

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 7-5007-00030/00031 Renewal Number: 1



04/05/2007

Facility Identification Data

Name: CORNELL UNIVERSITY MAIN CAMPUS
Address: COLLEGE AVE
ITHACA, NY 14853

Owner/Firm

Name: CORNELL UNIVERSITY
Address: 300 DAY HALL
ITHACA, NY 14853-2801, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: JEAN W COTTERILL
Address: 1285 FISHER AVE
CORTLAND, NY 13045-1090

Division of Air Resources:
Name: THOMAS A ELTER
Address: 615 ERIE BLVD WEST
SYRACUSE, NY 13204

Air Permitting Facility Owner Contact:
Name: PATRICK O MCNALLY
Address: ENV COMPLIANCE OFFICE
361 PINE TREE RD 180 EAST HILL PLZ
ITHACA, NY 14850
Phone:6072552304

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.

Attainment Status

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CORNELL UNIVERSITY MAIN CAMPUS is located in the town of ITHACA in the county of TOMPKINS.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone* ATTAINMENT)	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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

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

Facility Description

THE CORNELL UNIVERSITY UTILITIES DEPARTMENT INCLUDES THE CENTRAL HEATING PLANT (CHP) AND CHILLED WATER PLANTS WHICH PROVIDE STEAM AND CHILLED WATER TO MOST OF THE CAMPUS. THE CHP CONSISTS OF FIVE BOILERS AND A DIESEL GENERATOR. TWO BOILERS FIRE COAL, ONE BOILER FIRES NATURAL GAS ONLY, ONE BOILER FIRES NO.6 OIL ONLY, AND TWO BOILERS CAN FIRE NATURAL GAS OR NO.6 OIL.

Permit Structure and Description of Operations

The Title V permit for CORNELL UNIVERSITY MAIN CAMPUS is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus,

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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.

CORNELL UNIVERSITY MAIN CAMPUS is defined by the following emission unit(s):

Emission unit 1CHP02 - THIS EMISSION UNIT CONSISTS OF BOILERS 1 AND 2 EXHAUSTING THROUGH EP00002. BOILER 1 IS A 117 MMBTU/HR, COAL-FIRED SPREADER STOKER BOILER. BOILER 2 IS A 103 MMBTU/HR, NO.6 OIL-FIRED BOILER.

Emission unit 1CHP02 is associated with the following emission points (EP):
00002

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

Process: B1C is located at 1ST FLOOR, Building 5510B - PROCESS B1C CONSISTS OF COAL COMBUSTION IN 117 MMBTU/HR SPREADER STOKER BOILER 1.

Process: B20 is located at 1ST FLOOR, Building 5510B - PROCESS B20 CONSISTS OF NO. 6 FUEL OIL COMBUSTION IN 103 MMBTU/HR BOILER 2.

Emission unit 1CHP03 - THIS EMISSION UNIT CONSISTS OF BOILER 5 EXHAUSTING THROUGH EP00003. BOILER 5 IS A 145 MMBTU/HR, NATURAL GAS-FIRED BOILER.

Emission unit 1CHP03 is associated with the following emission points (EP):
00003

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

Process: B5G is located at 1ST FLOOR, Building 5510B - PROCESS B5G IS NATURAL GAS COMBUSTION IN 145 MMBTU/HR BOILER 5.

Emission unit 1CHP05 - THIS EMISSION UNIT CONSISTS OF THE COAL STORAGE PILE FOR BOILERS 1 AND 8. NOTE THAT ALL EMISSIONS FROM THIS EMISSION UNIT ARE FUGITIVE.

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

Process: CSP is located at Building CPILE1 - THIS PROCESS CONSISTS OF COAL STORAGE AND HANDLING ASSOCIATED WITH THE COAL STORAGE PILE. ALL EMISSIONS ARE FUGITIVE.

Emission unit 1CHP01 - THIS EMISSION UNIT CONSISTS OF BOILERS 6,7 AND 8 EXHAUSTING THROUGH EP00001. BOILERS 6 AND 7 ARE IDENTICAL BOILERS. EACH IS CAPABLE OF FIRING NATURAL GAS AT 145 MMBTU/HR OR NO. 6 FUEL OIL AT 138 MMBTU/HR. BOILERS 6 AND 7 ARE SUBJECT TO NSPS Db. BOILER 8 IS A 248 MMBTU/HR

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COAL-FIRED OVERFEED STOKER BOILER. BOILER 8 HAS SPECIAL SULFUR-IN-FUEL LIMITS BASED ON AMBIENT MODELING. BOILERS 6 AND 7 ARE ALSO PERMITTED TO BURN WASTE FUEL A FOR HEAT RECOVERY.

Emission unit 1CHP01 is associated with the following emission points (EP):
00001

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

Process: 67G is located at 1ST FLOOR, Building 5510B - PROCESS 67G CONSISTS OF NATURAL GAS COMBUSTION IN A 145 MMBTU/HR BOILER. THIS PROCESS APPLIES TO BOILER 6 AND/OR BOILER 7. ALL PROCESS APPLICABLE REQUIREMENTS AND REPORTED PROCESS EMISSIONS APPLY TO EACH BOILER.

Process: 67O is located at 1ST FLOOR, Building 5510B - PROCESS 67O CONSISTS OF COMBUSTION OF OIL (NO. 6 FUEL OIL OR NO. 6 FUEL OIL AND WASTE FUEL A). THE DESIGN CAPACITY OF THE UNIT WHEN FIRING NO. 6 OIL IS 138 MILLION Btu'S PER HOUR. THIS PROCESS APPLIES TO BOILER 6 AND/OR BOILER 7. ALL PROCESS APPLICABLE REQUIREMENTS AND REPORTED PROCESS EMISSIONS APPLY TO EACH BOILER.

Process: B8C is located at 1ST, Building 5510B - PROCESS B8C CONSISTS OF COAL COMBUSTION IN THE 248 MMBTU/HR MASS OVERFEED STOKER BOILER 8.

Title V/Major Source Status

CORNELL UNIVERSITY MAIN CAMPUS is subject to Title V requirements. This determination is based on the following information:

The facility is major for HAPs, PM, SO₂, CO and NO_x.

Program Applicability

The following chart summarizes the applicability of CORNELL UNIVERSITY MAIN CAMPUS 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



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TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

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

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

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

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

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

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

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

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the

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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
8221	COLLEGES AND UNIVERSITIES, NEC

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-004-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL Grade 6 Oil
1-02-002-05	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - SUBBITUMINOUS COAL Overfeed Stoker
1-02-002-04	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - SUBBITUMINOUS COAL Spreader Stoker
3-05-103-03	MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS OPEN STOCKPILES

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Coal

Facility Emissions Summary

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000092-52-4	1, 1 BIPHENYL (HAP)	> 0	but < 10 tpy
000079-34-5	1, 1, 2, 2-TETRACHLOROETHANE (HAP)	> 0	but < 10 tpy
000107-06-2	1, 2-DICHLOROETHANE (HAP)	> 0	but < 10 tpy
000106-99-0	1, 3-BUTADIENE (HAP)	> 0	but < 10 tpy
000098-86-2	1-PHENYLETHANONE (HAP)	> 0	but < 10 tpy
001746-01-6	2, 3, 7, 8-TETRACHLORODIBENZO-P-D IOXIN (HAP)	> 0	but < 10 tpy
000051-28-5	2, 4, DINITROPHENOL (HAP)	> 0	but < 10 tpy
000078-59-1	2-CYCLOHEXEN-1-ONE, 3, 5, 5-TRIME THYL (HAP)	> 0	but < 10 tpy
000075-07-0	ACETALDEHYDE (HAP)	> 0	but < 10 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER (HAP)	> 0	but < 10 tpy
000107-02-8	ACROLEIN (HAP)	> 0	but < 10 tpy
000532-27-4	ALPHA-CHLOROACETOPHENONE (HAP)	> 0	but < 10 tpy
007440-36-0	ANTIMONY (HAP)	> 0	but < 10 tpy
007440-38-2	ARSENIC (HAP)	> 0	but < 10 tpy
000071-43-2	BENZENE (HAP)	> 0	but < 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL) (HAP)	> 0	but < 10 tpy
000106-46-7	BENZENE, 1, 4-DICHLORO- (HAP)	> 0	but < 10 tpy
000100-44-7	BENZYL CHLORIDE (HAP)	> 0	but < 10 tpy
007440-41-7	BERYLLIUM (HAP)	> 0	but < 10 tpy
000117-81-7	BIS (2-ETHYLHEXYL) PHTHALATE (HAP)	> 0	but < 10 tpy
000075-25-2	BROMOFORM (HAP)	> 0	but < 10 tpy
007440-43-9	CADMIUM (HAP)	> 0	but < 10 tpy
000075-15-0	CARBON DISULFIDE (HAP)	> 0	but < 10 tpy

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000630-08-0	CARBON MONOXIDE	>= 250 tpy
007782-50-5	CHLORINE (HAP)	> 0 but < 10 tpy
000108-90-7	CHLOROBENZENE (HAP)	> 0 but < 10 tpy
000067-66-3	CHLOROFORM (HAP)	> 0 but < 10 tpy
007440-47-3	CHROMIUM (HAP)	> 0 but < 10 tpy
007440-48-4	COBALT (HAP)	> 0 but < 10 tpy
000057-12-5	CYANIDE (HAP)	> 0 but < 10 tpy
000075-09-2	DICHLOROMETHANE (HAP)	> 0 but < 10 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO (HAP)	> 0 but < 10 tpy
000106-93-4	ETHANE, 1,2-DIBROMO (HAP)	> 0 but < 10 tpy
000075-00-3	ETHANE, CHLORO (HAP)	> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE (HAP)	> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)	> 0 but < 10 tpy
000110-00-9	FURAN C4H4O	> 0 but < 2.5 tpy
000110-00-0	HAP	>= 50 tpy but < 100 tpy
000110-54-3	HEXANE (HAP)	> 0 but < 10 tpy
007647-01-0	HYDROGEN CHLORIDE (HAP)	>= 10 tpy
007664-39-3	HYDROGEN FLUORIDE (HAP)	> 0 but < 10 tpy
007439-92-1	LEAD (HAP)	> 0 but < 10 tpy
007439-96-5	MANGANESE (HAP)	> 0 but < 10 tpy
007439-97-6	MERCURY (HAP)	> 0 but < 10 tpy
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER (HAP)	> 0 but < 10 tpy
000074-83-9	METHYL BROMIDE (HAP)	> 0 but < 10 tpy
000074-87-3	METHYL CHLORIDE (HAP)	> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE (HAP)	> 0 but < 10 tpy
000060-34-4	METHYL HYDRAZINE (HAP)	> 0 but < 10 tpy
000074-88-4	METHYL IODIDE (HAP)	> 0 but < 10 tpy
001634-04-4	METHYL TERTBUTYL ETHER (HAP)	> 0 but < 10 tpy
000091-20-3	NAPHTHALENE (HAP)	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS (HAP)	> 0 but < 10 tpy
000210-00-0	OXIDES OF NITROGEN	>= 250 tpy
000075-00-0	PARTICULATES	>= 250 tpy
000127-18-4	PERCHLOROETHYLENE (HAP)	> 0 but < 10 tpy
000108-95-2	PHENOL (HAP)	> 0 but < 10 tpy
007723-14-0	PHOSPHORUS (YELLOW) (HAP)	> 0 but < 10 tpy
000075-00-5	PM-10	>= 250 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS (HAP)	> 0 but < 10 tpy
000123-38-6	PROPIONALDEHYDE (HAP)	> 0 but < 10 tpy
007782-49-2	SELENIUM (HAP)	> 0 but < 10 tpy
000100-42-5	STYRENE (HAP)	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy
007664-93-9	SULFURIC ACID	>= 50 tpy but < 100 tpy
000077-78-1	SULFURIC ACID, DIMETHYL ESTER (HAP)	> 0 but < 10 tpy
000108-88-3	TOLUENE (HAP)	> 0 but < 10 tpy
000998-00-0	VOC	>= 10 tpy but < 25 tpy
001330-20-7	XYLENE, M, O & P MIXT. (HAP)	> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through

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properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

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

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

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

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

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

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complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

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

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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

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

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision,

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determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V

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permit must be revised or reopened to assure compliance with applicable requirements.

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

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

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

Item L:

Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M:

Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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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	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	88
1-CHP01/-/67G	40CFR 60-A.11 (d)	General provisions - compliance with standards and maintenance requirements	39
1-CHP01/-/67O	40CFR 60-A.11 (d)	General provisions - compliance with standards and maintenance requirements	56
1-CHP01/-/67G	40CFR 60-A.12	General provisions - Circumvention	40
1-CHP01/-/67O	40CFR 60-A.12	General provisions - Circumvention	57
1-CHP01/-/67G	40CFR 60-A.13	General provisions - Monitoring requirements	41
1-CHP01/-/67O	40CFR 60-A.13	General provisions - Monitoring requirements	58
1-CHP01/-/67G	40CFR 60-A.7 (b)	Notification and Recordkeeping	35
1-CHP01/-/67O	40CFR 60-A.7 (b)	Notification and Recordkeeping	52
1-CHP01/-/67G	40CFR 60-A.7 (c)	Notification and Recordkeeping	36



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1-CHP01/-/670	40CFR 60-A.7(c)	Notification and Recordkeeping	53
1-CHP01/-/67G	40CFR 60-A.7(d)	Notification and Recordkeeping	37
1-CHP01/-/670	40CFR 60-A.7(d)	Notification and Recordkeeping	54
1-CHP01/-/67G	40CFR 60-A.7(f)	Notification and Recordkeeping	38
1-CHP01/-/670	40CFR 60-A.7(f)	Notification and Recordkeeping	55
1-CHP01/-/670	40CFR 60-Db.42b(a)	Standard for Sulfur Dioxide Firing Coal and/or Oil.	59
1-CHP01/-/670	40CFR 60-Db.43b(f)	Standard for Particulate Matter Opacity.	60
1-CHP01/-/67G	40CFR 60-Db.44b(a)(1)	Standard for Nitrogen Oxides Firing Natural Gas and Distillate Oil. (see narrative)	42
1-CHP01/-/670	40CFR 60-Db.44b(a)(2)	Standard for Nitrogen Oxides Firing Residual Oil	61
1-CHP01/-/67G	40CFR 60-Db.46b	Compliance and Performance Test Methods and Procedures for Particulate Matter and and Nitrogen Oxides.	43
1-CHP01/-/670	40CFR 60-Db.46b	Compliance and Performance Test Methods and Procedures for Particulate Matter and and Nitrogen Oxides.	62, 63
1-CHP01/-/67G	40CFR 60-Db.49b(d)	Reporting and Recordkeeping Requirements.	44
1-CHP01/-/670	40CFR 60-Db.49b(d)	Reporting and Recordkeeping Requirements.	64
1-CHP01/-/67G	40CFR 60-Db.49b(g)	Reporting and Recordkeeping Requirements.	45
1-CHP01/-/670	40CFR 60-Db.49b(g)	Reporting and Recordkeeping Requirements.	65
1-CHP01/-/67G	40CFR 60-Db.49b(h)	Reporting and Recordkeeping Requirements.	46
1-CHP01/-/670	40CFR 60-Db.49b(h)	Reporting and Recordkeeping Requirements.	66
1-CHP01/-/67G	40CFR 60-Db.49b(i)	Reporting and Recordkeeping Requirements.	47
1-CHP01/-/670	40CFR 60-Db.49b(i)	Reporting and Recordkeeping Requirements.	67
1-CHP01/-/670	40CFR 60-Db.49b(j)	Reporting and Recordkeeping Requirements.	68
1-CHP01/-/67G	40CFR 60-Db.49b(o)	Reporting and Recordkeeping Requirements.	48
1-CHP01/-/670	40CFR 60-Db.49b(o)	Reporting and Recordkeeping Requirements.	69

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FACILITY	40CFR 63-DDDDD	Recordkeeping Requirements.	
FACILITY	40CFR 64	Boilers and Process Heaters NESHP rule	28
FACILITY	40CFR 68	COMPLIANCE ASSURANCE MONITORING	29
FACILITY	40CFR 82-F	Chemical accident prevention provisions	21
FACILITY	6NYCRR 200.6	Protection of Stratospheric Ozone - recycling and emissions reduction	22
FACILITY	6NYCRR 200.7	Acceptable ambient air quality.	1
FACILITY	6NYCRR 201-1.4	Maintenance of equipment.	10, 23
FACILITY	6NYCRR 201-1.7	Unavoidable noncompliance and violations	89
FACILITY	6NYCRR 201-1.8	Recycling and Salvage	11
FACILITY	6NYCRR 201-3.2(a)	Prohibition of reintroduction of collected contaminants to the air	12
FACILITY	6NYCRR 201-3.3(a)	Exempt Activities - Proof of eligibility	13
FACILITY	6NYCRR 201-6	Trivial Activities - proof of eligibility	14
FACILITY	6NYCRR 201-6.5(a) (4)	Title V Permits and the Associated Permit Conditions	24, 30, 31
FACILITY	6NYCRR 201-6.5(a) (7)	General conditions	15
FACILITY	6NYCRR 201-6.5(a) (8)	General conditions	16
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5(c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5(c) (3)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	25
FACILITY	6NYCRR 201-6.5(c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	6
FACILITY	6NYCRR 201-6.5(d) (5)	Compliance schedules	17
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	2
FACILITY	6NYCRR 201-6.5(f) (6)	Off Permit Changes	18
FACILITY	6NYCRR 201-6.5(g)	Permit shield	26
FACILITY	6NYCRR 202-1.1	Required emissions tests.	19
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	90
FACILITY	6NYCRR 211.3	General Prohibitions -	20

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		visible emissions	
		limited	
FACILITY	6NYCRR 215	Open Fires	9
FACILITY	6NYCRR 225-1.2(a)	Sulfur in Fuel	27
		Limitations.	
1-CHP02/-/B20	6NYCRR 225-1.2(a)(2)	Sulfur in Fuel	81
		Limitations Post	
		12/31/87.	
1-CHP01/00001	6NYCRR 225-1.7(c)	Emission and fuel	74
		monitoring.	
1-CHP01/-/670	6NYCRR 225-2.3(b)(1)	Eligibility to burn waste	49
		fuel A.	
1-CHP02/-/B20	6NYCRR 227.2(b)(1)	Particulate emissions.	85
1-CHP01/-/670	6NYCRR 227-1.2(a)(1)	Particulate Emissions	50
		from Liquid Fuels.	
1-CHP02/-/B20	6NYCRR 227-1.2(a)(2)	Particulate Emissions	91
		Firing Liquid Fuels	
		Excluding Distillate Oil.	
		(see narrative)	
1-CHP01/-/B8C	6NYCRR 227-1.2(a)(4)	Particulate Emissions	70
		Firing Solid Fuels.	
1-CHP02/-/B1C	6NYCRR 227-1.2(a)(4)	Particulate Emissions	75
		Firing Solid Fuels.	
1-CHP01	6NYCRR 227-1.3(a)	Smoke Emission	32
		Limitations.	
1-CHP02/-/B1C	6NYCRR 227-1.3(a)	Smoke Emission	76
		Limitations.	
1-CHP02/-/B20	6NYCRR 227-1.3(a)	Smoke Emission	82
		Limitations.	
1-CHP01	6NYCRR 227-1.4(b)	Stack Monitoring	33
1-CHP01/-/67G	6NYCRR 227-2.4(b)(1)	Control Requirements for	34
		large boilers which are	
		not case by case.	
1-CHP01/-/670	6NYCRR 227-2.4(b)(1)	Control Requirements for	51
		large boilers which are	
		not case by case.	
1-CHP02/-/B20	6NYCRR 227-2.4(b)(1)	Control Requirements for	83, 84
		large boilers which are	
		not case by case.	
1-CHP03	6NYCRR 227-2.4(b)(1)	Control Requirements for	86
		large boilers which are	
		not case by case.	
1-CHP02/-/B1C	6NYCRR 227-2.4(b)(2)	This is the case by case	77
		portion for large	
		boilers.	
1-CHP02/-/B1C	6NYCRR 227-2.4(g)	Emission limitations for	78
		other combustion	
		sources.	
1-CHP01/-/B8C	6NYCRR 227-2.5(c)	Alternative emission	71
		limits	
1-CHP01/-/B8C	6NYCRR 257-1.4	Air Quality Standards	72, 73
		general - compliance	
1-CHP02/-/B1C	6NYCRR 257-1.4	Air Quality Standards	79, 80
		general - compliance	
1-CHP03	6NYCRR 257-1.4	Air Quality Standards	87
		general - compliance	

Applicability Discussion:

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

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ECL 19-301.

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

6NYCRR Part 200-.6

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

6NYCRR Part 200-.7

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

6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department

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representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-6

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

6NYCRR 201-6.5(a)(4)

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

6NYCRR 201-6.5(a)(7)

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

6NYCRR 201-6.5(a)(8)

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

6NYCRR Part 201-6.5(c)

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

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be

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

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

This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

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

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

6NYCRR 201-6.5(d)(5)

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

6NYCRR Part 201-6.5(e)

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

6NYCRR 201-6.5(f)(6)

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

6NYCRR Part 201-6.5(g)

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

6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for

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the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-.2

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

6 NYCRR Part 211.3

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

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

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

40 CFR Part 82, Subpart F

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

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Facility Specific Requirements

In addition to Title V, CORNELL UNIVERSITY MAIN CAMPUS has been determined to be subject to the following regulations:

40CFR 60-A.11 (d)

This regulation specifies the type of opacity monitoring requirements in relation to compliance with the standards and maintenance requirements.

40CFR 60-A.12

This regulation prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

40CFR 60-A.13

This regulation specifies how monitoring shall be performed and which methods and appendices are used to determine if the monitoring is adequate and in compliance with the regulated standards.

40CFR 60-A.7 (b)

This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40CFR 60-A.7 (c)

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

40CFR 60-A.7 (d)

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

40CFR 60-A.7 (f)

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

40CFR 60-Db.42b (a)

This regulation calls for a 90% reduction in the emissions of sulfur dioxide from facilities that burn coal or oil.

40CFR 60-Db.43b (f)

This regulation specifies maximum allowable opacity for affected affected sources. The opacity of the emission may not exceed 20%, except for one six minute period when the maximum opacity may not exceed 27%.

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40CFR 60-Db.44b (a) (1)

These standards apply to all boilers firing natural gas and/or distillate oil except as provided in 40 CFR 60.44b(a)(4) Duct Burners Used in a Combined Cycle System.

40CFR 60-Db.44b (a) (2)

NSPS Subpart Db limits emissions of NO_x to no more than 0.30 lb NO_x/mmBtu, 30 day average.

40CFR 60-Db.46b

This section sets the compliance and performance test methods and procedures for emissions of particulate matter and oxides of nitrogen.

40CFR 60-Db.49b (d)

This subdivision requires reporting and recordkeeping for affected steam generating units - annual fuel capacity factors.

40CFR 60-Db.49b (g)

This subdivision requires reporting and recordkeeping for affected steam generating units - specific oxides of nitrogen requirements.

40CFR 60-Db.49b (h)

Boilers 6 and 7 are subject to 40 CFR Part 60, Subpart Db. This section requires the owner to submit excess emissions reports.

40CFR 60-Db.49b (i)

This section requires the owner to submit CEM monitoring reports.

40CFR 60-Db.49b (j)

This section requires the owner to submit fuel sulfur reports.

40CFR 60-Db.49b (o)

This section of the NSPS requires the owner or operator to maintain records for 2 years.

40CFR 63-DDDDDD

Cornell is subject to the NESHAPS for Industrial/Commercial/Institutional boilers. Because this permit is being issued to Cornell before the compliance date, and because multiple compliance options exist, this condition requires Cornell to comply does not specify which option to use.

40CFR 64

Boilers 1 and 8 are subject to EPA's Compliance Assurance Monitoring rule. The boilers are also subject to the MACT standard for institutional boilers, 40 CFR Part 63, Subpart DDDDD. The CAM plan for the boilers, which addresses compliance with the DEC's SIP particulate limit (6 NYCRR 227-1), adopts the approach used in the MACT standard. The PM limit in the MACT standard is much more stringent than the SIP PM limit, and establishes an opacity limit of 20%. Accordingly, this is adopted for the SIP PM Limit.

6NYCRR 225-1.2 (a)

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This regulation sets the limits for sulfur in fuel being burned at stationary sources in New York State with a heat input greater than 250 million BTU per hour. The limits are: for oil - from 0.20% [in NYC] to 1.50% by weight; for solid fuel - from 0.20 [in NYC] to 2.5 pounds of sulfur per million BTU. This limit applies to facilities that submitted permit applications after March 15, 1973 and are not located in New York City, Nassau, Rockland or Westchester counties.

6NYCRR 225-1.2 (a) (2)

This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.7 (c)

This regulation requires that measurements be made daily of the rate of each fuel burned, the gross heat content and ash content of each fuel burned (determined at least once per week), and the average electrical output (daily) and hourly generation rate.

6NYCRR 225-2.3 (b) (1)

This regulation requires that each piece of equipment which fires Waste Fuel A demonstrate, at a minimum, 99% combustion efficiency in burning Waste fuel A

6NYCRR 227.2 (b) (1)

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

6NYCRR 227-1.2 (a) (1)

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

6NYCRR 227-1.2 (a) (2)

This rule limits particulate emissions to 0.20 pound per million Btu heat input from any stationary combustion installation with a maximum heat input capacity exceeding 50 million Btu per hour but no greater than 250 million Btu per hour using oil (other than distillate oil), coal tar, or any liquid fuel derived from coal.

6NYCRR 227-1.2 (a) (4)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units which fire solid fuels at variable sizes of heat input (mmBtu/hr).

6NYCRR 227-1.3 (a)

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

6NYCRR 227-1.4 (b)

This regulation requires the specific contents of excess emissions reports for opacity from facilities that

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employ continuous opacity monitors (COMs).

6NYCRR 227-2.4 (b) (1)

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

6NYCRR 227-2.4 (b) (2)

This condition lists the emission limitations for large boilers.

6NYCRR 227-2.4 (g)

This subdivision is meant to require RACT on a significant combustion source which has no RACT provisions.

6NYCRR 227-2.5 (c)

For those sources for which the owner or operator demonstrates that the applicable presumptive RACT emission limit in section 227-2.4 of this Subpart is not economically or technically feasible, the owner or operator can request the department to set a higher source specific emission limit. Economic or technical feasibility must include, but is not limited to, the evaluation of fuel switching, selective catalytic reduction or system averaging as compliance options. This alternative RACT emission limit must be approved by the department and by the administrator as a revision to the State Implementation Plan.

Boiler 8 has been shown to not meet the presumptive RACT limits.

6NYCRR 257-1.4

(a) No person shall permit, suffer or allow the emission of contaminants from an emission source which alone or in combination with emissions from other sources cause contravention of air quality standards promulgated in this Part.

Boiler 8 and Boiler 1 have special sulfur in fuel limits.

Compliance Certification

Summary of monitoring activities at CORNELL UNIVERSITY MAIN CAMPUS:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
1-CHP01/-/67G	record keeping/maintenance procedures	36
1-CHP01/-/67O	record keeping/maintenance procedures	53
1-CHP01/-/67O	monitoring of process or control device parameters as surrogate	59
1-CHP01/-/67O	continuous emission monitoring (cem)	60
1-CHP01/-/67G	continuous emission monitoring (cem)	42
1-CHP01/-/67O	continuous emission monitoring (cem)	61
1-CHP01/-/67G	record keeping/maintenance procedures	44
1-CHP01/-/67O	record keeping/maintenance procedures	64
1-CHP01/-/67G	record keeping/maintenance procedures	45
1-CHP01/-/67O	record keeping/maintenance procedures	65
1-CHP01/-/67G	record keeping/maintenance procedures	46
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New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 7-5007-00030/00031 Renewal Number: 1

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Basis for Monitoring

Cornell must monitor fuel sulfur to demonstrate compliance with 6 NYCRR 225. Cornell must monitor emissions of NOx from Boilers 6 and 7. Cornell must monitor opacity from the combined stacks.