Facility Identification Data
Name: MOUNT SINAI HOSPITAL
Address: 1 GUSTAVE L LEVY PL
NEW YORK, NY 10029

Owner/Firm
Name: MOUNT SINAI MEDICAL CENTER
Address: 1 GUSTAVE L LEVY PL
NEW YORK, NY 10029-6504, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
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Phone:2122417219

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 modification to correct the monitoring description language error for the reporting schedule within item 3 of the "Monitoring Description" for Conditions # 44 - 55 for 6 NYC 227- 2.4(c)(2), from Semi-annualy to Quarterly (Calendar). In this Renewal 1, Modification 1, these twelve conditions are identified and listed as Conditions 1-1 thru 1-12. Any requirement of continuous monitoring such as CEMS monitoring, is required to be reported on a Quarterly (Calendar) basis.

Attainment Status

MOUNT SINAI 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

Mount Sinai Hospital is a teaching hospital that operates six steam boilers. All six boilers are capable of firing either natural gas or # 6 fuel oil (residual fuel oil). Four of the boilers, Boilers # 1, # 2, # 3 and # 4 (Emission Sources B0001, B0002, B0003 and B0004; respectively) are rated at 60 MM Btu/hr heat input each, and the other two boilers, Boilers # 5 and # 6 (Emission Sources B0005 and B0006; respectively) are rated at 95 MM Btu/hr heat input each. The following includes a detailed summary of the modifications to the Title V Renewal permit:

1. The three Ethylene Oxide Sterilizers:

As of July 31, 2003, the facility has removed the three ethylene oxide (EtO) sterilizers. The compliance plan to eliminate the three EtO sterilizers was submitted on May 15, 2003. The three sterilizers used a 12/88 gas mixture (12% by weight ethylene oxide, EtO, and 88% by weight dichlorodifluoromethane, CFC-12) as the sterilant for medical equipment used in the hospital. As a result of the removal of the three ethylene oxide sterilizers, two of which were identical AMSCO Model 2057 and the other one was AMSCO Model 2037, the following items have been removed from the facility, and hence from the Title V permit renewal: Emission Unit U-E0001, Emission Point E0001, Process 007 and Emission Sources/controls ETS01, ETS02, ETS03 and ETSCT and their requirements of 6 NYCRR 212.3(a) and 6 NYCRR 212.9 . Emission control ETSCT was never constructed.

2. NOx RACT Limits:

The facility has modified changes in Emission Unit U-C0001 pertaining to the operation of the facility's six boilers, Boilers # 1, # 2, # 3, # 4, # 5 & # 6 (Emission Sources B0001, B0002, B0003, B0004, B0005 & B0006,; respectively) in accordance with the Plant Oxygen O2 vs. Steam Flow Load curves. Previous surrogate percent oxygen limits for NOx RACT requirements were replaced by revised "percent Oxygen in Flue Gas vs. Steam Load" Curves (Curves 5.2.1-2 thru 5.2.6-2 when firing natural gas and Curves 5.2.1-1 thru 5.2.6-1 when firing # 6 fuel oil), that were developed as a result of NOx RACT compliance stack testing conducted on May 5 thru May 17, 2003 and reported in "Boiler NOx RACT Compliance Emission Evaluation for Mount Sinai Medical Center, Volume 1 "dated June 20, 2003. This report was submitted to NYSDEC on July 17, 2003. All twelve curves for the six boilers are attached to the end of the permit.

The Boiler NOx RACT Compliance Emission Evaluation Report contains upper and lower percent oxygen limits depicted in a series of twelve curves, one set of two curves for each of the six boilers firing natural gas (5.2.1-2, 5.2.2-2, 5.2.3-2, 5.2.4-2, 5.2.5-2 and 5.2.6-2), and one set of two curves for each boiler firing residual fuel oil (5.2.1-1, 5.2.2-1, 5.2.3-1, 5.2.4-1, 5.2.5-1 and 5.2.6-1). All twelve curves can be found in Appendix A at the end of this permit. Existing pound per hour steam load limits are eliminated as permitted by the new NOx RACT emission limitations presented in Curves 5.2.1-2 thru 5.2.6-2 and 5.2.1-1 thru 5.2.6-1.

At all times, each of the six boilers are to be operated according to the Plant Oxygen O2 vs. Steam Flow Load Curves (Curves 5.2.1-2 thru 5.2.6-2 when firing natural gas and Curves 5.2.1-1 thru 5.2.6-1 when firing # 6 fuel oil) that were developed during the May 5-17, 3003 stack testing and were reported ton June 23, 2003 to the Department, to demonstrate compliance with the NOx limit of 0.10 lbs/MM BTU when firing natural gas and with the NOx limit of 0.30 lbs/MM BTU when firing # 6 fuel oil as part of the Evaluation Report for the NOx RACT Compliance Plan for Boilers B0001, B0002, B0003, B0004, B0005 and B0006.

The The NOx RACT Compliance Plan is based on an emission testing program and report dated Iuly, 2003 for demonstration of compliance with NOx RACT. The NOx RACT Plan requires compliance with specific emission limits for each boiler firing a specific fuel (0.10 pounds per million Btus when firing natural gas and 0.30 pounds per million Btus when firing # 6 fuel oil). In this stack test program, two parameters were monitored for NOx Compliance; the Plant Oxygen O2 % and the Steam Flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. The corresponding stack test results defining each curve are "tabulated below each set of curves. All results are below emission rate limits."

The new compliance curves of the surrogate flue gas percent oxygen are a function of the boiler steam load. During the transition period, algorithms for the newly developed NOx RACT curves were developed and inserted into the DCS controls. Additionally, the DCS was modified to provide boiler operators indication of surrogate parameters on a real time basis, alarms and methods of control. A training session was provided to the boiler operators specific to this matter.

The twelve Plant Oxygen O2 vs. Steam Flow Load Curves as described as:

1. For Boiler # 1 (Emission Source B0001), Curve 5.2.1-2 when firing natural gas, and Curve 5.2.1-1 when firing # 6 fuel oil.

2. For Boiler # 2 (Emission Source B0002), Curve 5.2.2-2 when firing natural gas, and Curve 5.2.2-1 when firing # 6 fuel oil.

3. For Boiler # 3 (Emission Source B0003), Curve 5.2.3-2 when firing natural gas, and Curve 5.2.3-1 when firing # 6 fuel oil.

4. For Boiler # 4 (Emission Source B0004), Curve 5.2.4-2 when firing natural gas, and Curve 5.2.4-1 when firing # 6 fuel oil.

5. For Boiler # 5 (Emission Source B0005), Curve 5.2.5-2 when firing natural gas, and Curve 5.2.5-1 when firing # 6 fuel oil.

6. For Boiler # 6 (Emission Source B0006), Curve 5.2.6-2 when firing natural gas, and Curve 5.2.6-1 when firing # 6 fuel oil.

The facility utilizes current Westinghouse combustion management process controls with the Plant Oxygen O2 vs. Steam Flow Load compliance curves (Curves 5.2.1-2 thru 5.2.6-2 when firing natural gas and Curves 5.2.1-1 thru 5.2.6-1 when firing # 6 fuel oil) as controlling algorithm for NOx emissions as part of the Evaluation Report for the NOx RACT Compliance Plan for each of the six boilers. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate.

The facility campus has eleven diesel generators, which are used as an emergency backup power source and can fire distillate fuel oil (# 2 fuel oil). Each emergency generator is exempt from permitting requirements providing restrictive operation is maintained (operating less than 500 hours annually). The facility shall keep records to demonstrate that each engine operates below the limit. Each engine burns diesel fuel (distillate oil) which must not contain more than 0.20% by weight sulfur.

The facility campus contains nine oil storage tank's ranging between 50,000 and 800 gallons, that are exempt from permitting since each tanks capacity is less than 300,000 barrels of distillate or residual oil. However Tank 006, a 20,000 gallon distillate oil storage tank shall have available the tank dimensions and an analysis showing the capacity of the tank to comply with the New Source Performance Standards (NSPS) of 40 NYCRR Part 60 subpart Kb. The rest of the tanks were constructed before the applicability dates of subpart K, Ka, and Kb or are smaller than the applicability volumes. In addition, the facility campus operates 303 laboratory fume hoods which are exempt from permitting since they are laboratory hoods, 6 NYCRR 201-6.3.2(c)(40).

Permit Structure and Description of Operations

The Title V permit for MOUNT SINAI 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.

MOUNT SINAI HOSPITAL is defined by the following emission unit(s):

Emission unit UC0001 - Emission unit U-C0001 consists of a total of six boilers, four are identical Combustion Engineering Type 13.5 (VU-10)-168 boilers, Boilers # 1, # 2, # 3 & # 4 (Emission Sources B0001, B0002, B0003 & B0004) with a nominal rated capacity of 60 MM Btu/hr heat input and 50,000 pounds per hour of steam output each, and two are identical Erie City/16M Keystone boilers, Boilers # 5 & # 6 (Emission Sources B0005 & B0006) with a nominal rated capacity of 95 MM Btu/hr heat input and 80,000 pounds per hour of steam output each. Each boiler is capable of firing natural gas or # 6 fuel oil (residual fuel). There are separate burners for each fuel. Process G14 is the firing of natural gas in the operation of Boilers #1, # 2, # 3 and # 4 (Emission Sources B0001, B0002, B0003 & B0004), and Process O14 is the firing of # 6 fuel oil in the operation of the same four boilers. Process G56 is the firing of natural gas in the operation of Boilers # 5 & # 6 (Emission Sources B0005 & B0006), and Process O56 is the firing of # 6 fuel oil in the operation of the same two boilers. There are separate burners for each fuel. There is a common stack for these boilers, which is located in the Annenberg building. There are nine fuel oil storage tanks that are exempt from permiting, however; Tank 006 constructed in 1997 shall comply Subpart Kb in 40 CFR 60.

The maximum total heat input from these six boilers is 430 MM BTU/hr, and all of the six boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from all of the six boilers are exhausted through one common stack which is identified as Emission Point C0001.

The facility will comply with the NOx RACT emission limitation of 0.10 lb NOx per MMBtu when firing natural gas, and with the NOx RACT emission limitation of 0.30 lb NOx per MMBtu when firing # 6 fuel oil (residual oil).

The Boiler NOx RACT Compliance Emission Evaluation Report contains upper and lower percent oxygen limits depicted in a series of twelve curves, one curve for each of the six boilers firing natural gas (5.2.1-2, 5.2.2-2, 5.2.3-2, 5.2.4-2, 5.2.5-2 and 5.2.6-2), and one curve for each boiler firing residual fuel oil (5.2.1-1, 5.2.2-1, 5.2.3-1, 5.2.4-1, 5.2.5-1 and 5.2.6-1). All twelve curves can be found in Appendix A at the end of this permit. Existing pound per hour steam load limits are eliminated as permitted by the new NOx RACT emission limitations presented in Curves 5.2.1-2 thru 5.2.6-2 and 5.2.1-1 thru 5.2.6-1.

The new compliance curves of the surrogate flue gas percent oxygen are a function of the boiler steam load. During the transition period, algorithms for the newly developed NOx RACT curves were developed and inserted into the DCS controls. Additionally, the DCS was modified to provide boiler operators indication of surrogate parameters on a real time basis, alarms and methods of control. A training session was provided to the boiler operators specific to this matter.
Emission unit UC0001 is associated with the following emission points (EP):
C0001
It is further defined by the following process(es):
Process: G14 is located at S3, Building ANNENBERG - Process G14 is the firing of natural gas in the operation of the four identical boilers, Boilers #1, # 2, # 3 and # 4 (Emission Sources B0001, B0002, B0003 & B0004) in Emission Unit U-C0001. Emission Sources B0001, B0002, B0003 & B0004 are four identical Combustion Engineering type 13.5 (VU-10)-168 boilers with a nominal rated capacity of 60 MM Btu/hr heat input and 50,000 pounds per hour of steam output each. The maximum total heat input from these four boilers is 240 MM BTU/hr. In addition to these four boilers, two more boilers (95 MM BTU/hr each and are identified as Emission Source B0005 & B0006, and operate on natural gas via Process G56) are collectively identified as Emission Unit U-C0001, and all of the six boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from all of the six boilers are exhausted through one common stack which is identified as Emission Point C0001.
Process: G56 is located at S3, Building ANNENBERG - Process G56 is the firing of natural gas in the operation of the two identical boilers, Boilers # 5 & # 6 (Emission Sources B0005 & B0006) in Emission Unit U-C0001. Emission Sources B0005 & B0006 are two identical Erie City/16M Keystone boilers with a nominal rated capacity of 95 MM Btu/hr heat input and 80,000 pounds per hour of steam output each. The maximum total heat input from these two boilers is 190 MM BTU/hr. In addition to these two boilers, four more boilers (60 MM BTU/hr each, are identified as Emission Sources B0001, B0002, B0003 & B0004, and operate on natural gas via Process G14) are collectively identified as Emission Unit U-C0001, and all of the six boilers supply both hot water and steam for the

space heating and the air conditioning of the building. Emissions from all of the six boilers are exhausted through one common stack which is identified as Emission Point C0001.
Process: O14 is located at S3, Building ANNENBERG - Process O14 is the firing of # 6 fuel oil (residual oil) in the operation of the four identical boilers, Boilers #1, # 2, # 3 and # 4 (Emission Sources B0001, B0002, B0003 & B0004) in Emission Unit U-C0001. Emission Sources B0001, B0002, B0003 & B0004 are four identical Combustion Engineering type 13.5 (VU-10)-168 boilers with a nominal rated capacity of 60 MM Btu/hr heat input and 50,000 pounds per hour of steam output each. The maximum total heat input from these four boilers is 240 MM BTU/hr. In addition to these four boilers, two more boilers (95 MM BTU/hr each, are identified as Emission Sources B0005 & B0006, and operate on # 6 fuel oil via Process O56) are collectively identified as Emission Unit U-C0001, and all of the six boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from all of the six boilers are exhausted through one common stack which is identified as Emission Point C0001.
Process: O56 is located at S3, Building ANNENBERG - Process O56 is the firing of # 6 fuel oil (residual oil) in the operation of the two identical boilers, Boilers # 5 & # 6 (Emission Sources B0005 & B0006) in Emission Unit U-C0001. Emission Sources B0005 & B0006 are two identical Erie City/16M Keystone boilers with a nominal rated capacity of 95 MM Btu/hr heat input and 80,000 pounds per hour of steam output each. The maximum total heat input from these two boilers is 190 MM BTU/hr. In addition to these two boilers, four more boilers (60 MM BTU/hr each, are identified as Emission Source B0001, B0002, B0003 & B0004, and operate on # 6 fuel oil via Process O14) are collectively identified as Emission Unit U-C0001, and all of the six boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from all of the six boilers are exhausted through one common stack which is identified as Emission Point C0001.

Title V/Major Source Status
MOUNT SINAI HOSPITAL is subject to Title V requirements. This determination is based on the following information:
Mount Sinai Hospital is a major facility because the potential emissions of nitrogen oxides is greater than the major source thresholds, which is 25 tons per year for nitrogen oxides. All facilities utilizing this Title V General Permit shall be considered major sources.

Program Applicability
The following chart summarizes the applicability of MOUNT SINAI HOSPITAL 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	Description
8062	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	Description
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
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 the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP)

designation.

Cas No.	Contaminant Name	PTE lbs/yr	Range	
000079-34-5	1,1,2,2-TETRACHLOROETHANE	1291320		Y
000107-21-1	1,2-ETHANEDIOL	381720	Y	
000123-91-1	1,4-DIETHYLENE DIOXIDE	1192855	Y	
000075-05-8	ACETONITRILE	pteyear	Y	
000062-53-3	ANILINE	pteyear	Y	
000071-43-2	BENZENE	pteyear	Y	
000630-08-0	CARBON MONOXIDE	pteyear	F	
000056-23-5	CARBON TETRACHLORIDE	pteyear	Y	
000067-66-3	CHLOROFORM	pteyear	Y	
000075-09-2	DICHLOROMETHANE	pteyear	Y	
000050-00-0	FORMALDEHYDE	pteyear	Y	
000068-12-2	FORMAMIDE, N,N-DIMETHYL	pteyear	Y	
0NY100-00-0	HAP	pteyear	C	
007647-01-0	HYDROGEN CHLORIDE	pteyear	Y	
007439-92-1	LEAD	pteyear	Y	
000067-56-1	METHYL ALCOHOL	pteyear	Y	
000078-93-3	METHYL ETHYL KETONE	pteyear	Y	
000091-20-3	NAPHTHALENE	pteyear	Y	
0NY210-00-0	OXIDES OF NITROGEN	pteyear		
0NY075-00-0	PARTICULATES	pteyear		
000108-95-2	PHENOL	pteyear	Y	
0NY075-00-5	PM-10	pteyear	F	
007446-09-5	SULFUR DIOXIDE	pteyear		
000108-88-3	TOLUENE	pteyear	Y	
0NY998-00-0	VOC	pteyear	B	
001330-20-7	XYLENE, M, O & P MIXT.	pteyear	Y	

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 - 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)**

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		56	Powers and Duties of the Department with respect to air pollution control
U-C0001	40CFR 60-Kb.116b(b)	40	NSPS for volatile organic liquid storage vessels- monitoring of operations
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21, 22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	11	
FACILITY	6NYCRR 201-1.4	57	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	24	
FACILITY	6NYCRR 201-1.8	23	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.2(c)	25	Exempt Activities - exempt activity list
FACILITY	6NYCRR 201-3.3(a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-5.3(b)	58	Permit Content and Terms of Issuance - permit conditions
FACILITY	6NYCRR 201-6	26, 27, 34, 35, 36, 37	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	14	
FACILITY	6NYCRR 201-6.5(a)(7)	2	
FACILITY	6NYCRR 201-6.5(a)(8)	15	
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)	28	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	16	
FACILITY	6NYCRR 201-6.5(e)	6	
FACILITY	6NYCRR 201-6.5(f)(6)	17	
FACILITY	6NYCRR 201-6.5(g)	29	
FACILITY	6NYCRR 202-1.1	18	
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8, 9	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	59, 60	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	19	General Prohibitions - visible emissions

			limited
FACILITY	6NYCRR 215	10	
FACILITY	6NYCRR 225-1.2(d)	30, 31	Sulfur-in-fuel limitations - Table 2
FACILITY	6NYCRR 225-1.8(a)	32	Reports, sampling and analysis.
U-C0001/C0001	6NYCRR 227.2(b)(1)	43	
U-C0001	6NYCRR 227-1.2(a)(1)	38	Particulate Emissions from Liquid Fuels.
U-C0001/C0001	6NYCRR 227-1.2(b)	41	Particulate Emissions from 2 or More Connected Furnaces.
U-C0001/C0001	6NYCRR 227-1.3	42	Smoke Emission Limitations.
U-C0001	6NYCRR 227-1.4(b)	39	
FACILITY	6NYCRR 227-1.7(a)	33	
U-C0001/C0001/G14/B0001	6NYCRR 227-2.4(c)(2)	1-1	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
U-C0001/C0001/G14/B0002	6NYCRR 227-2.4(c)(2)	1-2	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
U-C0001/C0001/G14/B0003	6NYCRR 227-2.4(c)(2)	1-3	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
U-C0001/C0001/G14/B0004	6NYCRR 227-2.4(c)(2)	1-4	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
U-C0001/C0001/G56/B0005	6NYCRR 227-2.4(c)(2)	1-5	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
U-C0001/C0001/G56/B0006	6NYCRR 227-2.4(c)(2)	1-6	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
U-C0001/C0001/O14/B0001	6NYCRR 227-2.4(c)(2)	1-7	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
U-C0001/C0001/O14/B0002	6NYCRR 227-2.4(c)(2)	1-8	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
U-C0001/C0001/O14/B0003	6NYCRR 227-2.4(c)(2)	1-9	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
U-C0001/C0001/O14/B0004	6NYCRR 227-2.4(c)(2)	1-10	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
U-C0001/C0001/O56/B0005	6NYCRR 227-2.4(c)(2)	1-11	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.
U-C0001/C0001/O56/B0006	6NYCRR 227-2.4(c)(2)	1-12	Emission limitations for mid-sized boilers firing gas, distillate or residual fuels.

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 201-5.3(b)
Lists those contaminants subject to contaminant specific requirements

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)
This regulation specifies that the permit incorporate all reporting requirements

associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and 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 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 201-6.5(g)
Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-1.1
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 there 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, MOUNT SINAI HOSPITAL has been determined to be subject to the following regulations:

40CFR 60-Kb.116b (b)
Owners or operators of affected storage tanks with capacities greater than or equal to 10,000 gallons must keep records of the tanks dimensions and an analysis of its capacity for the life of the tank. If the tank's capacity is less than 20,000 gallons, then it is subject to no other provisions of this subpart.

6NYCRR 201-3.2 (c)
This section lists the specific activities which may be exempt from the permitting provisions of this Part.

6NYCRR 225-1.2 (d)
The sulfur-in-fuel limitations for residual and distillate oil and for solid fuel are listed in Tables 1,2 and 3 or 6 NYCRR Part 225-1.2(c), (d) and (e)

6NYCRR 225-1.8 (a)
Upon request 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

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 227-1.2 (a) (1)
This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units of greater than 250 mmBtu/hr heat input capacity which fire coal, oil, or coal derived fuels.

6NYCRR 227-1.2 (b)
This regulation requires the total heating capacity connected to a stack to be used to determine the permissible particulate emission rate.

6NYCRR 227-1.3
This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6NYCRR 227-1.4 (b)
This regulation requires the specific contents of excess emissions reports for opacity from facilities that employ continuous opacity monitors (COMs).

6NYCRR 227-1.7 (a)
This regulation requires any stationary combustion installation described in section 6 NYCRR 227-1.2 of this Part, to provide pertinent emissions data upon request by the Department..

6NYCRR 227-2.4 (c) (2)
This regulation requires mid-size boilers (fuel combustion units with a maximum heat input capacity greater than 50 million Btu per hour and equal to or less than 100 million Btu per hour that produce steam or heats water or any other heat transfer medium) to meet the following emission limits (listed in pounds NOx per million Btu) by May 31, 1985: for Gas fuel - 0.10
for Distillate Oil -0.12
for Residual Oil - 0.30
Compliance with these emission limits are determined with a 1-hour average in accordance with section 227-2.6(a)(4). If CEMs are used to determine compliance, the requirements of 227-2.6(b) apply, including the use of a 24-hour averaging period.

Compliance Certification
Summary of monitoring activities at MOUNT SINAI HOSPITAL:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-C0001	40	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	30	work practice involving specific operations

FACILITY	31	work practice involving specific operations
FACILITY	32	record keeping/maintenance procedures
U-C0001/C0001	43	intermittent emission testing
U-C0001	38	intermittent emission testing
U-C0001/C0001	42	continuous emission monitoring (cem)
U-C0001	39	record keeping/maintenance procedures
U-C0001/C0001/G14/B0001	1-1	monitoring of process or control device parameters as surrogate
U-C0001/C0001/G14/B0002	1-2	monitoring of process or control device parameters as surrogate
U-C0001/C0001/G14/B0003	1-3	monitoring of process or control device parameters as surrogate
U-C0001/C0001/G14/B0004	1-4	monitoring of process or control device parameters as surrogate
U-C0001/C0001/G56/B0005	1-5	monitoring of process or control device parameters as surrogate
U-C0001/C0001/G56/B0006	1-6	monitoring of process or control device parameters as surrogate
U-C0001/C0001/O14/B0001	1-7	monitoring of process or control device parameters as surrogate
U-C0001/C0001/O14/B0002	1-8	monitoring of process or control device parameters as surrogate
U-C0001/C0001/O14/B0003	1-9	monitoring of process or control device parameters as surrogate
U-C0001/C0001/O14/B0004	1-10	monitoring of process or control device parameters as surrogate
U-C0001/C0001/O56/B0005	1-11	monitoring of process or control device parameters as surrogate
U-C0001/C0001/O56/B0006	1-12	monitoring of process or control device parameters as surrogate

Basis for Monitoring

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

Condition # 5 for 6 NYCRR 201-6.5(c)(3)(ii): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

Condition # 6 for 6 NYCRR 201-6.5(e): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition specifies the overall permit requirements for compliance certification, including emission limitations, standards or work practices. This facility must submit an annual compliance certification to the NYSDEC and the USEPA.

Condition # 7 for 6 NYCRR 202-2.1: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition sets forth the applicability criteria for submitting an annual

statement of emissions. The criteria is based on annual emission threshold quantities and ozone attainment designation. This condition is a 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 # 25 for 6 NYCRR 201-3.2(c): This is a facility-wide condition. This condition lists the specific activities which may be exempt from the permitting provisions of this Part. The facility has eleven (11) diesel generators which are exempt from permitting provided that each engine operates less than 500 hours per year. The facility is required to keep records for each diesel engine, which shows the hours it operated each month.

Condition # 28 for 6NYCRR 201-6.5(c)(3): This is a facility-wide condition. This condition specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and 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 # 30 for 6NYCRR 225-1.2(d): This is a facility-wide condition. This condition is for work practice involving specific operations monitoring condition for Sulfur Dioxide. This condition prohibits the facility from purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations of 0.20 % by weight for distillate oil (# 2 fuel oil). The facility must maintain a log of the sulfur content of oils on a per delivery basis and keep records on site for five (5) years.

Condition # 31 for 6NYCRR 225-1.2(d): This is a facility-wide condition. This condition is for work practice involving specific operations monitoring condition for Sulfur Dioxide. This condition prohibits the facility from purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations of 0.30 % by weight for residual oil (# 6 fuel oil). The facility must maintain a log of the sulfur content of oils on a per delivery basis and keep records on site for five (5) years.

Condition # 32 for 6 NYCRR 225-1.8(a): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. Upon request 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 # 38 for 6 NYCRR 227-1.2(a)(1): This condition is an emission unit level intermittent emission testing condition for Particulates that applies to EU: U-C0001. This condition establishes a particulate emission limit of 0.1 in terms of lbs per mmBtu of heat input for stationary combustion units of greater than 250 mmBtu/hr heat input capacity which fire coal, oil, or coal derived fuels.

Condition # 39 for 6 NYCRR 227-1.4(b): This condition is an emission unit level record keeping/maintenance procedures condition for continuous opacity monitoring system (COMS) that applies to EU: U-C0001. This condition requires the specific contents of excess emissions reports for opacity from facilities that employ continuous opacity monitors (COMs).

Condition # 40 for 40 CFR 60.116b(b), NSPS Subpart Kb: This condition is an emission unit level record keeping/maintenance procedures condition for VOC that applies to EU: U-C0001. Owners or operators of affected storage tanks with capacities greater than or equal to 10,000 gallons must keep records of the tanks dimensions and an analysis of its capacity for the life of the tank. If the tank's capacity is less than 20,000 gallons, then it is subject to no other provisions of this subpart.

Condition # 42 for 6 NYCRR 227-1.3: This condition is an emission unit and emission point level continuous emission monitoring (CEM) condition for Particulates that applies to EU: U-C0001 and EP: C0001. This condition requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

Condition # 43 for 6 NYCRR 227.2(b)(1): This condition is an emission unit and emission point level intermittent emission testing condition for Particulates that applies to EU: U-C0001 and EP: C0001. This condition is from the 1972 version of Part 227 and still remains as part of New York's SIP. The condition establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

Condition # 1-1 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: G14 and Emission Source B0001. The NOx RACT emission limitation of 0.10 lb of NOx per mm Btu may not be exceeded when firing natural gas in Boiler B0001.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.1-2), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.1-2 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.-1-2 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.

Condition # 1-2 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: G14 and Emission Source B0002. The NOx RACT emission limitation of 0.10 lb of NOx per mm Btu may not be exceeded when firing natural gas in Boiler B0002.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.2-2), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.2-2 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.2-2 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.

Condition # 1-3 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: G14 and Emission Source B0003. The NOx RACT emission limitation of 0.10 lb of NOx per mm Btu may not be exceeded when firing natural gas in Boiler B0003.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.3-2), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.3-2 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.3-2 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.

Condition # 1-4 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: G14 and Emission Source B0004. The NOx RACT emission limitation of 0.10 lb of NOx per mm Btu may not be exceeded when firing natural gas in Boiler B0004.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.4-2), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.4-2 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.4-2 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.

Condition # 1-5 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: G56 and Emission Source B0005. The NOx RACT emission limitation of 0.10 lb of NOx per mm Btu may not be exceeded when firing natural gas in Boiler B0005.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.5-2), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx

compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.5-2 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.5-2 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.

Condition # 1-6 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: G56 and Emission Source B0006. The NOx RACT emission limitation of 0.10 lb of NOx per mm Btu may not be exceeded when firing natural gas in Boiler B0006.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.6-2), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.6-2 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.6-2 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.

Condition # 1-7 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: O14 and Emission Source B0001. The NOx RACT emission limitation of 0.30 lb of NOx per mm Btu may not be exceeded when firing # 6 fuel oil in Boiler B0001.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.1-1), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.1-1 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.1-1 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.

Condition # 1-8 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: O14 and Emission Source B0002. The NOx RACT emission limitation of 0.30 lb of NOx per mm Btu may not be exceeded when firing # 6 fuel oil in Boiler B0002.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.2-1), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.2-1 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.2-1 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.

Condition # 1-9 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: O14 and Emission Source B0003. The NOx RACT emission limitation of 0.30 lb of NOx per mm Btu may not be exceeded when firing # 6 fuel oil in Boiler B0003.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.3-1), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.3-1 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.3-1 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.

Condition # 1-10 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: O14 and Emission Source B0004. The NOx RACT emission limitation of 0.30 lb of NOx per mm Btu may not be exceeded when firing # 6 fuel oil in Boiler B0004.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.4-1), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in

the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.4-1 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.4-1 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.

Condition # 1-11 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: O56 and Emission Source B0005. The NOx RACT emission limitation of 0.30 lb of NOx per mm Btu may not be exceeded when firing # 6 fuel oil in Boiler B0005.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.5-1), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.5-1 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.5-1 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.

Condition # 1-12 for 6 NYCRR 227-2.4(c)(2): This condition is an emission unit, emission point, process and emission source level continuous monitoring of process or control device parameters as surrogate condition for oxides of nitrogen that applies to Emission Unit: U-C0001, Emission Point: C0001, Process: O56 and Emission Source B0006. The NOx RACT emission limitation of 0.30 lb of NOx per mm Btu may not be exceeded when firing # 6 fuel oil in Boiler B0006.

At all times, the boiler will be operated according to the Plant Oxygen O2 vs. Steam Flow Load curve (Curve 5.2.6-1), developed during the May 5-17, 2003 stack testing and reported on June 20, 2003 to the Department, to demonstrate compliance with the above limit for natural gas as part of the Evaluation Report for the NOx RACT Compliance Plan for Boiler B0001. In this stack test, two parameters were monitored for NOx compliance; the flue gas Oxygen O2 % and the steam flow in pounds per hour. Oxygen O2 % is monitored in the exhaust as a surrogate for NOx limit for the boiler. Curve 5.2.6-1 can be found in Appendix A at the end of this permit together with the other eleven sets of curves for the six boilers.

The facility utilizes current Westinghouse combustion management process controls with compliance curve 5.2.6-1 as controlling algorithm for NOx. The control system is complete with graphics representing real time monitoring and hourly averaging of percent O2 in flue gas and boiler steam flow rate. An automated combustion control system maintains the proper exit oxygen levels by modulating air registers according to boiler load.