



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

Permit ID: 2-6104-00249/00004

Renewal Number: 3

02/22/2019

Facility Identification Data

Name: NYC-HH - KINGS COUNTY HOSPITAL CENTER

Address: 451 CLARKSON AVE

BROOKLYN, NY 11203

Owner/Firm

Name: NYC HEALTH & HOSPITALS CORP

Address: 125 Worth St

New York, NY 10013-4006, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: Caitlyn P Nichols

Address: 1 HUNTERS POINT PLZ

47-40 21ST ST

LONG ISLAND CITY, NY 11101

Phone:

Division of Air Resources:

Name: SAJI SAMUEL

Address: NYSDEC - REGION 2

47-40 21ST ST

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Air Permitting Contact:

Name: Richard Bess

Address: NYC HH Kings County Hospital Ctr

451 Clarkson Ave

Brooklyn, NY 11203

Phone:7182452953

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

Facility has submitted this application for the renewal & modification of Air Title V Facility permit.



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In this modification, facility proposes to include five exempt emission sources to this permit: four hydrogen fuel cells and one emergency generator engine. Three (3) hydrogen fuel cells will be located in the main hospital building and one (1) hydrogen fuel cell and the emergency engine generator in the Dr.Susan Smith McKinney (DSSM) building. Both buildings are adjacent and owned by NYCHHC. Hydrogen fuels cells are exempt under 201-3.2 (c) (46) and the emergency engine is exempt under 201-3.2 (c)(6).

Annual NO_x emission rate potential from these five exempt sources are calculated to be 2.8431 tons/yr.

Facility has proposed to limit NO_x emissions to 2.42 TPY thus less than the 6 NYCRR Part 231 NO_x Significant Project Threshold 2.5 TPY by limiting the emergency generator operation to 425 hours (instead of 500 hours). Hence, New Source Review 6 NYCRR Part 231-2 is not applicable for this project.

Rating of Emission sources: -

Emergency Generator: 2.56 MMbtu/hr

Fuel Cell # 1: 1.1 MW/hr

Fuel Cell # 2: 1.0 MW/hr

Fuel Cell # 3: 0.6 MW/hr

Fuel Cell # 4: 0.4 MW/hr

NO_x PTE of four hydrogen fuel cells =0.0231tpy (Manufacturer emission factor 0.0017lbs/MW-hr)

NO_x PTE of one emergency generator with emergency operation limited to 425 hrs/yr = 2.39 tpy (AP- 42 Emission factor of 4.41/b/MMbtu).

Total PTE of five sources =2.42 tpy.

New Source Review 6 NYCRR Part 231-2 is not applicable for this project.

Attainment Status

NYC-HH - KINGS COUNTY HOSPITAL CENTER is located in the town of BROOKLYN in the county of KINGS.

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



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

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

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

Facility Description:

The facility is a hospital associated with the New York Health and Hospitals Corporation. The hospital operates five (5) boilers, each rated at 49.9 mm Btu/hr, and fifteen (15) diesel-powered emergency generators.

All boilers currently use natural gas as primary fuel and #6 fuel oil as secondary fuel. After burners replacement, # 2 distillate fuel oil will be used instead of #6 residual fuel oil.

Facility maintains eight (8) Capstone microturbines each rated at 190 KW power output (exempt under 6 NYCRR part 201-3.2(c)(5)) with a total output of 1.52MW. Annual potential emissions from these eight microturbines are calculated to be 2.37 TPY (with the manufacturer guaranteed emission factor 0.356/lbs NOx/MWhe), which is less than the 6 NYCRR Part 231 NOX Significant Project Threshold 2.5 TPY.

The facility is including the exempt sources in Dr.Susan Smith McKinney (DSSM) building in this Title V permit . Both of these buildings are adjacent and owned by NYCHHC. DSSM currently maintains an emergency generator (exempt under 201-3.2 (c) (6).

The facility is also in the process of installing four (4) hydrogen fuel cells which are exempt sources under 201-3.2 (c) (46). Three (3) in the KCH building, and one (1) in DSSM building.

Annual emission rate potential (ERP) of these exempt sources are calculated to be 2.82 TPY. But facility is capping the DSSM Generator usage to 425 hours so that the NOx emission will be 2.40 TPY which is less than the 6 NYCRR Part 231 NOx Significant Project Threshold 2.5 TPY. Therefore, this modification project is exempt from New Source Review as per 6 NYCRR Part 231-2.

Permit Structure and Description of Operations



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The Title V permit for NYC-HH - KINGS COUNTY HOSPITAL CENTER 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.

NYC-HH - KINGS COUNTY HOSPITAL CENTER is defined by the following emission unit(s):

Emission unit U00002 - Emission Unit U-00002 consists of three Cleaver Brooks boilers (Emission Sources 00003, 00004 & 00005), rated at 49.9 MM Btu/hr each, capable of burning natural gas (Process 010); and # 6 residual fuel oil (Process 020) or #2 distillate fuel oil (Process 032). The flue gases from these three boilers exit through a common stack, identified as Emission point 00002. These three boilers are located in Building Z (Boiler House). NYC-HH - Kings County Hospital Center's boilers currently burn # 6 fuel oil as a secondary fuel to natural gas. After burners replacement, # 2 distillate fuel oil will be used instead of #6 residual fuel oil.

Emission unit U00002 is associated with the following emission points (EP):
00002

Process: 010 is located at POWER HOUSE, Building BLDG Z - Process 010 consists of the burning of natural gas in three of the Cleaver Brooks boilers (Emission Sources 00003, 00004 & 00005), rated at 49.9 MM Btu/hr each, in Emission Unit U-00002, and are located in Building Z (Power House). The flue gases from these three boilers exit through a common stack, identified as Emission point 00002.

Process: 020 is located at POWER HOUSE, Building BLDG Z - Process 020 consists of the burning of # 6 residual oil in three of the Cleaver Brooks boilers (Emission Sources 00003, 00004 & 00005), rated at 49.9 MM Btu/hr each, in Emission Unit U-00002, and are located in Building Z (Power House). The flue gases from these three boilers exit through a common stack, identified as Emission point 00002.

Process: 032 is located at Power House, Building BLDG Z - Process 032 consists of the burning of # 2 distillate oil in three of the Cleaver Brooks boilers (Emission Sources 00003, 00004 & 00005), rated at 49.9 MM Btu/hr each, in Emission Unit U-00002, and are located in Building Z (Power House). The flue gases from these three boilers exit through a common stack, identified as Emission point 00002.



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Emission unit U00005 - Emission Unit-00005 consists of one (1) emergency generator, exempt under 201-3.2 (c) (6) and four (4) new hydrogen fuel cells exempt under 201-3.2 (46).

The One (1) emergency generator and one (1) Hydrogen fuel cell are located in Dr.Susan Smith McKinney (DSSM) building . Three (3) Hydrogen fuel cells are in main KCH building. Both buildings are adjacent and owned by NYCHHC.

Annual emission rate potential from these exempt sources are calculated to be 2.8 Tons/yr . But the facility is capping emergency generator's usage to 425 hours instead of 500 hours to keep it under 2.4 TPY , which is less than the 6 NYCRR Part 231 NOx Significant Project Threshold 2.5 TPY.

Process: DIE is located at Building DSSM - Emergency engines using diesel/distillate oil.

Emission unit U00004 - Facility has eight (8) Capstone microturbines each rated at 190 KW power output (exempt under 6 NYCRR part 201-3.2(c)(5)) with a total output of 1.52MW. Annual potential emissions from these eight microturbines are calculated to be 2.37 TPY (with the manufacturer guaranteed emission factor 0.356/bs NOx/MWhe), which is less than the 6 NYCRR Part 231 NOX Significant Project Threshold 2.5 TPY. Therefore, this is an exempt activity.

Process: TNG Eight (8) Microturbines burning natural gas.

Emission unit U00001 - Emission Unit U-00001 consists of two Cleaver Brooks boilers (Emission Sources 00001 & 00002), rated at 49.9 MM Btu/hr each, capable of burning natural gas (Process 001); and # 6 residual fuel oil (Process 002) or #2 distillate fuel oil (Process 003). The flue gases from these two boilers exit through a common stack, identified as Emission point 00001. These two boilers are located in Building Z (Boiler House). NYC-HH - Kings County Hospital Center's boilers currently burn # 6 fuel oil as a secondary fuel to natural gas. After burners replacement, # 2 distillate fuel oil will be used instead of #6 residual fuel oil.

Emission unit U00001 is associated with the following emission points (EP):
00001

Process: 001 is located at POWER HOUSE, Building BLDG Z - Process 001 consists of the burning of natural gas in two of the Cleaver Brooks boilers (Emission Sources 00001 & 00002), rated at 49.9 MM Btu/hr each, in Emission Unit U-00001, and are located in Building Z (Boiler House). The flue gases from these two boilers exit through a common stack, identified as Emission point 00001.



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Process: 002 is located at POWER HOUSE, Building BLDG Z - Process 002 consists of the burning of # Btu/hr each, in Emission Unit U-00001, and are located in Building Z (Power House). The flue gases from these two boilers exit through a common stack, identified as Emission point 00001.

Process: 003 is located at Power House, Building BLDG Z - Process 003 consists of the burning of # 2 distillate fuel oil in two of the Cleaver Brooks boilers (Emission Sources 00001 & 00002), rated at 49.9 MM Btu/hr each, in Emission Unit U-00001, and are located in Building Z (Power House). The flue gases from these two boilers exit through a common stack, identified as Emission point 00001.

Title V/Major Source Status

NYC-HH - KINGS COUNTY HOSPITAL CENTER is subject to Title V requirements. This determination is based on the following information:

NYC-HH Kings County Hospital Center is a major facility because the potential emissions of NOx (Nitrogen Oxides) is greater than the major source thresholds, which is 25 tons per year.

Program Applicability

The following chart summarizes the applicability of NYC-HH - KINGS COUNTY HOSPITAL CENTER with regards to the principal air pollution regulatory programs:

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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - 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 231-5, 231-6) - 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, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments



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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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - 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 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 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, 6 NYCRR 200.10) - 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



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GENERAL MEDICAL & SURGICAL HOSPITALS

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution 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
2-01-001-01	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Turbine
2-01-002-01	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS Turbine

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000075-07-0	ACETALDEHYDE	4.58			
000107-02-8	ACROLEIN	0.7074			



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000071-43-2	BENZENE	47.46
000630-08-0	CARBON MONOXIDE	217615
000067-66-3	CHLOROFORM	0.7729
000050-00-0	FORMALDEHYDE	557.7
007439-92-1	LEAD	23.67
0NY210-00-0	OXIDES OF NITROGEN	199999
0NY075-00-0	PARTICULATES	3201
0NY075-00-5	PM-10	3201
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS	23.29
000115-07-1	PROPYLENE	62.04
007446-09-5	SULFUR DIOXIDE	199999
000108-88-3	TOLUENE	118.89
0NY100-00-0	TOTAL HAP	9011
0NY998-00-0	VOC	16110
001330-20-7	XYLENE, M, O & P MIXT.	4.64

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

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

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

Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and



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Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)

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

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)

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

Item G: Property Rights - 6 NYCRR 201-6.4(a)(6)

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

Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)

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

Item I: Permit Shield - 6 NYCRR Part 201-6.4(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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

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



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- 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 2 01-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

Item K: 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 L: Federally Enforceable Requirements - 40 CFR 70.6(b)

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

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Item A: Emergency Defense - 6 NYCRR 201-1.5

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

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

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

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

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

Item B: 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

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Permit ID: 2-6104-00249/00004
 Renewal Number: 3
 02/22/2019

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
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FACILITY	ECL 19-0301	50	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-IIII	37	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
FACILITY	40CFR 63-JJJJJJ	38	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
FACILITY	40CFR 63-ZZZZ	39, 40	Reciprocating Internal Combustion Engine (RICE) NESHP
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	51	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.2(c)(6)	21	Exempt Activities - emergency power generating units
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 41, 42	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring



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FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	23	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-6.4(g)	24	Permit Shield
FACILITY	6NYCRR 201-7	25	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-1.2	29	Notification.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	52	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	30	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225.1(a)(3)	34	Sulfur in Fuel Limitations (SIP)
FACILITY	6NYCRR 225-1.2(d)	31	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.2(g)	32	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.2(h)	33	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.6	53	Reports, Sampling, and Analysis
FACILITY	6NYCRR 227.2(b)(1)	36	Particulate emissions.
FACILITY	6NYCRR 227-1.3(a)	35	Smoke Emission Limitations.
U-00001	6NYCRR 227-2.4(c)(1)(ii)	43	2010 NOx RACT presumptive limit.
U-00002	6NYCRR 227-2.4(c)(1)(ii)	46	2010 NOx RACT presumptive limit.
U-00001	6NYCRR 227-2.5(a)	44	Fuel switching option.
U-00002	6NYCRR 227-2.5(a)	47	Fuel switching option.
U-00001	6NYCRR 227-2.6	45	Testing, monitoring, and reporting requirements
U-00002	6NYCRR 227-2.6	48	Testing, monitoring, and reporting requirements

Applicability Discussion:

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



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ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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



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6 NYCRR 201-6.4 (a) (4)

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

6 NYCRR 201-6.4 (a) (7)

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

6 NYCRR 201-6.4 (a) (8)

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

6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

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

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

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

6 NYCRR 201-6.4 (d) (4)

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

6 NYCRR 201-6.4 (e)

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

6 NYCRR 201-6.4 (f) (6)

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



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6 NYCRR 201-6.4 (g)

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

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, NYC-HH - KINGS COUNTY HOSPITAL CENTER has been determined to be subject to the following regulations:

40 CFR Part 60, Subpart III

This regulation defines performance standards for stationary compression ignition type internal combustion engines.



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40 CFR Part 63, Subpart JJJJJ

This regulation covers facilities that own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

40 CFR Part 63, Subpart ZZZZ

This regulation defines performance standards for stationary reciprocating internal combustion engines

6 NYCRR 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.

6 NYCRR 202-1.2

This regulation specifies that the department is to be notified at least 30 days in advance of any required stack test. The notification is to include a list of the procedures to be used that are acceptable to the department. Finally, free access to observe the stack test is to be provided to the department's representative.

6 NYCRR 211.1

6 NYCRR 225.1 (a) (3)

This regulation limits the amount of sulfur that can be in fuel burned at a stationary source. It references Table 1 of the 1979 version of the sulfur in fuel limitations expressed in terms of percent by weight for fuel oil and pounds per million Btu gross heat content for solid fuel. **NOTE: This citation has been replaced by requirements cited under 225-1.2(a)(2) and is no longer part of current State regulations, however, it remains part of New York State's approved State Implementation Plan (SIP).**

6 NYCRR 225-1.2 (d)

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



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6 NYCRR 225-1.2 (g)

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

6 NYCRR 225-1.2 (h)

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

6 NYCRR 225-1.6

This section establishes the requirements for reporting, sampling, and analyzing fuel by subject facilities.

6 NYCRR 227.2 (b) (1)

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

6 NYCRR 227-1.3 (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.

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

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

6 NYCRR 227-2.5 (a)

Fuel switching NOx RACT compliance option.

6 NYCRR 227-2.6

This regulation establishes the compliance testing, monitoring, and reporting requirements for NOx RACT affected stationary combustion installations.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility.



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Facility's annual emissions for NOx & SO2 must be below 99.99 TPY each.

Annual emission rate potential (ERP) of the exempt sources in Emission Unit U-00005, is calculated to be 2.82 TPY (with the manufacturer guaranteed emission factor 0.356lbs NOx/MWhe). But facility is capping the DSSM Generator usage to 425 hours so that the NOx emission will be 2.40 TPY which is less than the 6 NYCRR Part 231 NOx Significant Project Threshold 2.5 TPY.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	40 CFR Part 60, Subpart Dc	Steam generators 10-100 million Btu per hour

Reason: Kings County hospital is replacing its five boiler burners to have the #2 oil burning capability. 40 CFR 60 Subpart Dc will not be applicable to these boilers as per the cost analysis provided by facility in an email dated 10/30/2018 . Therefore the boiler burner replacement does not meet the requirement for a reconstructed boiler.

FACILITY	40 CFR Part 60, Subpart KKKK	Stationary Combustion Turbine NSPS
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Reason: The eight microturbines each rated @ 2.28 MMBtu/hr (190 KW) are below the 10 MMBtu/hr threshold for 40 CFR Part 60 Subpart KKKK applicability.

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

Compliance Certification

Summary of monitoring activities at NYC-HH - KINGS COUNTY HOSPITAL CENTER:

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

FACILITY	21	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	28	work practice involving specific operations
U-00005	49	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	34	work practice involving specific operations
FACILITY	31	work practice involving specific operations
FACILITY	32	work practice involving specific operations
FACILITY	33	work practice involving specific operations
FACILITY	53	record keeping/maintenance procedures
FACILITY	36	intermittent emission testing
FACILITY	35	monitoring of process or control device parameters as surrogate
U-00001	43	intermittent emission testing
U-00002	46	intermittent emission testing
U-00001	44	intermittent emission testing
U-00002	47	intermittent emission testing
U-00001	45	intermittent emission testing
U-00002	48	intermittent emission testing

Basis for Monitoring

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

Condition for 6 NYCRR 202-2.1: This is a facility-wide condition. This condition sets forth the applicability criteria for submitting an annual statement of emissions. The criteria are based on annual emission threshold quantities and ozone attainment designation. This condition applies to all Title V facilities and these facilities must submit an annual emission statement by April 15th of each year.

Condition for 6 NYCRR 201-7: Condition limits facility-wide annual NOx and SO2 emissions to 99.99 TPY (annual total rolled monthly) to cap out from part 231 applicability. The condition requires facility to calculate 12-month NOx and SO2 emissions for all sources on a monthly basis, using approved emission factors and fuel usages. Also, a diesel fuel oil usage limit of 120,000 gallons in emergency generators was established in order to meet the 99.00 tpy NOx limit.

6 NYCRR Part 201-7- Capping condition for Emission Unit U00005 limits the NOx



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emissions from four hydrogen fuel cells (HFC01, HFC02, HFC03, HFC04) and one emergency generator(GEN01) to 2.42 TPY.

Annual NO_x emission rate potential from these five exempt sources are calculated to be 2.8431 tons/yr. Condition limits NO_x emissions to 2.42 TPY thus less than the 6 NYCRR Part 231 NO_x Significant Project Threshold 2.5 TPY by limiting the emergency generator operation to 425 hours (instead of 500 hours).

NO_x PTE of four hydrogen fuel cells =0.0231TPY (with manufacturer emission factor 0.0017lbs/MW-hr.)

NO_x PTE of one emergency generator with emergency operation limited to 425hrs/yr (AP- 42 EF of 4.41/b/MMbtu) = (2.56MMbtu/hr x 4.41lb/MMbtu x 425hrs/yr) /2000lbs/ton = 2.399 TPY

Total PTE of five sources =2.42 TPY

Conditions for 6 NYCRR 225-1.2(d); 6 NYCRR 225-1.2 (g); 6 NYCRR 225-1.2 (h): These are facility-wide conditions limiting sulfur-in fuel oils. These conditions prohibit any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations as specified. The sulfur content must be determined by the seller. The facility must maintain a log of the sulfur content of oils on a per delivery basis. Percent of sulfur by weight in #2 distillate oil and #6 residual oil are limited to 0.0015 and 0.30 respectively.

Condition for 6 NYCRR 225-1.6: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition requires the facility to retain the fuel oil supplier certifications for each shipment of oil received. Such certifications shall contain, supplier name, date of shipment, quantity shipped, heating value of the oil, oil sulfur content, and the method used to determine the sulfur content.

Condition for 6 NYCRR 227-1.3(a): This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Opacity. This condition 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. This condition requires a daily inspection for visible emissions. If visible emissions are continued after corrective actions, this condition requires permittee to perform a Method 9 test and notify the Department.

Condition for 6 NYCRR 227-2.4(c) (1)(ii): These conditions specify the NO_x RACT limit 0.08lbs/MMBtu for mid-size boilers while burning #2 distillate oil or natural gas. Permittee is also required to demonstrate compliance with this limit by performing emission stack test once during the permit term.



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6 NYCRR 227.2(b)(1): This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. This condition establishes a particulate limit of 0.10 pounds per million Btus based on a 2-hour average emission for the oil-fired five boilers and is required to perform stack emission testing once during the term of the permit using Department approved protocol.

Condition for 6 NYCRR 227-2.5 (a): This condition is for boilers while burning residual fuel oil. Facility is in the process of boiler burner replacement and after that all boilers will stop using residual oil. As per the stack test results for the NO_x emission conducted in 2012, facility couldn't achieve the NO_x RACT limit of 0.20lbs/MMBtu while burning residual oil. Hence the facility chose the fuel switching option under 6 NYCRR 227-2.5(a) to comply with NO_x RACT limit. This condition requires facility to burn cleaner fuel, which is natural gas, between May 1st and September 30th of each year. Fuel switching must result in quantifiable annual NO_x emissions equal to or less than the NO_x emissions expected if the emission source complied with the applicable presumptive RACT emission limits set forth in section 227-2.4 of this subpart. This condition requires facility to demonstrate compliance for each boiler by calculating annual NO_x emission on a calendar year basis.

Condition for 6 NYCRR 227-2.6: This condition is for the intermittent stack emission testing to find out the emission factors for NO_x.

Condition for 40 CFR 63 Subpart JJJJJ: Facility is an area source of HAP, and the five boilers are subject to this subpart. Condition requires facility to comply with the applicable portions of 40 CFR Subpart 63 JJJJJ.

Condition 6 NYCRR 201-6.4 (g): This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

Kings County hospital is replacing its five boiler burners to have the #2 oil burning capability. 40 CFR 60 Subpart Dc will not be applicable to these boilers as per the cost analysis provided by facility in an email dated 10/30/18. Therefore, the boiler burner replacement does not meet the requirement for a reconstructed boiler.

The eight microturbines each rated @ 2.28 MMBtu/hr (190 KW) are below the 10 MMBtu/hr applicability threshold for 40 CFR Part 60 Subpart KKKK.

The microturbines are exempt under section 201-3.2(c)5 (with a heat input peak load less than 10 MMBtu/hr). Annual potential emissions from this new emission unit were calculated to be 2.37 TPY (with the manufacturer guaranteed emission factor 0.356/bs



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NO_x/MWh), which is less than the Significant Project Threshold for NO_x 2.5TPY for 6 NYCRR Part 231 review applicability.

There are no NSPS or NESHAP regulations for the four hydrogen fuel cells located at the facility.

Condition for 201-3.2c(6)- Facility has 15 emergency generating engines listed below subject to this condition. Operation of these engines,(except for Gen01 @425yrs/yr) are strictly limited to 500 hours per year and that is also only during emergency situations.

A stationary internal combustion engine that operates as a mechanical or electrical power source only when the usual supply of power is unavailable and operates for no more than 500 hours per year. The 500 hours of annual operation for the engine include operation during emergency situations, routine maintenance, and routine exercising (for example, test firing the engine for one hour a week to ensure reliability). A stationary internal combustion engine used for peak shaving generation is not an emergency power generating stationary internal combustion engine.

Conditions for 40 CFR 60 Subparts IIII and 40 CFR 63 Subpart ZZZZ: conditions specify that the emergency generators subject to the requirements of NSPS 40 CFR Subpart IIII and NESHAPS 40 CFR 63 ZZZZ must comply with the applicable requirements of those subparts.