



Permit Review Report

Permit ID: 1-4720-03061/00005  
04/03/2008

**Facility Identification Data**

Name: PINELAWN POWER  
Address: 380 PATTON AVE|NEXT TO BABYLON RESOURCE RECOVERY  
WEST BABYLON, NY 11704

**Owner/Firm**

Name: CLEARVIEW POWER LLC  
Address: 242 MILLER PLACE  
MILLER PLACE, NY 11764, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:  
Name: CAROL A FARKAS  
Address: NYSDEC - SUNY @ STONY BROOK  
50 CIRCLE RD  
STONY BROOK, NY 11790-3409  
Phone:6314440365

Division of Air Resources:  
Name: DANIEL J ROZELL  
Address: NYSDEC - REGION 1  
SUNY @ STONY BROOK - 50 CIRCLE RD  
STONY BROOK, NY 11790-3409

Air Permitting Contact:  
Name: PATRICK MOLONY  
Address: PINELAWN POWER LLC  
1 RIVERSHASE PKWY S  
BIRMINGHAM, AL 35244  
Phone:2059875548

**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**

Initial Title V permit application for a dual fuel-fired, nominal 50 MW (simple-cycle operation) or 79.9 MW (combined-cycle operation) combustion turbine electric power generation station with natural gas as the primary fuel and low (0.05 percent by weight) sulfur distillate oil (kerosene) as backup fuel. Annual NOx and VOC emissions are capped at 22.5 tons each to avoid applicability of NOx RACT (6NYCRR 227-2) and New Source Review (6NYCRR 231-2) requirements.



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**Attainment Status**

PINELAWN POWER is located in the town of BABYLON in the county of SUFFOLK. 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 < 10 $\mu$ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO <sub>2</sub> )	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NO <sub>x</sub> )**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

\* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NO<sub>x</sub>) which are ozone precursors.

\*\* NO<sub>x</sub> has a separate ambient air quality standard in addition to being an ozone precursor

**Facility Description**

Pinelawn Power is a combined-cycle electric generating facility that sells power to the Long Island Power Authority. The facility consists of a dual-fuel (natural gas and low sulfur distillate) combustion turbine generator, a once-through steam generator equipped with natural gas-fired duct burners, a steam turbine generator, a cooling tower, and other ancillary equipment.

**Permit Structure and Description of Operations**

The Title V permit for PINELAWN POWER 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



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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.

PINELAWN POWER is defined by the following emission unit(s):

Emission unit U00001 - EMISSION UNIT U00001 IS AN ELECTRIC GENERATING UNIT CONSISTING OF A GE SPRINT COMBUSTION TURBINE GENERATOR (CTG) AND A ONCE-THROUGH HEAT RECOVERY STEAM GENERATOR (HRSG) CAPABLE OF EITHER SIMPLE-CYCLE OR COMBINED CYCLE OPERATION. THE HRSG IS EQUIPPED WITH DUCT BURNERS FOR SUPPLEMENTAL FIRING IN COMBINED-CYCLE MODE. THE CTG CAN FIRE EITHER NATURAL GAS OR KEROSENE WHILE THE DUCT BURNERS CAN FIRE ONLY NATURAL GAS. THE GAS TURBINE AND DUCT BURNERS EXHAUST THROUGH A COMMON STACK (EP000001) VIA A NOX SCR AND CO CATALYST.

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

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

Process: P01 is located at Building TGB - EMISSION UNIT U0001 OPERATING IN SIMPLE-CYCLE MODE WITH THE COMBUSTION TURBINE FIRING NATURAL GAS.

Process: P02 is located at Building TGB - EMISSION UNIT U0001 OPERATING IN SIMPLE-CYCLE MODE WITH THE COMBUSTION TURBINE FIRING LOW SULFUR (LIMITED TO 0.05% SULFUR BY WEIGHT) DISTILLATE OIL (KEROSENE). OPERATIONS WITH THE COMBUSTION TURBINE FIRING DISTILLATE OIL ARE LIMITED TO 720 HOURS PER YEAR .

Process: P03 is located at Building TGB - EMISSION UNIT U0001 OPERATING IN COMBINED-CYCLE MODE WITH THE COMBUSTION TURBINE FIRING NATURAL GAS AND NO DUCT BURNER FIRING.

Process: P04 is located at Building TGB - EMISSION UNIT U0001 OPERATING IN COMBINED-CYCLE MODE WITH THE COMBUSTION TURBINE FIRING LOW SULFUR (LIMITED TO 0.05% SULFUR BY WEIGHT) DISTILLATE OIL (KEROSENE) AND NO DUCT BURNER FIRING LOW SULFUR (LIMITED TO 0.05% SULFUR BY WEIGHT) DISTILLATE OIL (KEROSENE) AND NO DUCT BURNER FIRING. OPERATIONS WITH THE COMBUSTION TURBINE FIRING DISTILLATE OIL ARE LIMITED TO 720 HOURS PER YEAR.

Process: P05 is located at Building TGB - EMISSION UNIT U0001 OPERATING IN COMBINED-CYCLE MODE WITH THE COMBUSTION TURBINE AND THE DUCT BURNER BOTH FIRING NATURAL GAS.

**Title V/Major Source Status**

PINELAWN POWER is subject to Title V requirements. This determination is based on the following information: NOx and VOC are capped at 45,000 lbs/yr to avoid major source classification.

**Program Applicability**

The following chart summarizes the applicability of PINELAWN POWER with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO



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NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	YES
TITLE IV	YES
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.



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**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.

<b>SIC Code</b>	<b>Description</b>
4911	ELECTRIC SERVICES

**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.

<b>SCC Code</b>	<b>Description</b>
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**



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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 of 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
000106-99-0	1,3-BUTADIENE	45000	Y
000075-07-0	ACETALDEHYDE	45000	Y
000107-02-8	ACROLEIN	pteyear	Y
007664-41-7	AMMONIA	pteyear	D
007440-38-2	ARSENIC	pteyear	Y
000071-43-2	BENZENE	pteyear	Y
007440-41-7	BERYLLIUM	pteyear	Y
007440-43-9	CADMIUM	pteyear	Y
000630-08-0	CARBON MONOXIDE	pteyear	F
007440-47-3	CHROMIUM	pteyear	Y
000100-41-4	ETHYLBENZENE	pteyear	Y
000050-00-0	FORMALDEHYDE	pteyear	Y
0NY100-00-0	HAP	pteyear	B
007439-92-1	LEAD	pteyear	Y
007439-96-5	MANGANESE	pteyear	Y
007439-97-6	MERCURY	pteyear	Y
000091-20-3	NAPHTHALENE	pteyear	Y
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS		pteyear
0NY210-00-0	OXIDES OF NITROGEN	pteyear	
0NY075-00-0	PARTICULATES	pteyear	E
0NY075-00-5	PM-10	pteyear	E
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS	pteyear	Y
000075-56-9	PROPANE, 1,2-EPOXY-	pteyear	Y
007782-49-2	SELENIUM	pteyear	Y
007446-09-5	SULFUR DIOXIDE	pteyear	C
007664-93-9	SULFURIC ACID	pteyear	C
000108-88-3	TOLUENE	pteyear	Y
0NY998-00-0	VOC	pteyear	
001330-20-7	XYLENE, M, O & P MIXT.	pteyear	Y



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**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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

The Department will make available to the public any permit



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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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



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pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

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

**Item L: Permit Exclusion - ECL 19-0305**

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

**Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)**

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



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enforceable under only state regulations.

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

Item A: **General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**Regulatory Analysis**

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY		89	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A	38	
FACILITY	40CFR 60-A.12	46	General provisions - Circumvention
FACILITY	40CFR 60-A.13	47	General provisions - Monitoring requirements
U-00001	40CFR 60-A.13 (a)	67	General provisions - Monitoring requirements
FACILITY	40CFR 60-A.13 (d)	48	General provisions - Monitoring requirements
FACILITY	40CFR 60-A.13 (e)	49	General provisions - Monitoring requirements
FACILITY	40CFR 60-A.13 (h)	50	General provisions - Monitoring requirements
FACILITY	40CFR 60-A.14	51	General provisions - Modification
FACILITY	40CFR 60-A.15	52	General provisions - Reconstruction
FACILITY	40CFR 60-A.4	39	General provisions - Address
FACILITY	40CFR 60-A.7 (b)	40	Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (c)	41	Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (d)	42	Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (f)	43	Notification and Recordkeeping
FACILITY	40CFR 60-A.8 (d)	44	Recordkeeping



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FACILITY	40CFR 60-A.9	45	General provisions - Availability of information
U-00001	40CFR 60-Db.49b(d)	68	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 60-GG.332(b)	53	NOx Standard for Gas Turbines greater than 100 mmBTU/hr
FACILITY	40CFR 60-GG.334(d)	54	
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 72	55	
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	
FACILITY	6NYCRR 201-1.4	90	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 56, 57	Title V Permits and the Associated Permit Conditions
U-00001 the	6NYCRR 201-6	59, 60, 61, 62, 63, 64, 65	Title V Permits and the Associated Permit Conditions
U-00001/00001/P01	6NYCRR 201-6	69, 70, 71	Title V Permits and the Associated Permit Conditions
U-00001/00001/P02	6NYCRR 201-6	72, 73, 74, 75, 76	Title V Permits and the Associated Permit Conditions
U-00001/00001/P03	6NYCRR 201-6	77, 78, 79	Title V Permits and the Associated Permit Conditions
U-00001/00001/P04	6NYCRR 201-6	80, 81, 82, 83, 84	Title V Permits and the Associated Permit Conditions
U-00001/00001/P05	6NYCRR 201-6	85, 86, 87, 88	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	14	
FACILITY	6NYCRR 201-6.5(a)(7)	2	
FACILITY	6NYCRR 201-6.5(a)(8)	15	
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	16	
FACILITY	6NYCRR 201-6.5(e)	23	
FACILITY	6NYCRR 201-6.5(f)(6)	17	



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FACILITY	6NYCRR 201-7.2	24, 25, 26, 58	Emissions capping using synthetic minor permits
FACILITY	6NYCRR 202-1.1	18	
FACILITY	6NYCRR 202-2.1	6	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.1 (b)	27	Emission Statements - ozone attainment area applicability
FACILITY	6NYCRR 202-2.5	7	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 204-4.1	28, 29	Compliance Certification Report
FACILITY	6NYCRR 204-7.1	30	Submission of NOx Allowance Transfers
FACILITY	6NYCRR 204-8.1	31	
FACILITY	6NYCRR 204-8.2	32	Initial Certification and Recertification Procedures
FACILITY	6NYCRR 204-8.3	33	
FACILITY	6NYCRR 204-8.4	34	
FACILITY	6NYCRR 204-8.5	35	Recordkeeping and Reporting
U-00001	6NYCRR 204-8.7	66	Additional Requirements to Provide Heat Input Data for Allocations Purposes
FACILITY	6NYCRR 211.2	91	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	19	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 215	8	
FACILITY	6NYCRR 227.2 (b) (1)	37	
FACILITY	6NYCRR 227-1.3 (a)	36	Smoke Emission Limitations.
FACILITY	6NYCRR 227-2	25	Reasonably available control technology for NOx
FACILITY	6NYCRR 231-2	25, 26	New Source Review in Nonattainment Areas and Ozone Transport Region
FACILITY	6NYCRR 237-1.4 (a)	92	Generators equal to or greater than 25 MWe
U-00001	6NYCRR 237-1.6 (a)	102	Standard permit requirements
U-00001	6NYCRR 237-1.6 (c)	103	Nitrogen oxides requirements
FACILITY	6NYCRR 237-1.6 (f)	93	
FACILITY	6NYCRR 237-1.6 (g)	94	Effect on other authorities
FACILITY	6NYCRR 237-2	95	NOx Authorized account representative for NOx budget sources
FACILITY	6NYCRR 237-4.1	96	Compliance certification report.
FACILITY	6NYCRR 237-7.1	97	Submission of NOx allowance transfers
U-00001	6NYCRR 237-8	104	MONITORING AND REPORTING
U-00001	6NYCRR 238-1.6 (c)	105	Sulfur Dioxide requirements
FACILITY	6NYCRR 238-1.6 (e)	98	Recordkeeping and Reporting Requirements
U-00001	6NYCRR 238-1.6 (f)	106	
U-00001	6NYCRR 238-1.6 (g)	107	Effect on Other Authorities
FACILITY	6NYCRR 238-2.1	99	Authorization/responsibilities of the authorized account representative

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FACILITY	6NYCRR 238-3.2	100	Submission of SO2 Budget permit applications
FACILITY	6NYCRR 238-4.1	101	Compliance certification report
U-00001	6NYCRR 238-7.1	108	Submission of SO2 allowance transfers
U-00001	6NYCRR 238-8	109	

**Applicability Discussion:**

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

ECL 19-301.

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

6NYCRR Part 200-6

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

6NYCRR Part 200-7

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

6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)



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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 201-6

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

6NYCRR 201-6.5(a)(4)

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

6NYCRR 201-6.5(a)(7)

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

6NYCRR 201-6.5(a)(8)

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

6NYCRR Part 201-6.5(c)

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

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

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA



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

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

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

6NYCRR 201-6.5(d)(5)

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

6NYCRR Part 201-6.5(e)

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

6NYCRR 201-6.5(f)(6)

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

6NYCRR Part 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.

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-.2

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

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other



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than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

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

40 CFR Part 82, Subpart F

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

**Facility Specific Requirements**

In addition to Title V, PINELAWN POWER has been determined to be subject to the following regulations:

40CFR 60-A

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

40CFR 60-A.12

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

40CFR 60-A.13

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

40CFR 60-A.13 (a)

This regulation specifies that all New Source Performance Standard (NSPS) affected sources that are required to have continuous monitoring systems (CMS) are subject to the requirements of Appendix B of 40 CFR Part 60 and if the CMS is used to demonstrate compliance with emission limits on a continuous basis, then it is also subject to Appendix F of 40 CFR Part 60.

40CFR 60-A.13 (d)

This regulation contains the requirements for daily drift testing for continuous monitoring systems required by 40 CFR Part 60.



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40CFR 60-A.13 (e)

This regulation specifies minimum frequency of operation requirements for continuous monitoring systems required by 40 CFR Part 60.

40CFR 60-A.13 (h)

This regulation specifies the data averaging requirements for continuous monitoring systems subject to 40 CFR Part 60.

40CFR 60-A.14

This regulation defines the term modification and what is and is not considered to be a modification, for the purpose of rule applicability.

40CFR 60-A.15

This regulation defines the term reconstruction and what is and is not considered to be a reconstruction project, for the purpose of rule applicability.

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 Quality Assurance (BQA).

40CFR 60-A.7 (b)

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

40CFR 60-A.7 (c)

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

40CFR 60-A.7 (d)

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

40CFR 60-A.7 (f)

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

40CFR 60-A.8 (d)

This regulation contains the requirements for advance notification of Performance (stack) testing.

40CFR 60-A.9

This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

40CFR 60-Db.49b (d)

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



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40CFR 60-GG.332 (b)

This regulation establishes the equation to be used to determine the emissions for NO<sub>x</sub> for gas turbines with a heat input greater than 100 mmBTU/hour.

40CFR 60-GG.334 (d)

This regulation allows the owner or operator of any new turbine constructed after July 8, 2004, and which uses water or steam injection to control NO<sub>x</sub> emissions to use either the requirements in paragraph (a) of 40 CFR 60.334 for continuous water or steam to fuel ratio monitoring or may use a NO<sub>x</sub> CEMS installed, certified, operated, maintained, and quality-assured as described in paragraph (b) of 40 CFR 60.334.

40CFR 72

In order to reduce acid rain the the U.S. and Canada, Title IV of the Clean Air Act Amendments of 1990 requires the establishment of a program to reduce emissions of SO<sub>2</sub> and NO<sub>x</sub> (sulfur dioxide and oxides of nitrogen). Fossil fuel burning electric utility companies are a major source of these contaminants in the US. These sources were regulated in a phased approach. Phase I, which began in 1995, requires 110 of the higher-emitting utility plants in the eastern and Midwest states to meet intermediate SO<sub>2</sub> emission limitations. Phase II, which began in 2000, tightens the emission limitations and expands the coverage to most fossil fuel burning utilities. The utilities are given "allowances" which is a limited authorization to emit one ton of SO<sub>2</sub>. The utilities are required to limit SO<sub>2</sub> emissions to the number of allowances they hold. Some can benefit however by reducing their emissions and selling their excess allowances. Part 72 contains the means of implementing this portion of Title IV of the Clean Air Act.

6NYCRR 201-7.2

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6NYCRR 202-2.1 (b)

This regulation specifies the applicability criteria for submitting an emission statement to the department for sources located in ozone attainment areas. The criteria are based on the potential to emit a regulated air contaminant at a rate which equals or exceeds the following thresholds in tons per year:

- Volatile Organic Compounds (VOC) - 50
- Oxides of Nitrogen (NO<sub>x</sub>) - 100
- Carbon Monoxide (CO) - 100
- Sulfur Dioxide (SO<sub>2</sub>) - 100
- Particulate Matter, diameters less than 10 microns (PM<sub>10</sub>) - 100
- Lead and its compounds (measured as elemental lead) - 5
- Any one hazardous air pollutant - 10
- Combination of hazardous air pollutants - 25
- Any other regulated air pollutant - 100

6NYCRR 204-4.1

This condition covers the compliance certification report requirements for the NO<sub>x</sub> Budget Program.

6NYCRR 204-7.1

This condition lists the requirements for transfer of allowances in the NO<sub>x</sub> Budget Program.

6NYCRR 204-8.1

This condition lists the general requirements for the NO<sub>x</sub> Budget trading program. They include, but are not limited



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to monitoring requirements, certification, record keeping and reporting.

6NYCRR 204-8.2

This condition covers the procedures for initially certifying and recertifying the monitoring systems of the unit meet the requirements of the NOx Budget Program

6NYCRR 204-8.3

This condition states the requirements for data substitution during times when the monitoring systems to not meet applicable quality assurance requirements.

6NYCRR 204-8.4

This condition lists the addresses where monitoring plans and their modifications, compliance certifications, recertifications, quarterly QA/QC reports and petitions for alternative monitoring shall be sent.

6NYCRR 204-8.5

The NOx authorized account representative shall submit each quarterly report to the department and the administrator within 30 days following the end of the calendar quarter covered by the report. Quarterly reports shall be submitted in the manner specified in subpart H of 40 CFR part 75 and 40 CFR 75.64.

- For units subject to an Acid Rain Emissions limitation, quarterly reports shall include all of the data and information required in subpart H of 40 CFR part 75 for each NOx budget unit (or group of units using a common stack) as well as information required in subpart G of 40 CFR part 75.

- For units not subject to an acid rain emissions limitation, quarterly reports are only required to include all of the data and information required in subpart H of 40 CFR part 75 for each NOx budget unit (or group of units using a common stack).

Compliance certification

The NOx authorized account representative shall submit to the department and the administrator a compliance certification in support of each quarterly report based on reasonable inquiry of those persons with primary responsibility for ensuring that all of the unit's emissions are correctly and fully monitored. The certification shall state that:

(i) the monitoring data submitted were recorded in accordance with the applicable requirements of this Subpart and 40 CFR part 75, including the quality assurance procedures and specifications;

(ii) for a unit with add-on NOx emission controls and for all hours where data are substituted in accordance with 40 CFR 75.34(a)(1), the add-on emission controls were operating within the range of parameters listed in the monitoring plan and the substitute values do not systematically underestimate NOx emissions; and

(iii) for a unit that is reporting on a control period basis under this subdivision the NOx emission rate and NOx concentration values substituted for missing data under subpart D of 40 CFR part 75 are calculated using only values from a control period and do not systematically underestimate NOx emissions.

The NOx authorized account representative shall comply with all recordkeeping and reporting requirements in this section and with the requirements of section 204-2.1(e) of 6 NYCRR Part 204.

6NYCRR 204-8.7



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This condition is a requirement for monitoring and reporting if a particular monitoring scenario is utilized.

6NYCRR 227.2 (b) (1)

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

6NYCRR 227-1.3 (a)

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

6NYCRR 227-2

This regulation limits the emission of oxides of nitrogen (NO<sub>x</sub>) from stationary combustion installations (boilers, combustion turbines and internal combustion engines).

6NYCRR 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

6NYCRR 237-1.4 (a)

This condition specifies that any emission unit or facility with a unit; that at any time on or after January 1, 1999, serves a generator with a nameplate capacity equal to or greater than 25 MWe, and sells any amount of electricity, is a NO<sub>x</sub> budget unit and subject to the requirements of NYCRR 237

6NYCRR 237-1.6 (a)

This condition requires the applicant to submit a NO<sub>x</sub> budget application for a permit and to operate in compliance with that permit.

6NYCRR 237-1.6 (c)

This subdivision outlines the standard requirements of the Acid Deposition Reduction NO<sub>x</sub> Budget Trading Program for oxides of nitrogen.

6NYCRR 237-1.6 (f)

This describes the liability issues regarding the requirements of the ADR NO<sub>x</sub> Budget Trading Program .

6NYCRR 237-1.6 (g)

This item states that no provision of the ADR NO<sub>x</sub> Budget Trading Program, a NO<sub>x</sub> budget permit application, or a NO<sub>x</sub> budget permit, will exempt or exclude the owners and operators from compliance with any other provisions of applicable State and federal law and regulations.

6NYCRR 237-2

This condition requires the permittee to select and authorize one person to manage, and represent the owners of any NO<sub>x</sub> budget unit; and specifies the responsibilities of this NO<sub>x</sub> authorized account representative

6NYCRR 237-4.1

This item specifies the requirements of the compliance certification report.

6NYCRR 237-7.1

This item specifies what information and actions are necessary in order to record the transfer of NO<sub>x</sub> allowances. t



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6NYCRR 237-8

This item requires the owners and operators of a NOx budget unit to comply with the monitoring and reporting requirements of NYCRR 237-8 and Subpart H of 40 CFR part 75; and allows NOx budget units which are also NOx budget units under NYCRR Part 204 to be summarily referenced in order to demonstrate compliance with the requirements of this item.

6NYCRR 238-1.6 (c)

This Item requires the owners and operators of each SO2 budget source and each SO2 budget unit to hold SO2 allowances available for compliance deductions under NYCRR 238-6.5; and how such allowances will be managed.

6NYCRR 238-1.6 (e)

This item requires the owners and operators of the SO2 budget source to keep on site at the source pertinent documents for a period of 5 years from the date the document is created.

6NYCRR 238-1.6 (f)

This subdivision outlines the liability of an affected source.

6NYCRR 238-1.6 (g)

This subdivision outlines the liability of an affected source as subject to other requirements.

6NYCRR 238-2.1

This section outlines the authorization and responsibilities of the SO2 authorized account representative.

6NYCRR 238-3.2

SO2 budget must be submitted 12 months prior to unit operation.

6NYCRR 238-4.1

This section lists all of the requirements for the submission of the compliance certification report.

6NYCRR 238-7.1

This section outlines the requirements for the submission of SO2 allowance transfers.

6NYCRR 238-8

This condition requires the owner or operator of the facility to comply with the reporting and record keeping requirements of 40 CFR Part 75.

**Compliance Certification**

Summary of monitoring activities at PINELAWN POWER:

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
U-00001	67	record keeping/maintenance procedures
FACILITY	48	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance



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FACILITY	41	procedures record keeping/maintenance
U-00001	68	procedures record keeping/maintenance
FACILITY	53	procedures record keeping/maintenance
FACILITY	54	procedures record keeping/maintenance
U-00001	59	procedures monitoring of process or control device parameters as surrogate
U-00001	60	monitoring of process or control device parameters as surrogate
U-00001	61	monitoring of process or control device parameters as surrogate
U-00001	62	monitoring of process or control device parameters as surrogate
U-00001	63	monitoring of process or control device parameters as surrogate
U-00001	64	continuous emission monitoring (cem)
U-00001	65	monitoring of process or control device parameters as surrogate
U-00001/00001/P01	69	continuous emission monitoring (cem)
U-00001/00001/P01	70	continuous emission monitoring (cem)
U-00001/00001/P01	71	continuous emission monitoring (cem)
U-00001/00001/P02	72	continuous emission monitoring (cem)
U-00001/00001/P02	73	work practice involving specific operations
U-00001/00001/P02	74	work practice involving specific operations
U-00001/00001/P02	75	continuous emission monitoring (cem)
U-00001/00001/P02	76	continuous emission monitoring (cem)
U-00001/00001/P03	77	continuous emission monitoring (cem)
U-00001/00001/P03	78	continuous emission monitoring (cem)
U-00001/00001/P03	79	continuous emission monitoring (cem)
U-00001/00001/P04	80	continuous emission monitoring (cem)
U-00001/00001/P04	81	continuous emission monitoring (cem)
U-00001/00001/P04	82	continuous emission monitoring (cem)
U-00001/00001/P04	83	work practice involving specific operations
U-00001/00001/P04	84	work practice involving specific operations
U-00001/00001/P05	85	record keeping/maintenance procedures
U-00001/00001/P05	86	continuous emission monitoring (cem)
U-00001/00001/P05	87	continuous emission monitoring (cem)
U-00001/00001/P05	88	continuous emission monitoring (cem)
FACILITY	5	record keeping/maintenance procedures



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FACILITY	23	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
U-00001	66	record keeping/maintenance procedures
FACILITY	37	intermittent emission testing
FACILITY	36	monitoring of process or control device parameters as surrogate
U-00001	103	record keeping/maintenance procedures
FACILITY	96	record keeping/maintenance procedures
U-00001	104	record keeping/maintenance procedures
U-00001	105	record keeping/maintenance procedures
FACILITY	98	record keeping/maintenance procedures
FACILITY	101	record keeping/maintenance procedures

**Basis for Monitoring**

General Monitoring Requirements: Title V facilities are required to submit semiannual reports and annual compliance certifications, which the Department uses to determine if the facility has complied with the requirements of their permit. Title V facilities are also required to submit an annual emission statement which quantifies the actual amount of emissions that the facility emitted for the previous year.

Fuel Monitoring Requirements: The facility is required to conduct and submit a nitrogen and sulfur analysis on their fuel semiannually to both the Department and EPA. The applicant may submit a fuel vendor certification instead of conducting the fuel analysis.

Opacity Requirements: The facility is required to annually conduct and certify compliance with a 20 percent opacity limit.

NOx Budget Requirements: The facility must record and report their actual mass NOx emissions.

Facility Limitations: The facility is required to install continuous emissions monitors (CEMs) for ammonia and oxides of nitrogen on each turbine. The turbines are each required to meet the following limitations -

NOx

Firing gas:	2.5 ppmvd (corrected to 15% O2)* and 4.33 lbs/hr **
Firing kerosene:	6.0 ppmvd (corrected to 15% O2)* and 10.4 lbs/hr **
Gas with duct burner :	6.05 lbs/hr **



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NH3

Firing gas: 10.0 ppmvd (corrected to 15% O2)\* and 6.47 lbs/hr\*\*  
Firing kerosene: 6.40 lbs/hr\*\*  
Gas with duct burner: 9.04 lbs/hr\*\*

Kerosene is limited to 0.05% sulfur content by weight. Kerosene may be used only 720 hrs per year.

\* The ppmvd limit shall be applicable during periods of steady state operation where a gas turbine operates 16 or more minutes consecutively in one clock hour. When a gas turbine operates in steady state less than 16 minutes (consecutively in one clock hour, and excluding startup or shutdown) a mass emission limit of 2.5 pounds applies.

\*\* The pounds per hour NOx limit shall apply during steady state operations where the turbine operates for the full 60 minutes of the hour.

These limitations apply during steady state operation of the gas turbines, which is defined as 60 percent load or greater. The facility is required to operate at or above 60 percent load except during periods of start-up or shutdown. The facility is limited to 22.5 tons per year of NOx emissions. This limit was used to avoid applicability with non-attainment new source review.

Start-up and Shutdown Limitations: The facility has specific limitations during periods of start-up and shutdown. During start-up the control equipment must be both "warmed" and "cycled" up to peak performance. Until the proper amount of exhaust flow has been achieved the control equipment is not operating at maximum efficiency. During shutdown the control equipment must be turned off prior to the gas turbine. The gas turbine can't be switched off immediately, it must be "cycled" down. During this "cycle down" period the amount of exhaust flow decreases to the point where the control equipment must be shutdown. However, the gas turbine must still fire a minimal amount of fuel for a brief period of time. Therefore, start-up is limited to a maximum of 30 minutes in duration, while shutdown is limited to a maximum of 20 minutes in duration. The facility is required to report quarterly the time of duration for each start-up and shutdown and the amount of NOx and ammonia emitted during these periods. The facility is required to meet the following emission limitations during periods of start-up or shutdown:

NOx

Gas start-up: 15 lbs per occurrence  
Gas shut-down: 5 lbs per occurrence  
Kerosene start-up: 35 lbs per occurrence  
Kerosene shut-down : 8 lbs per occurrence

Excess Emissions Requirements: The facility is required to submit to the Department, quarterly reports of excess emissions of any pollutant. These reports include the duration of the exceedance, the amount of the exceedance, and the explanation for the exceedance.

Recordkeeping Requirements: All Title V facilities are required to maintain copies of their records on-site for a minimum period of five years.

New York State Department of Environmental Conservation

**Permit Review Report**



**Permit ID: 1-4720-03061/00005**  
**04/03/2008**