



Permit ID: 2-6202-00674/00001

Permit Review Report  
Renewal Number: 1

09/10/2008

**Facility Identification Data**

Name: ST LUKE'S ROOSEVELT HOSPITAL  
Address: 1111 AMSTERDAM AVE  
NEW YORK, NY 10025

**Owner/Firm**

Name: ST LUKE'S ROOSEVELT HOSPITAL  
Address: 419 W 114TH ST  
NEW YORK, NY 10025, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

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NEW YORK, NY 10025  
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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.

**Attainment Status**

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

**Criteria Pollutant**

**Attainment Status**



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

St. Luke's-Roosevelt Hospital center operates emission sources consisting of four boilers and four emergency generators.

**Permit Structure and Description of Operations**

The Title V permit for ST LUKE'S ROOSEVELT 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.

ST LUKE'S ROOSEVELT HOSPITAL is defined by the following emission unit(s):  
Emission unit U00001 - This unit consists of four (4) boilers. The large boiler (S0001) has capacity to burn No.6



fuel only. The other three boilers (S0002, S0003 & S0004) have dual -fuel capabilities, burning no.6 oil and natural gas. Boilers S0001 and S0004 (total of 213 mmbtu/hr) exhaust to common stack E0002 and boilers S0002 and S0003 (total of 87mmbtu/hr) exhaust to common stack E0001.

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

E0001, E0002

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

Process: 001Four boilers burning No. 6 fuel oil.

Process: 002Three small boilers burning natural gas fuel. Note that large boiler is not capable of burning natural gas fuel.

**Title V/Major Source Status**

ST LUKE'S ROOSEVELT HOSPITAL is subject to Title V requirements. This determination is based on the following information:

It is a Title V permit is requires for this facility since the oxides of nitrogen emissions are equal or exceed 25 tons per year.

**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

**Description**

GENERAL MEDICAL & SURGICAL HOSPITALS

**SCC Codes**

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

1-01-006-02

**Description**

EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION

ELECTRIC UTILITY BOILER - NATURAL GAS

Boilers < 100 MBtu/Hr except Tangential

1-02-004-02

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL

INDUSTRIAL BOILER - RESIDUAL OIL

10-100MMBTU/HR \*\*

**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



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the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE		Range	
		lbs/yr			
007440-36-0	ANTIMONY	45000		Y	
000630-08-0	CARBON MONOXIDE	490000		F	
000630-08-0	CARBON MONOXIDE	19000		F	
000075-45-6	CHLORODIFLUORO-METHANE		pteyear		A
061789-51-3	COBALT NAPHTHA	pteyear		Y	
000075-71-8	DICHLORODIFLUOROMETHANE		pteyear		A
000811-97-2	ETHANE, 1,1,1,2-TETRAFLUORO		pteyear		A
000111-76-2	ETHANOL, 2-BUTOXY-	pteyear		C	
000100-41-4	ETHYLBENZENE	pteyear		Y	
000075-21-8	ETHYLENE OXIDE	pteyear		Y	
000050-00-0	FORMALDEHYDE	pteyear		Y	
0NY100-00-0	HAP	pteyear		A	
0NY100-00-0	HAP	pteyear			
000822-06-0	HEXANE, 1,6-DIISOCYANATO-	pteyear		Y	
007647-01-0	HYDROGEN CHLORIDE	pteyear		Y	
007439-92-1	LEAD	pteyear		Y	
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS			pteyear	Y
007697-37-2	NITRIC ACID	pteyear		A	
0NY090-00-0	OIL MIST	pteyear		C	
0NY210-00-0	OXIDES OF NITROGEN	pteyear		H	
0NY210-00-0	OXIDES OF NITROGEN	pteyear		H	
0NY075-00-0	PARTICULATES	pteyear		G	
0NY075-00-0	PARTICULATES	pteyear		H	
0NY075-00-5	PM-10	pteyear		G	
0NY075-00-5	PM-10	pteyear		G	
007446-09-5	SULFUR DIOXIDE	pteyear			
007446-09-5	SULFUR DIOXIDE	pteyear		H	
000108-88-3	TOLUENE	pteyear		Y	
0NY998-00-0	VOC	pteyear		F	
0NY998-00-0	VOC	pteyear		B	
001330-20-7	XYLENE, M, O & P MIXT.	pteyear			



### 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;
- (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 - 6 NYCRR 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)**

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, 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			
	Powers and Duties of the		Department with respect to air pollution control
FACILITY	40CFR 68		
	Chemical accident		prevention provisions
FACILITY	40CFR 82-F		
	Protection of		Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6		
	Acceptable ambient air		quality.
FACILITY	6NYCRR 200.7		
FACILITY	6NYCRR 201-1.4		
	Unavoidable noncompliance		and violations
FACILITY	6NYCRR 201-1.7		
FACILITY	6NYCRR 201-1.8		
	Prohibition of		reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)		
	Exempt Activities - Proof		of eligibility
FACILITY	6NYCRR 201-3.3 (a)		



Trivial Activities -		
FACILITY	6NYCRR 201-6	proof of eligibility
Title V Permits and the		
FACILITY	6NYCRR 201-6.5 (a) (4)	Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	
FACILITY	6NYCRR 201-6.5 (a) (8)	
FACILITY	6NYCRR 201-6.5 (c)	
Permit conditions for		
FACILITY	6NYCRR 201-6.5 (c) (2)	Recordkeeping and Reporting of Compliance Monitoring
Permit conditions for		
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	Recordkeeping and Reporting of Compliance Monitoring
Permit conditions for		
FACILITY	6NYCRR 201-6.5 (d) (5)	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (e)	
FACILITY	6NYCRR 201-6.5 (f) (6)	
FACILITY	6NYCRR 202-1.1	
FACILITY	6NYCRR 202-2.1	
Emission Statements -		
FACILITY	6NYCRR 202-2.5	Applicability
Emission Statements -		
FACILITY	6NYCRR 211.2	record keeping requirements.
General Prohibitions -		
FACILITY	6NYCRR 211.3	air pollution prohibited.
General Prohibitions -		
FACILITY	6NYCRR 215	visible emissions limited
FACILITY	6NYCRR 225.1(a) (3)	
Sulfur in Fuel		
FACILITY	6NYCRR 225.7(a)	Limitations (SIP)



Reports, Sampling and		Analysis
FACILITY	6NYCRR 227.2(b)(1)	
U-00001/E0001/001	6NYCRR 227-1.3(a)	
Smoke Emission		Limitations.
U-00001/E0002/001	6NYCRR 227-1.3(a)	
Smoke Emission		Limitations.
U-00001/-/001/S0001	6NYCRR 227-2.4(b)(1)	
Control Requirements for		large boilers which are not case by case.
U-00001	6NYCRR 227-2.4(d)	
RACT for Oxides of		Nitrogen - small boilers.

**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, ST LUKE'S ROOSEVELT HOSPITAL has been determined to be subject to the following regulations:

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 .7 (a)

The commissioner may require an owner of an air contamination source to retain for up to three years, and to submit to him, fuel analyses, information on the quantity of fuel received, burned or sold, and results of stack sampling, stack monitoring and other procedures to ensure compliance with the provisions of the Part. **NOTE: This citation has been replaced by requirements cited under 225-1.8(a) and is no longer a part of current State regulations,**



however, it remains as part of New York State's approved State Implementation Plan (SIP).

6NYCRR 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.

6NYCRR 227-1.3 (a)

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

6NYCRR 227-2.4 (b) (1)

This paragraph provides a table for gas only, gas and/or oil firing capable, pulverized coal, and overfeed stoker emission limits. Compliance is determined by a stack test.

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.

**Compliance Certification**

Summary of monitoring activities at ST LUKE'S ROOSEVELT HOSPITAL:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	24	work practice involving specific operations
FACILITY	25	record keeping/maintenance procedures
FACILITY	26	intermittent emission testing
U-00001/E0001/001	31	monitoring of process or control device parameters as surrogate
U-00001/E0002/001	32	monitoring of process or control device parameters as surrogate
U-00001/-/001/S0001	30	intermittent emission testing
U-00001	29	record keeping/maintenance procedures

**Basis for Monitoring**

6 NYCRR Part 201-6.5 (c)(3)(ii): This condition has been added to all New York State Title V permits. The condition serves several purposes:

- to clarify that all reports required by federally enforceable monitoring conditions are to be submitted at least every 6 months on a calendar year basis in order to comply with Title V requirements. The reporting requirement supercedes any of the reporting requirement that may be listed for an individual permit monitoring condition which may have incorrectly listed a reporting period exceeding 6 months. Any monitoring conditions that may have more frequent reporting requirements will remain in effect as displayed in the condition. This condition corrects a deficiency noted by the USEPA for previously issued Title V permits;
- to clearly specify the both the obligation and procedures the facility must meet and follow in reporting permit



deviations or exceedances;

- to clearly state that no violations of federal rules may be excused during start-up, shutdown, malfunctions or upsets unless allowed by the specific requirement.

Part 201-6.5(e): Condition has been added in order to comply with the Title V annual compliance certification requirements and specify the mailing addresses for submitting the compliance reports. It further specifies what constitutes compliance certification with the terms and conditions of the permit. This is a required monitoring condition for all Title V permitted facilities. The facility demonstrates compliance with the NOx RACT limits via periodic stack tests (see condition cited under 227-2.4)b(1) however, this condition has been added to assure proper operation during the interim period between tests.

Part 202-2.1: Condition #30 specifies the emission statement requirement for Title V permitted facilities. This condition is inserted in every Title V permit.

6 NYCRR Part 225.1(a)(3): Condition limits the percent by weight of sulfur in distillate oil and residual oil burned at the facility. Monitoring is required per fuel oil delivery which in turn determines compliance with the requirement prior to burning.

6 NYCRR Part 225.7(a): Condition requires the permittee to maintain fuel oil supplier certifications for each oil shipment received at the facility. The monitoring method being employed is appropriate for the sulfur-in-fuel applicable requirement for the Starrett City facility. A number of regulations rely on certifications, a responsibility that most sources and suppliers must take seriously to avoid liability for substantial penalties. While some sources may not comply with this requirement, and spot monitoring can be helpful in identifying them, fuel certification is the method that EPA itself relies on in certain instances (e.g., certain NSPS rules and PSD permits, permit provisions). While ever more stringent monitoring requirements can always be applied, it is necessary to use methods that are appropriate to the case at hand, based on the applicable requirement, the type and size of the facility, economics, facility location, and other factors, while avoiding the imposition of gratuitously, onerous conditions on the source.

Part 227-1.2(a)(2): The facility is subject to the requirement of this part. The facility is required to limit particulate matter emissions to 0.20 lbs/mm btu when burning residual oil and and requires facility to perform stack test once per permit term to demonstrate the compliance.

NYCRR 227-1.3(a): Condition requires the facility to comply with the specified opacity limits and requires facility to monitor the stacks for visible emissions on a daily basis. If no plume is observed from a stack, it can be assumed that the opacity limit is being met. If a visible plume is observed two consecutive days of firing oil, then the facility must conduct a Method 9 analysis to measure the opacity. While Part 227 provides that Method 9 analyses are acceptable methods for determining compliance with the opacity standards for the combustion units, the circumstances under which Method 9 analyses are required are not defined. The Department has developed a standard method that results in a consistent approach to determining compliance with the opacity requirements of Part 227 as well as other rules which contain an opacity limit. The approach requires that the facility owner look for the presence of visible emissions once per day. If visible emissions are detected two days in a row, a Method 9 observation must be done by a certified individual within two business days of the occurrence.

This method is more structured and routine than past treatment of opacity requirements in which problems may have occurred for some time before the Department became aware of them and sent a certified observer to document the violation. The approach in this permit allows the smoke condition to exist for only two days before a Method 9 analysis is necessary. It should be noted that the presence of visible emissions is not necessarily an indication that the opacity limit is being exceeded, only that it may need to be assessed by Method



9 if it persists for two days. Since the use of a continuous emissions monitor is not a requirement for this facility, and federal regulations do not contain any further opacity monitoring requirements for units such as those at this facility, this has become the standard approach to monitoring opacity for operations such as this.

The placement of this requirement in this permit does not preclude the Department or the EPA from conducting a Method 9 observation when deemed to be necessary. This approach has been used in many permits and has been found by the EPA under the Title V program to be an acceptable method for opacity monitoring for these situations.

Part 227-2.4(b): See compliance discussion part for the compliance status of this part. Facility submitted a NOx compliance stack test protocol on August 6, 2003 for the boiler (S0001) to demonstrate compliance with the NOx RACT limit of 0.30 pounds per mm btu. Once the protocol is approved by the Department, the facility will perform the stack test. If the NOx emissions exceed the limit, department will take appropriate actions to bring the facility in compliance. Stack test per permit term is required by this condition, although only an initial stack test is required by regulation. Previous experience with similar units has shown that if properly maintained NOx RACT limits will not be exceeded, therefore, boiler tune up requirement condition has been added under 201-6.5(e) to ensure ongoing compliance.

Part 227-2.4(d): Boilers S0002, S0003 and S0004 are of heat input capacities less than 50 mmbtu/hr. This condition requires facility to conduct annual tune-up as described in air gude 33. Annual tune up is the reasonably available control technology for these size boilers.

Part 227.2(b)(1): This conditon establishes a particulate limit of 0.10 lbs/mm Btu for all combustion units when burning oil. Compliance is demonstrated via a periodic stack test as required under the regulation. The regulation is from the 1972 version of Part 227 which still remains as part of New York's SIP. The four boilers (S0001, S0002, S0003, S0004) are subject to the requirement of this part.