October 3, 2012

Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

RE: REVISED PERMIT MODIFICATION FOR ABBOTT NORTHWESTERN HOSPITAL (PERMIT NUMBER 05300061)

Dear Air Quality Permit Document Coordinator:

Allina Hospitals and Clinics (Allina) currently own Abbott Northwestern Hospital (Hospital) located at 800 28th Street East, Minneapolis, Minnesota. The Hospital owns and operates emission units (Facility) under Minnesota Pollution Control Agency air permit number 05300061-001. The Facility is classified as a synthetic minor source under Part 70. The Facility is currently permitted to operate the following significant emission units:

- Four boilers (EU01-04, GP001) that combust natural gas or number 6 fuel oil
- Six emergency generators (EU05-10, GP002) that combust distillate fuel oil (EU05-09 participate in a peak shaving program)
- Four boilers (EU11-14, GP003) that combust natural gas or distillate fuel oil
- Four emergency generators (EU15-18, GP004) that combust distillate fuel oil (GP004 units do not participate in peak shaving)

Permit Modification Revision

Allina submitted a permit revision dated March 30, 2012. The following information has changed since the March 30, 2012 application as part of the MPCA technical review process:

- Additional applicable sections have been identified in New Source Performance Standard Subpart IIII and 40 CFR Part 89 Sections 112 and 113 that apply to EU27. This information was communicated to the MPCA in an email sent July 31, 2012. The revised highlighted standards are included with this application attached to MPCA Form CD-01 for EU27.
- Information regarding the ethylene oxide sterilization units was provided to the MPCA in an email on August 28, 2012. These emission units are normally considered insignificant at hospitals; however they are included with this application because the Hospital was required to conduct an Air Emissions Risk Analysis (AERA) as part of the permitting process. The two ethylene oxide units are identified as EU29 and EU30. The following forms have been updated as a result:
  - MPCA Form GI-05A is included to describe the control equipment.
  - MPCA Form GI-05B is modified to include the new emission units.
  - MPCA form CH-07 is updated to denote that NESHAP Subpart WWWWW applies to the ethylene oxide sterilization units.
  - NESHAP Subpart WWWWW is included following form CH-07.
  - Emission Calculations are provided in Table B1

- A revised Cumulative Levels and Effects (CLE) report was submitted to the MPCA on September 12, 2012 and contains the additional information requested by the MPCA . The revised CLE report is not included with this revised application because it has already been submitted.
- Additionally, MPCA form SCP-01 is updated to denote that this is a supplemental application and has been recertified by the responsible official.

This permit application supersedes the March 30, 2012 application.

Closing

If you have any technical questions regarding this revised permit application, please contact Ryan Birkenholz with Golder Associates Inc. at (651) 697-9737.

Sincerely,

Allina Health System

Daryl Schroeder
Vice President of Operations, Allina Health System

Attachments: Attachment A – Emission Calculations and MPCA Air Permit Modification Application

7) Submittal Certification

I certify under penalty of law that the enclosed documents and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I also certify, in accordance with Minn. R. 7007.0500, subp. 2 (K)(2) and subp. 2 (K)(3), that I have reviewed the procedures implemented by my facility to maintain compliance and that those procedures are, to the best of my knowledge and belief, reasonable to maintain compliance with all applicable requirements, including those that will become applicable during the term of the permit.

Permittee responsible official:		**Co-Permittee responsible official (if applicable)**	
Mr./Ms.	Mr. Daryl Schroeder	Mr./Ms.	
Title:	Vice President of Operations, Allina Health System	Title:	
Signature:	Daryl Schroeder	Signature:	
Date:	10/4/12	Date:	

8) Package Submittal

Applications, notifications, and/or requests that are submitted without authorized signature(s) (under Submittal Certification for all applications and under Confidentiality Certification if you are seeking confidential treatment of any information in the application); without required forms, and/or without the required application fee, will be returned. Please make your check out to the Minnesota Pollution Control Agency. Send the complete application package and check to:

Fiscal Services
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

You may choose to submit your application as a "pdf" file on a compact disc (CD). If you choose this option, you must still include a paper copy of any form that requires a signature.