New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6201-00005/00007 **7/22/02 12:45:42**

Facility Identification Data
Name: NEW YORK PRESBYTERIAN HOSPITAL
Address: 622 W 168TH ST
City: NEW YORK
Zip: 10032

Owner/Firm
Name: NEW YORK AND PRESBYTERIAN HOSPITAL
City: NEW YORK
State: NY Country: USA Zip: 10032
Owner Classification: Corporation/Partnership

Permit Contacts
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Permit Description
Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

This facility has been in existence since 1960. This facility was formerly known as Columbia Presbyterian Medical Center. The facility is applying for an initial Title V Permit. The facility is using five boilers that provide the hospital's thermal requirements. Each is equipped with dual fuel burners (natural gas & # 6 fuel oil). All of the boilers emit through a common stack. In 1995, boilers 001 & 002 were derated from a heat input of 56 MM BTU/HR to 49 MM BTU/HR each (3 burners per boiler). The

other three boilers, boilers 003, 004 & 005 have a heat input of 150 MMBTU/HR each (1 burner per boiler). New burners on boilers 003, 004 & 005 meet the requirements of the NOx RACT rule for large boilers. Small boilers 001 & 002 comply with the annual tune-up requirement.

Prior to 1995, the hospital boilers were only capable of burning # 6 fuel oil. In January 1995, gas firing capability was added at the expense of CON EDISON and the hospital only burned natural gas during a five year agreement with CON EDISON (1995-1999) with # 6 fuel oil only during gas interruptions. Due to the volatile nature of energy sources, the hospital would like to retain the flexibility to use either oil or natural gas as the primary boiler fuel.

Process 001 is the firing of natural gas in boilers 001, 002, 003, 004 AND 005. Process 002 is the firing of # 6 fuel oil in boilers 001, 002, 003, 004 AND 005. Boilers 001 & 002 must comply with the annual tune-up requirement. Boilers 003, 004 & 005 must meet the NOx RACT for large boilers of 0.30 LB/MMBTU/HR when operating

Attainment Status
NEW YORK PRESBYTERIAN HOSPITAL is located in the town of MANHATTAN in the county of NEW YORK.
The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	MODERATE NON-ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	MODERATE NON-ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description
This facility has been in existence since 1960. This facility was formerly known as Columbia Presbyterian Medical Center. The facility uses five boilers which provide the hospital's thermal requirements. Each boiler is equipped with dual fuel burners (for natural gas & # 6 fuel oil). All of the

boilers emit through a common stack. In 1995, two boilers, boilers 001 & 002 were derated from a heat input of 56 MM BTU/HR TO 49 MM BTU/HR each (3 burners per boiler). The other three boilers, boilers 003, 004 & 005 have a heat input of 150 MMBTU/HR each (1 burner per boiler). The new boilers 001 & 002 comply with the annual tune-up requirement.

Process 001 is the firing of natural gas in boilers 001, 002, 003, 004 AND 005. Process 002 is the firing of # 6 fuel oil in boilers 001, 002, 003, 004 AND 005. Boilers 001 & 002 must comply with the annual tune-up requirement. Boilers 003, 004 & 005 must meet the NOx RACT for large boilers of 0.30 LB/MMBTU/HR when operating on natural gas or fuel oil. All five boilers burn #6 fuel oil or natural gas to generate steam for heating the hospital buildings.

With the issuance of this Title V permit, the facility will be able to use up to 4.5 million gallons of # 6 fuel oil per year and therefore is capping out of 40 CFR 52-A.21, PREVENTION OF SIGNIFICANT DETERIORATION by limiting the emission of sulfur dioxide to below 100 tons per year (95 tons per year - for any twelve consecutive months).

The boiler plant is located in the basement. All five boilers exhaust through a common stack on the roof. New burners on boilers 003, 004 & 005 meet the requirements of the NOx RACT rule for large boilers. Small boilers 001& 002 must comply with the annual tune-up requirement.

Permit Structure and Description of Operations

The Title V permit for NEW YORK PRESBYTERIAN HOSPITAL is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

combustion	-	devices which burn fuel to generate heat, steam or power
incinerator	-	devices which burn waste material for disposal
control	-	emission control devices
process	-	any device or contrivance which may emit air contaminants that is not included in the above categories.

NEW YORK PRESBYTERIAN HOSPITAL is defined by the following emission unit(s):
Emission unit U00001 - The emission unit is composed of five boilers, all capable of firing natural gas or #6 fuel oil. All of the boilers discharge through a common stack.
Emission unit U00001 is associated with the following emission points (EP):
00001
It is further defined by the following process(es):
Process: 001 is located at BASEMENT, Building HOSPITAL - Process 001 is the firing of natural gas in boilers 001, 002, 003, 004 AND 005. The boilers burn natural gas to generate steam for heating the hospital buildings. The facility converted the five (5) boilers from oil to oil & gas. These modifications/conversions were done by CON EDISON in January of 1995. Withe the issuance of this Title V permit, the facility is required to use less than or equal to 4.5 million gallons of # 6 fuel oil per year and hence is capping out of 40 CFR 52-A.21, PREVENTION OF SIGNIFICANT DETERIORATION, by limiting the emission of sulfur dioxide to below 100 tons per year (95 TPY - for any twelve consecutive months).
Process: 002 is located at BASEMANT, Building HOSPITAL - Process 002 is the firing of # 6 fuel oil in boilers 001, 002, 003, 004 AND 005. The five boilers burn # 6 oil to generate steam for heating the hospital buildings. The NOx RACT limit for large gas/oil boilers is 0.30 LB/MMBTU. The facility converted the five (5) boilers from oil to oil & gas. These modifications were made by CON EDISON in January of 1995. With the issuance of this Title V permit, the facility is required to use less than or equal to 4.5 million gallons of # 6 fuel oil per year, and hence is capping out of 40 CFR 52-A.21, PREVENTION OF SIGNIFICANT DETERIORATION, by limiting the emission of sulfur dioxide to less than 100 tons per year (95 TPY - for any twelve consecutive months).

Title V/Major Source Status
NEW YORK PRESBYTERIAN HOSPITAL is subject to Title V requirements. This determination is based on the following information:
The New York Presbyterian Hospital - Prebyterian Campus is a major facility because the potential emissions of carbon monoxide, nitrogen oxides and volatile organic compounds are greater than the major source thresholds (100 tons/year for carbon monoxide, and 25 tons per year for both nitrogen oxides and volatile organic compounds).

Program Applicability
The following chart summarizes the applicability of NEW YORK PRESBYTERIAN HOSPITAL with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	YES
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO

NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's(hydrofluorocarbons)or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or

appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
8062	GENERAL MEDICAL & SURGICAL HOSPITALS

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-004-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL Grade 6 Oil

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		>= 50 tpy but < 100 tpy
0NY100-00-0	HAP		> 0 but < 2.5 tpy
007439-92-1	LEAD(HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy
0NY075-00-0	PARTICULATES		>= 100 tpy but < 250 tpy
0NY075-00-5	PM-10		>= 50 tpy but < 100 tpy
007446-09-5	SULFUR DIOXIDE	1528620	
0NY998-00-0	VOC		>= 10 tpy but < 25 tpy

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	40CFR 52-A.21	Prevention of Significant Deterioration	42, 43, 41, 47, 48
U-00001/00001/002	40CFR 52-A.21	Prevention of Significant Deterioration	63, 64
FACILITY	40CFR 82-F.	Protection of Stratospheric Ozone - recycling and emissions reduction	44
FACILITY	6NYCRR 200.5	Sealing.	1
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	2

FACILITY	6NYCRR 200.7	Maintenance of equipment.	3
FACILITY	6NYCRR 201-1.10(b)	Permitting - public access to records kept for Title V permitting	8
FACILITY	6NYCRR 201-1.2	Permitting - unpermitted emission sources	4
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	76
FACILITY	6NYCRR 201-1.5	Emergency defense	5
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	6
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	7
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	9
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	10
FACILITY	6NYCRR 201-5.	State Facility Permit General Provisions	77
FACILITY	6NYCRR 201-5.3(b)	Permit Content and Terms of Issuance - permit conditions	78
FACILITY	6NYCRR 201-6.	Title V Permits and the Associated Permit Conditions	12, 17, 19, 23, 45, 11, 14, 15, 18, 20, 21, 22, 46, 13, 16
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	24
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	25
FACILITY	6NYCRR 201-6.5(g)	Permit shield	26, 27
FACILITY	6NYCRR 202-1.1	Required emissions tests.	28
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	29
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	30
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	79
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	31
FACILITY	6NYCRR 215.	Open Fires	32
FACILITY	6NYCRR 225-1.2(a)(1)	Sulfur in Fuel Limitations Pre January 1, 1988 (SIP standards).	33
FACILITY	6NYCRR 225-1.2(a)(2)	Sulfur in Fuel Limitations Post 12/31/87.	35, 34
FACILITY	6NYCRR 225-1.2(d)	Sulfur-in-fuel limitations - Table 2	36
U-00001/00001	6NYCRR 227-1.2(a)(1)	Particulate Emissions from Liquid Fuels.	49
U-00001/00001/002	6NYCRR 227-1.3	Smoke Emission Limitations.	62
FACILITY	6NYCRR 227-1.3(a)	Smoke Emission Limitations.	37
U-00001/00001	6NYCRR 227-1.3(a)	Smoke Emission Limitations.	50
U-00001/00001/001/00003	6NYCRR 227-2.4(b)	Control Requirements for large boilers.	53
U-00001/00001/001/00004	6NYCRR 227-2.4(b)	Control Requirements for	56

		large boilers.	
U-00001/00001/001/00005	6NYCRR 227-2.4(b)	Control Requirements for large boilers.	59
U-00001/00001/002/00003	6NYCRR 227-2.4(b)	Control Requirements for large boilers.	67
U-00001/00001/002/00004	6NYCRR 227-2.4(b)	Control Requirements for large boilers.	70
U-00001/00001/002/00005	6NYCRR 227-2.4(b)	Control Requirements for large boilers.	73
U-00001/00001/001/00001	6NYCRR 227-2.4(d)	RACT for Oxides of Nitrogen - small boilers.	51
U-00001/00001/001/00002	6NYCRR 227-2.4(d)	RACT for Oxides of Nitrogen - small boilers.	52
U-00001/00001/002/00001	6NYCRR 227-2.4(d)	RACT for Oxides of Nitrogen - small boilers.	65
U-00001/00001/002/00002	6NYCRR 227-2.4(d)	RACT for Oxides of Nitrogen - small boilers.	66
FACILITY	6NYCRR 227-2.5(a)	Fuel Switching	38
U-00001/00001/001/00003	6NYCRR 227-2.6(a)(3)	Testing, monitoring, reporting requirements for large boilers.	54
U-00001/00001/001/00004	6NYCRR 227-2.6(a)(3)	Testing, monitoring, reporting requirements for large boilers.	57
U-00001/00001/001/00005	6NYCRR 227-2.6(a)(3)	Testing, monitoring, reporting requirements for large boilers.	60
U-00001/00001/002/00003	6NYCRR 227-2.6(a)(3)	Testing, monitoring, reporting requirements for large boilers.	68
U-00001/00001/002/00004	6NYCRR 227-2.6(a)(3)	Testing, monitoring, reporting requirements for large boilers.	71
U-00001/00001/002/00005	6NYCRR 227-2.6(a)(3)	Testing, monitoring, reporting requirements for large boilers.	74
U-00001/00001/001/00003	6NYCRR 227-2.6(c)	Stack Test Requirements.	55
U-00001/00001/001/00004	6NYCRR 227-2.6(c)	Stack Test Requirements.	58
U-00001/00001/001/00005	6NYCRR 227-2.6(c)	Stack Test Requirements.	61
U-00001/00001/002/00003	6NYCRR 227-2.6(c)	Stack Test Requirements.	69
U-00001/00001/002/00004	6NYCRR 227-2.6(c)	Stack Test Requirements.	72
U-00001/00001/002/00005	6NYCRR 227-2.6(c)	Stack Test Requirements.	75
FACILITY	6NYCRR 227-2.6(c)(2)	CEMS requirements	40, 39

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

6NYCRR Part 200-.5
Allows for the sealing of non-compliant air contamination sources

6NYCRR Part 200-.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.2
Any existing emission source that is required to be permitted or registered but has not done so, must apply for the necessary permit or registration. The source is subject to all regulations that were applicable at the time the original permit or registration was required as well as any subsequent applicable requirements that came into effect since.

6NYCRR Part 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.5
An enforcement action may be avoided if the facility can demonstrate that an emergency situation occurred which resulted in an emission limitation or permit violation. The following information would constitute evidence of an emergency situation: a properly signed operating log recorded during the actual event which; identifies the cause(s) of the emergency, indicates that all equipment was operating properly at the time, the person responsible took all reasonable steps to minimize the exceedance or violation, and that the department was notified of the emergency within 2 working days of the event.

6NYCRR Part 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-1.10(b)
Any permit application, compliance plan, permit, and monitoring and compliance certification report that is submitted as part of the Title V permit process must be made available to the public as per requirements set forth under 6 NYCRR Part 616 - Public Access to Records and section 114(c) of the Clean Air Act Amendments of 1990.

6NYCRR Part 201-3.2(a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart.

All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-3.3(a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-5
This regulation applies to those permit terms and conditions which are not federally enforceable. It specifies the applicability criteria for state facility permits, the information to be included in all state facility permit applications as well as the permit content, terms of permit issuance, and sets guidelines for modifying state facility permits and allowing for operational flexibility. For permitting purposes, this rule specifies the need to list all emission units except those that are exempt or trivial pursuant to Subpart 201-3 in the permit application and provide a description of the emission unit's processes and products. Finally, this rule also provides the Department the authority to include this and any other information that it deems necessary to identify applicable Federal standards, recordkeeping and reporting requirements, and establish terms and conditions that will ensure compliance with the national ambient air quality standards.

6NYCRR Part 201-5.3(b)
Lists those contaminants subject to contaminant specific requirements

6NYCRR Part 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR Part 201-6.5(e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR Part 201-6.5(g)
Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2
This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3
This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215
Prohibits open fires at industrial and commercial sites.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances

except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, NEW YORK PRESBYTERIAN HOSPITAL has been determined to be subject to the following regulations:

40CFR 52-A.21
This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions; ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i) .

i0

6NYCRR 201-6.5 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 225-1.2 (a) (1)
This regulation provides the specific limits for the amount of sulfur in the fuel being burned at the facility.

6NYCRR 225-1.2 (a) (2)
This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.2 (d)
The sulfur-in-fuel limitations for residual and distillate oil and for solid fuel are listed in Tables 1,2 and 3 or 6 NYCRR Part 225-1.2(c), (d) and (e)

6NYCRR 227-1.2 (a) (1)
This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units of greater than 250 mmBtu/hr heat input capacity which fire coal, oil, or coal derived fuels.

6NYCRR 227-1.3
This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6NYCRR 227-1.3 (a)
This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-2.4 (b)
This paragraph provides a table for gas only, gas and/or oil firing capable, pulverized coal, and overfeed stoker emission limits. Compliance is determined by a stack test.

6NYCRR 227-2.4 (d)
This rule specifies that the reasonably available control technology (RACT) requirement for small boilers (< or = 50 million BTUs/hr) at Title V facilities consists of an annual tune-up.

6NYCRR 227-2.5 (a)
This regulation allows compliance to be based upon fuel switching. Fuel switching is a conversion to natural gas during the ozone season from May 1 through September 15. Fuel switching is likely to result in decreased NOx emissions.

6NYCRR 227-2.6 (a) (3)
Stack testing is required to demonstrate compliance with the NOx RACT limit of 0.30 lbs/MMBTU. This is required for all boilers between 100 and 250 MMBTU/hour. These requirements apply to boilers 003, 004 and 005.

6NYCRR 227-2.6 (c)
Stack testing is required to demonstrate compliance with the NOx RACT limit of 0.20 lbs/MMBTU. This is required for all boilers which burn natural gas at a rate between 100 and 250 MMBTU/hr. These requirements apply to boilers 003, 004 and 005.

6NYCRR 227-2.6 (c) (2)
This regulation requires the facility to submit a compliance test protocol to the Department at least 90 days prior to emission testing.

Compliance Certification
Summary of monitoring activities at NEW YORK PRESBYTERIAN HOSPITAL:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	work practice involving specific operations	42
FACILITY	work practice involving specific operations	43
U-00001/00001/002	work practice involving specific operations	63
U-00001/00001/002	work practice involving specific operations	64
FACILITY	record keeping/maintenance procedures	24
FACILITY	record keeping/maintenance procedures	25
FACILITY	record keeping/maintenance procedures	29
FACILITY	work practice involving specific	33

	operations	
FACILITY	work practice involving specific operations	34
FACILITY	work practice involving specific operations	35
FACILITY	work practice involving specific operations	36
U-00001/00001	intermittent emission testing	49
U-00001/00001/002	record keeping/maintenance procedures	62
FACILITY	monitoring of process or control device parameters as surrogate	37
U-00001/00001	monitoring of process or control device parameters as surrogate	50
U-00001/00001/001/00003	monitoring of process or control device parameters as surrogate	53
U-00001/00001/001/00004	monitoring of process or control device parameters as surrogate	56
U-00001/00001/001/00005	monitoring of process or control device parameters as surrogate	59
U-00001/00001/002/00003	monitoring of process or control device parameters as surrogate	67
U-00001/00001/002/00004	monitoring of process or control device parameters as surrogate	70
U-00001/00001/002/00005	monitoring of process or control device parameters as surrogate	73
U-00001/00001/001/00001	record keeping/maintenance procedures	51
U-00001/00001/001/00002	record keeping/maintenance procedures	52
U-00001/00001/002/00001	record keeping/maintenance procedures	65
U-00001/00001/002/00002	record keeping/maintenance procedures	66
FACILITY	record keeping/maintenance procedures	38
U-00001/00001/001/00003	intermittent emission testing	54
U-00001/00001/001/00004	intermittent emission testing	57
U-00001/00001/001/00005	intermittent emission testing	60
U-00001/00001/002/00003	intermittent emission testing	68
U-00001/00001/002/00004	intermittent emission testing	71
U-00001/00001/002/00005	intermittent emission testing	74
U-00001/00001/001/00003	intermittent emission testing	55
U-00001/00001/001/00004	intermittent emission testing	58
U-00001/00001/001/00005	intermittent emission testing	61
U-00001/00001/002/00003	intermittent emission testing	69
U-00001/00001/002/00004	intermittent emission testing	72
U-00001/00001/002/00005	intermittent emission testing	75
FACILITY	record keeping/maintenance procedures	39
FACILITY	record keeping/maintenance procedures	40

Basis for Monitoring

Conditions #24, 25 & 29 - 6NYCRR 201-6.5 requires all facilities to submit semi-annual compliance reports. 6NYCRR 201-2.1 requires submission of annual compliance reports. These reports must note all deviations from permit requirements.

Conditions #33, 34, 35 and 36 - 6NYCRR 225-1.2 restricts the amount of sulfur allowed in fuel oils to 0.30 percent by weight. These values are to be measured by the fuel supplier, and must be maintained at the facility.

Conditions #49, 50 & 37 - 6NYCRR 227-1.2(a)(1) requires particulate emissions to be less than or equal to 0.10 lbs/MMBTU. 6NYCRR 227-1.3(a) requires the use of a continuous opacity monitor with a maximum opactiy of 20percent which may be exceeded for up to 6 minutes per hour up to a maximum of 27 percent.

Condition #62 - 6NYCRR 227-1.3 requires a daily inspection for visible emissions. If visible emissions are noted for two consecutive days, a Method 9 test must be performed.

Conditions #53, 56, 59, 67, 70, & 73 - 6NYCRR 227-2.4(b) requires that large boilers (between 100 and 225MMBTU/hr) must comply with the NOx RACT limit of 0.30 lbs/MMBTU for fuel oil. These conditions apply to boilers 003, 004 and 005.

Conditions #51, 52, 65 & 66 - 6NYCRR 227-2.4(d) requires that small boilers (less than 50 MMBTU/hr) must be tuned up annually. These conditions apply to boilers 001 and 002.

Condition #38 - 6NYCRR 227-2.5(a) allows the facility to use fuel switching as a method to reduce NOx emissions during the ozone season from May 1 through September 15. The facility must maintain fuel usage records.

Conditions #54, 55, 57, 58, 60, 61, 68, 69, 71, 72, 74 & 75 - 6NYCRR 227-2.6(a)(3) and 6NYCRR 227-2.6(c) require that one stack test must be performed during the term of the permit in order to demonstrate that the facility is able to comply with the NOx RACT emission limit of 0.30 lbs/MMBTU for fuel oil and 0.20 lbs/MMBTU for natural gas. These requirements apply to boilers 003, 004 and 005.

Condition #39 - 6NYCRR 227-2.6(c)(2) requires that a compliance test protocol must be submitted to the Department at least 90 days before the stack testing.

Condition2 #42, 43, 63 & 64 - 40CFR 52.21, Subpart A requires a limit on sulfur dioxide emissions. In order to limit these emissions, these conditions limit the amount of #6 fuel oil which may be used in any consecutive twelve month period to 4.5 million gallons.