



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

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June 1, 2021

[thomas.john@dec.ny.gov](mailto:thomas.john@dec.ny.gov)

Mr. Thomas John

Section Chief, Division of Air Resources

New York State Department of Environmental Conservation, Region 2

47-40 21st Street

Long Island City, NY 11101

Re: Draft title V Operating Permit Renewal Montefiore Medical Center,  
Permit ID # 2-6002-00105/00002, Bronx, Bronx County, NY

Dear Mr. John:

Thank you for the opportunity to comment on the draft renewal title V operating permit for the Montefiore Medical Center ("Montefiore or facility") that the New York State Department of Environmental Conservation Region 2 office (NYSDEC) issued for a 30-day public review on May 5, 2021. To ensure that the draft permit complies with New York's approved title V Operating Permit Program, NYSDEC's air regulations and applicable Clean Air Act (CAA) requirements, and that the permit record adequately supports the NYSDEC's permitting decision, EPA recommends that the NYSDEC address the following:

1. Condition 32 of the draft permit cites to 6 NYCRR Part 225-1.2(d) and establishes a limit of 0.0015% on the sulfur content of the distillate fuel oil fired in the combustion sources at the facility. The correct citation for Condition 32 is 6 NYCRR Part 225-1.2(h), not Part 225-1.2(d) since the latter establishes sulfur content limits for the combustion sources that fire residual oil, not distillate fuel oil.
2. Condition 51 of the draft permit establishes a limit of 0.003% on the sulfur content of the fuel oil combusted by the facility's combustion turbine. EPA believes this limit should be 0.0015%.
3. CAM Rule Applicability – As specified at §64.2, the CAM rule applies to those emissions units that are subject to emission limitations or standards for the applicable regulated pollutant (or a surrogate thereof) (e.g., lb/hr, lb/MMBTU, ppm or destruction efficiency or percentage reduction)<sup>1</sup>, use control devices to achieve compliance with the applicable emission limitation or standard, and have pre-control potential to emit (PTE) of a regulated pollutant in an amount at or greater than the major source threshold. Based on the draft permit, the facility's combustion turbine has emission limitations in the form of percentage of NO<sub>x</sub> reduction and uses what is described as a NO<sub>x</sub> catalytic reduction control device. However, there is no information in the application, permit review report (PRR) or draft permit regarding the combustion turbine's

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<sup>1</sup> 40 CFR § 64.1 Definitions "Emission limitation or standard"

pre-control NO<sub>x</sub> PTE and no discussion on whether CAM applies to the combustion turbine. If the pre-control NO<sub>x</sub> PTE is at least 25 tpy, then CAM applicability should be performed for this combustion turbine. If applicable, the CAM rule requirements should be added to the draft permit. If CAM is not applicable, please include a discussion on that in the PRR. Also, please provide to us along with your response to comments, the combustion turbine's pre-control NO<sub>x</sub> PTE and the supporting calculations.

We look forward to working with you to address these comments. If you have any further questions or wish to discuss any of these issues, please feel free to contact Ms. Viorica Petriman at 212-637-4021 or [petriman.viorica@epa.gov](mailto:petriman.viorica@epa.gov).

Sincerely,

Suilin W. Chan, Chief  
Permitting Section  
Air and Radiation Division