New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 9-1402-00573/00007 Modification Number: 1 1/30/02 08:58:01

Facility Identification Data
Name: BUFFALO STATE COLLEGE
Address: 1300 ELMWOOD AVE
City: BUFFALO
Zip: 14222

Owner/Firm
Name: STATE UNIVERSITY OF NEW YORK
City: ALBANY
State: NY Country: USA Zip: 12246
Owner Classification: State

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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(2) 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 while the permit review report is based on information found in the accompanying permit, it is not an enforceable document and therefore, has no legal standing.

Summary Description of Proposed Project
This project consists of the addition of one small, natural gas fired boiler to the powerhouse, which will be used predominantly during the summer months. This boiler has a maximum design heat input capacity of 33.5 MMBTU/hr and is equipped with a low-NOx burner. This modification required changes to the monitoring condition for 6NYCRR227-2 to include emissions from the new boiler when determining compliance with the facility-wide NOx CAP of 99 tons per year . Additional applicable requirements included in this modification are 40CFR60, Standards of Performance for New Stationary Sources (NSPS), Subpart A, General Provisions and Subpart Dc, Standards of Performance for Small

Industrial-Commercial-Institutional Steam Generating Units. In accordance with 40CFR60, Subpart Dc, a natural gas fired boiler is only subject to recordkeeping and reporting requirements which include notification specified under 40CFR60.48c(a), and the daily monitoring and recordkeeping of natural gas usage specified under 40CFR48c(g) and (i). The monitoring of fuel usage is already required to avoid 6NYCRR227-2 applicability. Therefore, even though Subparts A and Dc are new requirements for the facility, this modification was considered minor since the only new requirement is the initial notification which includes the design heat input capacity, identification of fuels to be combusted and the annual capacity factor (actual heat input/potential maximum design heat input for 12 consecutive months of calendar year) at which facility is expected to run. Several conditions in the original title V permit were expired and replaced with updated conditions with no significant difference in compliance requirements.

Attainment Status

BUFFALO STATE COLLEGE is located in the town of BUFFALO in the county of ERIE.
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*	MARGINAL 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

Buffalo State College, located at 1300 Elmwood Avenue in the City of Buffalo, New York, is a four year college operated by the State University of New York (SUNY). It offers degree programs in liberal arts and science to approximately 11,000 students. Buffalo State College currently operates a power house on campus containing five boilers which supply steam for the space heating of the buildings and dormitories on campus. Buffalo Sate College also operates a gasoline/diesel dispensing station , exempt from permitting in accordance with 6NYCRR201-3.2 (c) (16). The facility operates other sources throughout the campus which are considered exempt from permitting in accordance with 6NYCRR201-3.2(c),

including 12 small natural gas fired furnaces, 20 emergency generators (5 diesel fueled and 15 natural gas fired), six (6) fuel oil (distillate/residual oil) storage tanks with capacities less than 300,000 bbls, two (2) storage tanks with capacities less than 10,000 gallons (not subject to Part 229 or Part 233), numerous laboratory hoods, an exhaust system for paint mixing, transfer, filling or sampling and/or solvent storage and eight (8) non-contact water cooling towers. The Standard Industrial Classification (SIC) Code for this facility is 8221-Colleges, Universities, & Professional Schools.

Permit Structure and Description of Operations

The Title V permit for BUFFALO STATE COLLEGE is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.
A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

combustion	-	devices which burn fuel to generate heat, steam or power
incinerator	-	devices which burn waste material for disposal
control	-	emission control devices
process	-	any device or contrivance which may emit air contaminants that is not included in the above categories.

BUFFALO STATE COLLEGE is defined by the following emission unit(s):
Emission unit U00001 - This emission unit consists of the campus power plant located in Building 45 containing five boilers, which produce steam for space heating throughout the college campus. Boilers 1-4 fire residual oil or natural gas and have a maximum design heat input capacity of approximately 53 MMBTU/hr, each. Boiler 5 is equipped with a low-NOx burner, fires only natural gas and has a maximum design heat input capacity of 33.5 MMBTU/hr. All five boilers exhaust through a common stack, with a current potential stack heat input of 245.5 MMBTU/hr.

Emission unit U00001 is associated with the following emission points (EP):
BSC01, It is further defined by the following process(es):
Process: 100 is located at Building 45 - Process 100 is the combustion of residual oil in any of the four midsized power plant boilers to produce steam for space heating.
Process: 200 is located at Building 45 - Process 200 is the combustion of natural gas in any of the five

power plant boilers to produce steam for space heating.

Emission unit U00002 - This emission unit consists of a fuel dispensing site containing two fiberglass underground storage tanks installed in 1979 with capacities of 8,000 gallons each. One tank is used for gasoline storage and the other holds disel fuel. The annual throughput of gasoline is 30,000 gallons, with an average monthly thruput of approximately 2,500 gallons. The average annual throughput of diesel is 12,000 gallons.

Title V/Major Source Status
BUFFALO STATE COLLEGE is subject to Title V requirements. This determination is based on the following information:
The facility-wide emissions for sulfur dioxide (SO2) and nitrous oxide (NOx) at Buffalo State College exceed the major source pollutant thresholds (100 tpy each) listed in 6NYCRR Subpart 201-6, Title V Facility Permits and the major source threshold of 100 tpy NOx specified in 6NYCRR227-2, Reasonably Available Control Technology (RACT) for Oxides of Nitrogen. Buffalo State College has chosen to avoid the requirements of 6NYCRR227-2 by limiting facility-wide NOx emissions below the major source threshold at 99 tons per year. The facility is subject to the provisions of Title V for sulfur dioxide emissions, which are generated predominantly by the combustion of No. 6 oil in four midsized boilers at the powerhouse.

Program Applicability
The following chart summarizes the applicability of BUFFALO STATE COLLEGE with regards to the principal air pollution regulatory programs:

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

SIP	YES

NOTES:

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

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

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

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

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

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

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

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

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

Compliance Status

Facility is in compliance with all requirements

SIC Codes

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

SIC Code	Description
8220	COLLEGES, UNIVERSITIES, PROFESSIONAL SCHOOLS, & JUNIOR COLLEGES

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
1-03-004-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - RESIDUAL OIL 10-100MMBTU/HR **
1-03-006-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS 10-100 MMBtu/Hr

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
0NY210-00-0	OXIDES OF NITROGEN	198000	
0NY075-00-0	PARTICULATES		>= 25 tpy but < 40 tpy

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
U-00001/-/200/0001E	40CFR 60-A.	General provisions	1-7
U-00001/-/200/0001E	40CFR 60-A.4	General provisions - Address	1-8
U-00001/-/200/0001E	40CFR 60-A.7(a)	Notification and Recordkeeping	1-9
U-00001/-/200/0001E	40CFR 60-A.7(b)	Notification and Recordkeeping	1-10
U-00001/-/200/0001E	40CFR 60-Dc.40c	Steam generators 10-100 million Btu per hour	1-12, 1-11
U-00001/-/200/0001E	40CFR 60-Dc.48c(a)	Reporting and Recordkeeping Requirements.	1-13
U-00001/-/200/0001E	40CFR 60-Dc.48c(g)	Reporting and Recordkeeping Requirements.	1-14
U-00001/-/200/0001E	40CFR 60-Dc.48c(i)	Reporting and Recordkeeping Requirements.	1-15
FACILITY	40CFR 82-F.	Protection of Stratospheric Ozone - recycling and emissions reduction	46
FACILITY	6NYCRR 200.1	Definitions.	1
FACILITY	6NYCRR 200.3	False Statement.	2
FACILITY	6NYCRR 200.5	Sealing.	3
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	4
FACILITY	6NYCRR 200.7	Maintenance of equipment.	5
FACILITY	6NYCRR 201-1.10(b)	Permitting - public access to records kept	11

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FACILITY	6NYCRR 201-1.2	Permitting - unpermitted emission sources	6
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	1-17
FACILITY	6NYCRR 201-1.5	Emergency defense	8
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	9
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	10
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	12
FACILITY	6NYCRR 201-3.2(c)(6)	Exempt Activities - emergency power generating units	13
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	14
FACILITY	6NYCRR 201-5.	State Facility Permit General Provisions	54
FACILITY	6NYCRR 201-5.3(b)	Permit Content and Terms of Issuance - permit conditions	55
FACILITY	6NYCRR 201-6.	Title V Permits and the Associated Permit Conditions	15, 16, 18, 19, 21, 22, 23, 24, 25, 27, 47, 48, 17, 20, 26
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	1-1
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	1-2
FACILITY	6NYCRR 201-6.5(g)	Permit shield	30, 31
FACILITY	6NYCRR 202-1.1	Required emissions tests.	32
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	33
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	34
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	56
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	35
FACILITY	6NYCRR 215.	Open Fires	36
FACILITY	6NYCRR 225-1.2(a)(2)	Sulfur in Fuel Limitations Post 12/31/87.	37
FACILITY	6NYCRR 225-1.8(a)	Reports, sampling and analysis.	38
FACILITY	6NYCRR 225-1.8(d)	Reports, sampling, and analysis	39
U-00001/-/100	6NYCRR 227.2(b)(1)	Particulate emissions.	1-6
U-00001/BSC01/100	6NYCRR 227.2(b)(1)	Particulate emissions.	52, 1-16
U-00001/BSC01	6NYCRR 227-1.2(b)	Particulate Emissions from 2 or More Connected Furnaces.	49
FACILITY	6NYCRR 227-1.3	Smoke Emission Limitations.	1-3, 1-4
FACILITY	6NYCRR 227-1.6(a)	Corrective Action.	40
FACILITY	6NYCRR 227-1.6(b)	Corrective Action: Facility Shutdown.	41
FACILITY	6NYCRR 227-1.6(c)	Corrective Action: Facility Shutdown	42

		Prohibitions.	
FACILITY	6NYCRR 227-1.6(d)	Corrective Action: Facility Shutdown Prohibitions.	43
FACILITY	6NYCRR 227-2.	Reasonably available control technology for NOx	44, 1-5
U-00002	6NYCRR 230.5	Gasoline dispensing sites - recordkeeping and reporting.	53

Applicability Discussion:

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

6NYCRR Part 200-.5
Allows for the sealing of non-compliant air contamination sources

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 201-1.2
Any existing emission source that is required to be permitted or registered but has not done so, must apply for the necessary permit or registration. The source is subject to all regulations that were applicable at the time the original permit or registration was required as well as any subsequent applicable requirements that came into effect since.

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 201-1.5
An enforcement action may be avoided if the facility can demonstrate that an emergency situation occurred which resulted in an emission limitation or permit violation. The following information would constitute evidence of an emergency situation: a properly signed operating log recorded during the actual event which; identifies the cause(s) of the emergency, indicates that all equipment was operating

properly at the time, the person responsible took all reasonable steps to minimize the exceedance or violation, and that the department was notified of the emergency within 2 working days of the event.

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 contaminants to the air

6NYCRR Part 201-1.10(b)
Any permit application, compliance plan, permit, and monitoring and compliance certification report that is submitted as part of the Title V permit process must be made available to the public as per requirements set forth under 6 NYCRR Part 616 - Public Access to Records and section 114(c) of the Clean Air Act Amendments of 1990.

6NYCRR Part 201-3.2(a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart.
All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-3.3(a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-5
General Provisions - this requirement applies to those permit terms and conditions which are not federally enforceable; specifies that permittees must maintain emission units and control devices in compliance with all rules; authorizes reasonable access for inspections for department representatives; requires that on-site monitoring recordkeeping be made available for review for at least 5 years.

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

6NYCRR Part 201-5.3(b)
Lists those contaminants subject to contaminant specific requirements

6NYCRR Part 201-6
General provisions for Title V permits including:
Applicable Criteria, Limits, Terms, Conditions and Standards - requires that facility operations take place in accordance with approved criteria, emission limits, terms, conditions and standards as specified in the permit and that any documents required by the federally enforceable portion of the permit be certified by a responsible official

Cessation or Reduction of Permitted Activity Not a Defense - specifies that the cessation or reduction of a permitted activity to maintain compliance is not a defense in an enforcement action

Compliance Requirements - lists the information that must be included in any required compliance monitoring records and reports; and requires; compliance with any approved compliance schedule; the submittal of risk management plans as per 112(r) of the Act if necessary; and the submittal of compliance progress reports on a semiannual basis, at a minimum

Federally-Enforceable Requirements - specifies what permit terms and conditions, in general, are federally enforceable

Fees - requires the permittee to pay any required fees

Monitoring, Related Recordkeeping and Reporting Requirements - requires all compliance monitoring and recordkeeping to be conducted according to the terms and conditions of the permit and any Q/A requirements; any monitoring or support information is to be retained for minimum of 5 years.

Permit Revocation, Modification, Reopening, Reissuance or Termination and Associated Information Submission Requirements - specifies that the permit may be modified, revoked, reopened and reissued, or terminated for cause; and the permittee must furnish information regarding the permit to the department upon reasonable request

Permit Shield - sets forth criteria under which the permit shield applies and what authority the department maintains in pursuing violations
Property Rights - specifies that the permit does not convey any property rights

Reopening Cause - sets forth criteria and procedures for reopening a permit
Right to Inspect - establishes authority whereby department representatives may enter

and inspect a facility

Severability - establishes that the permit continues to be valid in instances where any provisions, parts or conditions of the permit are found to be invalid or are the subject of a challenge

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 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
Specifies that emissions tests may be required to ascertain compliance with any air pollution codes and rules.

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
Specifies the emission statement records that must be maintained for a 5 year period.

6NYCRR Part 211-.2
General air pollution prohibition

6 NYCRR Part 211.3
Restricts the opacity of visible emissions from any air contamination source.

6 NYCRR Part 215
Prohibits open fires at industrial and commercial sites.

40 CFR Part 82, Subpart F
Requires affected permittees to comply with the recycling and emissions reduction standards specified by this rule when using ozone depleting substances identified under Title VI of the Act. Specifically, these regulations apply to the following persons or activities:
a. Persons opening appliances for maintenance, service, repair, or disposal

b. Equipment used during the maintenance, service, repair, or disposal of appliances
c. Persons performing maintenance, service, repair, or disposal of appliances
d. Persons disposing of small appliances, motor vehicle air conditioners or MVAC's, and MVAC-like appliances
e. Persons owning commercial or industrial process refrigeration equipment
f. Owners/operators of appliances normally containing 50 or more pounds.
If applicable, the above persons or activities may be required to comply with certain disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, BUFFALO STATE COLLEGE has been determined to be subject to the following regulations:

40CFR 60-A.
Buffalo State College operates a 33.5 MMBTU/hr natural gas fired boiler which is subject to the requirements of Subpart Dc , New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units specified in 40CFR60. Any emission source which is subject to an NSPS is also subject to the general requirements of 40CFR60 specified in Subpart A. This condition requires the facility to review the General Provisions and comply with all applicable requirements.

40CFR 60-A.4
This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Enforcement and Compliance Assurance.

40CFR 60-A.7 (a)
This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

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. This allows the Administrator or NYSDEC inspectors to determine if any unreported violations have occurred.

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

not specified in the title V permit.

40CFR 60-Dc.48c (a)
This regulation requires the owner and operator of each affected facility to submit notification of the date of construction or reconstruction, anticipated startup, and actual startup of the facility. The notification must include the following information:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c or 40 CFR 60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired. The annual capacity factor is the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity.

40CFR 60-Dc.48c (g)
The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day. These records may be used to determine the actual heat input to verify the annual capacity factor.

40CFR 60-Dc.48c (i)
This regulation requires the source owner or operator to retain all records for a minimum of two years. This allows the Administrator or NYSDEC representatives to review records during inspections to verify fuel usage, heat input and the annual capacity factor.

6NYCRR 200 .1
This section contains a definition of terms referred to throughout New York's entire codes, rules and regulations.

6NYCRR 200 .3
No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

6NYCRR 201-3.2 (c) (6)
The following emergency power generating units are exempt from permitting requirements:
(i) Facility specific emergency power generating units where each individual unit operates for no more than 500 hours per year.
(ii) Centrally dispatched emergency power generating units where each individual unit operates for no more than 200 hours per year. Should a centrally dispatched emergency power generating unit be also operated as a facility specific emergency power generating unit, the annual 200 hour centrally dispatched operating time limit remains applicable, and the total combined hours for operating as either type of

emergency power generating unit shall be for no more than 500 hours.

6NYCRR 201-6.5 (c) (3) (ii)
This regulation specifies that 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. The deviation reports are due semiannually. This allows the Administrator and the NYSDEC to monitor the facility's compliance with applicable requirements.

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 225-1.8 (a)
Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years

6NYCRR 225-1.8 (d)
This requires that sampling, compositing and analysis of fuel samples must be done in accordance with methods acceptable to the commissioner.

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 0.1 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation. The facility is required to conduct a stack test during the term of the permit to verify that the particulate emissions from the boilers while combusting No. 6 oil comply with the specified emission limit. Records must be maintained and semiannual reporting is required.

6NYCRR 227-1.2 (b)
This requires that if two or more simultaneously operated furnaces are connected to a common air cleaning device and/or stack, the total heat input of all furnaces connected to the device and/or stack shall be the heat input for the purpose of computing the permissible emission rate.

6NYCRR 227-1.3
This regulation requires a limitation of 20% opacity during any 6 consecutive minutes, verified through a Method 9 evaluation. Compliance monitoring for opacity from the stationary combustion installations must be conducted through daily observation of emissions. When opacity is observed for 2 consecutive days, a Method 9 analysis must be conducted to make sure that the opacity is not greater than 20%. Results must be reported to the NYSDEC within 1 day of the analysis. If the opacity is determined to exceed 20%, corrective action must be taken immediately. Records of daily observations, Method 9 analysis and corrective actions taken must be maintained on-site and be available for review by the Administrator or NYSDEC inspectors. Reporting is required semi-annually.

6NYCRR 227-1.6 (a)
This regulation requires that any facility found in violation of the provisions of Part 227 must not operate the affected stationary combustion installation that is in violation unless it is equipped with approved emission control equipment, it is rehabilitated or upgraded in an approved manner; or the fuel is changed to an acceptable type

6NYCRR 227-1.6 (b)
This regulation states that the Department may seal the affected stationary combustion installation that does not comply with the provisions in subdivision 6 NYCRR 227-1.6(a) within the time provided.

6NYCRR 227-1.6 (c)
This regulation state that no person may operate any affected stationary combustion installation sealed by the commissioner in accordance with this Part 227.

6NYCRR 227-1.6 (d)
This regulation states that no person except Department personnel may remove, tamper with, or destroy any seal affixed to any affected stationary combustion installation.

6NYCRR 227-2.
This regulation limits the emission of oxides of nitrogen (NOx) from stationary combustion installations (boilers, combustion turbines and internal combustion engines) throughout the facility to 99 tpy allowing the facility to avoid the requirements of 6NYCRR227-2. NOx emissions are calculated monthly based on specified emission factors and fuel usage, then tallied on a 12-month rolling total basis and compared to the allowable limit to verify compliance. Annual reporting is required. Records must be maintained onsite for five years.

6NYCRR 230 .5
This requires that the owner and/or operator of any gasoline dispensing site maintain records showing the quantity of all gasoline delivered to the site each month. The rolling 12-month totals must be calculated to determined if the annual throughput exceeds 120,000 gallons, thereby making the site subject to the requirements of 230.2. The appropriate Stage I and Stage II vapor collection systems must be in place prior to any site exceeding the 120,000 gallons in annual throughput.

Compliance Certification
Summary of monitoring activities at BUFFALO STATE COLLEGE:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
U-00001/-/200/0001E	record keeping/maintenance procedures	1-9
U-00001/-/200/0001E	record keeping/maintenance procedures	1-12
U-00001/-/200/0001E	record keeping/maintenance procedures	1-13
U-00001/-/200/0001E	record keeping/maintenance procedures	1-14
FACILITY	monitoring of process or control device parameters as surrogate	13
FACILITY	record keeping/maintenance procedures	1-1
FACILITY	record keeping/maintenance procedures	1-2
FACILITY	record keeping/maintenance procedures	33

FACILITY	work practice involving specific operations	37
FACILITY	record keeping/maintenance procedures	38
U-00001/-/100	intermittent emission testing	1-6
U-00001/BSC01/100	record keeping/maintenance procedures	1-16
U-00001/BSC01/100	monitoring of process or control device parameters as surrogate	52
FACILITY	monitoring of process or control device parameters as surrogate	1-3
FACILITY	monitoring of process or control device parameters as surrogate	1-4
FACILITY	work practice involving specific operations	1-5
U-00002	work practice involving specific operations	53

Basis for Monitoring

This title V permit specifies special operating/monitoring conditions, recordkeeping and reporting required to verify compliance with the applicable requirement. The basis for monitoring for these requirements is as follows:

6NYCRR201-3.2 (c)(6):

Emergency generators are considered exempt from permitting only if they are operated less than 500 hours per year, including testing, and are used for emergency purposes only. The owner or operator must record all times that the emergency generator is operated based on hour meter readings or other verifiable method. Records must be maintained on-site so that inspectors from the USEPA and/or the NYSDEC can review them to verify compliance with the annual limit.

6NYCRR225-1:

The sulfur content in fuel oil and coal are limited by this regulation to lower the sulfur dioxide emissions resulting from some combustion sources. When sulfur dioxide is exhausted to the air it combines with water to form sulfuric acid. When it rains, snows, etc. this acid enters lakes and rivers, contaminating drinking water and fish, making the bodies of water uninhabitable for aquatic organisms. It also is harmful to human health, trees and vegetaion, buildings, etc.

At Buffalo State College residual oil and No. 2 oil used throughout the entire facility are subject to the sulfur in oil limit of 1.5 % by weight as specified under 6NYCRR225-1 (d). Compliance with this rule is verified through vendor certification. Records are required to be maintained on-site for five years. Reporting is required semiannually

6NYCRR227.2(b)(1):

This regulates particulate emissions from stationary combustion sources. Inhalable particulates are detrimental to human health , causing asthma and other lung diseases, heart disease and sometimes death. In cities and towns, particulates are responsible for reduced visibility and damage to painted surfaces and buildings.

The four mid-size (53 MMBTU/hr, each) oil fired boilers in EU 00001 are subject to the requirements of 6NYCRR227.2(b)(1). Particulate emissions from the combustion of No. 6 oil in these boilers (Process 100), exhausted through EP BSC01, are limited to 0.1 lb/MMBTU. Approval of a stack test protocol and the performance of a stack test is required prior to permit renewal to verify compliance with the specified limit. Records are required to be maintained on-site for five years for USEPA an/or NYSDEC inspectors to review. Reporting is required semiannually.

To minimize particulate emissions, Buffalo State College is also required to operate and maintain the oil fired boilers as specified by the manufacturer. Oxygen sensors must be calibrated at least quarterly and the boilers must be operated with sufficient oxygen to ensure complete combustion, without generating excessive NOx emissions. Boiler tune-ups are required annually. Records of maintenance, oxygen sensor calibrations and tune-ups must be maintained on-site so that NYSDEC and/or USEPA inspectors may review them to verify compliance with these requirements.

6NYCRR227-1.3(a) and 6NYCRR211.3:
Opacity is regulated under 6NYCRR227-1.3 and 6NYCRR211.3 to control the emission of particulates, which when respired can harm human health and can cause reduced visibility. An opacity determination is a surrogate method of determining compliance with the in-stack concentration limit.

Emission point BSC01 is subject to 6NYCRR227-1.3(a), which limits the average opacity of the emissions from stationary combustion sources during any six consecutive minutes to less than 20%. A daily check of visible emissions is required to verify compliance with this rule. The observation of emissions greater than zero percent opacity will trigger an investigation to determine the cause, followed by corrective action. If visible emissions persist, a Method 9 evaluation is required to determine whether the opacity limit has been exceeded. The facility is considered in violation of 6NYCRR227-1.3 and 6NYCRR211.3 , if the opacity is determined to be greater than 20%. Records of daily observations and Method 9 analysis must be maintained on-site for five years. In addition to semiannually, reporting is required any time a Method 9 analysis is conducted. Since the limits are equivalent, compliance with 6NYCRR211.3, which has a 20% opacity limit for any source emitting particulates, can be verified via the monitoring requirements specified under 6NYCRR227-1.3(a).

6NYCRR227-2:
Nitrous oxide emissions, which result mostly from combustion sources, such as boilers, furnaces, turbines, cars/trucks, etc.are responsible for ground-level ozone and acid rain.(like sulfur dioxide), both of which destroy human health and the environment. Nitrous oxide emissions also contribute to global warming,.

This regulation requires that combustion sources which emit nitrous oxides at 100 tons per year or more control NOx emissions through Reasonably Available Control Technlogy (RACT). To avoid the requirements of 6NYCRR Subpart 227-2- NOx RACT, Buffalo State College (BSC) chose to limit NOx emissions from the entire facility to 99 tpy or less. Each month, BSC must calculate facility-wide NOx emissions based on fuel usage and emission factors specified in their title V permit. Compliance is determined by summing the individual monthly NOx emissions during any consecutive 12-month period and comparing it to the 99 tpy CAP. Annual reporting is required. Records must be maintained on-site for five years and be available for inspection upon request.

40CFR60 Subparts A and Dc:
These regulate emissions from certain newly installed sources of air pollution, including the type of boiler that Buffalo State College will install as a result of this permit modification.

Since the maximum design heat input capacity of the natural gas fired Cleaver Brooks boiler is greater than 10 MMBTU/hr and less than 100 MMBTU/hr and the installation will occur after June 9, 1989, the boiler is subject to the requirements of 40CFR60 Subpart A - General Provisions and Subpart Dc -

Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The only requirements specified for a natural gas fired boiler are an initial notification and monitoring the amount of natural gas combusted on a daily basis. Records must be maintained on-site for review by inspectors from the USEPA and/or NYSDEC. Review of these records allows the inspectors to verify compliance with the requirements and verification of the annual capacity factor.

6NYCRR230.5

This regulation requires the control of gasoline emissions from gasoline dispensing sites. The control of gasoline, which contains carcinogens and other toxic compounds, is necessary because gasoline is hazardous to human health and contributes to the formation of ground-level ozone. If a gasoline dispensing site has an annuual throughput of 120,000 gallons or less, they are exempt from the control requirements specified under 6NYCRR230. However, to qualify for that exemption they must be able to prove that their annual throughput does not exceed 120,000 gallons/year, during any 12 consecutive months.

Buffalo State College operates a gasoline dispensing site on campus to fuel their motor vehicles, which has an annual throughput of 120,000 gallons per year or less. They must maintain gasoline purchase records and each month calculate the 12-month rolling total. These records must be available for inspection by the USEPA and/or the NYSDEC to verify compliance with this requirement. Reporting is required semi-annually.