



Facility Identification Data

Name: DOWNSTATE MEDICAL CENTER
Address: 450 CLARKSON AVE
BROOKLYN, NY 11203-2098

Owner/Firm

Name: STATE UNIVERSITY OF NEW YORK
Address: STATE UNIVERSITY PLAZA
381 BROADWAY
ALBANY, NY 12246, USA
Owner Classification: State

Permit Contacts

Division of Environmental Permits:
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LONG ISLAND CITY, NY 11101-5407
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Air Permitting Contact:
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450 CLARKSON AVE
BROOKLYN, NY 11203
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Permit Description

Introduction

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

Summary Description of Proposed Project

This is a minor Title V modification for replacement of an existing exempt low pressure steam boiler and an existing exempt domestic hot water boiler with one (1) new 10.46 MM Btu/hr dual fuel fired boiler (Emission Source S0007 in Emission Unit 0-U0003). Natural gas (Process NAT) is the primary fuel with #2 fuel oil (Process 2FO) as backup. The existing facility emission caps for NOx and SO2 will not be affected by this modification and would remain unchanged at 225 tpy each. In addition, there are no new caps being placed on the proposed new boiler



(Emission Source S0007 in Emission Unit 0-U0003) itself.

Based on the emissions calculations and existing emission caps, this proposed Title V modification is classified as minor according to 6 NYCRR 621.4(g)(2)(iii)(2), and is below Part 231 thresholds. In addition, there are no new emission caps associated with the new boiler.

The new boiler (Emission Source S0007 in Emission Unit 0-U0003) is subject to NSPS Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The facility will demonstrate compliance with the SO₂ emission standards for the new boiler (Emission Source S0007 in Emission Unit 0-U0003) by the use of the fuel supplier certification for the sulfur content in the #2 distillate oil instead of the use of Continuous Emission Monitoring System (CEMS). The certification from the fuel supplier must include the name of the oil supplier, and a statement from the oil supplier that the oil complied with the specifications under the definition of distillate oil in New York City.

Attainment Status

DOWNSTATE MEDICAL CENTER 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
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO ₂)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NO _x)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NO_x) which are ozone precursors.

** NO_x has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

SUNY Downstate Medical Center (also referred to as SUNY Health center), located at 450 Clarkson Avenue in Brooklyn, New York, is a 376-bed renowned teaching hospital. The standard industrial classification codes (SIC) for this facility are 8062 - General Medical and Surgical Hospitals and 82221-Colleges, Universities, Professional Schools, and Junior Colleges. SUNY at Brooklyn operates five (5) boilers which supply steam for the space heating of the building. The steam is produced by five (5) dual fuel Combustion Engineering boilers (Emission Sources S0001, S0002, S0003, S0004 & S0005). Each boiler has a maximum heat input of 42 MM Btu/hr. All five boilers burn both natural gas (Process GAS) and #6 fuel oil (Process OIL). The five boilers are collectively identified as Emission Unit U-00001. Emissions from these five boilers are exhausted through one common stack which is identified as Emission point E0001. Three of the five boilers were constructed on 3/31/1956 and the other two



boilers were constructed on 6/1/1963. There are no changes to this emission unit.

The facility also has a 200 lb/hr Environmental crematorium (Emission Source S0006), which processes human cadavers that are generated onsite (Process 002) and is identified as Emission Unit 0-U0002. The crematory uses natural gas as its primary fuel and emissions from the crematorium exhaust through a dedicated circular stack which identified as Emission Point E0002. There are no changes to this emission unit.

Two of the facility's exempt small boilers in the HSEB Nurse's Residence are being replaced by a new non-exempt 10.461 MM Btu/hr dual fuel fired boiler with this permit modification.

The facility operates other sources which are considered exempt from permitting in accordance with 6 NYCRR 201-3.2(c), including one small boiler in the HSEB Nurse's Residence (<10 MM Btu/hr), two (2) internal combustion engines in the Garage University Hospital (<225 bhp), six (6) emergency power generators in the Power Plant University Hospital HSEB (<500 hours/yr), four (4) non-contact water cooling towers and water treatment systems in the University Hospital Basic Science Study Center HSEB, thirteen (13) fuel oil storage tanks in the HSEB University Hospital Basic Science Nurse's Residence (<300,000 bbls), and one hundred and twenty (120) ventilating and exhaust systems for laboratory operations campus-wide. These exempt units remain unchanged.

The existing facility emission caps for NOx and SO2 will not be affected by this modification and would remain unchanged at 225 tpy each. In addition, there are no new caps being placed on the proposed new boiler (Emission Source S0007 in Emission Unit 0-U0003) itself.

The new boiler (Emission Source S0007 in Emission Unit 0-U0003) is subject to NSPS Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The facility will demonstrate compliance with the SO2 emission standards for the new boiler (Emission Source S0007 in Emission Unit 0-U0003) by the use of the fuel supplier certification for the sulfur content in the #2 distillate oil instead of the use of Continuous Emission Monitoring System (CEMS). The certification from the fuel supplier must include the name of the oil supplier, and a statement from the oil supplier that the oil complied with the specifications under the definition of distillate oil in New York City.

Permit Structure and Description of Operations

The Title V permit for DOWNSTATE MEDICAL CENTER 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.

DOWNSTATE MEDICAL CENTER is defined by the following emission unit(s):

Emission unit 0U0003 - Emission Unit 0-U0003 consists of a 10.46 MM Btu/hr dual fuel fired boiler (Emission Source S0007) to replace the existing exempt low pressure steam boiler and an existing exempt domestic hot water boiler. This new boiler will burn natural gas (Process NAT) as the primary fuel and #2 fuel oil (Process 2FO) as a secondary fuel. The flue gases from this new boiler exit through a stack, identified as Emission Point E0003.

Emission unit 0U0003 is associated with the following emission points (EP):
E0003

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

Process: 2FO is located at Building 1 - Process 2FO consists of the operation of the new dual-fuel external combustion boiler (Emission Source S0007) in Emission Unit 0-U0003, burning #2 fuel oil as the secondary fuel. The flue gases from this new boiler exit through a stack, identified as Emission Point E0003.

Process: NAT is located at Building 1 - Process NAT consists of the operation of the new dual-fuel external combustion boiler (Emission Source S0007) in Emission Unit 0-U0003, burning natural gas as the primary fuel. The flue gases from this new boiler exit through a stack, identified as Emission Point E0003.

Emission unit 0U0002 - Emission Unit 0-U0002 consists of a 200 lb/hr JK Environmental/SP-300 crematorium (Emission Source S0006), which processes cadavers (Process 002). The flue gas from the crematorium exits through a dedicated stack, identified as Emission Point E0002.

Emission unit 0U0002 is associated with the following emission points (EP):
E0002

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

Process: 002 is located at 8TH FLOOR, Building 1 - Process 002 consists of the operation of a 200 lb/hr crematorium (Emission Source S0006) in Emission Unit 0-U0002, processing cadavers generated on-site. The flue gases from this crematorium exit through a stack, identified as Emission Point E0002.

Emission unit 0U0001 - Emission Unit 0-U0001 consists of five Combustion Engineering boilers, each with a maximum heat input of 42 MM Btu/hr, identified as Emission Sources S0001, S0002, S0003, S0004 & S0005. These five external combustion boilers operate on dual-fuel, natural gas (Process GAS) and number 6 fuel oil (Process OIL). The flue gases from these boilers exit through a common stack, identified as E0001.

Emission unit 0U0001 is associated with the following emission points (EP):
E0001

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

Process: GAS is located at BOILER ROOM/SUBBASEM, Building 1 - Process GAS consists of the operation of five dual-fuel external combustion boilers, Emission Sources S0001, S0002, S0003, S0004 & S0005, burning natural gas, in Emission Unit 0-U0001. The flue gases from these boilers exit through a common stack, identified as Emission Point E0001.

Process: OIL is located at BOILER ROOM/SUBBASEM, Building 1 - Process OIL consists of the operation of five dual-fuel external combustion boilers, Emission Sources S0001, S0002, S0003, S0004 & S0005, burning number 6 fuel oil, in Emission Unit 0-U0001. The flue gases from these boilers exit through a common stack, identified as Emission Point E0001.



DOWNSTATE MEDICAL CENTER is subject to Title V requirements. This determination is based on the following information:

Downstate Medical Center 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 DOWNSTATE MEDICAL CENTER with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

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

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

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

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source



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

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

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

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

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

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

Compliance Status

Facility is in compliance with all requirements

SIC Codes

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

SIC Code

8062
8221

Description

GENERAL MEDICAL & SURGICAL HOSPITALS
COLLEGES AND UNIVERSITIES, NEC

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes



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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 - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
5-01-005-05	SOLID WASTE DISPOSAL - GOVERNMENT SOLID WASTE DISPOSAL: GOVERNMENT - OTHER INCINERATION Pathological

Facility Emissions Summary

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		>= 10 tpy but < 25 tpy
0NY100-00-0	HAP		> 0 but < 2.5 tpy
0NY210-00-0	OXIDES OF NITROGEN	450000	
0NY075-00-0	PARTICULATES		>= 25 tpy but < 40 tpy
0NY075-00-5	PM-10		>= 10 tpy but < 25 tpy
007446-09-5	SULFUR DIOXIDE	450000	
0NY998-00-0	VOC		>= 2.5 tpy but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought 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 and/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;



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(3) During the period of the emergency the facility owner and/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 and/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 and/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 B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part

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 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part

201-6.3(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 D: Certification by a Responsible Official - 6 NYCRR Part

201-6.3(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 E: Requirement to Comply With All Conditions - 6 NYCRR Part

201-6.5(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 F: Permit Revocation, Modification, Reopening, Reissuance or

Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(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 G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR

Part 201-6.5(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 H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(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 J: Permit Shield - 6 NYCRR Part 201-6.5(g)



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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 K: Reopening for Cause - 6 NYCRR Part 201-6.5(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 L: 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,



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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 M: 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: 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		17	Powers and Duties of the Department with respect to air pollution control Best Available Control Technology
FACILITY	40CFR 52-A.21(j)	1 -16	
0-U0003/E0003/2FO/S0007	40CFR 60-A	1 -23	
0-U0003	40CFR 60-A.4	1 -18	General provisions - Address
0-U0003/E0003/2FO/S0007	40CFR 60-Dc.40c	1 -24	Steam generators 10-100 million Btu per hour
0-U0003/E0003/2FO/S0007	40CFR 60-Dc.42c(d)	1 -25	Standard for Sulfur Dioxide Firing Oil. (see narrative)
0-U0003/E0003/2FO/S0007	40CFR 60-Dc.42c(h)	1 -26	Exemption from Averaging Requirements
0-U0003/E0003/2FO/S0007	40CFR 60-Dc.42c(i)	1 -27	Standard for Sulfur Dioxide Period of Requirements.
0-U0003/E0003/2FO/S0007	40CFR 60-Dc.44c(g)	1 -28	Alternative Compliance and Performance Test Methods and Procedures for Sulfur Dioxide.
0-U0003	40CFR 60-Dc.44c(h)	1 -19	Alternative Compliance and Performance Test Methods and Procedures for Sulfur Dioxide.



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0-U0003/E0003/2FO/S0007	40CFR 60-Dc.46c(e)	1	-29	Exemption from Emission Monitoring for Sulfur Dioxide.
0-U0003/E0003/2FO/S0007	40CFR 60-Dc.48c(d)	1	-30	Reporting and Recordkeeping Requirements.
0-U0003/E0003/2FO/S0007	40CFR 60-Dc.48c(e) (1)	1	-31	Reporting and Recordkeeping requirements - fuel supplier certifications
0-U0003/E0003/2FO	40CFR 60-Dc.48c(e) (11)	1	-22	
0-U0003/E0003/2FO	40CFR 60-Dc.48c(e) (2)	1	-21	Reporting and Recordkeeping Requirements.
0-U0003	40CFR 60-Dc.48c(e) (3)	1	-20	
0-U0003/E0003/2FO/S0007	40CFR 60-Dc.48c(g)	1	-32	
0-U0003/E0003/2FO/S0007	40CFR 60-Dc.48c(i)	1	-33	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 68	7		Chemical accident prevention provisions
FACILITY	40CFR 82-F	8		Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	-1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	1	-4	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.4	18		
FACILITY	6NYCRR 201-1.7	1	-5	
FACILITY	6NYCRR 201-1.8	1	-6	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	1	-7	
FACILITY	6NYCRR 201-3.3(a)	1	-8	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	9, 12, 13		Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.5(a) (4)	1	-9	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a) (7)	1	-2	
FACILITY	6NYCRR 201-6.5(a) (8)	1	-10	
FACILITY	6NYCRR 201-6.5(c)	1		
FACILITY	6NYCRR 201-6.5(c) (2)	2		Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c) (3) (ii)	3		Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d) (5)	1	-11	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(e)	4		
FACILITY	6NYCRR 201-6.5(f) (6)	1	-12	
FACILITY	6NYCRR 201-7.2	1	-15, 1 -16, 1 -17	
FACILITY	6NYCRR 202-1.1	1	-13	Emissions capping using synthetic minor permits
FACILITY	6NYCRR 202-2.1	5		Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	6		
FACILITY	6NYCRR 211.2	22		Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.3	1	-14	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 215	1	-3	General Prohibitions - visible emissions limited



Permit Review Report

Permit ID: 2-6104-00132/00009

Renewal Number: 1

Modification Number: 1 05/29/2009

0-U0002/E0002/002/S0006	6NYCRR 219-4	23	ALL NEW AND MODIFIED INCINERATORS, CREMATORIES
0-U0002/E0002/002/S0006	6NYCRR 219-4.11	29	
0-U0002/E0002/002/S0006	6NYCRR 219-4.5 (a)	24	
0-U0002/E0002/002/S0006	6NYCRR 219-4.5 (b)	25, 26	
0-U0002/E0002/002/S0006	6NYCRR 219-4.7	27, 28	
FACILITY	6NYCRR 225.1 (a) (3)	11	
FACILITY	6NYCRR 225-1.8	10	
0-U0001	6NYCRR 227.2 (b) (1)	15	
0-U0001/E0001	6NYCRR 227-1.3 (a)	16	
0-U0001	6NYCRR 227-2.4 (d)	14	
FACILITY	6NYCRR 231-2	1 -17	Continuous emission monitoring. Sulfur in Fuel Limitations (SIP) Reports, sampling and analysis. Smoke Emission Limitations. RACT for Oxides of Nitrogen - small boilers. New Source Review in Nonattainment Areas and Ozone Transport Region

Applicability Discussion:

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

ECL 19-301.

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.

6NYCRR Part 200-.6

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

6NYCRR Part 200-.7

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

6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart.



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

6NYCRR Part 201-3.3(a)

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

6NYCRR Part 201-6

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

6NYCRR 201-6.5(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.

6NYCRR 201-6.5(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.

6NYCRR 201-6.5(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.

6NYCRR Part 201-6.5(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 certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(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.

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

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)

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.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(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.

6NYCRR Part 202-1.1

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

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere



which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

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

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 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, DOWNSTATE MEDICAL CENTER has been determined to be subject to the following regulations:

40CFR 52-A.21 (j)

BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61. Emission and operational limitations required from a BACT determination will have to be entered into the special permit conditions, separately by the permit reviewer.

40CFR 60-A

This regulation contains the General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements

40CFR 60-A.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).

40CFR 60-Dc.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.

40CFR 60-Dc.42c (d)

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.

40CFR 60-Dc.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

40CFR 60-Dc.42c (i)

This regulation requires that the sulfur dioxide emission limits, percentage reductions, and fuel oil sulfur limitations apply at all times, including periods of startup, shutdown, and malfunction.

40CFR 60-Dc.44c (g)

This regulation requires that oil fired facilities, demonstrating compliance with the sulfur dioxide standard through sampling and analysis, must test every shipment of oil after the initial approval of the sampling plan.

40CFR 60-Dc.44c (h)

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

40CFR 60-Dc.46c (e)

This regulation allows facilities subject to paragraphs 40 CFR 60-Dc.42c(h)(1), (2), or (3) who show compliance through vendor certification, to be exempt from the monitoring requirements of section 40 CFR 60-Dc.46c

40CFR 60-Dc.48c (d)

This regulation requires the owner or operator of the facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c, to submit semi-annual reports to the EPA

40CFR 60-Dc.48c (e) (1)

Reporting and recordkeeping provisions for facilities subject to a sulfur-in-fuel standard, sulfur dioxide emission limit, or percent reduction of sulfur dioxide emissions.

40CFR 60-Dc.48c (e) (11)

If fuel supplier certifications are used to demonstrate compliance with the distillate oil specifications under 40 CFR 60-Dc.41c, then reports shall include a certified statement signed by the owner or operator that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

40CFR 60-Dc.48c (e) (2)

Reporting and recordkeeping provisions for facilities subject to a sulfur-in-fuel standard, sulfur dioxide emission limit, or percent reduction of sulfur dioxide emissions.

40CFR 60-Dc.48c (e) (3)

Reporting and recordkeeping provisions for facilities subject to a sulfur-in-fuel standard, sulfur dioxide emission limit, or percent reduction of sulfur dioxide emissions.

40CFR 60-Dc.48c (g)

The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.



40CFR 60-Dc.48c (i)

This regulation requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

6NYCRR 201-6.5 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-7.2

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6NYCRR 219-4

This subpart sets forth the emission standards and requirements for all new and modified (after January 1, 1989) crematories and pathological waste incinerators.

6NYCRR 219-4.11

This section sets forth the Inspection and Reporting requirements for the crematories. Each owner or operator must inspect the facility annually and submit a report to the commissioner, certifying that the condition and operation of that facility, including the calibration of all instrumentation, meet manufacturer's specifications.

6NYCRR 219-4.5 (a)

This section sets forth the emission standards of six-minute average opacity for the crematories, which is less than 10 percent.

6NYCRR 219-4.5 (b)

This section sets forth the primary combustion chamber temperature of the crematories and pathological incinerator(s), which is described in section 219-4.4 of this subpart.

6NYCRR 219-4.7

This section sets forth the continuous emission monitoring (CEMs) requirements for the crematories, which are primary and secondary (or last) combustion chamber exit temperatures.

6NYCRR 225 .1 (a) (3)

This regulation limits the amount of sulfur that can be in fuel burned at a stationary source. It references Table 1 of the 1979 version of the sulfur in fuel limitations expressed in terms of percent by weight for fuel oil and pounds per million Btu gross heat content for solid fuel. **NOTE: This citation has been replaced by requirements cited under 225-1.2(a)(2) and is no longer part of current State regulations, however, it remains part of New York State's approved State Implementation Plan (SIP).**

6NYCRR 225-1.8

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

6NYCRR 227 .2 (b) (1)



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Permit ID: 2-6104-00132/00009

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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.

6NYCRR 227-1.3 (a)

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

6NYCRR 227-2.4 (d)

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

6NYCRR 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

Compliance Certification

Summary of monitoring activities at DOWNSTATE MEDICAL CENTER:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
0-U0003/E0003/2FO/S0007	1-25	work practice involving specific operations
0-U0003	1-19	monitoring of process or control device parameters as surrogate
0-U0003/E0003/2FO/S0007	1-30	record keeping/maintenance procedures
0-U0003/E0003/2FO/S0007	1-31	record keeping/maintenance procedures
0-U0003/E0003/2FO	1-22	record keeping/maintenance procedures
0-U0003/E0003/2FO	1-21	record keeping/maintenance procedures
0-U0003	1-20	record keeping/maintenance procedures
0-U0003/E0003/2FO/S0007	1-32	record keeping/maintenance procedures
0-U0003/E0003/2FO/S0007	1-33	record keeping/maintenance procedures
FACILITY	3	record keeping/maintenance procedures
FACILITY	4	record keeping/maintenance procedures
FACILITY	1-16	monitoring of process or control device parameters as surrogate
FACILITY	1-17	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
0-U0002/E0002/002/S0006	23	record keeping/maintenance procedures
0-U0002/E0002/002/S0006	29	record keeping/maintenance procedures
0-U0002/E0002/002/S0006	24	monitoring of process or



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0-U0002/E0002/002/S0006	25	control device parameters as surrogate
0-U0002/E0002/002/S0006	26	monitoring of process or control device parameters as surrogate
0-U0002/E0002/002/S0006	27	monitoring of process or control device parameters as surrogate
0-U0002/E0002/002/S0006	28	monitoring of process or control device parameters as surrogate
FACILITY	11	work practice involving specific operations
FACILITY	10	record keeping/maintenance procedures
0-U0001	15	intermittent emission testing
0-U0001/E0001	16	monitoring of process or control device parameters as surrogate
0-U0001	14	record keeping/maintenance procedures

Basis for Monitoring

Condition # 4 for 6NYCRR Part 201-6.5(c)(3)(ii): This is a facility-wide condition. 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 # 5 for 6NYCRR Part 201-6.5(e): This is a facility-wide condition. This condition specifies the overall permit requirements for compliance certification, including emission limitations, standards or work practices.

Condition # 6 for 6NYCRR Part 202-2.1: This is a facility-wide condition. 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 requirements 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 # 8 for 6 NYCRR 225-1.8(b): 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.

Condition # 9 for 6 NYCRR 225.1(a)(3): This is a facility-wide condition. This condition is for Work Practice Involving Specific Operations for sulfur content. This condition limits the amount of sulfur that can be in fuel burned at a stationary source. It references Table 1 of the 1979 version of the sulfur in fuel limitations expressed in terms of percent by weight for fuel oil and pounds per million Btu gross heat content for solid fuel. The sulfur limit is 0.30 percent by



weight for residual fuel oil - number 4, number 5 and/or number 6 for the New York City area. NOTE: This citation has been replaced by requirements cited under 225-1.2(a)(2) and is no longer part of current State regulations, however, it remains part of New York State's approved State Implementation Plan (SIP).

The intent of 6 NYCRR 225.1(a)(3) is to prohibit within a certain region the combustion of fuels with sulfur contents exceeding certain levels. The Downstate Medical Center is located within the New York City area which has sulfur content limit of 0.30 percent by weight for residual fuel and 0.20 percent by weight for distillates.

Condition # 14 for 6 NYCRR 227-2.4(d): This condition is an emission unit level condition for Record Keeping/Maintenance Procedures for Oxides of Nitrogen that applies to EU:0-U0001. This condition is for the NO_x RACT condition for small boilers (those with a heat input less than or equal to 50 MM Btu/hr) and applies to the boilers with Emission Sources S0001, S0002, S0003, S0004 & S0005 in Emission Unit 0-U00001, which are the five Combustion Engineering boilers, each with a maximum heat input of 42 MM Btu/hr. A boiler tune-up shall be performed annually to the five small 42 MM Btu/hr (each) Combustion Engineering boilers, identified as Emission Sources S0001, S0002, S0003, S0004 & S0005 in Emission Unit 0-U00001. The facility is required to tune-up each boiler at least once a year in order to ensure that the boiler is operating properly, thus minimizing the emissions to the atmosphere. The owner or operator of a small boiler (between 20 and 50 MM Btu/hr) shall maintain a log (in the format acceptable to the Department as in Air Guide 33) containing the following information:

- (1) The date which the equipment was adjusted; and
- (2) The name, title, and affiliation of the person who adjusted the equipment.

Annual tune-up maintenance usually includes not only some aspects of daily, weekly, and monthly scheduled maintenance, but also focuses on tests, evaluations and adjustments necessary for efficient combustion. Annual tune-up maintenance requirements must include a tune-up checklist (see Appendix A of Air Guide 33) and written procedures.

Condition # 15 for 6 NYCRR 227.2(b)(1): This condition is an emission unit level condition for Intermittent Emission Testing for Particulates that applies to EU: 0-U0001. 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/MM Btu based on a 2 hour average emission for any oil fired stationary combustion installation.

Condition # 16 for 6 NYCRR 227-1.3(a): This condition is an emission unit level and emission point level monitoring condition for Particulates and opacity that applies to EU: 0-U0001 and EP: E0001. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Opacity. 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. These conditions require a daily



inspection for visible emissions. If visible emissions are noted for two consecutive days, a Method 9 test must be performed.

Condition # 1-16 for 6 NYCRR 201-7.2, Capping out of 40 CFR 52.A.21: This is a facility-wide condition. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Sulfur Dioxide.

This condition for section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions in a state facility permit.

This facility is capping out of PSD (40 CFR 52-A.21) to limit the SO₂ emissions to 225 tons per year (tpy) for Sulfur Dioxide. This cap will also effectively limit the emissions of all other regulated pollutants to less than 225 tpy.

Condition # 1-17 for 6 NYCRR 201-7.2, Capping out of 6 NYCRR 231-2: This is a facility-wide condition. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Oxides of Nitrogen. This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions in a state facility permit.

This facility is capping out of NSR (6 NYCRR 231-2) to limit the NO_x emissions to 225 tons per year (tpy) for Oxides of Nitrogen. This cap will also effectively limit the emissions of all other regulated pollutants to less than 225 tpy.

Condition # 1-20 for 40 CFR 60.48c(e)(3), NSPS Subpart Dc: This condition is an emission unit level Record Keeping/Maintenance Procedures condition for Sulfur Dioxide that applies to EU: 0-U0003.

This condition sets forth the reporting and recordkeeping provisions for facilities subject to a sulfur-in-fuel standard, sulfur dioxide emission limit, or percent reduction of sulfur dioxide emissions. sets forth the applicability criteria for

Condition # 1-21 for 40 CFR 60.48c(e)(2), NSPS Subpart Dc: This condition is an emission unit level, emission point level, and process level Record Keeping/Maintenance Procedures condition for Sulfur Dioxide that applies to EU: 0-U0003, EP: E0003 and Proc: 2FO.

This condition sets forth the reporting and recordkeeping provisions for facilities subject to a sulfur-in-fuel standard, sulfur dioxide emission limit, or percent reduction of sulfur dioxide emissions.



Condition # 1-22 for 40 CFR 60.48c(e)(11), NSPS Subpart Dc: This condition is an emission unit level, emission point level and process level Record Keeping/Maintenance Procedures condition for Sulfur Dioxide that applies to EU: 0-U0003, EP: E0003 and Proc: 2FO.

This condition specifies that if fuel supplier certifications are used to demonstrate compliance with the distillate oil specifications under 40 CFR 60-Dc.41c, then reports shall include a certified statement signed by the owner or operator that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

Condition # 1-25 for 40 CFR 60.42c(d), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source level Record Keeping/Maintenance Procedures condition for Sulfur Dioxide that applies to EU: 0-U0003, EP: E0003, Proc: 2FO, and ES: S0007.

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 0.5 percent by weight.

Condition # 1-30 for 40 CFR 60.48c(d), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source level Record Keeping/Maintenance Procedures condition for Sulfur Dioxide that applies to EU: 0-U0003, EP: E0003, Proc: 2FO, and ES: S0007.

This condition requires the owner or operator of the facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c, to submit semi-annual reports to the EPA

Condition # 1-31 for 40 CFR 60.48c(e)(1), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source level Record Keeping/Maintenance Procedures condition for Sulfur Dioxide that applies to EU: 0-U0003, EP: E0003, Proc: 2FO, and ES: S0007.

This condition sets forth the reporting and recordkeeping provisions for facilities subject to a sulfur-in-fuel standard, sulfur dioxide emission limit, or percent reduction of sulfur dioxide emissions.

Condition # 1-32 for 40 CFR 60.48c(g), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source level Record Keeping/Maintenance Procedures condition for Sulfur Dioxide that applies to EU: 0-U0003, EP: E0003, Proc: 2FO, and ES: S0007.



This condition requires the owner or operator of each affected facility to record and maintain records of the amount of each fuel combusted during each day.

Condition # 1-33 for 40 CFR 60.48c(i), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source level Record Keeping/Maintenance Procedures condition for Sulfur Dioxide that applies to EU: 0-U0003, EP: E0003, Proc: 2FO, and ES: S0007.

This condition requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for a minimum of 5 years.

Condition # 23 for 6 NYCRR 219-4: This condition is an emission unit level, emission point level, process level and emission source level Record Keeping/Maintenance Procedures condition for Particulates that applies to EU: 0-U0002, EP: E0002, Proc: 002, and ES: S0006.

This condition sets forth the emission standards and requirements for all new and modified (after January 1, 1989) crematories and pathological waste incinerators.

Condition # 24 for 6 NYCRR 219-4.5(a): This condition is an emission unit level, emission point level, process level and emission source level monitoring condition for Particulates that applies to EU: 0-U0002, EP: E0002, Proc: 002, and ES: S0006. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Opacity.

This condition sets forth the emission standards of six-minute average opacity for the crematories, which is less than 10 percent.

Condition # 25 for 6 NYCRR 219-4.5(b): This condition is an emission unit level, emission point level, process level and emission source level monitoring condition for Particulates that applies to EU: 0-U0002, EP: E0002, Proc: 002, and ES: S0006. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Temperature.

This condition sets forth the secondary combustion chamber temperature of the crematories and pathological incinerator(s), which is described in section 219-4.4 of this subpart. The secondary combustion chamber temperature of the crematory cannot fall below 1800 degrees Fahrenheit.

The secondary combustion chamber temperature of the crematory must be maintained at all times at 1800 degrees Fahrenheit that waste is being burned.

Condition # 26 for 6 NYCRR 219-4.5(b): This condition is an emission unit level, emission point level, process level and emission source level monitoring condition for Particulates that applies to EU: 0-U0002, EP: E0002, Proc: 002, and ES: S0006. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Temperature.



This condition sets forth the primary combustion chamber temperature of the crematories and pathological incinerator(s), which is described in section 219-4.4 of this subpart. The primary combustion chamber temperature of the crematory cannot fall below 1400 degrees Fahrenheit.

Condition # 27 for 6 NYCRR 219-4.7: This condition is an emission unit level, emission point level, process level and emission source level monitoring condition for Particulates that applies to EU: 0-U0002, EP: E0002, Proc: 002, and ES: S0006. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Temperature.

This condition sets forth the continuous emission monitoring (CEMs) requirements for the crematories, which are secondary (or last) combustion chamber exit temperatures.

The continuous exit temperature of the **secondary (or last)** combustion chamber temperature of the crematory cannot fall below 1800 degrees Fahrenheit using CEMs.

Any person who owns or operates a crematory facility must install, operate and maintain in accordance with manufacturer's instructions, instruments meeting specifications acceptable to the commissioner for continuously monitoring and recording the secondary (or last) combustion chamber exit temperature. Temperature charts produced by the continuous monitor/recorder shall demonstrate compliance with the combustion operating temperature requirements. Any malfunction of the monitor or recorder shall be reported to the NYSDEC within 24 hours of occurrence and corrective action shall be implemented immediately. Records of operation, monitoring, maintenance and repair shall be kept onsite for five years and shall be readily available for NYSDEC review upon request.

Condition # 28 for 6 NYCRR 219-4.7: This condition is an emission unit level, emission point level, process level and emission source level monitoring condition for Particulates that applies to EU: 0-U0002, EP: E0002, Proc: 002, and ES: S0006. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Temperature.

This condition sets forth the continuous emission monitoring (CEMs) requirements for the crematories, which are primary combustion chamber exit temperatures.

The continuous emission monitoring (CEMs) requirements for the crematories, which are **primary** combustion chamber exit temperatures cannot fall below 1400 degrees Fahrenheit using CEMs.

Any person who owns or operates a crematory facility must install, operate and maintain in accordance with manufacturer's instructions, instruments meeting specifications acceptable to the commissioner for continuously monitoring and recording the primary combustion chamber exit temperature. Temperature charts produced by the continuous monitor/recorder shall demonstrate compliance with the combustion operating temperature requirements. Any malfunction of the



monitor or recorder shall be reported to the NYSDEC within 24 hours of occurrence and corrective action shall be implemented immediately. Records of operation, monitoring, maintenance and repair shall be kept onsite for five years and shall be readily available for NYSDEC review upon request.

Condition # 29 for 6 NYCRR 219-4.11: This condition is an emission unit level, emission point level, process level and emission source level monitoring condition for Particulates that applies to EU: 0-U0002, EP: E0002, Proc: 002, and ES: S0006. This condition is for Record Keeping/Maintenance Procedures.

This condition sets forth the Inspection and Reporting requirements for the crematories. Each owner or operator of a permitted crematory facility must inspect the facility annually and submit a report to the commissioner, certifying that the condition and operation of that facility, including the calibration of all instrumentation, meet manufacturer's specifications. Annual inspections shall be conducted by a qualified incinerator service technician. The Operation and Maintenance Manual for the JK Environmental SP-300 incinerator shall be utilized at all times and maintenance and calibration procedures performed shall be recorded. Records shall be kept on site for five years and shall be available for NYSDEC review upon request.