

Sacred Heart Medical Center SRCAA Order #95-21 - Revision #3 Review Memo

Background:

On December 7, 1995, Order 95-21 was issued to Sacred Heart Medical Center (SHMC), located at 801 W 8th Ave, Spokane, WA. The Order was issued as a voluntary emission limit order, per SHMC's request under WAC 173-400-091, to limit their potential to emit and not trigger the air operating permit requirements given in Chapter 173-401 WAC (Title V requirements). Order 95-21 contains limits on annual NOx, SO₂, and CO emissions. The order also contains an equation that limits the facility's total annual fuel usage among all the various fuel burning equipment (i.e., boilers and generators) to levels at which the emissions limits will not be exceeded. By using the equation, SHMC has flexibility over which equipment they wanted to operate, and which fuels they wanted to burn and still meet the annual emission limit. Order 95-21 also contains a requirement to track fuel usage for each emission unit.

Current Revisions to Order #95-21:

Order 95-21 was revised (Revision 1) on September 1, 1999, to correct the equation given in the Order to limit the annual fuel usage among all the various classifications of equipment.

Order 95-21 was revised (Revision 2) on June 10, 2000, to allow for annual fuel usage tracking and record keeping.

SRCAA Review of Revision Request (Revision #3)

SHMC has requested revision of equation 1 in the Order, specifically revision of the equation's coefficients that relate to natural gas usage from terms of MMft³ to therms. Equation 1 limits the facility's total annual fuel usage, and the current coefficients in the equation that relate to natural gas usage are in terms of lbs emissions/MMft³ natural gas burned. However, the natural gas meters at SHMC monitor natural gas usage in terms of therms. Note that one therm = 100,000 BTU and the average HHV of natural gas supplied to the Spokane area is 1,037 BTU/ft³ (annual average). The requested revision will not change the Order's current emissions or fuel usage limits and will help to simplify SHMC's record keeping and fuel usage monitoring. SHMC's requested revision to the fuel usage equation is acceptable.

SRCAA proposes to make the following changes to Order 95-21:

- 1) Revise the equation 1 in the Order to the following (changes to the equation are highlighted in grey):

$$0.0096 * NG_{B1} + 0.0135 * NG_{B2} + 20 * O_B + 604 * O_{G1} + 438 * O_{G2} \leq 174,400$$

where:

NG_{B1} = annual natural gas use in boilers rated at less than 10 million BTU/hour measured in therms

- NG_{B2} = annual natural gas use in boilers rated at 10-100 million BTU/hour measured in therms
- O_B = annual diesel use in boilers measured in 1000's of gallons
- O_{G1} = annual diesel use in generators rated 600 HP or less measured in 1000's of gallons
- O_{G2} = annual diesel use in generators rated at greater than 600 HP measured in 1000's of gallons.

- 2) Revise the order cover page to i) reference SRCAA's current location and address, and ii) the revisions to the RCW (RCW 70.94 was recodified to 70A.15).

Prior to issuing the final revised order, the draft revised order will go through a 30-day public comment period, as required in WAC 173-400-171. The public comment period must consist of a minimum of thirty days and start at least thirty days prior to any hearing. The first day of the public comment period begins on the next calendar day after the permitting authority posts the public notice on their website. The public notice must be posted on the SRCAA agency website for the duration of the public comment period.

Additionally, a copy of the public notice will be sent to the EPA Region 10 Administrator as required in WAC 173-400-091(11). A notice is also required to be published in the State Permit Register, per WAC 173-401-805 for "Authorization for a source to operate without an operating permit by limiting its potential to emit to levels below those that would require the source to obtain an operating permit." SRCAA will submit the required information for publication to the State Permit Register for the draft revised order. At the end of the comment period, all comments received will be considered before a final order is issued.

SHMC has reviewed the attached revised Order 95-21 and has no comments on the proposed revisions. The draft regulatory order is attached for your review. Upon review and of the draft and signing of the review memo, the public notice and EPA notification requirements will be initiated.

PREPARED BY: _____
 Joe Southwell, Environmental Engineer

DATE: May 26, 2023

REVIEWED BY: _____, P.E.
 April Westby, P.E.

DATE: _____

REVIEWED BY: _____
 Scott Windsor, Control Officer

DATE: _____