



# **Air Quality Permitting Response to Public Comments**

**September 26, 2016**

**Permit to Construct No. P-2016.0011**

**ST. LUKE'S NAMPA MEDICAL CENTER  
Nampa, Idaho**

**Facility ID No. 027-00152**

Prepared by:  
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AIR QUALITY DIVISION

**Final**

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## BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct the ST. LUKE'S NAMPA MEDICAL CENTER from August 23, 2016 through September 22, 2016, in accordance with IDAPA 58.01.01.209.01.c. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

## PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: <http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

- Comment 1:** From Idaho Conservation League Conservation Assistant Austin Hopkins, received 09/19/2016: This PTC would permit the installation of three boilers, two cooling towers, four emergency internal combustion engines, and associated diesel fuel storage tanks. With regards to the proposed boilers, on August 23, 2016, the EPA finalized rule changes to the *National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers*, part of 40 CFR 63.1 For this permit these rule changes may affect the operation of the three proposed boilers through the following:
- Changes in definitions of “startup” and “shutdown” to clarify procedures, and;
  - The addition of alternative PM standards for certain new or reconstructed oil-fired boilers with heat input capacity of 10 million British thermal units per hour (MMBtu/hr) or greater that combust low-sulfur oil.
- Response 1:** DEQ has reviewed 40 CFR 63.1 as amended and concludes that the changes do not apply to these boilers. Federal Regulation 40 CFR 63.11195 (e) as specifically lists gas-fired boilers as not subject to the subpart. The boilers in this project are dual-fueled gas-fired boilers with diesel back-up fitting the definition of gas-fired boilers in 40 CFR 63.11237 as follows: “*Gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.*”

## Appendix

### Public Comments Submitted for

### Permit to Construct No. P-2016.0011



208.345.6933 • PO Box 844, Boise, ID 83702 • [www.idahoconservation.org](http://www.idahoconservation.org)

9/19/2016

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Air Quality Division  
DEQ State Office  
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Boise, ID 83706

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Submitted via email: [anne.drier@deq.idaho.gov](mailto:anne.drier@deq.idaho.gov) and [tom.burnham@deq.idaho.gov](mailto:tom.burnham@deq.idaho.gov)

#### **RE: Proposed air quality permit to construct for St. Luke's, Nampa**

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Dear Ms. Drier and Mr. Burnham;

Thank you for the opportunity to comment on DEQ's proposed air quality permit to construct (PTC) for St. Luke's Nampa Medical Center.

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting and preserving Idaho's air quality.

This PTC would permit the installation of three boilers, two cooling towers, four emergency internal combustion engines, and associated diesel fuel storage tanks. With regards to the proposed boilers, on August 23, 2016, the EPA finalized rule changes to the *National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers*, part of 40 CFR 63.<sup>1</sup> For this permit these rule changes may affect the

operation of the three proposed boilers through the following:

- Changes in definitions of “startup” and “shutdown” to clarify procedures, and;
- The addition of alternative PM standards for certain new or reconstructed oil-fired boilers with heat input capacity of 10 million British thermal units per hour (MMBtu/hr) or greater that combust low-sulfur oil

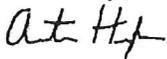
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<sup>1</sup> Information available from: <https://www3.epa.gov/airquality/combustion/actions.html>

Given the close timing between development of this PTC and release of these final rule changes we wanted to ensure that the permittee is aware of these new requirements.

Please do not hesitate to contact me at 208-345-6933 ext. 23 or [ahopkins@idahoconservation.org](mailto:ahopkins@idahoconservation.org) if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,



Austin Hopkins Conservation Assistant