

**Division of Air Resources
Permit Review Report**

Permit ID: 2-6204-00064/00005
Renewal Number: 3
10/21/2019

Facility Identification Data

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

Owner/Firm

Name: SOCIETY OF NEW YORK HOSPITAL
Address: 525 E 68TH ST
NEW YORK, NY 10065-4873, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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Division of Air Resources:
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Air Permitting Contact:
Name: Patrick Ford
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525 E 68TH ST
NEW YORK, NY 10065
Phone:2127464223

**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 a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

This application is submitted to the department to seek permit renewal #3.

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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
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)	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:

New York Presbyterian hospital (NYPH) downtown campus (also known as Presbyterian Weill Cornell Campus) currently has a Title V permit to operate a few stationary combustion sources that include four large size boilers, a cogeneration(cogen) plant, and two ethylene oxide sterilizers both connected to a common abator. The hospital also operates nine (9) diesel firing emergency generators, eleven (11) fuel oil storage tanks and a few fume hoods.

The three of the four boilers are each rated at 145 MMBtu/hr and the fourth boiler is rated at 137.5 MMBtu/hr. All four boilers are capable of firing natural gas and No. 2 fuel oil. Emissions vent via a common stack. The cogeneration plant consists of one turbine and a duct burner. Cogen operates on natural gas only and the exhaust breeching system is connected to the common boilers' stack for final venting to atmosphere.

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 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

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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 U00001 - This emission unit consists of three (3) 145 mmbtu/hr boilers (Boiler # 1, 2 & 3), one (1) 137.8mmbtu/hr boiler (Boiler # 4 installed in 2004)), one (1) 85.7 mmbtu/hr Solar Combustion Turbine (combined cycle combustion operation) and one (1) 37.9 mmbtu/hr Eclipse duct burner. The flue gases will be discharged through a common stack (Emission point 00001).

All the boilers are dual fuel fired (natural gas and no. 2 fuel oil) and the flue gases exit through the common stack. The Emission point 00001 is fitted with a continuous opacity monitoring System (COMS).

Emission unit U00001 is associated with the following emission points (EP):
E0001

Process: 001 is located at FIRST FLOOR, Building ANNEX - The process 001 is when the four boilers fires natural gas and flue gases will exhaust via a common stack E0001.

Process: 002 is located at FIRST FLOOR, Building ANNEX - The process 002 is when the four boilers fires No.2 oil and flue gases will exhaust via a common stack E0001.

Process: CNG is located at Building ANNEX - The process CNG is when the turbine and the duct burner fire natural gas and flue gases will exhaust via a common stack E0001

Emission unit U00002 - This emission unit consists of two Amsco ethylene oxide sterilizers and one Amsco abator unit.

Process: 003 is located at Building MAIN - The process 003 is when emission unit U-00002 consists of two (2) Ethylene oxide sterilizers and an abator use 100% ETO 100 grams or 170 grams cartridges.

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:

New York Presbyterian Hospital is a major facility because the potential emissions of nitrogen oxides and sulfur dioxides are greater than the major source thresholds (25 Tons/yr for nitrogen oxides and 100 Tons/yr for sulfur dioxide. The facility wide annual emissions of nitrogen dioxide exceed 25 Tons/yr.

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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - 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 231-5, 231-6) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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.

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Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - 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 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 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, 6 NYCRR 200.10) - 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
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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

1-03-005-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - DISTILLATE OIL 10-100MMBTU/HR **
1-03-006-02	EXTERNAL COMBUSTION BOILERS -

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3-15-020-01

COMMERCIAL/ INDUSTRIAL
COMMERCIAL/ INSTITUTIONAL BOILER - NATURAL
GAS
10-100 MMBtu/Hr
PHOTOGRAPHIC EQUIPMENT
HEALTH CARE - HOSPITALS
Sterilization w/ Ethylene Oxide

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service 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 of 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 for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000075-07-0	ACETALDEHYDE	0.02		0.0158	
000107-02-8	ACROLEIN	0.02		0.01525	
007440-38-2	ARSENIC	21.1		2.685	
000071-43-2	BENZENE	0.28		0.027	
007440-41-7	BERYLLIUM	15.12		2.04	
007440-43-9	CADMIUM	20.76		2.013	
000630-08-0	CARBON MONOXIDE	472206		169708	
007440-47-3	CHROMIUM	22.32		2.013	
000075-21-8	ETHYLENE OXIDE	21.8		2.3	
000050-00-0	FORMALDEHYDE	0.04		0.007	
007439-92-1	LEAD	45.24		6.27	
007439-96-5	MANGANESE	32.02		4.1	
007439-97-6	MERCURY	16.4		2.013	
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	4.98		3.025	
0NY210-00-0	OXIDES OF NITROGEN	792943		238024	
0NY075-00-0	PARTICULATES	79195.8		18270	
0NY075-00-5	PM-10	79195.8		18270	
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS			0.266	
000115-07-1	PROPYLENE	1.02		0.0911	
007446-09-5	SULFUR DIOXIDE	1128229		152220	
000108-88-3	TOLUENE			97.5	

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0NY998-00-0 VOC

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NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

- Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)**
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.
- Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item G: Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.

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Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item I: Permit Shield - 6 NYCRR Part 201-6.4(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements

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of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the

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emergency was at the time being properly operated and maintained;
 (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

**Item B: General Provisions for State Enforceable Permit Terms and Condition - 6
NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by 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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description

FACILITY	ECL 19-0301	68	Powers and Duties of the Department with respect to air
FACILITY	40CFR 60-A.13	31	pollution control General provisions - Monitoring
FACILITY	40CFR 60-A.13(a)	32	requirements General provisions - Monitoring
FACILITY	40CFR 60-A.13(c)	33	requirements General provisions - Monitoring
FACILITY	40CFR 60-A.13(e)	34	requirements General provisions - Monitoring

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FACILITY	40CFR 60-A.13(h)	35	requirements General provisions - Monitoring requirements
FACILITY	40CFR 60-A.4	28	General provisions - Address
FACILITY	40CFR 60-A.7(b)	29	Notification and Recordkeeping
FACILITY	40CFR 60-A.8(e)	30	Performance Tests
U-00001/-/002/S0009	40CFR 60-Db.42b(j)	52	Exemption from Standards for Sulfur Dioxide.
U-00001/-/001/S0009	40CFR 60-Db.43b(f)	48	Standard for Particulate Matter Opacity.
U-00001/-/002/S0009	40CFR 60-Db.43b(f)	53	Standard for Particulate Matter Opacity.
U-00001/-/002/S0009	40CFR 60-Db.49b(d)	54	Reporting and Recordkeeping Requirements.
U-00001/-/001/S0009	40CFR 60-Db.49b(h)	49	Reporting and Recordkeeping Requirements.
U-00001/-/002	40CFR 60-Db.49b(r)	51	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 60-IIII	36	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
FACILITY	40CFR 60-KKKK	37	Stationary Combustion Turbine NSPS
U-00001/-/CNG	40CFR 60-KKKK.4320(a)	59	Stationary Combustion Turbine NSPS - Table 1 NOx emission limits
U-00001/-/CNG/S0010	40CFR 60-KKKK.4320(a)	63	Stationary Combustion Turbine NSPS - Table 1 NOx emission limits
U-00001/-/CNG/S0011	40CFR 60-KKKK.4320(a)	64	Stationary Combustion Turbine NSPS - Table 1 NOx emission limits
U-00001/-/CNG	40CFR 60-KKKK.4330	60	Stationary Combustion Turbine NSPS - SO2 emission limits
U-00001/-/CNG	40CFR 60-KKKK.4365(a)	61	Stationary Combustion Turbine NSPS - Exemption from monitoring total sulfur content of fuel
U-00001/-/CNG	40CFR 60-KKKK.4400(b)	62	Stationary Combustion Turbine NSPS - Performance testing for NOx
FACILITY	40CFR 63-JJJJJJ	38	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

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U-00002/-/003	40CFR 63-WWWW.10390	66	Area Source NESHAP for Hospital Ethylene Oxide Sterilizers - Standards
U-00002/-/003	40CFR 63-WWWW.10432	67	Area Source NESHAP for Hospital Ethylene Oxide Sterilizers - Recordkeeping
FACILITY	40CFR 63-ZZZZ	39, 40	Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	69	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 41, 42	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-7	23, 43	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability

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FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	70	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	24	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-2.2	71	High Toxicity Air Contaminants (HTACs)
FACILITY	6NYCRR 215.2	9	Mass Emission Limits
FACILITY	6NYCRR 225-1.2(h)	25	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.5(c)	26	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.6(f)	27	Monitoring Requirements
U-00001/-/002	6NYCRR 227.2(b)(1)	50	Excess Emission Reports
U-00001/E0001	6NYCRR 227-1.3(a)	65	Particulate emissions.
U-00001/E0001	6NYCRR 227-1.4(a)	72	Smoke Emission Limitations.
U-00001/-/001/S0001	6NYCRR 227-2.4(b)(1)(ii)	47	Stack Monitoring. (see narrative)
U-00001/-/CNG	6NYCRR 227-2.4(e)(3)	57, 58	2010 NOx RACT presumptive limits. NOx requirements for other combustion turbines.

Applicability Discussion:

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

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 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

6 NYCRR 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.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

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6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR Subpart 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.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be

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certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (d) (4)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 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.

6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6 NYCRR 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.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

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40 CFR Part 68

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

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

40 CFR 60.13

This regulation specifies how monitoring shall be performed and which methods and appendices are used to determine if the monitoring is adequate and in compliance with the regulated standards.

40 CFR 60.13 (a)

This regulation specifies that all New Source Performance Standard (NSPS) affected sources that are required to have continuous monitoring systems (CMS) are subject to the requirements of Appendix B of 40 CFR Part 60 and if the CMS is used to demonstrate compliance with emission limits on a continuous basis, then it is also subject to Appendix F of 40 CFR Part 60.

40 CFR 60.13 (c)

This regulation specifies how monitoring shall be performed and which methods and appendices are used to determine if the monitoring is adequate and in compliance with the regulated standards.

40 CFR 60.13 (e)

This regulation specifies minimum frequency of operation requirements for continuous monitoring systems required by 40 CFR Part 60.

40 CFR 60.13 (h)

This regulation specifies the data averaging requirements for continuous monitoring systems subject to 40 CFR Part 60.

40 CFR 60.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality

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Assurance (BQA).

40 CFR 60.42b (j)

This subdivision contains an exemption from the percent reduction requirements if the affected facility fires very low sulfur content oil.

40 CFR 60.4320 (a)

This regulation states that the owner or operator of a stationary combustion turbine must meet the applicable oxides of nitrogen limit in Table 1 of 40 CFR 60 Subpart KKKK.

40 CFR 60.4330

This regulation specifies that the emission limit for sulfur dioxide from a stationary combustion turbine is 0.060 lb SO₂/MMBtu heat input.

40 CFR 60.4365 (a)

This section provides an exemption from monitoring total sulfur content of the fuel used by a facility.

40 CFR 60.43b (f)

This regulation specifies maximum allowable opacity for affected sources. The opacity of the emission may not exceed 20%, except for one six minute period when the maximum opacity may not exceed 27%.

40 CFR 60.4400 (b)

This condition specifies NO_x performance testing requirements.

40 CFR 60.49b (d)

This subdivision requires reporting and recordkeeping for affected steam generating units - annual fuel capacity factors.

40 CFR 60.49b (h)

This subdivision specifies that the facility must submit excess emission reports.

40 CFR 60.49b (r)

This regulation specifies that owner or operators that combust very low sulfur oil are required to obtain fuel receipts. The oil need not meet the fuel nitrogen content specification in the definition of distillate oil. Reports shall be submitted to the Administrator certifying that only very low sulfur oil meeting this definition was combusted.

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40 CFR 60.7 (b)

This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40 CFR 60.8 (e)

This regulation requires the facility to provide appropriate sampling ports, safe platforms and utilities as necessary for Performance (stack) testing.

40 CFR 63.10390

Facility's two Amsco ethylene oxide sterilizers are subject to this subpart. Emissions are controlled with one Amsco abator unit. 40 CFR 63.10390 condition requires that facility must sterilize full loads of items having a common aeration time, except under medically necessary circumstances.

40 CFR 63.10432

40 CFR 63.10432 requires facility to keep copy of the Initial Notification of Compliance Status.

40 CFR Part 60, Subpart IIII

This regulation defines performance standards for compression ignition stationary reciprocating internal combustion engines.

40 CFR Part 60, Subpart KKKK

This regulation defines performance standards for stationary combustion turbines.

40 CFR Part 63, Subpart JJJJJ

This regulation covers facilities that own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

40 CFR Part 63, Subpart ZZZZ

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This regulation defines performance standards for stationary reciprocating internal combustion engines

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212-2.2

Table 2 of 212-2.2 lists the compounds eligible for the alternative compliance option. The table lists actual annual mass emission limits for select compounds. The mass emission limit represents a conservative offsite concentration which will be below the respective annual guideline concentration for the particular air contaminant.

6 NYCRR 225-1.2 (h)

Sulfur-in-fuel limitation for the firing of distillate oil on or after July 1, 2016.

6 NYCRR 225-1.5 (c)

This citation sets the daily and weekly fuel monitoring requirements for subject emission sources.

6 NYCRR 225-1.6 (f)

This citation requires subject facilities to submit excess emissions reports to the Department.

6 NYCRR 227.2 (b) (1)

This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6 NYCRR 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.

6 NYCRR 227-1.4 (a)

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Subdivisions (a) and (f) of this section (227-1.4) have not been approved by EPA and have not been included in the NYS SIP.

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

Future NOx RACT presumptive limits effective 7/1/14.

6 NYCRR 227-2.4 (e) (3)

NOx RACT requirements for combustion turbines fired with fuels other than natural gas or distillate oil.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

Compliance Certification

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

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	33	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
U-00001/-/001/S0009	48	monitoring of process or control device parameters as surrogate
U-00001/-/002/S0009	53	monitoring of process or control device parameters as surrogate
U-00001/-/002/S0009	54	record keeping/maintenance procedures
U-00001/-/001/S0009	49	record keeping/maintenance procedures
U-00001/-/002	51	record keeping/maintenance procedures
U-00001/-/CNG	59	intermittent emission testing
U-00001/-/CNG/S0010	63	intermittent emission testing
U-00001/-/CNG/S0011	64	intermittent emission testing
U-00001/-/CNG	60	intermittent emission testing
U-00001/-/CNG	61	work practice involving specific operations
U-00002/-/003	67	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
U-00001	44	work practice involving specific operations
U-00001	45	work practice involving specific operations
U-00001	46	work practice involving specific operations
U-00001/-/CNG	55	work practice involving specific operations
U-00001/-/CNG	56	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
FACILITY	71	monitoring of process or control device parameters as surrogate
FACILITY	25	work practice involving specific operations
FACILITY	26	record keeping/maintenance procedures

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FACILITY	27	record keeping/maintenance procedures
U-00001/-/002	50	intermittent emission testing
U-00001/E0001	65	monitoring of process or control device parameters as surrogate
U-00001/E0001	72	monitoring of process or control device parameters as surrogate
U-00001/-/001/S0001	47	intermittent emission testing
U-00001/-/CNG	57	intermittent emission testing
U-00001/-/CNG	58	intermittent emission testing

Basis for Monitoring

6 NYCRR 201-6.4(c)(3)(ii): This is a facility-wide condition that applies to monitoring conditions in all Title V Permits. All facilities that are subject to the Title V requirements must submit reports of any required monitoring to the NYSDEC every six months.

6 NYCRR 201-6.4(e): This is a facility-wide record keeping requirement that applies to all Title V facilities. These facilities must submit an annual compliance certification to the NYSDEC and the USEPA.

6 NYCRR part 201-7: Facility has installed one boiler S009 in 2004 and a Cogen unit(turnbine and duct burner) in 2008. Facility has capped Part 231-2 applicability in these projects by keeping the Maximum Annual Potential(MAP) same as before, which was 324 tons per year of NO. Facility has also limited NOx and SO2 emission increases from these individual projects below 40 tpy, the PSD threshold. Facility is required to use approvable emission factors and fuel usage data to demonstrate compliance with the permit limits.

6 NYCRR 202-2.1: A requirement for all Title V facilities. These facilities must submit an annual emission statement by April 15th of each year.

6 NYCRR Part 225-1.2(h): Condition limits the sulfur content of distillate fuel oil used in the boilers to 0.0015% by weight.

6 NYCRR Part 225-1.5(c): Condition requires facility to daily record the fuel firing rate & weekly determination of gross heat content ash content of fuel fired.

6 NYCRR Part 227-1.3 &1.4(a): The opacity is limited to 20% except for one 6 minute period per hour, but not to exceed 27%. The combined total heat input of combustion sources exhausted through emission point 0001 is greater than 250 mmbtu/hr and facility is continuously monitoring opacity for all combustion sources listed in Emission Unit U00001 at emission point E0001. Facility is required to measure fuel firing rate daily and gross heat and ash content of each fuel fired once a week.

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6 NYCRR Part 227-2.4(b) NO_x RACT: All four boilers are large boilers (>100MMBtu/hr) and fire natural gas or #2 oil. The presumptive NO_x RACT limit for large boilers burning oil and gas is 0.15 lbs/mmbtu. This permit limits NO_x emission of these boiler to 0.15lb/mmbtu, and the facility is required to demonstrate compliance with this limit by performing stack test using Department approved procedures once during the permit term.

6 NYCRR part 227-2.4(e)(3): Facility in their May 29, 2019 NO_x RACT analysis for the Solar turbine and duct burner which uses natural gas as fuel demonstrated that installing SCR or SCONO_x controls on turbine is not economically feasible since the estimated cost exceeds the threshold set by the Department, \$5500/ton NO_x removed, and determined that 9 ppmvd@ 15% oxygen is the RACT for the process CNG. Facility is required to performs stack test to demonstrate compliance.

40 CFR Subpart Db: The Babcock and Wilcox boiler (S0009) rated 137.8 mmbtu/hr installed in 1/1/2004 is subject to the 40 CFR Db requirements. Monitoring, recordkeeping and reporting requirements are placed in the permit. NYRR Part 227-2 NO_x limit for oil/gas 0.15lbs/mmbtu is more stringent than 40 CFR Subpart Db NO_x limit 0.2lbs/mmbtuu for (high heat release rate) and therefore, Db NO_x limit is not placed in the permit.

40 CFR Subpart KKKK: The Cogen unit (85.7mmbtu/hr Solar turbine & 37.9mmbtu/hr duct burner) installed in year 2008 is subject to NO_x and SO₂ emission limits, monitoring, recordkeeping and reporting requirements of this Subpart. NO_x & SO₂ emission limits are 25ppm at 15% O₂ and 0.065 lb/mmbtu respectively. Facility is required to demonstrate compliance with the NO_x limit by performing stack emission test annually (or once every two years for NO_x) as specified in 40 CFR part 60.4400(a).

The facility may elect not to monitor the total sulfur content of the fuel combusted in the turbine, if the fuel is demonstrated not to exceed potential sulfur emissions of 26 ng SO₂/J (0.060 lb SO₂/mmBtu) heat input. The facility must use the fuel quality characteristics in a current, valid purchase contract, tariff sheet, or transportation contract for the fuel, specifying that: 1) The total sulfur content for natural gas use is 20 grains of sulfur or less per 100 standard cubic feet, or 2) Has potential sulfur emissions of less than 26 ng SO₂/J (0.060 lb SO₂/mmBtu) heat input.

40 CFR Subpart IIII: The Emergency engine generator in Greenburg building Caterpillar 3512 C rated at 1500 KW manufactured in 2008 is subject to 40 CFR 60 Subpart Part IIII requirements.

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40 CFR 63 Subpart JJJJJ- Facility's four boilers are subject to the requirements of this subpart.

40 Subpart WWWW

Facility's two Amsco ethylene oxide sterilizers are subject to this subpart. Emissions are controlled with one Amsco abator unit. 40 CFR 63.10390 condition requires that facility must sterilize full loads of items having a common aeration time, except under medically necessary circumstances, and 40 CFR 63.10432 requires facility to keep copy of the Initial Notification of Compliance Status.

Also, NYCRR Part 212.2 condition requires facility to calculate previous 12 month total ETO emissions on a monthly basis to demonstrate that the total facility HTAC emissions are below the Mass Emission Limit threshold 25 tons for Ethylene Oxide.