

Michael Vergamini

From: Michael Vergamini
Sent: Tuesday, July 19, 2022 9:51 AM
To: douglas.davis@mytennova.com; Stacey Bostick
Cc: Julie Verissimo
Subject: RE: 06-0056 Tennova Healthcare - Cleveland
Attachments: 06-0056 Operating Permit (DRAFT) 07.18.2022.docx

Douglas.davis@mytennova.com
Stacey.bostick@mytennova.com

Doug and Stacey, thank you for talking with us yesterday. I have attached a draft copy of your operating permit for review. Note that, per our conference call yesterday, we need the following to complete the draft permit:

- 1) Please provide an additional APC 100 form so as to include the 1500 kW generator on this operating permit.
- 2) The 800 kW generator (06-0056-04) is eligible to be considered an insignificant source. You may request that this source be considered an insignificant source, and we will provide a letter confirming its designation.
- 3) We determined during the conference call that the boilers only use No. 2 fuel oil as a backup fuel in a limited manner, with no more than 48 hours per year of non-emergency use for periodic testing, maintenance, or operator testing. Please provide a statement that your boilers are operated as "gas-fired boilers, as defined in §63.11237. Conformance with the definition means that the boiler(s) at this facility are not subject to 40 CFR 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources."
- 4) Please provide an agreement letter, requesting ~~lower~~ emission limits for the following sources:
 - a. The boilers (06-0056-01) have a combined maximum hourly emission rate of 0.56 pounds of PM per hour, and an allowable PM limit of 8.80 pounds per hour. You can request a PM limit between 0.56 and 8.80 pounds of PM per hour.
 - b. The boilers (06-0056-01) have a combined maximum hourly emission rate of 0.04 pounds of SO_x per hour, and an allowable SO₂ limit of 12.0 pounds of SO₂ per hour. You can request a SO₂ limit between 0.04 and 12.0 pounds of SO_x per hour.
 - c. The 1,500 kW generator (06-0056-03) has a maximum hourly emission rate of 1.41 pounds of PM per hour, and an allowable PM limit of 7.0 pounds per hour. You can request a PM limit between 1.41 and 7.0 pounds of PM per hour.
 - d. The 1,500 kW generator (06-0056-03) has a maximum hourly emission rate of 0.02 pounds of SO₂ per hour, and an allowable SO₂ limit of 7.04 pounds of SO₂ per hour. You can request a SO₂ limit between 0.02 and 7.0 pounds of SO₂ per hour.

The request to designate the 800 kW generator insignificant and the statement regarding operation of the boilers as gas-fired boilers under 40 CFR 63, Subpart JJJJJ can be included in the same letter as the requested PM and SO₂ emission limits.

Please call or email me if you have any questions. Thank you,



Mike Vergamini | EPS2
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