Appendix A (or A-1) is typically the appendix of abbreviations and acronyms.
- [D10]Public notice WILL BE required at renewal for all Title V sources.
- [D11]Does this mean that the following ARE deemed necessary by the Department, or are these just suggested possibilities? Be specific if you are ordering some type of control.
- [D12]See comment [D8].
- [D13]Are hours of operation limited? There should be a condition specifying the allowable hours, even if they are allowed to operate 8760 hrs/yr.
- [D14]Was this limit ever established in a construction permit?
- [D15]I'm confused!!! Is this compliance plan to be a part of this permit? A compliance plan can not be optional as is implied by this language. Since our SIP change will be effective January 16, 2001, the final compliance with Subpart Ce must be met by January 16, 2002. This date must be clearly stated in the permit. Please refer to 62-213.440(2)(a) &(b), F.A.C. Not only are significant milestones to be clearly identified, there are also specific reporting requirements that must be made part of the permit. (I have just been told by Russell that this was a note to the permit engineer and not to be part of the model. This compliance plan needs some more work.)
- [D16]This is the problem with a compliance plan. Once incorporated into a permit through the issuance process, if something changes, the only way to change the terms of the compliance plan is through a full permit revision.
- [D17]Was this compliance plan proposed by the applicant? If so, it is a little out of date now. If it was created by the Department, it needs to be sent to the applicant for agreement and submission with the appropriate certifications. A compliance plan is not something that we can impose directly, it is supposed to be something submitted by the applicant at the time of the application to show how they will come into compliance with any requirement that they are not in compliance with at the time of submitting the application.
- [D18]Please check these dates. If the Draft is not issued until Jan. 7, the plan can not be effective 1/16/01.
- [D19]Font is 10 pt. instead of 11pt.
- [D20]Add the following: {Permitting Note: In cases where the applicable requirements from the NSPS and the SIP differ, the most stringent limitation shall apply.}
- [D21]Font is 10 pt. instead of 11pt.
- [D22]B.9. - B.16., the rule citing should be 40 CFR 60.33e(a), yours have left out the "e".
- [D23]Are all of the requirements in condition B.11. more stringent than the requirements of condition E.11.b. from Russell's model (Rule 62-296.401(4)(c)2)? How does 100 ppm equate to 4 lbs/hr for this unit. If there is a mix in these conditions for what is more restrictive, both conditions may need to be in the permit (similar to the VE conditions).
- [D24]40 CFR 60.33e(a), there should not be a () around the e.
- [D25]Font is 10 pt. instead of 11pt.
- [D26]Table OP-1 needs to be referenced as an included attachment at the beginning of the permit, and be attached to the permit.
- [D27]This should be referenced in Section C. Relevant Documents.

[D28]This rule cite needs to be added.

[D29]This condition is probably not needed since this facility has (will have) a wet scrubber. If there is not a federally enforceable condition requiring that the wet scrubber remain, then this condition should stay.

[D30]Font is 10 pt. instead of 11pt.

[D31]This condition also applies to all other emissions units at the facility because of 62-296.320(2). It could reside at the facility-wide section.

[D32]These should be three different E.U. numbers within this one subsection.

[D33]Where is the rest of Subsection C.? Do you want us to take a look at it?

[D34]Overall, the permit looks pretty complete. Please double-check the formatting throughout, there are a lot of extraneous tabs and paragraph breaks. Also missing page breaks.