

## New York State Department of Environmental Conservation Permit Review Report Permit ID: 2-6204-00064/00005

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## **Facility Identification Data**

Name: NY - PRESBYTERIAN HOSPITAL-525 E 68TH ST Address: 525 EAST 68TH STREET City: NEW YORK Zip: 10021

#### **Owner/Firm**

Name: SOCIETY OF NEW YORK HOSPITAL City: NEW YORK State: NY Country: USA Zip: 10021 Owner Classification: Corporation/Partnership

#### **Permit Contacts**

Division of Environmental Permits: Name: ELIZABETH A. CLARKE Address: ONE HUNTERS POINT PLAZA 47-40 21ST ST

Division of Air Resources: Name: KAMAL K. MALHOTRA Address: NYSDEC 47-40 21 STREET Phone:7184824944

Air Permitting Contact: Name: PAUL SCHWABACHER Address: NY PRESBYTERIAN HOSPITAL 525 EAST 68TH STREET Phone:2127461954

## 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)(2) 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 while the permit review report is based on information found in the accompanying permit, it is not an enforceable document and therefore, has no legal standing.

#### **Summary Description of Proposed Project**

THE NEW YORK PRESBYTERIAN HOSPITAL IS LOCATED IN MANHATTAN (NEW YORK CITY) AT 525 EAST 68TH STREET, NEW YORK 10021. THE NEW YORK PRESBYTERIAN HOSPITAL OPERATES EMISSION SOURCES CONSISTING OF BOILERS, EMERGENCY



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GENERATORS, AND ETHYLENE OXIDE STERILIZERS AND IS SEEKING FOR AN AIR PERMIT UNDER THE TITLE V OPERATING PERMIT PROGRAM.

## **Attainment Status**

NY - PRESBYTERIAN HOSPITAL-525 E 68TH ST 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** 

ATTAINMENT
MODERATE NON-ATTAINMENT
ATTAINMENT
SEVERE NON-ATTAINMENT
ATTAINMENT
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**

THE NEW YORK PRESBYTERIAN HOSPITAL CONSISTS OF THREE BOILERS WITH A COMMON STACK. THE PRIMARY FUEL IS NATURAL GAS WITH DISTILLATE FUEL OIL # 2 AS SECONDARY BACK UP. IN ADDITION, THE FACILITY CONSISTS OF TWO ETHYLENE OXIDE STERILIZERS AND EIGHT EMERGENCY POWER GENERATING UNITS.

#### **Permit Structure and Description of Operations**

The Title V permit for NY - PRESBYTERIAN HOSPITAL-525 E 68TH ST 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



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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 iOoutdoor 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.

NY - PRESBYTERIAN HOSPITAL-525 E 68TH ST is defined by the following emission unit(s): Emission unit U00002 - THIS UNIT CONSISTS OF TWO (2) ETHYLENE OXIDE STERILIZATION UNITS EQUIPPED WITH AERATORS. THESE UNITS ARE OPERATED WITH PENNOXIDE OXYFUME.

Emission unit U00002 is associated with the following emission points (EP): E0002

It is further defined by the following process(es):

Process: 003 is located at 00, Building N - THIS EMISSION UNIT CONSISTS OF ETHYLENE OXIDE STERILIZATION SYSTEM. TWO (2) UNITS OPERATE WITHOUT AN ABATOR. THE LENGTH OF THE CYCLE TIME IS 3 AND 1/2 HOURS.

Emission unit U00001 - THIS UNIT CONSISTS OF THREE (3) BOILERS WITH A TOTAL POTENTIAL HEAT INPUT OF 378 MMBTU/HR. THEY HAVE DUAL FUEL CAPACITIES, WITH NATURAL GAS AS PRIMARY FUEL AND NO. 2 FUEL OIL AS SECONDARY FUEL. Emission unit U00001 is associated with the following emission points (EP): E0001

It is further defined by the following process(es):

Process: 001 is located at FIRST FLOOR, Building ANNEX - THIS EMISSION UNIT CONSISTS OF THREE (3) BOILERS THAT OPERATE ON NATURAL GAS. THE FLUE GAS FROM THE BOILERS EXITS THROUGH A COMMON STACK - EMISSION POINT E0001.

Process: 002 is located at FIRST FLOOR, Building ANNEX - THIS EMISSION UNIT CONSISTS OF THREE (3) BOILERS THAT OPERATE ON NO. 2 FUEL OIL. THE FLUE GAS EXITS THROUGH A COMMON STACK - EMISSION POINT E0001.

## Title V/Major Source Status

NY - PRESBYTERIAN HOSPITAL-525 E 68TH ST is subject to Title V requirements. This determination is based on the following information:

The New York Presbyterian Hospital is a major facility because the potential emissions of nitrogen



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oxides and sulfur dioxide are greater than the major source thresholds (25 tons/year for nitrogen oxides, and 100 tons/year for sulfur dioxide). The facility-wide annual actual emissions for nitrogen oxides exceed 25 tons/year.

## **Program Applicability**

The following chart summarizes the applicability of NY - PRESBYTERIAN HOSPITAL-525 E 68TH ST with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
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



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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.



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SIC Code

Description 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
1-03-005-01	EXTERNAL COMBUSTION BOILERS -
	COMMERCIAL/INDUSTRIAL
	COMMERCIAL/INSTITUTIONAL BOILER - DISTILLATE OIL
	Grades 1 and 2 Oil
1-03-006-01	EXTERNAL COMBUSTION BOILERS -
	COMMERCIAL/INDUSTRIAL
	COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS
	Over 100 MMBtu/Hr
3-99-999-94	MISCELLANEOUS MANUFACTURING INDUSTRIES
	MISCELLANEOUS INDUSTRIAL PROCESSES
	Other Not Classified

#### **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

РТЕ

lbs/yr

Range



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007440-38-2	ARSENIC(HAP)	14.2
007440-41-7	BERYLLIUM(HAP)	8.4
007440-43-9	CADMIUM(HAP)	37
000630-08-0	CARBON MONOXIDE	>= 50 tpy but < 100 tpy
007440-47-3	CHROMIUM(HAP)	228
000075-21-8	ETHYLENE OXIDE(HAP)	> 0 but < 10 tpy
0NY100-00-0	HAP	> 0 but < 2.5 tpy
007439-92-1	LEAD(HAP)	> 0 but < 10 tpy
007439-96-5	MANGANESE (HAP)	48
007439-97-6	MERCURY (HAP)	10
007440-02-0	NICKEL METAL AND INSOLUBLE	61
	COMPOUNDS (HAP)	
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy
0NY075-00-0	PARTICULATES	>= 10 tpy but < 25 tpy
0NY075-00-5	PM-10	>= 10 tpy but < 25 tpy
007446-09-5	SULFUR DIOXIDE	>= 100 tpy but < 250 tpy
0NY998-00-0	VOC	>= 2.5 tpy but < 10 tpy

## **Regulatory Analysis**

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	40CFR 82-F.	Protection of Stratospheric Ozone - recycling and emissions reduction	35
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	9
FACILITY	6NYCRR 201-1.2	Permitting - unpermitted emission sources	4
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	e 5
FACILITY	6NYCRR 201-1.5	Emergency defense	6
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	7
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	8
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proo	£ 10
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	11
FACILITY	6NYCRR 201-5.	State Facility Permit General Provisions	45
FACILITY	6NYCRR 201-5.3(b)	Permit Content and Terms of Issuance - permit conditions	46
FACILITY	6NYCRR 201-6.	Title V Permits and the Associated Permit Conditions	12, 13, 15, 16, 18, 19, 20, 21, 22, 24, 36, 37, 14, 17, 23
FACILITY	6NYCRR 201-6.5(c)(3)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	25



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FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	26
FACILITY	6NYCRR 201-6.5(q)	Permit shield	27
FACILITY	6NYCRR 202-1.1	Required emissions tests.	28
FACILITY	6NYCRR 202-2.1	Emission Statements -	29
111011111		Applicability	2,2
FACILITY	6NYCRR 202-2.5	Emission Statements -	30
PACIBITI	UNICIA ZUZ-Z.J	record keeping	50
	0110	requirements.	4.7
FACILITY	6NYCRR 211.2	General Prohibitions -	47
		air pollution	
ard		prohibited.	
	()	-	2.1
FACILITY	6NYCRR 211.3	General Prohibitions -	31
		visible emissions	
		limited	
U-00002	6NYCRR 212.3(a)	General Process Emission	43, 44
		Sources - emissions from	
		existing emission	
		sources	
FACILITY	6NYCRR 215.	Open Fires	32
FACILITY	6NYCRR 225.1(a)(3)	Sulfur in Fuel	34
		Limitations - SIP	
FACILITY	6NYCRR 225-1.8	Reports, sampling and	33
111012111	0110101 220 210	analysis.	55
U-00001	6NYCRR 227-1.2(a)(1)		38
0 00001	UNICIAL 22/ 1.2(0)(1)	from Liquid Fuels.	50
U-00001	6NYCRR 227-1.2(b)	Particulate Emissions	40
0-00001	UNICRR 227-1.2(D)	from 2 or More Connected	40
		Furnaces.	2.0
U-00001	6NYCRR 227-1.3	Smoke Emission	39
		Limitations.	
U-00001/E0001/001	6NYCRR 227-2.4(b)(1)		41
		large boilers which are	
		not case by case.	
U-00001/E0001/002	6NYCRR 227-2.4(b)(1)	Control Requirements for	42
		large boilers which are	
		not case by case.	
		=	

#### **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



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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 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 contaminants to the 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.



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#### 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

General Provisions - this requirement applies to those permit terms and conditions which are not federally enforceable; specifies that permittees must maintain emission units and control devices in compliance with all rules; authorizes reasonable access for inspections for department representatives; requires that on-site monitoring recordkeeping be made available for review for at least 5 years.

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the state-only portion of the permit, unless they are specifically addressed by it.

#### 6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

#### 6NYCRR Part 201-6

General provisions for Title V permits including:

Applicable Criteria, Limits, Terms, Conditions and Standards - requires that facility operations take place in accordance with approved criteria, emission limits, terms, conditions and standards as specified in the permit and that any documents required by the federally enforceable portion of the permit be certified by a responsible official

Cessation or Reduction of Permitted Activity Not a Defense - specifies that the cessation or reduction of a permitted activity to maintain compliance is not a defense in an enforcement action

Compliance Requirements - lists the information that must be included in any required compliance monitoring records and reports; and requires; compliance with any approved compliance schedule; the submittal of risk management plans as per 112(r) of the Act if necessary; and the submittal of compliance progress reports on a semiannual basis, at a minimum

Federally-Enforceable Requirements - specifies what permit terms and conditions, in general, are federally enforceable

Fees - requires the permittee to pay any required fees



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Monitoring, Related Recordkeeping and Reporting Requirements - requires all compliance monitoring and recordkeeping to be conducted according to the terms and conditions of the permit and any Q/A requirements; any monitoring or support information is to be retained for minimum of 5 years.

Permit Revocation, Modification, Reopening, Reissuance or Termination and Associated Information Submission Requirements - specifies that the permit may be modified, revoked, reopened and reissued, or terminated for cause; and the permittee must furnish information regarding the permit to the department upon reasonable request

Permit Shield - sets forth criteria under which the permit shield applies and what authority the department maintains in pursuing violations Property Rights - specifies that the permit does not convey any property rights

Reopening Cause - sets forth criteria and procedures for reopening a permit Right to Inspect - establishes authority whereby department representatives may enter and inspect a facility

Severability - establishes that the permit continues to be valid in instances where any provisions, parts or conditions of the permit are found to be invalid or are the subject of a challenge

#### 6NYCRR Part 201-6.5(c)(3)

Requires that any reports of any required monitoring must be submitted at a minimum frequency of every 6 months.

## 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

Specifies that emissions tests may be required to ascertain compliance with any air pollution codes and rules.

## 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



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Specifies the emission statement records that must be maintained for a 5 year period.

<u>6NYCRR Part 211-.2</u> General air pollution prohibition

#### 6 NYCRR Part 211.3

Restricts the opacity of visible emissions from any air contamination source.

<u>6 NYCRR Part 215</u> Prohibits open fires at industrial and commercial sites.

## 40 CFR Part 82, Subpart F

Requires affected permittees to comply with the recycling and emissions reduction standards specified by this rule when using ozone depleting substances identified under Title VI of the Act. Specifically, these regulations apply to the following persons or activities:

- a. Persons opening appliances for maintenance, service, repair, or disposal
- b. Equipment used during the maintenance, service, repair, or disposal of appliances
- c. Persons performing maintenance, service, repair, or disposal of appliances

d. Persons disposing of small appliances, motor vehicle air conditioners or MVAC's, and MVAC-like appliances

e. Persons owning commercial or industrial process refrigeration equipment

f. Owners/operators of appliances normally containing 50 or more pounds.

If applicable, the above persons or activities may be required to comply with certain disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

## **Facility Specific Requirements**

In addition to Title V, NY - PRESBYTERIAN HOSPITAL-525 E 68TH ST has been determined to be subject to the following regulations:

## <u>6NYCRR 212 .3 (a)</u>

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for existing (on or before July 1, 1973) process emission sources.

## 6NYCRR 225 .1 (a) (3)

This condition limits the amount of sulfur that can be in fuel burned at the facility. The limit for the amount of sulfur in distillate fuel oil # 2 is 0.20 percent by weight.

#### 6NYCRR 225-1.8



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This regulation requires an owner or operator of a facility which purchases and fires coal and/or oil to s ubmit reports to the commissioner containing fuel analysis data, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1.

#### <u>6NYCRR 227-1.2 (a) (1)</u>

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 227-1.2 (b)

This facility has three boilers with the flue through a common stack. This condition requires that the total heat input of all the boilers connected to a common stack shall be the heat input for the purpose of computing the permissible emission rate.

#### 6NYCRR 227-1.3

This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

#### 6NYCRR 227-2.4 (b) (1)

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.

#### **Compliance Certification**

Summary of monitoring activities at NY - PRESBYTERIAN HOSPITAL-525 E 68TH ST:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	record keeping/maintenance procedures	25
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	29
U-00002	record keeping/maintenance procedures	43
U-00002	record keeping/maintenance procedures	44
FACILITY	work practice involving specific operations	34
FACILITY	record keeping/maintenance procedures	33
U-00001	intermittent emission testing	38
U-00001	continuous emission monitoring (cem)	39
U-00001/E0001/001	intermittent emission testing	41
U-00001/E0001/002	intermittent emission testing	42

#### **Basis for Monitoring**

Condition # 25 (6 NYCRR 201-6.5(c)(3)): This facility-wide monitoring condition has been added to all Title V permits issued in New York State to clarify that all required monitoring reports are to be submitted at least every 6 months on a calendar year basis in order to comply with Title V requirements regardless of the reporting requirement that may be listed for an individual permit monitoring condition. Any monitoring conditions that may have more frequent reporting requirements will remain in effect as displayed in the condition.



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Condition # 26 (6 NYCRR 201-6.5(e)): This facility-wide monitoring condition has been added in order to comply with the Title V annual compliance certification requirements and specify the mailing addresses for submitting the compliance reports.

Condition # 29 (6 NYCRR 202-2.1): This facility-wide monitoring condition is a requirement for all Title V facilities. These facilities must submit an annual emission statement by April 15th of each year.

Condition # 43 and # 44 (6 NYCRR 212.3(a)): These monitoring conditions have been added at the Emission Unit level to ensure monitoring, record keeping and reporting requirements for the emission of ethylene oxide from the two sterilizers.

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Condition # 34 (6 NYCRR 225-1(a)(3)) and # 33 (6 NYCRR 225-1.8): These facility level monitoring conditions limit the sulfur content of fuel oil used at the facility and specify sampling and record keeping requirements. The sulfur content must be determined by the seller. The facility must maintain a log of the sulfur content of oil on a per delivery basis for at least three years.

Conditions # 38 (6 NYCRR 227-1.2(a)(1)): This is a Emission Unit level condition to perform stack test once per permit term for each fuel feed to ensure compliance with particulate emissions. In addition, this permit requires the facility to conduct daily monitoring and maintain records of fuel flow. For the next stack test, the facility will identify at least two operating parameters that will be be monitored daily to demonstrate the ongoing compliance with the particulate emissions. During the test, acceptable ranges for these parameters will be established. These parameters and ranges will be added to the permit.

Conditions # 39 (6 NYCRR 227-1.3): This is an Emission Unit level condition for monitoring of opacity limits using Continuous Emission Monitoring (CEM) system.

Conditions # 41 and # 42 (both under 6 NYCRR 227-2.4(b)(1)) are the Emission Unit level conditions for NOx RACT limits for the category of large boilers. Compliance will be based on stack test once per permit term for each fuel feed to ensure compliance with particulate emissions. In addition, this permit requires the facility to conduct daily monitoring and maintain records of fuel flow. For the next stack test, the facility will identify at least two operating parameters that will be be monitored daily to demonstrate the ongoing compliance with the NOx emissions. During the test, acceptable ranges for these parameters will be established. These parameters and ranges will be added to the permit.