



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6204-00059/00001

**Renewal Number: 2
05/16/2014**

Facility Identification Data

Name: MOUNT SINAI HOSPITAL
Address: 1 GUSTAVE L LEVY PL|1450 MADISON AVE
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:
Name: ELIZABETH A CLARKE
Address: NYSDEC
47-40 21ST ST
LONG ISLAND CITY, NY 11101-5407
Phone:7184824997

Division of Air Resources:
Name: DIANA MENASHA
Address: NYSDEC REGION 2 OFFICE
HUNTERS POINT PLAZA
LONG ISLAND CITY, NY 11101
Phone:7184827263

Air Permitting Contact:
Name: MARK A MATTHEWS, SR
Address: MOUNT SINAI MEDICAL ENVIRONMENTAL HEALTH & SAFETY
ONE GUSTAVE L LEVY PLACE BOX 1091
NEW YORK, NY 10029
Phone:2122415909

Permit Description

Introduction

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

Summary Description of Proposed Project

Application for renewal of Air Title V Facility.

The facility currently is permitted to operate six (6) boilers firing natural gas and residual #6 fuel oil. The



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six boilers are identified as Emission Unit U-C0001, which consists of four (4) identical combustion Engineering Type 13.5 (VU-10)-168 boilers each with a nominal rated capacity of 60 million Btu heat input per hour producing 50,000 lbs of steam per hour (Emission sources B0001, B0002, B0003 & B0004) and two identical Erie City 16 M Keystone boilers each with a nominal rated capacity of 95 million Btu heat input per hour producing 80,000 lbs of steam per hour (Emission Sources B0005 & B0006). The maximum heat input from these six boilers is 430 million Btu per hour. All six boilers supply both hot water and steam for space heating and the air conditioning for the building. Emissions from all of the six boilers are exhausted through one common stack, which is identified as Emission Point C0001.

The facility currently complies with the NOx RACT emission limitation of 0.10 lbs NOx per million Btu heat input when firing natural gas, and with the NOx RACT emission limitation of 0.30 lbs NOx per million Btu heat input when firing residual #6 fuel oil. Because of the common stack, a CEMS system is not utilized at the facility. The facility utilizes a surrogate parameter, flue gas percent oxygen, to monitor for NOx RACT compliance. Boundary limits for operation are defined by a series of twelve curves, one curve for each of the six boilers firing residual #6 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] and 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]. The compliance curves of the surrogate parameter flue gas percent oxygen are a function of the boiler steam load. Algorithms for the NOx curves were developed and inserted into the DCS controls.

The facility is in the early construction phase of the replacement of all of the boilers and has an Air State Facility permit, DEC ID #2-6204-00059/00005 with an effective date of 10/03/2011 for this project. During the term of the renewal permit, the new boilers will become operational. The current schedule for the construction and the initial operation of the boilers is tabulated below.

Boiler #	Construction Schedule	Available Steam (lb/hr) During Construction
BLR06	07/01/2012 -- 12/31/2013	140,000
BLR05	04/01/2013 -- 07/01/2014	180,000
BLR04	07/01/2014 -- 12/01/2014	235,000
BLR03	12/01/2014 -- 06/01/2015	235,000
BLR02	12/01/2014 -- 06/01/2015	235,000
BLR01	06/01/2015 -- 11/01/2015	310,000

This schedule is necessary to provide sufficient steam generation capacity during the winter heating season during cold weather conditions. The above construction replaces the project milestone dates included in the ASF permit.

The ASF permit defines Emission Unit U-B0001, which consists of four identical Victory Energy VS-4-48 boilers each with a nominal rated capacity of 60 million Btu heat input per hour producing 50,000 lbs of steam per hour (Emission Sources BLR01, BLR02, BLR03 & BLR04) and two refurbished Victory Energy boilers each with a nominal rated capacity of 95 million Btu heat input per hour producing 80,000 lbs steam per hour (Emission Sources BLR05 & BLR06). Emission Sources BLR01, BLR02, BLR03 & BLR04 replace Emission Sources B0001, B0002, B0003 & B0004 of Emission Unit U-C0001, and



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Emission Sources BLR05 & BLR06 replace Emission Sources B0005 & B0006 in Emission Unit U-B0001. With the above construction schedule, the renewed permit will include:

Eleven (11) Emission Sources - B0001, B0002, B0003, B0004 & B0005 of Emission Unit U-C0001, and BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06 of Emission Unit U-B0001 and their corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls - BRLC1, BLRC2, BLRC3, BLRC4, BLRC5 & BLRC6. Boiler #6 (Emission Source B0006) has been already refurbished in 2012 and is now identified as Emission Source BLR06 in Emission Unit U-B0001 as 95 MM Btu/hr Victory Energy Voyager-VS4-48 boiler.;

Process O56 for Emission Sources B0005 & B0006 is re-designated O55 for Emission Source B0005.

Process G56 for Emission Sources B0005 & B0006 is re-designated G55 for Emission Source B0005.

All eleven boilers will be connected to the one common stack, which is identified as Emission Point C0001 in Emission Unit U-C0001 and Emission point B0001 in Emission Unit U-B0001.

The processes identified in this renewal application for the new boilers are designated the same as the process designation of the ASF permit, DEC ID # 2-6204-00059/00005 - Process G41 for natural gas firing for Emission Sources BLR01, BLR02, BLR03 & BLR04; Process G65 for natural gas firing for Emission Sources BLR05 & BLR06; Process O41 for distillate fuel oil #2 firing of Emission sources BLR01, BLR02, BLR03 & BLR04; and Process O65 for distillate fuel oil #2 firing of Emission Sources BLR05 & BLR06.

For the existing (old) boilers, compliance with the NOx emission limit is monitored by measuring a surrogate parameter, percent oxygen in the flue gas from each boiler. The boiler control system includes "NOx curves", which are part of the current permit. For the new boilers, MSMC will not be utilizing "NOx curves" of % O2 versus load as the existing boilers currently utilize for compliance demonstration. In accordance with Part 227-2.6 (a) (3) (i) - "for any mid-size boiler, NOx emissions must be measured with emission test requirements described in subdivision (c). MSMC will submit a compliance test protocol for Department approval, follow test procedures, and submit compliance test reports per Part 227-2.6(c). The new boilers will be operating with low NOx burners (LNB) and flue gas recirculation (FGR) for NOx control.

NYS DEC Subpart 227-2 defines NOx presumptive RACT emission limits for various boiler sizes prior to and after July 1, 2014. The new Victory Energy boilers have the same heat input and steam generation rating as the old Combustion Engineering and Keystone boilers. They are "mid-size" boilers because their heat input rating is between 25 and 100 million Btu per hour. The presumptive NOx RACT emission rate for mid-size boilers prior to July 1, 2014 is 0.10 lbs NOx per million Btu for gas firing only, and 0.30 lbs NOx per million Btu for residual #6 fuel oil / gas firing. The presumptive NOx RACT for the mid-size boilers after July 1, 2014 capable of firing distillate oil /gas is 0.08 lbs per million Btu heat input per hour. Based upon the construction schedule above,

BLR06 will be operating at 0.08 lbs NOx per million Btu from the effective date of the renewed permit;

BLR05 will be operating at 0.08 lbs NOx per million Btu after July 1, 2014;

BLR04 will be operating at 0.08 lbs NOx per million Btu after December 1, 2014;



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BLR02 & BLR03 will be operating at 0.08 lbs NOx per million Btu after June 1, 2015; and

BLR01 will be operating at 0.08 lbs NOx per million Btu after November 1, 2015.

Based on the above construction/ modification schedule for the six (6) mid-size boilers, the NOx PTE (lb/yr) for the facility has been calculated to be:

2013	722,940
2014	388,520
2015	294,540
2016	301,340

NYS DEC Subpart 227-2.3 allows up to one (1) year after July 1, 2014 for compliance with the post July 1, 2014 presumptive NOx RACT emission rate.

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, located at 1 Gustave Levy Place in New York, New York, is a complete research and teaching hospital and consists of the Mount Sinai Hospital and Mount Sinai School of Medicine. The Industrial Classification Code (SIC) for this facility is 8062 - Medical facility.

An Air State facility permit, DEC ID #2-6204-00059/00005, became effective on 10/03/2011 for the construction of the new boilers to replace the old boilers. This application for the renewal of the Title V permit encompasses the integration of the Air State Facility permit into the Title V Air permit. The new



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boilers will not operate under "NOx curves" as did the old boilers. Instead, the boilers will comply with NOx RACT Part 227-2.6 (a) (3) (i) and Part 227-2.6 (a) (3) (c).

The facility operates six (6) steam generating boilers. During the term of this permit renewal #2, four of the old boilers (B1, B2, B3 & B4) will be replaced by new boilers and the other two boilers (B5 & B6) will be refurbished as new boilers. The old boilers are identified as Emission Unit U-C0001. Four (4) of the old boilers – B1, B2, B3 & B4 (Emission Sources B0001, B0002, B0003 and B0004) – are each rated at 60 MM Btu of heat input per hour to generate 50,000 lbs of steam per hour at 125 psig. Two of the old boilers – B5 & B6 (Emission Sources B0005 and B0006) – are each rated at 95 MM Btu of heat input per hour to generate 80,000 lbs of steam per hour at 125 psig. The old boilers fired natural gas (primary fuel) or residual #6 fuel oil (secondary fuel). The six new/refurbished boilers will fire natural gas as the primary fuel or distillate #2 fuel oil as the secondary fuel, and are designated as Emission Unit U-B0001. The four old boilers will be replaced by four new Victory Energy Voyager Series boilers designated as Emission Sources BLR01, BLR02, BLR03 & BLR04 of Emission Unit U-B0001. Each of the new four boilers is rated at 60 MM Btu of heat input per hour to generate 50,000 lbs of steam per hour at 125 psig. The maximum annual natural gas fuel consumption of each boiler is 500.5 million cubic feet based on the assumption of 1,050 Btu per cubic foot. The other two boilers (refurbished) of Emission Unit U-B0001, designated as Emission Sources BLR05 & BLR06, are refurbished Victory Energy Voyager Series boilers, each rated at 95 MM Btu of heat input per hour to generate 80,000 lbs of steam per hour at 125 psig. The maximum annual natural gas fuel consumption of each of these two boilers is 792.57 million cubic feet (1,050 Btu per cubic foot). All six (6) Victory Energy boilers will be complete with low NOx burners (LNB) and flue gas recirculation (FGR) for NOx emission reduction. Associated with the refurbishment or modification of Boilers 5 & 6, and the replacement of Boilers 1, 2, 3 & 4 is the extension of the elevation of the existing stack height by 30 feet from 514 to 544 feet, unless further plume modeling alleviates this requirement.

The installation of the new/refurbished boilers, BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06, with LNB and FGR is associated with a manufacturer's guarantee of maximum NOx emission rate for compliance with 6 NYCRR Part 227-2 NOx RACT regulation for "Mid-size" boilers firing either distillate oil or natural gas on or after July 1, 2014 of 0.08 lbs NOx per million Btu heat input. A "mid-size" boiler is defined as a boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour. The PTE of NOx emissions will be reduced by 64% when firing natural gas, and by 73% when firing fuel oil in comparison to the old boilers. In addition, the replacement of the six old boilers with Emission Unit U-B0001 Emission Sources BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06 will also result in reduction in Potential to Emit (PTE) rates for the following contaminants: VOC, SO2, Pb, and Particulates/PM-10/PM-2.5.

During the term of the renewed permit with an effective date of 5/01/2014, the facility will be in transition replacing five (5) old boilers with five (5) new boilers. One of the old boilers, Emission Source B-0006, has been refurbished in 2013 and replaced with all new parts. It is essentially a Victory boiler, designated as Emission Source BLR06 in the Air State Facility Permit, DEC ID # 2-6204-00059/00005. During the term of the renewed permit, the facility will operate five (5) old boilers part of the time as indicated in the construction schedule below and one (1) new boiler (Emission Source BLR06) all of the time and five (5) new boilers (Emission Sources BLR01, BLR02, BLR03, BLR04 & BLR05) part of the time.

Boiler #	Construction---Operation Schedule	Available Steam (lb/hr) During Construction
BLR06	7/01/2012 -- 12/31/2013	140,000
BLR05	4/01/2013 -- 7/01/2014	180,000



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BLR04	7/01/2014 -- 12/01/2014	235,000
BLR03	12/01/2014 -- 6/01/2015	235,000
BLR02	12/01/2014 -- 6/01/2015	235,000
BLR01	6/01/2015 -- 11/01/2015	310,000

All five (5) old boilers are capable of firing either natural gas (primary fuel) or #6 fuel oil (residual fuel oil) as a back-up. Four (4) of the old boilers (Emission Sources B0001, B0002, B0003 & B0004) are Combustion Engineering units, each rated at 60 MM Btu/hr heat input and 50,000 pounds per hour of steam output. Old Boiler #5 (Emission Source B0005) is a Keystone unit rated at 95 MM Btu/hr heat input and 80,000 pounds per hour of steam output. The facility currently has five (5) boilers, Boiler #1, Boiler #2, Boiler #3, Boiler #4 & Boiler #5 (Emission Sources B0001, B0002, B0003, B0004 & B0005); respectively in Emission Unit U-C0001, which burn primarily natural gas (Processes G14 & G5) and are capable of firing #6 fuel oil (Processes O14 & O5) as a back-up. The emissions from all six boilers all exhaust through one stack (Emission Point C0001). The boilers and stack are located in the Annenberg Building.

During the term of the renewed permit with an effective date of 5/01/2014, the facility will eventually operate six (6) new boilers manufactured by Victory Energy Voyager described in the Air State Facility Permit, DEC ID # 2-6204-00059/00005 as Emission Unit U-B0001 with Emission Sources BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06, associated with their common stack, Emission Point B0001. Emission Sources BLR01, BLR02, BLR03 & BLR04 are each nominally rated at 60 million Btu heat input per hour to generate 50,000 lbs steam per hour replacing Emission Sources B0001, B0002, B0003 & B0004. Emission Sources BLR05 and BLR06 are each nominally rated at 95 million Btu heat input per hour producing 80,000 lbs steam per hour replacing Emission Sources B0005 and B0006. The schedule for the boiler replacements is listed above and is also included in the Project Description. The new Victory Energy boilers will fire natural gas as the primary fuel (Process G41 for BLR01, BLR02, BLR03 & BLR04, and Process G65 for BLR05 & BLR06), and distillate #2 fuel oil as the secondary fuel (process O41 for BLR01, BLR02, BLR03 & BLR04, and Process O65 for BLR05 & BLR06). Emission Point B0001 is the same as Emission Point C0001, except that the top elevation will be 30 feet higher unless further plume modeling indicates that such an elevation increase is not warranted. The stack has a continuous opacity monitor (COMS).

The proposed dates of construction commencement of the four new replacement these boilers are as follows for BLR01: 6/1/2015, BLR02: 12/1/2014, BLR03: 12/1/2014, BLR04: 7/1/2014. In addition, the projected construction dates for the two refurbishment or modified boilers is as follows for BLR05: 4/1/2013 and BLR06: 7/1/2012. Once all six (6) boilers are constructed/modified, the facility can operate these six (6) boilers under the Title V permit renewal #2, which incorporates these modifications incorporate these modifications.

The facility has submitted calculated NOx PTE rates for years 2013, 2014, 2015 and 2016 based upon the construction schedule for the transition from the old boilers to the new boilers. In the year 2013, the calculated NOx PTE is 361.5 tons as the new Victory Energy BLR06 is scheduled to be operational at the beginning of the year 2013; the old boiler B0005 is calculated to operate for only 90 days during the 2013 year; and the old boiler B0004 is scheduled for operation for only 66% of the 2013 year. The calculated NOx PTE for the year 2014 is 194.3 tons, a 46% decrease from the calculated PTE for previous year. The calculated NOx PTE for the year 2016 when all of the new boilers are 100% operational is 150.7 tons, which is 58% less than the first year of the renewed permit, in the year 2013. Each of the new boilers



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(Emission Sources BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06) is equipped with a low NO_x burner (LNB) and flue gas recirculation (FGR) and the secondary fuel is distillate #2 fuel oil, not #6 fuel oil anymore. These features support the manufacturer's NO_x emission rate guarantee of 0.08 lbs NO_x per million Btu heat input.

The facility is subject to the provisions for fuel sulfur content limitations per 6 NYCRR 225-1. The current Title V permit describes these limits for the sulfur dioxide contaminant - sulfur content of residual #6 fuel oil utilized throughout the facility is 0.30% by weight or less; the sulfur content of distillate #2 fuel oil utilized throughout the facility is 0.20% by weight or less till June 30, 2014 and 0.0015% by weight thereafter. The Emission Point B0001 is subject to the particulate and smoke emission and corrective action requirements of 6 NYCRR 227, Stationary Combustion Installations, 6 NYCRR 227.2(b)(1), 0.10 lbs/MM BTU as a two-hour average.

Prior to July 1, 2014, the facility is also subject to 6 NYCRR 227-2.4 (c) (2), Reasonably Available Control Technology (RACT), for oxides of nitrogen for mid-size boilers. The old boilers will comply with NO_x RACT emission limit of 0.10 lb NO_x per million Btu heat input per hour when firing natural gas and 0.30 lb NO_x per million Btu heat input per hour when firing residual #6 fuel oil. On or after to July 1, 2014, the new boilers will comply with NO_x RACT emission limit of 0.08 lb NO_x per million Btu heat input per hour when firing either natural gas or distillate #2 fuel oil.

The facility campus has fifteen (15) 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 (each operating < 500 hours annually). The facility shall keep records to demonstrate that each engine operates below the limit. Each engine burns diesel fuel (distillate fuel oil), which must not contain more than 0.20% by weight sulfur till June 30, 2014 and 0.0015% by weight thereafter according to 6 NYCRR 225-1.2 (g) & (h). The facility campus contains nine (9) distillate fuel oil storage tanks with storage capacities ranging between 800 and 50,000 gallons (<300,000 barrels), and three hundred and three (303) laboratory fume hoods.

Internal combustion engines, constructed or re-constructed on or after June 12, 2006, that meet the requirements of 40 CFR 60 Subpart IIII or subpart JJJJ meet the requirements of 40 CFR 63 subpart ZZZZ. Facilities that have stationary compression ignition internal combustion engines must comply with applicable portions of 40 CFR 60 Subpart IIII. Facilities that have a reciprocating internal combustion engines must comply with applicable portions of 40 CFR 63 subpart ZZZZ. The eleven (11) emergency generators at this facility are subject to the 40 CFR Part 60, Subpart IIII and 40 CFR Part 63, Subpart ZZZZ.

One of the nine facility campus tanks, Tank #006 (Emission Source TK006 in Emission UnitU-C0001), which is a 20,000 gallon distillate oil storage tank, for which the facility is required to 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 (eight tanks) were constructed before the applicability dates of Subparts K, Ka, and Kb or are smaller than the applicability threshold capacities. The residual #6 fuel oil storage tank and delivery system will be converted to handle distillate #2 fuel oil as part of the transition from the old boilers to the new boilers.

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



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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 five 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 one Erie City/16M Keystone boiler, Boiler # 5 (Emission Source B0005) with a nominal rated capacity of 95 MM Btu/hr heat input and 80,000 pounds per hour of steam output each. Each of the five boilers 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 G55 is the firing of natural gas in the operation of Boiler # 5 (Emission Source B0005), and Process O55 is the firing of # 6 fuel oil in the operation of the same boiler, Boiler # 5 (Emission Source B0005).

The maximum total heat input from these five (5) boilers is 335 MM Btu/hr. All of these five boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from all of the five boilers are exhausted through one common stack, which is identified as Emission Point C0001 and is located in the Annenberg Building. There are nine fuel oil storage tanks that are exempt from permitting, however; Tank 006 constructed in 1997 shall comply with Subpart Kb in 40 CFR 60.

Boiler #6 (Emission Source B0006) has been already refurbished in 2012 and is now identified as Emission Source BLR06 with its corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls - BRLC6 in Emission Unit U-B0001 as 95 MM Btu/hr Victory Energy Voyager-VS4-48 boiler.

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



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Emission unit UC0001 is associated with the following emission points (EP):

C0001

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. All of the four boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from all of the four boilers are exhausted through one common stack which is identified as Emission Point C0001.

Process: G55 is located at Basement, Building ANNENBERG - Process G55 is the firing of natural gas in Boiler #5, Emission Source B0005 in Emission Unit U-C0001, an Erie City/16M Keystone boiler with a nominal rated capacity of 95 MM Btu/hr heat input and 80,000 pounds per hour of steam output. The maximum total heat input from this boiler is 95 MM BTU/hr. In addition to Boiler #5, 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 five boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from all of the five boilers are exhausted through one common stack which is identified as Emission Point C0001.

Boiler #6 (Emission Source B0006) has been already refurbished in 2013 and is now identified as Emission Source BLR06 with its corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls - BRLC6 in Emission Unit U-B0001 as 95 MM Btu/hr Victory Energy Voyager-VS4-48 boiler.

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. All of the four boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from all of the four boilers are exhausted through one common stack which is identified as Emission Point C0001.

Process: O55 is located at Basement, Building ANNENBERG - Process O55 is the firing of # 6 fuel oil (residual oil) in the operation of Boiler # 5 (Emission Sources B0005) in Emission Unit U-C0001. Emission Source B0005 is an Erie City/16M Keystone boiler with a nominal rated capacity of 95 MM Btu/hr heat input and 80,000 pounds per hour of steam output. The maximum heat input from this boiler is 95 MM BTU/hr. In addition to Boiler #5, 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 five boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from all of the five boilers are exhausted through one common stack which is identified as Emission Point C0001.

Boiler #6 (Emission Source B0006) has been already refurbished in 2013 and is now identified as



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Emission Source BLR06 with its their corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls - BRLC6 in Emission Unit U-B0001 as 95 MM Btu/hr Victory Energy Voyager-VS4-48 boiler.

Emission unit UB0001 - Emission Unit U-B0001 consists of a total of six (6) Victory Energy Voyager Series boilers, four are identical boilers (Emission Sources BLR01, BLR02, BLR03 & BLR04) and the other two are identical boilers (Emission Sources BLR05 & BLR06). All six boilers have corresponding Low NOX Burners (LNB), Flue Gas Recirculation (FGR) Emission Controls - BRLC1, BLRC2, BLRC3 BLRC4, BLRC5 & BLRC6; respectively to meet the new lower NOx emission limit of 0.08 lb NOx per million BTU heat input for "midsize" boilers firing distillate oil or natural gas on or after July 1, 2014 under the NOx RACT 6 NYCRR 227-2. The first four boilers (Emission Sources BLR01, BLR02, BLR03 & BLR04) are identical and are replacement boilers with a nominal rated heat input capacity of 60 MM Btu/hr and 50,000 pounds/hr of steam each. The other two boilers (Emission Sources BLR05 & BLR06) are identical boilers, with a nominal rated heat input capacity of 95 MM Btu/hr and 80,000 pounds/hr of steam each, that are being refurbished. The ols six boilers (Emission Unit U-C0001) are being replaced or refurbished with six boilers (mission Unit U-B0001) that comply with the new lower emission rates under the NOx RACT 6 NYCRR 227-2.

Boilers #1, 2, 3 and #4 will burn natural gas (Process G41) as the primary fuel, and #2 fuel oil (Process O41) as the back-up fuel. Also, Boiler #5 & #6 will burn natural gas (Process G65) as the primary fuel, and #2 fuel oil (Process O65) as the back-up fuel. The emissions from all six boilers will exhaust through a common stack, identified as Emission Point B0001.

The installation of the new replacement Victory Energy Voyager Series boilers, Boilers #1, #2, #3 & #4 maintains the nominal capacity of each of these four boilers at 60.3 million Btu of heat input per hour when firing natural gas and 57.6 million Btus of heat input when firing distillate fuel oil. Each of these four boilers is designed for a maximum saturated steam flow rate of 50,000 pounds per hour at 125 psig. The modification of Boilers #5 and #6 maintains the nominal capacity of each existing boiler at 95 million Btus of heat input per hour and the maximum saturated steam flow rate of 80,000 pounds per hour at 125 psig.

After modification of Boilers #5 & #6, and the installation of the new replacement boilers, Boilers #1, #2, #3 & #4, the primary and secondary fuels will be natural gas and distillate fuel oil; respectively. The maximum total heat input to these six (6) boilers, based on unit ratings, is 430 MM Btu/hr. Emissions from all of the six boilers are exhausted through one common stack, which is identified as Emission Point B0001, except for the top elevation which is 30 feet higher unless plume modeling indicates the top elevation increase is not necessary.

During the term of the renewed permit, the facility will operate five (5) old boilers part of the time as indicated in the construction schedule below and one (1) new boiler (Emission Source BLR06) all of the time and five (5) new boilers (Emission Sources BLR01, BLR02, BLR03, BLR04 & BLR05) part of the time with their corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls - BRLC1, BLRC2, BLRC3, BLRC4 & BLRC5. Boiler #6 (Emission Source B0006) has been already refurbished in 2013 and is now identified as Emission Source BLR06 with its corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls as BLRC6 in Emission Unit U-B0001 as 95 MM Btu/hr Victory Energy Voyager-VS4-48 boiler.



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Boiler #	Construction-- Operation Schedule During Construction	Available Steam (lb/hr)
BLR06	7/23/2012 -- 12/31/2013	140,000
BLR05	4/01/2013 -- 7/01/2014	180,000
BLR04	7/01/2014 -- 12/01/2014	235,000
BLR03	12/01/2014 -- 6/01/2015	235,000
BLR02	12/01/2014 -- 6/01/2015	235,000
BLR01	6/01/2015 -- 11/01/2015	310,000

Emission unit UB0001 is associated with the following emission points (EP):
B0001

Process: G41 is located at Building ANNENBERG - Process G41 is the firing of natural gas in the operation of the four new identical boilers, Boilers # 1, #2, #3 & # 4 (Emission Sources BLR01, BLR02, BLR03 & BLR04) with their corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls - BLRC1, BLRC2, BLRC3 & BLRC4; respectively, in Emission Unit U-B0001. Emission Sources BLR01, BLR02, BLR03 & BLR04 are four identical Victory Energy Voyager Series VS4-48 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.

All of the four boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from all of the four boilers are exhausted through one common stack which is identified as Emission Point B0001.

Maximum natural gas consumption is 2,002 million cubic feet of per year for Boiler #1, Boiler #2, Boiler #3 & Boiler #4.

The installation of the Victory Energy Voyager boilers, Boilers #1, #2, #3 & #4 maintains the nominal capacity of each of these boilers at 60.3 million Btus of heat input per hour when firing natural gas and 57.6 million Btus of heat input when firing distillate fuel oil.

Process: G65 is located at Basement, Building ANNENBERG - Process G65 is the firing of natural gas in the operation of the two identical boilers, Boilers # 5 & # 6 (Emission Sources BLR05 & BLR06) with their corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls - BLRC5 & BLRC6; respectively, in Emission Unit U-B0001. Emission Sources BLR05 & BLR06 are two identical Energy Voyager Series VS4-48 boilers with a nominal rated capacity of 95 MM Btu/hr heat input and 80,000 pounds per hour of steam output each at 125 psig. The maximum total heat input from these two boilers is 190 MM BTU/hr.

These two boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from these two boilers are exhausted through one common stack which is identified as Emission Point B0001.



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Maximum natural gas consumption is 1,585 million cubic feet of gas per year for Boiler #5 & Boiler #6.

Boiler #6 (Emission Source B0006) has been already refurbished in 2012 and is now identified as Emission Source BLR06 with its corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls - BLRC6 in Emission Unit U-B0001 as 95 MM Btu/hr Victory Energy Voyager-VS4-48 boiler.

Process: O41 is located at Basement, Building ANNENBERG - Process O41 is the firing of #2 fuel oil (BLR01, BLR02, BLR03 & BLR04) with their corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls - BLRC1, BLRC2, BLRC3 & BLRC4; respectively, in Emission Unit U-B0001. Emission Sources BLR01, BLR02, BLR03 & BLR04 are four identical Victory Energy Voyager Series VS4-48 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. Distillate fuel oil has heat capacity of 140,000 Btu/gal.

$$\{(240 \text{ MM BTU/hr}) \times (8,760 \text{ hrs/yr})\} \times 1/(140,000 \text{ Btu/gal}) = 15.017 \text{ MM gal/yr}$$

Maximum #2 fuel oil (distillate oil) consumption is 15.017 million gallons per year for Boiler #1, Boiler #2, Boiler #3 & Boiler #4.

All of the four boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from all of the four boilers are exhausted through one common stack which is identified as Emission Point B0001.

The installation of the Victory Energy boilers, Boilers #1, #2, #3 & #4 maintains the nominal capacity of each of these boilers at 60.3 million Btus of heat input per hour when firing natural gas and 57.6 million Btus of heat input when firing distillate fuel oil.

Process: O65 is located at Basement, Building ANNENBERG - Process O65 is the firing of #2 fuel oil (distillate oil) in the operation of the two identical boilers, Boilers # 5 & # 6 (Emission Sources BLR05 & BLR06) with their corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls - BLRC5 & BLRC6; respectively in Emission Unit U-B0001. Emission Sources BLR05 & BLR06 are two identical Victory Energy Voyager Series VS4-48 boilers with a nominal rated capacity of 95 MM Btu/hr heat input and 80,000 pounds per hour of steam output each at 125 psig. The maximum total heat input from these two boilers is 190 MM BTU/hr. Distillate fuel oil has heat capacity of 140,000 Btu/gal.

$$\{(190 \text{ MM BTU/hr}) \times (8,760 \text{ hrs/yr})\} \times 1/(140,000 \text{ Btu/gal}) = 11.889 \text{ MM gal/yr}$$

Maximum #2 fuel oil consumption is 11.89 million gallons per year for Boilers #5 & Boiler #6.

These two boilers supply both hot water and steam for the space heating and the air conditioning of the building. Emissions from these two boilers are exhausted through one common stack which is identified as Emission Point B0001.

Boiler #6 (Emission Source B0006) has been already refurbished in 2012 and is now identified as Emission Source BLR06 with its corresponding Low NOX Burners, Flue Gas Recirculation Emission Controls - BLRC6 in Emission Unit U-B0001 as 95 MM Btu/hr Victory Energy Voyager-VS4-48 boiler.

Title V/Major Source Status

MOUNT SINAI HOSPITAL is subject to Title V requirements. This determination is based on the



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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - 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



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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 categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents

a unique process or function within a source category logically associated with a point of air pollution



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emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-004-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL 10-100MMBTU/HR **
1-02-005-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL 10-100MMBTU/HR **
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or 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	Range
		lbs/yr	
000630-08-0	CARBON MONOXIDE	372299	
007439-92-1	LEAD	29.54	
0NY210-00-0	OXIDES OF NITROGEN	1291320	
0NY075-00-0	PARTICULATES	195912	
0NY075-00-5	PM-10	195912	
007446-09-5	SULFUR DIOXIDE	9214	
0NY100-00-0	TOTAL HAP		> 0 but < 2.5 tpy
0NY998-00-0	VOC	34525	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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



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conditions for all facilities in New York State.

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
 - (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
 - (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit



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renewal application.

- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.
- Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)**
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:
- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
 - ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of Title IV of the Act;
 - iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.



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

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

Item 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.

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**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	ECL 19-0301	61	Powers and Duties of the Department with respect to air pollution control
U- B0001/B0001/G41/BLR01 FACILITY	40CFR 60-A	44	General provisions
	40CFR 60-A.4	37	General provisions - Address
U- B0001/B0001/O41/BLR01 FACILITY	40CFR 60-A.8(a)	46	Performance Tests
	40CFR 60-Dc.40c	38	Steam generators 10-100 million Btu per hour
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.40c	47	Steam generators 10-100 million Btu per hour
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.42c(h)	48	Exemption from Averaging Requirements
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.42c(i)	49	Standard for Sulfur Dioxide Period of Requirements.
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.46c(d)(2)	50	Alternative sulfur dioxide emissions monitoring.
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.46c(e)	51	Exemption from Emission Monitoring for Sulfur Dioxide.
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.48c(d)	52	Reporting and Recordkeeping



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			Requirements.
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.48c (e) (1)	53	
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.48c (e) (2)	54	
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.48c (e) (3)	55	
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.48c (e) (4)	56	
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.48c (e) (7)	57	
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.48c (f) (1)	58	Reporting and Recordkeeping Requirements (distillate oil).
U- B0001/B0001/O65/BLR05	40CFR 60-Dc.48c (f) (1)	60	Reporting and Recordkeeping Requirements (distillate oil).
FACILITY	40CFR 60-Dc.48c (g)	39	Reporting and Recordkeeping Requirements.
U- B0001/B0001/O41/BLR01	40CFR 60-Dc.48c (i)	59	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 60-IIII	40	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
FACILITY	40CFR 63-ZZZZ	41	Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	62	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 42, 43	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (7)	2	General Conditions -



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FACILITY	6NYCRR 201-6.4 (a) (8)	16	Fees
FACILITY	6NYCRR 201-6.4 (c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c) (2)	4	Recordkeeping and Reporting of Compliance Monitoring Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201- 6.4 (c) (3) (ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (d) (4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f) (6)	17	Off Permit Changes
FACILITY	6NYCRR 201-6.4 (g)	23	Permit Shield
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-1.3	24	Acceptable procedures.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	25	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	63	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2 (b)	26	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.2 (d)	27	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.2 (g)	28	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.2 (h)	29	Sulfur-in-Fuel Limitations
U- B0001/B0001/O41/BLR01	6NYCRR 227.2 (b) (1)	45	Particulate emissions.
FACILITY	6NYCRR 227-1.3	30	Smoke Emission Limitations.
FACILITY	6NYCRR 227-1.4 (b)	31	Stack Monitoring
FACILITY	6NYCRR 227-2.4 (c) (1)	32	Emission limits.
FACILITY	6NYCRR 227- 2.4 (c) (1) (i)	33	1994 NOx RACT presumptive limit.
FACILITY	6NYCRR 227- 2.4 (c) (1) (ii)	34	2010 NOx RACT presumptive limit.
FACILITY	6NYCRR 227-2.6 (a)	35	Applicable testing and/or monitoring requirements.
FACILITY	6NYCRR 227-2.6 (c)	36	Stack Test Requirements.

Applicability Discussion:

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



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ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

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6 NYCRR 201-6.4 (a) (4)

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

6 NYCRR 201-6.4 (a) (7)

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

6 NYCRR 201-6.4 (a) (8)

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

6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

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

6 NYCRR 201-6.4 (c) (3) (ii)

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

6 NYCRR 201-6.4 (d) (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.

6 NYCRR 201-6.4 (e)

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

6 NYCRR 201-6.4 (f) (6)

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



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6 NYCRR 201-6.4 (g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, MOUNT SINAI HOSPITAL has been determined to be subject to the following regulations:

40 CFR 60.4

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



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40 CFR 60.40c

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

40 CFR 60.42c (h)

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

40 CFR 60.42c (i)

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

40 CFR 60.46c (d) (2)

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

40 CFR 60.46c (e)

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

40 CFR 60.48c (d)

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

40 CFR 60.48c (e) (1)

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

40 CFR 60.48c (e) (2)

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



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40 CFR 60.48c (e) (3)

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

40 CFR 60.48c (e) (4)

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

40 CFR 60.48c (e) (7)

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

40 CFR 60.48c (f) (1)

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

40 CFR 60.48c (g)

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

40 CFR 60.48c (i)

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

40 CFR 60.8 (a)

This regulation contains the requirements for the completion date and reporting of Performance Testing (stack testing), at the facility. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, the owner or operator of the facility must conduct performance test(s) and furnish a written report of the test results.

40 CFR Part 60, Subpart A

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



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40 CFR Part 60, Subpart IIII

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

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

40 CFR Part 63, Subpart ZZZZ

This regulation requires facilities that have a reciprocating internal combustion engines to comply with applicable portions of 40 CFR 63 subpart ZZZZ.

Internal combustion engines, constructed or re-constructed on or after June 12, 2006, that meet the requirements of 40 CFR 60 Subpart IIII or subpart JJJJ meet the requirements of 40 CFR 63 subpart ZZZZ.

6 NYCRR 201-6.4 (a) (4)

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

6 NYCRR 201-6.4 (a) (7)

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

6 NYCRR 201-6.4 (a) (8)

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

6 NYCRR 201-6.4 (c)

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



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6 NYCRR 201-6.4 (c) (2)

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

6 NYCRR 201-6.4 (d) (4)

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

6 NYCRR 201-6.4 (f) (6)

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

6 NYCRR 202-1.3

This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. Alternate methods may be also be used provided they are determined to be acceptable by the department. Finally, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

6 NYCRR 211.1

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

6 NYCRR 225-1.2 (b)

Sulfur-in-fuel limitations for oil or solid fuel fired facilities effective through June 30, 2014.

6 NYCRR 225-1.2 (d)

Sulfur-in-fuel limitations that fire residual oil in the downstate after July 1, 2014.



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6 NYCRR 225-1.2 (g)

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

6 NYCRR 225-1.2 (h)

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

6 NYCRR 227.2 (b) (1)

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

6 NYCRR 227-1.3

This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6 NYCRR 227-1.4 (b)

This regulation requires the specific contents of excess emissions reports for opacity from facilities that employ continuous opacity monitors (COMs).

6 NYCRR 227-2.4 (c) (1)

Presumptive NO_x RACT emission limits for mid-size boilers.

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

Existing NO_x RACT presumptive limit that expires on 6/30/14.

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

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

6 NYCRR 227-2.6 (a)



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Applicable testing and/or monitoring requirements for emission sources subject to NOx RACT.

6 NYCRR 227-2.6 (c)

This regulation is a SIP regulation. This citation is for stack test requirements. The owner or operator of the facility is required to test for NOx emission and follow monitoring and reporting requirements. The stack testing for NOx emission requires the facility to:

- (1) Submit a compliance test protocol to the department for approval at least 30 days prior to emission testing. The condition of the testing and the locations of the sampling devices must be acceptable to the department; and
- (2) Utilize procedures set forth in 40 CFR Part 60, Appendix A or any other method acceptable to the department and EPA for determining compliance with the appropriate NOx limit in section 227-2.4 of this Subpart, and shall follow the procedures set forth in Part 202 of this Title.
 - (i) For large and mid-size boilers, utilize Method 7, 7E, or 19 from 40 CFR Part 60, Appendix A or another reference method approved by the department.
 - (ii) For simple cycle combustion turbines, utilize Method 20 from 40 CFR Part 60, Appendix A or another reference method approved by the department.
 - (iii) For combined cycle combustion turbines, utilize Method 7, 7E, or 19 from 40 CFR Part 60, Appendix A or another reference method approved by the department.
 - (iv) For internal combustion engines, utilize Method 7, 7E or 19 from 40 CFR Part 60, Appendix A or another reference method approved by the department.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	40 CFR 60.42c	Standard for Sulfur Dioxide

Reason: 40 CFR 60-Dc.42c, NSPS, which limits the sulfur content in the distillate fuel oil to 0.50 percent by weight, is not applicable to Emission Sources BLR01, BLR02, BLR03 or BLR04 (the four 60 MM Btu/hr



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Victory energy VS-4-48 replacement boilers) or to Emission Sources BLR05 & BLR06 (the two refurbished 95 MM Btu/hr Erie City/16M Keystone boilers) or to this facility. This regulation is overruled by regulations 6 NYCRR 225-1.2 (g) & (h), which limits the sulfur content in the distillate fuel oil (#2 oil) to 0.20 percent by weight to facilities in the severe ozone non-attainment area such as New York City through June 30, 2014, and to 0.0015 percent beginning July 1, 2014.

Mount Sinai Hospital must comply with the 0.20 percent by weight and the 0.0015 percent sulfur content limits as per 6 NYCRR 225-1.2 (b), (g) & (h), which are more stringent limits for New York City than 40 CFR 60-Dc.42c, NSPS.

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

**Compliance Certification
Summary of monitoring activities at MOUNT SINAI HOSPITAL:**

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

FACILITY	38	record keeping/maintenance procedures
U-B0001/B0001/O41/BLR01	50	monitoring of process or control device parameters as surrogate
U-B0001/B0001/O41/BLR01	52	record keeping/maintenance procedures
U-B0001/B0001/O41/BLR01	53	record keeping/maintenance procedures
U-B0001/B0001/O41/BLR01	54	record keeping/maintenance procedures
U-B0001/B0001/O41/BLR01	55	record keeping/maintenance procedures
U-B0001/B0001/O41/BLR01	56	record keeping/maintenance procedures
U-B0001/B0001/O41/BLR01	57	record keeping/maintenance procedures
U-B0001/B0001/O41/BLR01	58	record keeping/maintenance procedures
U-B0001/B0001/O65/BLR05	60	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
U-B0001/B0001/O41/BLR01	59	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	26	work practice involving specific operations
FACILITY	27	work practice involving specific operations
FACILITY	28	work practice involving specific operations
FACILITY	29	work practice involving specific operations
U-B0001/B0001/O41/BLR01	45	intermittent emission testing
FACILITY	30	continuous emission monitoring (cem)
FACILITY	31	continuous emission monitoring (cem)



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FACILITY	32	intermittent emission testing
FACILITY	33	intermittent emission testing
FACILITY	34	intermittent emission testing
FACILITY	35	record keeping/maintenance procedures
FACILITY	36	intermittent emission testing

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:

- 1. Condition # 5 for 6 NYCRR 201-6.4 (c) (3) (ii):** This is a facility-wide Record Keeping/Maintenance Procedures condition. This condition specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.
- 2. Condition # 6 for 6 NYCRR 201-6.4 (e):** This is a facility-wide Record Keeping/Maintenance Procedures condition. This condition specifies the overall permit requirements for compliance certification, including emission limitations, standards or work practices.
- 3. Condition # 7 for 6 NYCRR 202-2.1:** This is a facility-wide Record Keeping/Maintenance Procedures condition. This condition sets forth the applicability criteria for submitting an annual statement of emissions. The criteria is based on annual emission threshold quantities and ozone attainment designation. This condition applies to all Title V facilities and these facilities must submit an annual emission statement by April 15th of each year.
- 4. Condition # 26 for 6 NYCRR 225-1.2 (b):** This is a facility-wide Work Practice Involving Specific Operations condition for Sulfur content in the distillate fuel oil. The distillate fuel oil purchase is limited to 0.20 percent sulfur by weight effective through June 30, 2014. Compliance with this limit will be based on vendor certifications.
- 5. Condition # 27 for 6 NYCRR 225-1.2 (d):** This is a facility-wide Work Practice Involving Specific Operations condition for Sulfur content in the residual fuel oil. The residual fuel oil purchase is limited to 0.30 percent sulfur by weight on or after July 1, 2014. Compliance with this limit will be based on vendor certifications.



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6. Condition # 28 for 6 NYCRR 225-1.2 (g): This is a facility-wide Work Practice Involving Specific Operations condition for Sulfur content in the distillate fuel oil. The distillate fuel oil purchase is limited to 0.0015 percent sulfur by weight on or after July 1, 2014. Compliance with this limit will be based on vendor certifications.

7. Condition # 29 for 6 NYCRR 225-1.2 (h): This is a facility-wide Work Practice Involving Specific Operations condition for Sulfur content in the distillate fuel oil. The distillate fuel oil firing is limited to 0.0015 percent sulfur by weight on or after July 1, 2016. Compliance with this limit will be based on vendor certifications.

8. Condition # 30 for 6 NYCRR 227-1.3: This condition is an emission unit level, emission point level, process level and emission source/control level. This condition that applies to EUs: U-B0001 & U-C0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06 for Continuous Emission Monitoring for Particulates for Opacity. This condition requires a limitation and compliance monitoring for opacity from a stationary combustion installation. This condition is for monitoring continuously the visible emissions using a Continuous Opacity Monitor (COM).

This condition requires stack opacity not exceed 20 percent (six minute average), except for one six-minute period per hour of not more than 27 percent opacity. Compliance with this standard will be determined by Continuous Opacity Monitoring System (COMS) data, and/or any other credible evidence. The owner shall install, operate in accordance with manufacturer's instructions, and properly maintain, a COMS in the stack satisfying the criteria Appendix B of 40 CFR Part 60.

The owner shall submit an accurate excess emissions and monitoring system performance report to the Department for each calendar year quarter. All reports shall be certified by a responsible corporate official as true, accurate and complete and postmarked by the 60th day following the end of each calendar year quarter. The quarterly excess emissions report shall be submitted in a form acceptable to the Department.

9. Condition # 31 for 6 NYCRR 227-1.4 (b): This condition is an emission unit level, emission point level, process level and emission source/control level. This condition that applies to EUs: U-B0001 & U-C0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06 for Continuous Emission Monitoring for Particulates for Opacity. This condition requires a limitation and compliance monitoring for opacity from a stationary combustion installation. This condition is for monitoring continuously the visible emissions using a Continuous Opacity Monitor (COM).



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This condition requires stack opacity not exceed 20 percent (six minute average), except for one six-minute period per hour of not more than 27 percent opacity. Compliance with this standard will be determined by Continuous Opacity Monitoring System (COMS) data, and/or any other credible evidence. The owner shall install, operate in accordance with manufacturer's instructions, and properly maintain, a COMS in the stack satisfying the criteria Appendix B of 40 CFR Part 60.

The owner shall submit an accurate excess emissions and monitoring system performance report to the Department for each calendar year quarter. All reports shall be certified by a responsible corporate official as true, accurate and complete and postmarked by the 60th day following the end of each calendar year quarter. The quarterly excess emissions report shall be submitted in a form acceptable to the Department.

This condition requires the specific contents of excess emissions reports for opacity from facilities that employ continuous opacity monitors (COMs).

The owner or operator of a stationary combustion installation which utilizes a continuous opacity monitoring system (COMS) shall include the following in their quarterly excess emission reports:

- 1) Magnitude, date, and time of each exceedence;
- 2) For each period of excess emissions, specific identification of the cause and corrective action taken;
- 3) Date, time, and duration of each period of COMS downtime, and the corrective action for each period of downtime;
- 4) Total time the COMS is required to record data during the reporting period;
- 5) The total number of exceedences and the duration of exceedences expressed as a percentage of the total time in which the COMS are required to record data; and
- 6) Such other requirements as the Department may deem necessary in order to enforce Article 19 of the Environmental Conservation Law (ECL).

10. Condition # 32 for 6 NYCRR 227-2.4 (c) (1): This condition is an emission unit level, emission point level, process level and emission source/control level This condition that applies to EUs: U-B0001 & U-C0001, Emission Points: B0001 & C0001, Processes: G41, G65, G14, O41, O14 & O65, and Emission Sources: B0001, B0002, B0003, BLR04, BLR05 & BLR06. This condition is for Intermittent Emission Testing for Oxides

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of Nitrogen for mid-size boilers. This condition applies to all mid-size boilers (Emission Sources B0001, B0002, B0003, BLR04, BLR05 & BLR06) operating on natural gas (Processes G41, G65 & G14) and on distillate fuel oil (Processes O41, O65 & O14). Presumptive NO_x RACT emission limit of 0.12 pounds per million Btus for mid-size boilers prior to July 1, 2014 operating on distillate oil/natural gas. A “mid-size” boiler is defined as a boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour.

11. Condition # 33 for 6 NYCRR 227-2.4 (c) (i): This condition is an emission unit level, emission point level, process level and emission source/control level This condition that applies to EUs: U-B0001 & U-C0001, Emission Points: B0001 & C0001, Processes: G41, G65, G14, O41, O14 & O65, and Emission Sources: B0001, B0002, B0003, BLR04, BLR05 & BLR06. This condition is for Intermittent Emission Testing for Oxides of Nitrogen for mid-size boilers. This condition applies to all mid-size boilers (Emission Sources B0001, B0002, B0003, BLR04, BLR05 & BLR06) operating on natural gas (Processes G41, G65 & G14) and on distillate fuel oil (Processes O41, O65 & O14). Prior to July 1, 2014, the owner/operator of mid-size boilers (> 25 and equal to or <100 MM Btu/hr) boilers operating on residual oil/natural gas have a limit of 0.30 pounds of NO_x per million Btus under the NO_x RACT plan for mid-size boilers. A “mid-size” boiler is defined as a boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour.

12. Condition # 34 for 6 NYCRR 227-2.4 (c) (ii): This condition is an emission unit level, emission point level, process level and emission source/control level This condition that applies to EU: U-B0001, Emission Point: B0001, Processes: G41, G65, O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Intermittent Emission Testing for Oxides of Nitrogen for mid-size boilers. This condition applies to all mid-size boilers (Emission Sources BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06) operating on natural gas (Processes G41 & G65) and on distillate fuel oil (Processes O41 & O65). On or after July 1, 2014, the NO_x RACT emission limit is 0.08 pounds per million Btus for mid-size boilers operating on distillate oil/natural gas. A “mid-size” boiler is defined as a boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour.

13. Condition # 35 for 6 NYCRR 227-2.6 (a): This condition is an emission unit level, emission point level, process level and emission source/control level This condition that applies to EUs: U-B0001 & U-C0001, Emission Points: B0001 & C0001, Processes: G41, G65, G55, O41, O65 & O55, and Emission Sources: B0001, B0002, B0003, BLR04, BLR05 & BLR06. This condition is for Intermittent Emission Testing for Oxides of Nitrogen for mid-size boilers. This condition applies to all mid-size boilers (Emission Sources BLR01, BLR02, BLR03, BLR04, BLR05, BLR06 & B0005) operating on



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natural gas (Processes G41, G65 & G55) and on distillate fuel oil (Processes O41, O65 & O55). The NO_x RACT for mid-size boilers operating on distillate oil/natural gas is a limit of 0.12 pounds per million Btu per hour prior to July 1, 2014 and a limit of 0.08 pounds per million Btu per hour on or after July 1, 2014. A “mid-size” boiler is defined as a boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour

14. Condition # 36 for 6 NYCRR 227-2.6 (c): This condition is an emission unit level, emission point level, process level and emission source/control level This condition that applies to EU: U-B0001, Emission Point: B0001, Processes: G41, G65, O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Intermittent Emission Testing for Oxides of Nitrogen for mid-size boilers. This condition applies to all mid-size boilers (Emission Sources BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06) operating on natural gas (Processes G41 & G65) and on distillate fuel oil (Processes O41 & O65). The NO_x RACT for mid-size boilers operating on distillate oil/natural gas is a limit of 0.08 pounds per million Btu per hour on or after July 1, 2014. A “mid-size” boiler is defined as a boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour.

The owner or operator of mid-size boilers (source) is required to conduct an emission test (stack test) to verify NO_x emissions and to demonstrate compliance with 6 NYCRR 227-2.6(a). The facility is required to follow monitoring and reporting requirements. The stack testing for NO_x emission requires the facility to:

1. Submit a compliance test protocol to the department for approval at least 90 days prior to emission testing. The condition of the testing and the locations of the sampling devices must be acceptable to the department; and
2. Utilize procedures set forth in 40 CFR Part 60, Appendix A or any other method acceptable to the department and EPA for determining compliance with the appropriate NO_x limit in section 227-2.4 of this Subpart, and shall follow the procedures set forth in Part 202 of this Title.
 - i. For mid-size boilers (> 25 and equal to or <100 MM Btu/hr) boilers, utilize Method 7, 7E, or 19 from 40 CFR Part 60, Appendix A or another reference method approved by the department.
3. Submit a compliance test report containing the results of the emission test to the department no later than 60 days after completion of the emission test.



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15. Condition # 38 for 40 CFR 60.40c, NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level. This condition that applies to EU: U-B0001, Emission Point: B0001, Processes: G41, G65, O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Intermittent Emission Testing for Oxides of Nitrogen for mid-size boilers. This condition applies to all mid-size boilers (Emission Sources BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06) operating on natural gas (Processes G41 & G65) and on distillate fuel oil (Processes O41 & O65). A “mid-size” boiler is defined as a boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour.

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

40 CFR 60-Dc.40c, NSPS which limits the sulfur content in the distillate oil to 0.5 percent by weight is superseded by regulation 6 NYCRR 225-1.2, which limits the sulfur content in the distillate oil to 0.20 percent by weight to facilities in the severe ozone non-attainment area such as New York City until June 30, 2014 and 0.0015 percent by weight thereafter.

Mount Sinai Hospital must comply with the 0.20 percent by weight sulfur content limit in distillate oil as per 6 NYCRR 225-1.2 until June 30, 2014 and 0.0015 percent by weight thereafter which has more stringent limit for New York City than 40 CFR 60-Dc.40c, NSPS.

16. Condition # 39 for 40 CFR 60.48c (g), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level. This condition that applies to EU: U-B0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Record Keeping/Maintenance Procedures for all six boilers, Boilers BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06.

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

17. Condition # 40 for 40 CFR 60, NSPS Subpart III: This condition is Record Keeping/Maintenance Procedures for Oxides of Nitrogen for the eleven (11) emergency generators. These engines are classified as stationary compression ignition internal combustion engines.



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

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

18. Condition # 41 for 40 CFR 60, NSPS Subpart ZZZZ: This condition is Record Keeping/Maintenance Procedures for Oxides of Nitrogen for the eleven (11) emergency generators. These engines are classified as stationary compression ignition internal combustion engines.

This requirement is for internal combustion engines, constructed or re-constructed on or after June 12, 2006, that meet the requirements of 40 CFR 60 Subpart IIII or Subpart JJJJ meet the requirements of 40 CFR 63 Subpart ZZZZ.

Facilities that have reciprocating internal combustion engines must comply with applicable portions of 40 CFR 63 subpart ZZZZ.

19. Condition # 45 for 6 NYCRR 227.2(b)(1): This condition is an emission unit level, emission point level, process level and emission source/control level This condition that applies to EU: U-B0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Intermittent Emission Testing for Particulates for Particulates for all six boilers, Boilers BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. This condition establishes a particulate limit of 0.10 pounds per million Btus based on a 2 hour average emission for the referenced emission sources, and is required once during the term of the permit.

20. Condition # 50 for 40 CFR 60.46c (d) (2), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level This condition that applies to EU: U-B0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Record Keeping/Maintenance Procedures for all six boilers, Boilers BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Monitoring of Process or Control device Parameters as Surrogate for sulfur dioxide for the sulfur content of 0.20 percent by weight in the distillate oil.

This condition allows the owner of operator of an affected facility to determine the average sulfur dioxide emission rate by sampling the fuel prior to its combustion and



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calculating the emissions instead of installing and operating a continuous emissions monitor at the inlet of the control device.

40 CFR 60-Dc.46c(d)(2), NSPS which limits the sulfur content in the distillate oil to 0.5 percent by weight is superseded by regulation 6 NYCRR 225-1.2, which limits the sulfur content in the distillate oil to 0.20 percent by weight to facilities in the severe ozone non-attainment area such as New York City until June 30, 2014, and 0.0015 percent by weight thereafter.

Mount Sinai Hospital must comply with the 0.20 percent by weight sulfur content limit until June 30, 2014, and 0.0015 percent by weight thereafter in distillate oil as per 6 NYCRR 225-1.2, which has more stringent limit for New York City than 40 CFR 60-Dc.46c(d)(2), NSPS.

21. Condition # 52 for 40 CFR 60.48c (d), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-B0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Record Keeping/Maintenance Procedures for all six boilers, Boilers BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for reporting and recordkeeping for sulfur dioxide. This condition requires the owner or operator of the facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c, to submit semi-annual reports to the EPA.

22. Condition # 53 for 40 CFR 60.48c (e) (1), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-B0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Record Keeping/Maintenance Procedures for all six boilers, Boilers BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for reporting and recordkeeping provisions for facilities subject to a sulfur-in-fuel standard, sulfur dioxide emission limit, or percent reduction of sulfur dioxide emissions.

23. Condition # 54 for 40 CFR 60.48c (e) (2), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-B0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Record Keeping/Maintenance Procedures for all six boilers, Boilers BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for reporting and recordkeeping provisions for facilities subject to a sulfur-in-fuel standard, sulfur dioxide emission limit, or percent reduction of sulfur dioxide emissions.

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24. Condition # 55 for 40 CFR 60.48c (e) (3), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-B0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Record Keeping/Maintenance Procedures for all six boilers, Boilers BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for reporting and recordkeeping provisions for facilities subject to a sulfur-in-fuel standard, sulfur dioxide emission limit, or percent reduction of sulfur dioxide emissions.

25. Condition # 56 for 40 CFR 60.48c (e) (4), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-B0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Record Keeping/Maintenance Procedures for all six boilers, Boilers BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for reporting and recordkeeping provisions for facilities subject to a sulfur-in-fuel standard, sulfur dioxide emission limit, or percent reduction of sulfur dioxide emissions.

26. Condition # 57 for 40 CFR 60.48c (e) (7), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-B0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Record Keeping/Maintenance Procedures for all six boilers, Boilers BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for reporting and recordkeeping provisions for facilities subject to a sulfur-in-fuel standard, sulfur dioxide emission limit, or percent reduction of sulfur dioxide emissions.

27. Condition # 58 for 40 CFR 60.48c (f) (1), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-B0001, Emission Point: B0001, Process: O41, and Emission Sources: BLR01, BLR02, BLR03 & BLR04. This condition is for Record Keeping/Maintenance Procedures for Sulfur Dioxide. Fuel supplier certifications for distillate oil shall include the name of the oil supplier and a statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60-Dc.41c.

28. Condition # 59 for 40 CFR 60.48c (i), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-B0001, Emission Point: B0001, Processes: O41 & O65, and Emission Sources: BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition is for Record Keeping/Maintenance Procedures for all six boilers, Boilers BLR01, BLR02, BLR03, BLR04, BLR05 & BLR06. This condition requires the source



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

29. Condition # 60 for 40 CFR 60.48c (f) (1), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-B0001, Emission Point: B0001, Process:O65, and Emission Sources: BLR05 & BLR06. This condition is for Record Keeping/Maintenance Procedures for Sulfur Dioxide for Boilers , BLR05 & BLR06. The fuel supplier certifications for distillate oil shall include the name of the oil supplier and a statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60-Dc.41c.