



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6103-00158/00001

Renewal Number: 4

05/28/2019

Facility Identification Data

Name: NEW YORK PRESBYTERIAN BROOKLYN METHODIST HOSPITAL

Address: 506 6TH ST

BROOKLYN, NY 11215

Owner/Firm

Name: NEW YORK-PRESBYTERIAN BROOKLYN METHODIST

Address: 506 6TH ST

BROOKLYN, NY 11215-3609, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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Brooklyn, NY 11215

Phone:

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

Application for renewal of Air Title V Facility.

This is a renewal of the current Title V permit that expires on 3/15/2020 and a modification that includes the following:



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1. To change the name of the facility from "New York Methodist Hospital" to "New York-Presbyterian Brooklyn Methodist Hospital" as of October 31, 2016.
2. To add # 2 fuel oil (Process BOI) firing capability to Boiler # 4 (Emission Source B0005) as a secondary fuel. The primary fuel is natural gas (Process BNG).
3. To reduce the diameter of the chimney (Emission Point 00001) from 80 inches to 60 inches due to installation of a new liner.
4. To add a 2016 Caterpillar Model 3512, 1500 KW emergency diesel CI generator in the facility's new building (Center for Community Health).
5. To discontinue and to remove the two 940 KW Waukesha generator engines (Emission Sources E0004 & E0005) as of October 31, 2015. Also removing their associated process (Process CNG).

Attainment Status

NEW YORK PRESBYTERIAN BROOKLYN METHODIST HOSPITAL is located in the town of BROOKLYN in the county of KINGS.

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
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Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	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:

The New York Methodist Hospital (NYMH) is changing its name to "New York-Presbyterian Brooklyn Methodist Hospital" as of October 31, 2016. The facility is an existing Air Title V facility that operates four (4) mid-size Cleaver-Brooks boilers. These include one 25.1 MM Btu/hr boiler (Emission Source 00001), one 31.4 MM Btu/hr boiler (Emission Source 00002), and two identical 30.6 MM Btu/hr Cleaver-Brooks boilers (Emission Sources B0004 & B0005). All four boilers (Emission Sources 00001, 00002, B0004 & B0005) are capable of firing natural gas (Process BNG) as primary fuel and #2 fuel oil (Process BOI) as secondary fuel. On October 31, 2015, the hospital has removed the two identical Waukesha 940 KW co-generator engines (Emission Sources 00004 & 00005), that fire natural gas only (Process CNG),



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and are used to produce electricity for hospital purposes.

Typically, two boilers are in operation and the other two boilers are on stand-by. For the two new Cleaver Brooks boilers, typically, one boiler will be on 50% of the time on #2 fuel oil and the other 50% of the time on natural gas. The other new boiler will be operated three (3) months per year and the same boiler would be on standby for the other nine (9) months.

The facility has recently added a 2016 Caterpillar Model 3512, 1500 KW emergency diesel CI generator in the facility's new building (Center for Community Health). The facility will start operating this emergency diesel CI generator when this permit renewal #4 is issued.

Facilities that have exempt stationary compression ignition internal combustion engines must comply with applicable portions of 40 CFR 60 Subpart IIII and portions of 40 CFR 63 subpart ZZZZ.

The facility operates other sources which are considered exempt from permitting in accordance with 6 NYCRR 201-3.2 (c), including six (6) exempt boilers/water-heaters (under 10 MM Btu/hr each) in various hospital buildings (two 3.0 MM Btu/hr, and four < 1 MM Btu/hr), six (6) emergency generators (<500 hours per year each), and ten (10) fuel oil storage tanks (<300,000 barrels), which consist of four (4) underground storage tank (UST) for storing #2 fuel oil, one (1) AST for storing diesel fuel oil, and five (5) day tanks for supply of diesel to the generators.

Permit Structure and Description of Operations

The Title V permit for NEW YORK PRESBYTERIAN BROOKLYN METHODIST 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 BROOKLYN METHODIST HOSPITAL is defined by the following emission unit(s):

Emission unit U00001 - Emission Unit U-00001 consists of a total of four (4) mid-size boilers dual fuel external combustion Cleaver Brooks boilers (Emission Sources 00001, 00002, B0004 & B0005). Boiler 00001 is rated at 25.1 MM Btu/hr, Boiler 00002 is rated at 31.4boilers and Boilers B0004 & B0005 are



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rated at 30.6 MM btu/hr each. The four boilers provide heat and hot water to the hospital. All four boilers are capable of firing either #2 fuel oil (Process BOI) or natural gas (Process BNG). Natural gas as the primary fuel and #2 fuel oil as the secondary fuel. All four boilers are located in the sub-basement of the main building. Flue gases from these processes exit through a common stack (Emission Point 00001) connected to the boilers. The four boilers at New York Presbyterian Brooklyn Methodist Hospital are identified as:

Emission Source 00001 - one existing (since 1996) Cleaver Brooks CB-200-600 boiler of capacity of 25.1 MM Btu/hr.

Emission Source 00002 - one existing (since 1996) Cleaver Brooks CB-200-750 boiler of capacity 31.4 MM Btu/hr.

Emission Sources B0004 & B0005 - two new identical (installed in 2004) Cleaver Brooks CBLE 200-750-200ST boilers of capacity of 30.6 MM Btu/hr each.

Emission unit U00001 is associated with the following emission points (EP):
00001

Process: BNG is located at BOILER ROOM, Building 1 - Process BNG is the burning of natural gas as the primary fuel in three out of the four (4) external combustion Cleaver Brooks boilers (Emission Sources 00001, 00002, B0004 & B0005) in Emission Unit U-00001. The four boilers provide heat and hot water to the hospital. Flue gases from this process exit through a common stack (Emission Point 00001) connected to all four boilers. The four boilers at New York-Presbyterian Brooklyn Methodist Hospital are identified as:

Emission Source 00001 - one existing (since 1996) Cleaver Brooks CB-200-600 boiler of capacity of 25.1 MM Btu/hr.

MM Btu/hr.



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Emission Sources B0004 & B0005 - two new (installed in 2004) Cleaver Brooks CBLE 200 750 200ST boilers of capacity of 30.6 MM Btu/hr each.

Typically, two boilers are in operation and the other two boilers are on stand-by. For the two new Cleaver Brooks boilers, typically, one boiler will be on 50% of the time on #2 fuel oil and the other 50% of the time on natural gas. The other new boiler will be operated three (3) months per year and the same boiler would be on standby for the other nine (9) months.

Process: BOI is located at BOILER ROOM, Building 1 - Process BOI is the burning of #2 fuel oil as the secondary fuel in three out of the four (4) external combustion Cleaver Brooks boilers (Emission Sources 00001, 00002 & B0004) in Emission Unit U-00001. The four boilers provide heat and hot water to the hospital. Flue gases from this process exit through a common stack (Emission Point 00001) connected to the four boilers. The four boilers at New York Presbyterian Brooklyn Methodist Hospital are identified as:

Emission Source 00001 - one existing (since 1996) Cleaver Brooks CB-200-600 boiler of capacity of 25.1 MM Btu/hr.

Emission Source 00002 - one existing (since 1996) Cleaver Brooks CB-200-750 boiler of capacity 31.4 MM Btu/hr.

Emission Sources B0004 & B0005 - two new (installed in 2004) Cleaver Brooks CBLE 200 750 200ST boilers of capacity of 30.6 MM Btu/hr each.

Typically, two boilers are in operation and the other two boilers are on stand-by. For the two new Cleaver Brooks boilers, typically, one boiler will be on 50% of the time on #2 fuel oil and the other 50% of the time on natural gas. The other new boiler will be operated three (3) months per year and the same boiler would be on standby for the other nine (9) months.

Title V/Major Source Status

NEW YORK PRESBYTERIAN BROOKLYN METHODIST HOSPITAL is subject to Title V requirements. This determination is based on the following information:

New York-Presbyterian Brooklyn Methodist Hospital is a major facility because the potential emissions of nitrogen oxides is greater than the major source thresholds, which is 25 tons per year for nitrogen oxides. All facilities utilizing Title V Permits shall be considered major sources.

Program Applicability

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

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO



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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.

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,



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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

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

1-03-004-02

EXTERNAL COMBUSTION BOILERS -
 COMMERCIAL/INDUSTRIAL
 COMMERCIAL/INSTITUTIONAL BOILER - RESIDUAL
 OIL

1-03-006-02

10-100MMBTU/HR **
 EXTERNAL COMBUSTION BOILERS -
 COMMERCIAL/INDUSTRIAL
 COMMERCIAL/INSTITUTIONAL BOILER - NATURAL
 GAS
 10-100 MMBtu/Hr

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



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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 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
000630-08-0	CARBON MONOXIDE	109692.74		26799.53	
0NY210-00-0	OXIDES OF NITROGEN	177342.6		26161.44	
0NY075-00-0	PARTICULATES	17693.64		3100	
007446-09-5	SULFUR DIOXIDE	8933.8		620	
0NY998-00-0	VOC	8496.8		1754.73	

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



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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.

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;



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- 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 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



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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 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

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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
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FACILITY	ECL 19-0301	62	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A.14	40	General provisions - Modification
FACILITY	40CFR 60-A.15	41	General provisions - Reconstruction
FACILITY	40CFR 60-A.4	34	General provisions - Address
U-00001	40CFR 60-A.7 (a)	47	Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (b)	35	Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (c)	36	Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (d)	37	Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (f)	38	Notification and Recordkeeping
FACILITY	40CFR 60-A.9	39	General provisions - Availability of information
U-00001/00001/BOI	40CFR 60-Dc.40c	50, 51	Steam generators 10-100 million Btu per hour
U-00001/00001/BOI/00001	40CFR 60-Dc.40c	59	Steam generators 10-100 million Btu per hour
U-00001/00001/BOI/00002	40CFR 60-Dc.40c	60	Steam generators 10-100 million Btu per hour
U-00001/00001/BOI/B0004	40CFR 60-Dc.40c	61	Steam generators 10-100 million Btu per hour
U-00001/00001/BOI	40CFR 60-Dc.42c (d)	52	Standard for Sulfur Dioxide Firing Oil. (see narrative)
U-00001/00001/BOI	40CFR 60-Dc.42c (h)	53	Exemption from Averaging Requirements
U-00001/00001	40CFR 60-Dc.43c (c)	49	Standard for Opacity.
U-00001/00001/BOI	40CFR 60-Dc.44c (h)	54	Alternative Compliance and Performance Test Methods and Procedures for Sulfur Dioxide.
U-00001/00001/BOI	40CFR 60-Dc.45c	55	Compliance and Performance Test Methods and Procedures for Particulate Matter.



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U-00001/00001/BOI	40CFR 60-Dc.46c (d) (2)	56	Alternative sulfur dioxide emissions monitoring.
U-00001/00001/BOI	40CFR 60-Dc.47c	57	Emission Monitoring for Particulate Matter.
U-00001/00001/BOI	40CFR 60-Dc.48c (f) (1)	58	Reporting and Recordkeeping Requirements (distillate oil).
FACILITY	40CFR 60-IIII	42	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
FACILITY	40CFR 63-ZZZZ	43, 44	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	21	General Provisions
FACILITY	6NYCRR 201-1.4	63	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 201-3.2 (c)	22	Exempt Activities - exempt activity list
FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 45, 46	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



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FACILITY	6NYCRR 201-6.4 (d) (4)	24	Compliance Schedules
FACILITY	6NYCRR 201-6.4 (e)	6	- Progress Reports
FACILITY	6NYCRR 201-6.4 (f) (6)	17	Compliance
FACILITY	6NYCRR 201-6.4 (g)	25	Certification
FACILITY	6NYCRR 202-1.1	18	Off Permit Changes
FACILITY	6NYCRR 202-2.1	7	Permit Shield
FACILITY	6NYCRR 202-2.5	8, 26	Required emissions tests.
FACILITY	6NYCRR 211.1	64	Emission Statements -
FACILITY	6NYCRR 211.2	27	Applicability
FACILITY	6NYCRR 215.2	9	Emission Statements -
FACILITY	6NYCRR 225-1.2 (f)	28	record keeping
FACILITY	6NYCRR 225-1.2 (g)	29	requirements.
FACILITY	6NYCRR 225-1.2 (h)	30	General Prohibitions
FACILITY	6NYCRR 225-1.6	31	- air pollution
FACILITY	6NYCRR 227.2 (b) (1)	33	prohibited
U-00001/00001	6NYCRR 227-1.3 (a)	48	General Prohibitions
FACILITY	6NYCRR 227-	32	- visible emissions
	2.4 (c) (1) (ii)		limited.
			Open Fires -
			Prohibitions
			Sulfur-in-Fuel
			Limitations
			Sulfur-in-Fuel
			Limitations
			Sulfur-in-Fuel
			Limitations
			Reports, Sampling,
			and Analysis
			Particulate
			emissions.
			Smoke Emission
			Limitations.
			2010 NOx RACT
			presumptive limit.

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.



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6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

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,



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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 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 201-6.4 (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.

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.



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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.

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, NEW YORK PRESBYTERIAN BROOKLYN METHODIST HOSPITAL has been determined to be subject to the following regulations:

40 CFR 60.14

This regulation defines the term modification and what is and is not considered to be a modification, for the purpose of rule applicability.

40 CFR 60.15

This regulation defines the term reconstruction and what is and is not considered to be a reconstruction project, for the purpose of rule applicability.

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 Assurance (BQA).

40 CFR 60.40c

This regulation requires the source owner or operator to comply with the applicable General Provisions of 40 CFR 60 Subpart Dc. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.

40 CFR 60.42c (d)



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This regulation requires that on or after the date on which the initial performance test is completed or required to be completed under section 60.8 of 40 CFR 60 Subpart A, no owner or operator of an affected facility that combusts oil, shall combust oil with a sulfur content in excess of 0.5 percent by weight.

40 CFR 60.42c (h)

This regulation requires that compliance with emission limits and/or fuel oil sulfur limitations be based on a certification from the fuel supplier as stated in paragraph 40 CFR 60-Dc.48c(f)(1), (2), or (3) as applicable

40 CFR 60.43c (c)

This regulation requires that on or after the date on which the initial performance test is completed or is required to be completed, an affected facility that combusts coal, wood, or oil and has a heat input of 30 million Btu per hour (8.7 MW) or greater, shall not cause any gases to be discharged to the atmosphere, that exhibit an opacity greater than 20% (based on a 6-minute average) or exceeds 27% for one 6-minute period per hour.

40 CFR 60.44c (h)

This regulation requires facilities demonstrating compliance through vender certification to follow the compliance procedures listed in the appropriate paragraphs of 40 CFR 60-Dc.48c.

40 CFR 60.45c

This regulation requires the facility to conduct compliance testing for particulate matter by the methods listed in this section 40 CFR 60-Dc.45c.

40 CFR 60.46c (d) (2)

This regulation allows the owner or operator of an affected facility to determine the average sulfur dioxide emission rate by sampling the fuel prior to its combustion and calculating the emissions instead of installing and operating a continuous emissions monitor at the inlet of the control device

40 CFR 60.47c

This regulation requires that all continuous emissions monitors measuring opacity to be operated in accordance with Appendix B of this part 40 CFR 60.

40 CFR 60.48c (f) (1)

Fuel supplier certifications for distillate oil shall include the name of the oil supplier and a statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60-Dc.41c

40 CFR 60.7 (a)

This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance



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testing for continuous monitors and anticipated date for opacity observations as required.

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 60.7 (c)

This requirement details the information to be submitted in excess emissions and monitoring systems performance reports which must be submitted at least semi-annually for sources with compliance monitoring systems.

40 CFR 60.7 (d)

This condition specifies the required information and format for a summary report form and details when either a summary form and/or excess emissions reports are required.

40 CFR 60.7 (f)

This condition specifies requirements for maintenance of files of all measurements, including continuous monitoring system (CMS), monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices for at least two years.

40 CFR 60.9

This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

40 CFR Part 60, Subpart IIII

This regulation is for the Applicability of Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

Facilities that have stationary compression ignition internal combustion engines must comply with applicable portion of 40 CFR 60 Subpart IIII.

40 CFR Part 63, Subpart ZZZZ

This regulation is for the Applicability of Reciprocating Internal Combustion Engine (RICE) NESHP.

Facilities that have reciprocating internal combustion engines must comply with applicable portions of 40



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CFR 63 subpart ZZZZ.

6 NYCRR 201-3.2 (c)

This section lists the specific activities which may be exempt from the permitting provisions of this Part.

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 225-1.2 (f)

Sulfur-in-fuel limitations for the purchase of #2 heating oil on or after July 1, 2012.

6 NYCRR 225-1.2 (g)

Sulfur-in-fuel limitations for the purchase of distillate oil on or after July 1, 2014.

6 NYCRR 225-1.2 (h)

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

6 NYCRR 225-1.6

This section establishes the requirements for reporting, sampling, and analyzing fuel by subject facilities.

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



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27% opacity.

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

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

6 NYCRR Subpart 201-1

Subpart 201-1 contains general provisions for the state air permitting program including purpose, unpermitted sources, change in ownership, unavoidable noncompliance, emergency defense, public participation, recycling and salvage, prohibiting the reintroduction of collected air contaminants, program delegation and public access to recordkeeping.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	6 NYCRR Subpart 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region

Reason: New Source Review Non-Applicability in a Non-Attainment area
for New York-Presbyterian Brooklyn Methodist Hospital:

Project: The facility is adding one (1) 1500 KW Caterpillar Model 3512 emergency diesel CI generator in the facility's new building (Center for Community Health) and adding # 2 fuel oil (Process BOI) firing capability to Boiler # 4 (Emission Source B0005) as a secondary fuel. The primary fuel is natural gas (Process BNG). Also, the facility has removed two (2) Waukesha identical internal combustion cogeneration engines that burn natural gas (Process CNG) only on August, 2015.

Netting Analysis:

The contemporaneous period is May 1, 2019 to May 1, 2014 (5 annual periods prior to the proposed commence construction date of the new project or modified emission source, and ending with the proposed commence operation date.)

The scheduled commence construction date is July 1, 2018

The scheduled commence operation date is May 1, 2019

Start date of contemporaneous period: May 1, 2019

End date of contemporaneous period: May 1, 2014



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Project Emission Potential (PEP) of NO_x = sum of NO_x from each modification of an existing emission source + difference for NO_x from each modification of an existing emission source

Project Emission Potential (PEP) of NO_x = 10.31 tpy

The proposed PTE NO_x emissions from the project = 10.31 tpy
There are no other contemporaneous increases for this project. Hence, the net emissions increase for NO_x is the project potential itself, i. e., 10.31 tpy, which is < the Major Project Threshold (MFT) of 25 tpy in NYC (severe non-ozone area) and hence not a significant net emissions increase.

NO_x actual emissions from the removal of the two (2) Waukesha identical internal combustion cogeneration engines is 3.27 tpy. The NO_x emissions from the modification of an existing emission source {adding # 2 fuel oil (Process BOI) firing capability to Boiler # 4 (Emission Source B0005) } = 10.31 tpy

The contemporaneous credible emission increase/Decrease - ERC = - 3.27 tpy of NO_x (decrease)

The NEI for NO_x is the sum of the PEP (Project Emission Potential) and the contemporaneous period sum of NO_x emission increases and decreases.

Net Emission Increase = Project Emission Potential + contemporaneous Creditable Emission Increase/Decrease - Emission Reduction Credit

NEI = PEP + CEI - ERC

NEI = 10.31 + (- 3.27) - 0 = 7.04 tpy of NO_x

Addition of oil firing capability to Emission source B0005 =
Contemporaneous Credible Emission Increase/Decrease - ERC = 7.04 tpy

Non-attainment NO_x contaminant for which PEP equal or greater than SPT (Significant Project Threshold)

CONCLUSION:

Based on the NO_x emissions for adding # 2 fuel oil (Process BOI) firing capability to Boiler # 4 (Emission Source B0005) and for removing the two (2) Waukesha identical internal combustion cogeneration engines =

NO_x PTE for the addition - NO_x Actual Emissions for the removal =
10.31 tpy + (-3.27) tpy = 7.04 tpy of NO_x,
which is < 25 tpy

Based on the Subpart 231-2 Netting Analysis, since the Net Emission Decrease (NEI) for NO_x is 7.04 tpy for all of the addition/removal of the emission sources above which is < 25 tpy for the Significant Net



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Emission Increase (SNEIT), the facility is NOT subject to Subpart 231-2.

The Net Emission Increase (NEI) has to be < Significant Net Emission Increase (SNEIT) of 25 tpy of NOx for severe non-ozone area such as NYC for this project for New Source Review to be non-applicable.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at NEW YORK PRESBYTERIAN BROOKLYN METHODIST HOSPITAL:

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

FACILITY	36	record keeping/maintenance procedures
U-00001/00001/BOI	50	monitoring of process or control device parameters as surrogate
U-00001/00001/BOI	51	record keeping/maintenance procedures
U-00001/00001/BOI	52	work practice involving specific operations
U-00001/00001	49	monitoring of process or control device parameters as surrogate
U-00001/00001/BOI	54	monitoring of process or control device parameters as surrogate
U-00001/00001/BOI	56	monitoring of process or control device parameters as surrogate
U-00001/00001/BOI	57	monitoring of process or control device parameters as surrogate
U-00001/00001/BOI	58	record keeping/maintenance procedures
FACILITY	21	record keeping/maintenance procedures
FACILITY	22	work practice involving specific operations
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
FACILITY	28	work practice involving specific operations
FACILITY	29	work practice involving specific operations
FACILITY	30	work practice involving specific operations
FACILITY	31	record keeping/maintenance procedures
FACILITY	33	intermittent emission testing
U-00001/00001	48	monitoring of process or control device parameters as surrogate
FACILITY	32	intermittent emission testing



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Basis for Monitoring

This facility is subject to the requirements of Title V and has received a Title V general permit for Combustion Installation. The facility is required, under the provisions of 6 NYCRR Subpart 201-6, to submit quarterly, semiannual compliance reports and an annual Compliance Certification. This facility has to comply with the following monitoring conditions:

Condition # 5 for 6 NYCRR 201-6.4 (c) (3) (ii): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition 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.

Condition # 6 for 6 NYCRR 201-6.4 (e): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition specifies the overall permit requirements for compliance certification, including emission limitations, standards or work practices.

Condition # 7 for 6 NYCRR 202-2.1: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition sets forth the applicability criteria for submitting an annual statement of emissions. The criteria is based on annual emission threshold quantities and ozone attainment designation. This condition is a requirement for all Title V facilities. These facilities must submit an annual emission statement by April 15th of each year for emissions of the previous calendar year.

Condition # 21 for 6 NYCRR 201-1: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. Subpart 201-1 contains general provisions for the state air permitting program including purpose, unpermitted sources, change in ownership, unavoidable noncompliance, emergency defense, public participation, recycling and salvage, prohibiting the reintroduction of collected air contaminants, program delegation and public access to recordkeeping.

Condition # 22 for 6 NYCRR 201-3.2(c): This is a facility-wide condition for Oxides of Nitrogen. This condition is for Work Practice Involving Specific Operations. This condition lists the specific activities which may be exempt from the permitting provisions of this Part.

The 2016 Caterpillar Model 3512, 1500 KW emergency diesel CI generator in the facility's new building is exempt from NYSDEC permitting in accordance with 6 NYCRR 201-3.1(b) and 3.2(c)(6), only when the usual supply of power is unavailable, and operates for no more than 500 hours per year.



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6 NYCRR 201-3.2(c)(6):

Emergency power generating stationary internal combustion engines as defined in 200.1(cq) and engine test cells at engine manufacturing facilities that are utilized for research and development, reliability performance testing, or quality assurance performance testing.

6 NYCRR 200.1(cq):

Emergency power generating stationary internal combustion engine. A stationary internal combustion engine that operates as a mechanical or electrical power source only when the usual supply of power is unavailable, and operates for no more than 500 hours per year. The 500 hours of annual operation for the engine include operation during emergency situations, routine maintenance, and routine exercising (for example, test firing the engine for one hour a week to ensure reliability). A stationary internal combustion engine used for peak shaving generation is not an emergency power generating stationary internal combustion engine.

Condition # 26 for 6 NYCRR 202-2.5: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition is for Emission Statements - record keeping requirements.

This condition 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.

- (a) The following records shall be maintained for at least five years: (1) a copy of each emission statement to the department, and (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.
- (b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Since the NO_x emissions is a surrogate of the fuel consumption, the facility is to monitor and keep records of the natural gas and #2 fuel oil consumption on a daily basis and report it annually. Fuel consumption records will be maintained at the facility of the quantity of each fuel fired in Boilers 00001, 00002, B0004 & B0005 on a daily, monthly, and every twelve consecutive months basis to prove compliance. The annual emission statement documenting the fuel consumption will be submitted to NYSDEC every April 15 of each year.



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The owner or operator shall maintain a record of the quantity of each fuel fired in Boilers 00001, 00002, B0004 & B0005 at the facility. The following formula will be used to calculate (based on the fuel quantity), the monthly NO_x emissions for Boilers 00001, 00002, B0004 & B0005 on a rolling 12-month basis for Boilers 00001, 00002, B0004 & B0005, where the individual monthly NO_x emissions will be determined from the following equation:

$D (0.02) + G (100) = \text{lbs/yr of Oxides of Nitrogen emissions:}$

Where;

D = 12-month rolling total of distillate oil fired (from Boilers 00001, 00002, B0004 & B0005) in gals/yr; and

G = 12-month rolling total of natural gas fired (from Boilers 00001, 00002, B0004 & B0005) in MM SCF/yr.

Condition # 28 for 6 NYCRR 225-1.2 (f): This is a facility-wide condition. This condition is for Work Practice Involving Specific Operations for sulfur content limit of 0.0015 percent by weight. The distillate fuel oil (#2 heating oil) purchase is limited to 0.0015 percent sulfur by weight on or after July 1, 2012. Compliance with this limit will be based on vendor certifications.

Condition # 29 for 6 NYCRR 225-1.2 (g): This is a facility-wide condition. This condition is for Work Practice Involving Specific Operations for sulfur content limit of 0.0015 percent by weight. The distillate fuel oil (#2 heating oil) purchase is limited to 0.0015 percent sulfur by weight on or after July 1, 2014. Compliance with this limit will be based on vendor certifications.

Condition # 30 for 6 NYCRR 225-1.2 (h): This is a facility-wide condition. This condition is for Work Practice Involving Specific Operations for sulfur content limit of 0.0015 percent by weight. The distillate fuel oil (#2 heating oil) firing is limited to 0.0015 percent sulfur by weight on or after July 1, 2016. Compliance with this limit will be based on vendor certifications.

Condition # 31 for 6 NYCRR 225-1.6: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. The owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, 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. All records shall be available for a minimum of three years.



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Condition # 32 for 6 NYCRR 227-2.4 (c) (1) (ii): This condition is an emission unit level, emission point level, process level and emission source level condition that applies to Emission Unit: U-00001, Emission Point: 00001, Processes BNG & BOI, and Emission Sources: 00001, 00002, B0004 & B0005 for Intermittent Emission Testing for Oxides of Nitrogen.

The facility is required to perform testing the four Cleaver Brooks mid-size boilers identified as Emission Sources 00001, 00002, B0004 & B0005, the 25.2 MM Btu/hr Cleaver Brooks CB-200-600 boiler, the 31.4 MM Btu/hr Cleaver Brooks CB-200-750 MM Btu/hr, and the 30.6 MM Btu/hr Cleaver Brooks CBLE 200-750-200ST boilers; respectively operating on distillate oil and natural gas (Processes BNG & BOI) to verify the NO_x emission limit compliance. A mid-size boiler is a boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour.

On or after July 1, 2014, the owner/operator of mid-size boilers (> 25 and equal to or <100 MM Btu/hr) boilers operating on natural gas/distillate oil has a limit of 0.08 pounds of NO_x per million Btus under the NO_x RACT compliance for mid-size boilers.

This condition applies to distillate oil/natural gas fired mid-size boilers (Emission Sources 00001, 00002, B0004 & B0005). The owner or operator shall submit a testing protocol to the Department for approval a minimum of 30 days prior to any stack testing.

The owner or operator will maintain records on-site for a minimum of five years.

The compliance deadline, with the NO_x RACT emission limitation of 0.08 pounds NO_x per million Btus listed in this condition, is July 1, 2014 for operating on distillate oil/natural gas. Compliance with the monitoring, record keeping, or reporting requirements listed in this condition begins on July 1, 2014.

Condition # 33 for 6 NYCRR 227.2 (b) (1): This condition is an emission unit level, emission point level, process level and emission source level for Intermittent Emission Testing condition for Particulates that applies to EU: U-00001, Emission Point: 00001, Proc: BO1 and Emission Sources 00001, 00002 & B0004. This condition is from the 1972 version of Part 227 and still remains as part of New York's SIP. This condition establishes a particulate limit of 0.10 lbs/MMBtu based on a 2 hour average emission for any oil fired stationary combustion installation and is required once during the term of the permit.



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Condition # 36 for 40 CFR 60.7 (c), NSPS Subpart A: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition details the required information to be submitted in excess emissions and monitoring systems performance reports which must be submitted at least semi-annually for sources with compliance monitoring systems.

Condition # 48 for 6 NYCRR 227-1.3 (a): This condition is an emission unit level and emission point level monitoring condition for Particulates that applies to EU: U-00001 and EP: 00001. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Particulates. This condition is for the emission unit and emission point that is associated with Emission Sources 00001, 00002, B0004 & B0005 (the four mid-size boilers). This condition 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.

Condition # 49 for 40 CFR 60.43c (c), NSPS Subpart Dc: This condition is an emission unit level and emission point level monitoring condition for Particulates that applies to EU: U-00001 and EP: 00001. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Particulates for opacity and applies to the four mid-size boilers (Emission Sources 00001, 00002, B0004 & B0005 - the 25.2 MM Btu/hr Cleaver Brooks CB-200-600 boiler, the 31.4 MM Btu/hr Cleaver Brooks CB-200-750 MM Btu/hr, and the 30.6 MM Btu/hr Cleaver Brooks CBLE 200-750-200ST boilers; respectively) when operating on distillate oil.

This condition requires that on or after the date on which the initial performance test is completed or is required to be completed, an affected facility that combusts coal, wood, or oil and has a heat input of 30 million Btu per hour (8.7 MW) or greater, shall not cause any gases to be discharged to the atmosphere, that exhibit an opacity greater than 20% (based on a 6-minute average) or exceeds 27% for one 6-minute period per hour.

Condition # 50 for 40 CFR 60.40c, NSPS Subpart Dc: This condition is an emission unit level, emission point level and process level condition for Sulfur Dioxide that applies to EU: U-00001, EP: 00001 and Proc: BOI. This condition is for Monitoring of Process or Control device Parameters as Surrogate for Sulfur Dioxide. The sulfur content limit in # 2 fuel oil is 0.0015 % by weight for facilities in severe ozone non-attainment areas such as New York City effective July 1, 2014 as per 6 NYCRR 225-1.2.

This condition requires the source owner or operator to comply with the applicable General Provisions of 40 CFR 60 Subpart Dc. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.



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Condition # 51 for 40 CFR 60.40c, NSPS Subpart Dc: This condition is an emission unit level, emission point level and process level condition for Sulfur Dioxide that applies to EU: U-00001, EP: 00001 and Proc: BOI. This condition is for Recordkeeping/Maintenance Procedures for Sulfur Dioxide. The sulfur content limit in # 2 fuel oil is 0.0015 % by weight for facilities in severe ozone non-attainment areas such as New York City effective July 1, 2014 as per 6 NYCRR 225-1.2.

This condition requires the source owner or operator to comply with the applicable General Provisions of 40 CFR 60 Subpart Dc. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.

Condition # 52 for 40 CFR 60.42c (d), NSPS Subpart Dc: This condition is an emission unit level, emission point level and process level condition for Sulfur Dioxide that applies to EU: U-00001, EP: 00001 and Proc: BOI. This condition is for Work Practice Involving Specific Operations. The sulfur content limit in # 2 fuel oil is 0.0015 % by weight for facilities in severe ozone non-attainment areas such as New York City for facilities in severe ozone non-attainment areas such as New York City effective July 1, 2014 as per 6 NYCRR 225-1.2.

This condition requires that on or after the date on which the initial performance test is completed or required to be completed under section 60.8 of 40 CFR 60 Subpart A, no owner or operator of an affected facility that combusts oil, shall combust oil with a sulfur content in excess of 0.0015 percent by weight for facilities in severe ozone non-attainment areas such as New York City effective July 1, 2014 as per 6 NYCRR 225-1.2.

Condition # 54 for 40 CFR 60.44c (h), NSPS Subpart Dc: This condition is an emission unit level, emission point level and process level condition for Sulfur Dioxide that applies to EU: U-00001, EP: 00001 and Proc: BOI. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Sulfur Dioxide. The sulfur content limit in number 2 fuel oil is 0.0015 % by weight for facilities in severe ozone non-attainment areas such as New York City effective July 1, 2014 as per 6 NYCRR 225-1.2.

This condition requires facilities demonstrating compliance through vender certification to follow the compliance procedures listed in the appropriate paragraphs of 40 CFR 60-Dc.48c.

Condition # 56 for 40 CFR 60.46c (d) (2), NSPS Subpart Dc: This condition is an emission unit level, emission point level and process level condition for Sulfur Dioxide that applies to EU: U-00001, EP: 00001 and Proc: BOI. This condition is for Monitoring



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of Process or Control Device Parameters as Surrogate for Sulfur Dioxide. The sulfur content limit in #2 fuel oil is 0.0015 % by weight for facilities in severe ozone non-attainment areas such as New York City effective July 1, 2014 as per 6 NYCRR 225-1.2.

This condition allows the owner or operator of an affected facility to determine the average sulfur dioxide emission rate by sampling the fuel prior to its combustion and calculating the emissions instead of installing and operating a continuous emissions monitor at the inlet of the control device.

Condition # 57 for 40 CFR 60.47c, NSPS Subpart Dc: This condition is an emission unit level, emission point level and process level condition for Particulates that applies to EU: U-00001, EP: 00001 and Proc: BOI. This condition is for Monitoring of Process or Control Device Parameters for Opacity as Surrogate for Particulates..

This condition requires that all continuous emissions monitors measuring opacity to be operated in accordance with Appendix B of this part 40 CFR 60. The opacity limit is 27%.

Condition # 58 for 40 CFR 60.48c(f)(1), NSPS Subpart Dc: This condition is an emission unit level, emission point level and process level condition for Sulfur Dioxide that applies to EU: U-00001, EP: 00001 and Proc: BOI. This condition is for Recordkeeping/Maintenance Procedures for Sulfur Dioxide. The sulfur content limit in # 2 fuel oil is 0.0015 % by weight for facilities in severe ozone non-attainment areas such as New York City effective July 1, 2014 as per 6 NYCRR 225-1.2.

Fuel supplier certification for distillate oil shall include the name of the oil supplier and a statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60-Dc.41c.