New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6101-00185/00008
Renewal Number: 2
Modification Number: 2 08/18/2016

Facility Identification Data
Name: BROOKLYN NAVY YARD COGENERATION PLANT
Address: 63 FLUSHING AVE|BROOKLYN NAVY YARD, BLDG 41 UNIT #234
BROOKLYN, NY 11205

Owner/Firm
Name: BROOKLYN NAVY YARD COGENERATION PARTNERS, L.P.
Address: 63 FLUSHING AVE UNIT 234
BROOKLYN, NY 11205-1074, USA
Owner Classification: Corporation/Partnership

Permit Contacts
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63 FLUSHING AVE BLDG 41 UNIT # 234
BROOKLYN, NY 11205
Phone:7182376755

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
Application for renewal of Air Title V Facility.
Modification of permit to provide for removal of carbon monoxide oxidation catalyst.

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Attainment Status
BROOKLYN NAVY YARD COGENERATION PLANT 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
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:
Brooklyn Navy Yard Cogeneration Facility is a 286 megawatt(MW) gas- fired power plant consisting of two Siemens V84.2 gas turbines each equipped with a Heat Recovery Steam Generator and two distillate-fired generators. Evaporative cooling technology for inlet cooling may be installed and operated at the plant on each of the combustion turbines. Emissions controls include HR3 low NOx burners, selective catalytic for nitrogen oxides, and low sulfur fuels for sulfur dioxides. The Plant is located in the Brooklyn Navy Yard, NY. The Brooklyn Navy Yard is under the control of The Brooklyn Navy Yard Development Corporation.

Permit Structure and Description of Operations
The Title V permit for BROOKLYN NAVY YARD COGENERATION PLANT
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.

BROOKLYN NAVY YARD COGENERATION PLANT is defined by the following emission unit(s):

Emission unit U00004 - EMERGENCY GENERATOR NUMBER 2.

Emission unit U00004 is associated with the following emission points (EP):
00004
Process: 04A is located at ROOF, SW CORNER, Building B41 - COMBUSTION OF DISTILLATE FUEL OIL, KEROSENE, JET A FUEL, BIOFUELS .

Emission unit U00002 - Siemens V84.2 combustion turbine equipped with HR3 dry low-NOx burner, Si3D thermal performance upgrade, gas turbine air inlet cooling, selective catalytic reduction, water or steam injection for NOx control when firing oil, and a heat recovery steam generator(HRSG).

Emission unit U00002 is associated with the following emission points (EP):
00002
Process: 02A is located at 2nd Floor, Building B41 - COMBUSTION OF DISTILLATE OIL, KEROSENE, JET A FUEL, BIOFUELS DURING LOAD OPERATIONS BETWEEN 50% TO 100% LOAD.

Process: 02B is located at 2nd Floor, Building B41 - COMBUSTION OF NATURAL GAS DURING LOAD OPERATIONS BETWEEN 50% TO 100% LOAD.

Emission unit U00003 - EMERGENCY GENERATOR NUMBER 1.

Emission unit U00003 is associated with the following emission points (EP):
00003
Process: 03A is located at ROOF, SW CORNER, Building B41 - COMBUSTION OF DISTILLATE FUEL OIL.

Emission unit U00001 - Siemens V84.2 combustion turbine equipped with HR3 dry low-NOx burner, Si3D thermal performance upgrade, gas turbine air inlet cooling, selective catalytic reduction, water or steam injection for NOx control when firing oil, and a heat recovery steam generator(HRSG).

Emission unit U00001 is associated with the following emission points (EP):
00001
Process: 01A is located at 2nd Floor, Building B41 - COMBUSTION OF DISTILLATE OIL DURING LOAD OPERATIONS BETWEEN 50% TO 100% LOAD.

Process: 01B is located at 2nd Floor, Building B41 - COMBUSTION OF NATURAL GAS DURING LOAD OPERATIONS BETWEEN 50% TO 100% LOAD.

Title V/Major Source Status

BROOKLYN NAVY YARD COGENERATION PLANT is subject to Title V requirements. This determination is based on the following information:
This is a major facility requiring an Air Title V permit, because the emissions of Oxides of Nitrogen emission exceed Title V threshold. This is also a Title IV source.

Program Applicability
The following chart summarizes the applicability of BROOKLYN NAVY YARD COGENERATION PLANT with regards to the principal air pollution
regulatory programs:

Regulatory Program	Applicability
PSD	YES
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	YES
TITLE V	YES
TITLE VI	NO
RACT	NO
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 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 212.10, 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, 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
4911	ELECTRIC SERVICES
4931	ELEC & OTHER SERVICES COMBINED

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
2-02-001-01	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE -

	DISTILLATE OIL(DIESEL) Turbine
2-02-001-04	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL(DIESEL) Reciprocating: Cogeneration
2-02-002-01	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL 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 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
007664-41-7	AMMONIA		>= 250 tpy but < 75,000 tpy
007440-38-2	ARSENIC		> 0 but < 10 tpy
007440-41-7	BERYLLIUM		> 0 but < 10 tpy
007440-43-9	CADMIUM		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 50 tpy but < 100 tpy
007440-47-3	CHROMIUM		> 0 but < 10 tpy
007439-96-5	MANGANESE		> 0 but < 10 tpy
007439-97-6	MERCURY		> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 100 tpy but < 250 tpy
0NY075-00-0	PARTICULATES		>= 40 tpy but < 50 tpy
0NY075-00-5	PM-10		>= 40 tpy but < 50 tpy
007446-09-5	SULFUR DIOXIDE		>= 25 tpy but < 40 tpy
0NY100-00-0	TOTAL HAP		> 0 but < 2.5 tpy
0NY998-00-0	VOC		>= 10 tpy but < 25 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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 B: 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 C: 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 D: 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 E: **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 F: **Permit Revocation, Modification, Reopening, Reissuance or Termination, and 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 G: **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 H: **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 I: **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 J: **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 K: 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:

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 L: Permit Exclusion - ECL 19-0305

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

issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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	ECL 19-0301	134	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-A.21(j)	2 -8, 2 -9	Best Available Control Technology
U-00001/00001/01A	40CFR 52-A.21(j)	2 -30, 2 -31	Best Available Control Technology
U-00001/00001/01B	40CFR 52-A.21(j)	91, 92	Best Available Control Technology
U-00002/00002/02A	40CFR 52-A.21(j)	2 -38, 2 -39	Best Available Control Technology
U-00002/00002/02B	40CFR 52-A.21(j)	114, 115	Best Available Control Technology
U-00003/00003/03A	40CFR 52-A.21(j)	2 -42, 2 -43	Best Available Control Technology
U-00004/00004/04A	40CFR 52-A.21(j)	2 -44, 2 -45	Best Available Control Technology
FACILITY	40CFR 60-A.11	62	General provisions - compliance with

				standards and maintenance requirements
FACILITY	40CFR 60-A.12	63		General provisions - Circumvention
FACILITY	40CFR 60-A.7(b)	58		Notification and Recordkeeping
FACILITY	40CFR 60-A.7(f)	59		Notification and Recordkeeping
FACILITY	40CFR 60-A.8(b)	60		Performance Tests
FACILITY	40CFR 60-A.8(d)	61		Performance Tests
FACILITY	40CFR 60-GG.332(b)	64		NOx Standard for Gas Turbines greater than 100 mmBTU/hr
FACILITY	40CFR 60-GG.334(h)	2	-10	Fuel Content
FACILITY	40CFR 63-ZZZZ.6603(a)	2	-11	Reciprocating Internal Combustion Engine (RICE) NESHAP - requirements for existing engines at area sources of HAP emissions
FACILITY	40CFR 63-ZZZZ.6604	2	-12	Reciprocating Internal Combustion Engine (RICE) NESHAP - Fuel requirements for CI RICE
FACILITY	40CFR 63-ZZZZ.6605(a)	2	-13	Reciprocating Internal Combustion Engine (RICE) NESHAP - compliance
FACILITY	40CFR 63-ZZZZ.6605(b)	2	-14	Reciprocating Internal Combustion Engine (RICE) NESHAP - operate and maintain air pollution control and monitoring equipment
FACILITY	40CFR 63-ZZZZ.6625(e)	2	-15	Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance of engine and control device
FACILITY	40CFR 63-ZZZZ.6625(f)	2	-16	Reciprocating Internal Combustion Engine (RICE) NESHAP - non-resettable hour meter for certain existing emergency engines
FACILITY	40CFR 63-ZZZZ.6625(h)	2	-17	Reciprocating Internal Combustion Engine (RICE) NESHAP - idling time at startup
FACILITY	40CFR 63-ZZZZ.6625(i)	2	-18	Reciprocating Internal Combustion Engine (RICE) NESHAP - oil analysis program for compression ignition engines
FACILITY	40CFR 63-ZZZZ.6640(f)	2	-19	Reciprocating

FACILITY	40CFR 63-ZZZZ.6650(h)	2 -20	Internal Combustion Engine (RICE) NESHAP - emergency engines Reciprocating
FACILITY	40CFR 63-ZZZZ.6655	2 -21	Internal Combustion Engine (RICE) NESHAP - emergency engine demand response reporting Reciprocating
FACILITY	40CFR 68	20	Internal Combustion Engine (RICE) NESHAP - Record keeping requirements Chemical accident prevention provisions
FACILITY	40CFR 75	67, 2 -22	Continuous emission monitoring
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	40CFR 97-AAAAA.406	2 -23	Transport Rule (TR) NOx Annual Trading Program Standard Requirments
FACILITY	40CFR 97-BBBBB.506	2 -24	Transport Rule (TR) NOx Ozone Season Trading Program Standard Requirment
FACILITY	40CFR 97-CCCCC.606	2 -25	Transport Rule (TR) SO2 Group 1 Trading Program Standard Requirments
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	135, 1 -13	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11, 1 -6	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, 1 -7	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14, 1 -8	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 27, 28, 29, 68, 69, 2 -1, 2 -2, 2 -3, 2 -4	Title V Permits and the Associated Permit Conditions
U-00001	6NYCRR 201-6	2 -26	Title V Permits and the Associated Permit Conditions
U-00001/00001/01A	6NYCRR 201-6	75, 76, 2 -28, 2 -29	Title V Permits and the Associated Permit Conditions
U-00001/00001/01B	6NYCRR 201-6	83, 86, 2 -32, 2 -33	Title V Permits and the Associated Permit Conditions
U-00002	6NYCRR 201-6	2 -34	Title V Permits and

			the Associated Permit Conditions
U-00002/00002/02A	6NYCRR 201-6	96, 97, 2 -36, 2 -37	Title V Permits and the Associated Permit Conditions
U-00002/00002/02B	6NYCRR 201-6	107, 108, 2 -40, 2 -41	Title V Permits and the Associated Permit Conditions
U-00003/00003/03A	6NYCRR 201-6	117, 118	Title V Permits and the Associated Permit Conditions
U-00004/00004/04A	6NYCRR 201-6	126, 127	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	1 -9	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	1 -1	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	1 -10	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	1 -2	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	1 -3	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii	1 -4	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	1 -12	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	1 -5	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	1 -11	Off Permit Changes
FACILITY	6NYCRR 201-6.5(g)	31	Permit shield
FACILITY	6NYCRR 202-1.1	19	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	32	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2	2 -5	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.6	2 -6	Reports, Sampling, and Analysis
FACILITY	6NYCRR 227-1.3(a)	35	Smoke Emission Limitations.
FACILITY	6NYCRR 231-2.2(b)	2 -7	Applicability
U-00001	6NYCRR 231-2.2(b)	71, 72, 2 -27	Applicability
U-00001/00001/01A	6NYCRR 231-2.2(b)	77, 78, 79, 80	Applicability
U-00001/00001/01B	6NYCRR 231-2.2(b)	87, 88, 89, 90	Applicability
U-00002	6NYCRR 231-2.2(b)	93, 95, 2 -35	Applicability
U-00002/00002/02A	6NYCRR 231-2.2(b)	100, 101, 102, 103	Applicability
U-00002/00002/02B	6NYCRR 231-2.2(b)	110, 111, 112, 113	Applicability
U-00003	6NYCRR 231-2.2(b)	116	Applicability
U-00003/00003/03A	6NYCRR 231-2.2(b)	119, 120, 121, 122	Applicability

U-00004	6NYCRR 231-2.2(b)	125	Applicability
U-00004/00004/04A	6NYCRR 231-2.2(b)	128, 129, 130, 131	Applicability
FACILITY	6NYCRR 231-2.4	38	Permit Requirements
FACILITY	6NYCRR 237-1.6(c)	136	Nitrogen oxides requirements
FACILITY	6NYCRR 237-1.6(e)	137	Recordkeeping and reporting requirements
FACILITY	6NYCRR 237-1.6(f)	138	Liability
FACILITY	6NYCRR 237-1.6(g)	139	Effect on other authorities
FACILITY	6NYCRR 237-4.1	140	Compliance certification report.
FACILITY	6NYCRR 237-7.1	141	Submission of NOx allowance transfers
FACILITY	6NYCRR 237-8	142	MONITORING AND REPORTING
FACILITY	6NYCRR 238-1.6(a)	143	Permit Requirements
FACILITY	6NYCRR 238-1.6(c)	144	Sulfur Dioxide requirements
FACILITY	6NYCRR 238-1.6(e)	145	Recordkeeping and Reporting Requirements
FACILITY	6NYCRR 238-1.6(f)	146	Liability
FACILITY	6NYCRR 238-1.6(g)	147	Effect on Other Authorities
FACILITY	6NYCRR 238-2.1	148	Authorization/responsibilities of the authorized account representative
FACILITY	6NYCRR 238-4.1	149	Compliance certification report
FACILITY	6NYCRR 238-7.1	150	Submission of SO2 allowance transfers
FACILITY	6NYCRR 238-8	151	Monitoring and Reporting
FACILITY	6NYCRR 242-1.5	152, 153, 154	CO2 Budget Trading Program - Standard requirements

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

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.

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) (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.

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.

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 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 there 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, BROOKLYN NAVY YARD COGENERATION PLANT has been determined to be subject to the following regulations:
40 CFR 52.21 (j)
BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61. Emission and operational limitations required from a BACT determination will have to be entered into the special permit conditions, separately by the permit reviewer.

40 CFR 60.11

40 CFR 60.12

40 CFR 60.332 (b)

40 CFR 60.334 (h)
This regulation requires the applicant to monitor the sulfur and nitrogen content of the fuel being burned

in the turbine.

40 CFR 60.7 (b)

40 CFR 60.7 (f)

40 CFR 60.8 (b)

40 CFR 60.8 (d)

40 CFR 63.6603 (a)
These conditions list the emission limits, operating limits, and work practices that existing engines located at an area source of HAP emissions must meet.

The engines must meet work practices, emission limits, and operating limits on carbon monoxide or formaldehyde for the specific type of engine listed in table 2d of subpart ZZZZ.

40 CFR 63.6604
These conditions state the fuel requirements for compression ignition engines that uses diesel fuel.

40 CFR 63.6605 (a)
This condition states that the facility must meet all emission limits and operating limits that this rule imposes at all times.

40 CFR 63.6605 (b)
This condition requires the facility to operate their engine(s) so that emissions of hazardous air pollutants are minimized during periods when the engine(s) are starting up, shutting down, and malfunctioning.

40 CFR 63.6625 (e)
This regulation requires the owners or operator of an existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions, an existing stationary emergency RICE, or an existing stationary RICE located at an area source of HAP emissions must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

40 CFR 63.6625 (f)
This condition reduces the emission of hazardous air pollutants by requiring existing emergency engines greater than or equal to 500 brake horsepower located at a major source of HAP emissions and existing emergency engines located at an area source of HAP emissions to install a non-resettable hour meter.

40 CFR 63.6625 (h)
This regulation requires the owner or operator of a reciprocating internal combustion engine, operating at a major source of hazardous air pollutants, to minimize the idling time of the engine at startup. Startup time is limited to 30 minutes or less.

40 CFR 63.6625 (i)
This condition allows compression ignition engines subject to work practices to extend the length of time between oil changes.

40 CFR 63.6640 (f)
This condition states the operation requirements for emergency engines.

40 CFR 63.6650 (h)
This condition states the reporting requirements for emergency engines that operate for demand response.

40 CFR 63.6655
This regulation sets forth the record keeping requirements for owners or operators of stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40 CFR 97.406
This condition provides the general requirements for implementing EPAs Transport Rule (TR) 40 CFR Part 97, Subpart AAAAA; intended to reduce the interstate transport of fine particulate matter and ozone. This particular condition requires facilities to measure and report their emissions of Nitrogen Oxide (NOx) and to hold TR annual NOx allowances sufficient to cover these emissions. Commonly referred to as a budget trading program, each State has an established 'budget' of emissions that are distributed or sold to facilities, which, in turn, can only emit as much as they hold in allowances.

40 CFR 97.506
This condition provides the general requirements for implementing EPAs Transport Rule (TR) 40 CFR Part 97, Subpart BBBBB; intended to reduce the interstate transport of fine particulate matter and ozone. This particular condition requires facilities to measure and report their emissions of Nitrogen Oxide (NOx) during the ozone season (May through September) and to hold TR ozone season NOx allowances sufficient to cover these emissions. Commonly referred to as a budget trading program, each State has an established 'budget' of emissions that are distributed or sold to facilities, which, in turn, can only emit as much as they hold in allowances.

40 CFR 97.606
This condition provides the general requirements for implementing EPAs Transport Rule (TR) 40 CFR Part 97, Subpart CCCCC; intended to reduce the interstate transport of fine particulate matter and ozone. This particular condition requires facilities to measure and report their emissions of sulfur dioxide (SO2) annually and to hold TR annual SO2 allowances sufficient to cover these emissions. Commonly referred to as a budget trading program, each State has an established 'budget' of emissions that are distributed or sold to facilities, which, in turn, can only emit as much as they hold in allowances.

40 CFR Part 75

6 NYCRR 211.1

6 NYCRR 225-1.2

6 NYCRR 225-1.6
This section establishes the requirements for reporting, sampling, and analyzing fuel by subject facilities.

6 NYCRR 227-1.3 (a)

6 NYCRR 231-2.2 (b)
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 the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The purpose of Section 231-2.2 is to define what new or modified facilities are subject to the

requirements set forth in the other sections of the rule. Under subsection (b) of the section, facilities located in the severe ozone non-attainment area have an option regarding the level of pollution controls provided that certain requirements are met.

6 NYCRR 231-2.4

6 NYCRR 237-1.6 (c)

6 NYCRR 237-1.6 (e)

6 NYCRR 237-1.6 (f)

6 NYCRR 237-1.6 (g)

6 NYCRR 237-4.1

6 NYCRR 237-7.1

6 NYCRR 238-1.6 (a)

6 NYCRR 238-1.6 (c)

6 NYCRR 238-1.6 (e)

6 NYCRR 238-1.6 (f)

6 NYCRR 238-1.6 (g)

6 NYCRR 238-2.1

6 NYCRR 238-4.1

6 NYCRR 238-7.1

6 NYCRR 242-1.5

His regulation requires that the facility hold enough carbon dioxide allowances in their carbon dioxide budget at least equal to the amount of carbon dioxide emitted from the facility each year.

6 NYCRR Subpart 237-8

6 NYCRR Subpart 238-8

Compliance Certification
Summary of monitoring activities at BROOKLYN NAVY YARD COGENERATION PLANT:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	2-8	work practice involving specific operations
FACILITY	2-9	work practice involving specific operations
U-00001/00001/01A	2-30	intermittent emission testing
U-00001/00001/01A	2-31	intermittent emission testing
U-00001/00001/01B	91	intermittent emission testing
U-00001/00001/01B	92	intermittent emission testing
U-00002/00002/02A	2-38	intermittent emission testing
U-00002/00002/02A	2-39	intermittent emission testing
U-00002/00002/02B	114	intermittent emission testing
U-00002/00002/02B	115	intermittent emission testing
U-00003/00003/03A	2-42	intermittent emission testing
U-00003/00003/03A	2-43	intermittent emission testing
U-00004/00004/04A	2-44	intermittent emission testing
U-00004/00004/04A	2-45	intermittent emission testing
FACILITY	64	record keeping/maintenance procedures
FACILITY	2-10	record keeping/maintenance procedures
FACILITY	2-11	record keeping/maintenance procedures
FACILITY	2-15	record keeping/maintenance procedures
FACILITY	2-16	record keeping/maintenance procedures
FACILITY	2-17	monitoring of process or control device parameters as surrogate
FACILITY	2-18	record keeping/maintenance procedures
FACILITY	2-19	record keeping/maintenance procedures
FACILITY	2-20	record keeping/maintenance procedures
FACILITY	2-21	record keeping/maintenance procedures
FACILITY	2-22	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures
FACILITY	2-23	record keeping/maintenance procedures
FACILITY	2-24	record keeping/maintenance procedures
FACILITY	2-25	record keeping/maintenance procedures
FACILITY	2-1	continuous emission monitoring (cem)
FACILITY	2-2	continuous emission monitoring (cem)
FACILITY	2-3	continuous emission monitoring (cem)
FACILITY	2-4	continuous emission monitoring (cem)
FACILITY	27	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	29	work practice involving specific operations
U-00001	2-26	record keeping/maintenance procedures
U-00001/00001/01A	2-28	continuous emission monitoring (cem)

U-00001/00001/01A	2-29	continuous emission monitoring (cem)
U-00001/00001/01A	75	continuous emission monitoring (cem)
U-00001/00001/01A	76	continuous emission monitoring (cem)
U-00001/00001/01B	2-32	continuous emission monitoring (cem)
U-00001/00001/01B	2-33	continuous emission monitoring (cem)
U-00001/00001/01B	83	continuous emission monitoring (cem)
U-00001/00001/01B	86	continuous emission monitoring (cem)
U-00002	2-34	record keeping/maintenance procedures
U-00002/00002/02A	2-36	continuous emission monitoring (cem)
U-00002/00002/02A	2-37	continuous emission monitoring (cem)
U-00002/00002/02A	96	continuous emission monitoring (cem)
U-00002/00002/02A	97	continuous emission monitoring (cem)
U-00002/00002/02B	2-40	continuous emission monitoring (cem)
U-00002/00002/02B	2-41	continuous emission monitoring (cem)
U-00002/00002/02B	107	continuous emission monitoring (cem)
U-00002/00002/02B	108	continuous emission monitoring (cem)
U-00003/00003/03A	117	intermittent emission testing
U-00003/00003/03A	118	intermittent emission testing
U-00004/00004/04A	126	intermittent emission testing
U-00004/00004/04A	127	intermittent emission testing
FACILITY	1-4	record keeping/maintenance procedures
FACILITY	1-5	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	2-5	work practice involving specific operations
FACILITY	2-6	record keeping/maintenance procedures
FACILITY	35	monitoring of process or control device parameters as surrogate
FACILITY	2-7	work practice involving specific operations
U-00001	2-27	record keeping/maintenance procedures
U-00001	71	record keeping/maintenance procedures
U-00001	72	record keeping/maintenance procedures
U-00001/00001/01A	77	intermittent emission testing
U-00001/00001/01A	78	continuous emission monitoring (cem)
U-00001/00001/01A	79	continuous emission monitoring (cem)
U-00001/00001/01A	80	intermittent emission testing
U-00001/00001/01B	87	intermittent emission testing
U-00001/00001/01B	88	intermittent emission testing
U-00001/00001/01B	89	continuous emission monitoring (cem)
U-00001/00001/01B	90	continuous emission monitoring (cem)
U-00002	2-35	record keeping/maintenance procedures
U-00002	93	record keeping/maintenance procedures
U-00002	95	record keeping/maintenance procedures
U-00002/00002/02A	100	intermittent emission testing
U-00002/00002/02A	101	intermittent emission testing
U-00002/00002/02A	102	continuous emission monitoring (cem)
U-00002/00002/02A	103	continuous emission monitoring (cem)
U-00002/00002/02B	110	intermittent emission testing
U-00002/00002/02B	111	continuous emission monitoring (cem)
U-00002/00002/02B	112	continuous emission monitoring (cem)
U-00002/00002/02B	113	intermittent emission testing
U-00003	116	record keeping/maintenance procedures
U-00003/00003/03A	119	intermittent emission testing
U-00003/00003/03A	120	intermittent emission testing
U-00003/00003/03A	121	intermittent emission testing
U-00003/00003/03A	122	intermittent emission testing
U-00004	125	record keeping/maintenance procedures
U-00004/00004/04A	128	intermittent emission testing
U-00004/00004/04A	129	intermittent emission testing
U-00004/00004/04A	130	intermittent emission testing
U-00004/00004/04A	131	intermittent emission testing
FACILITY	38	record keeping/maintenance procedures
FACILITY	136	record keeping/maintenance procedures
FACILITY	140	record keeping/maintenance procedures
FACILITY	142	record keeping/maintenance procedures

FACILITY	144	record keeping/maintenance procedures
FACILITY	145	record keeping/maintenance procedures
FACILITY	149	record keeping/maintenance procedures
FACILITY	151	record keeping/maintenance procedures
FACILITY	153	record keeping/maintenance procedures
FACILITY	154	record keeping/maintenance procedures

Basis for Monitoring
NYCRR Part 201-6.5 (c)(3)(ii): This condition that applies to monitoring conditions in all Title V Permits. All facilities that are subject to the Title V requirements must submit reports of any required monitoring to the NYSDEC every six months.

Part 201-6.5(e): Condition has been added in order to comply with the Title V annual compliance certification requirements and specify the mailing addresses for submitting the compliance reports. It further specifies what constitutes compliance certification with the terms and conditions of the permit. This is a required monitoring condition for all Title V permitted facilities.

art 202-2.1 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

6 NYCRR Part 225: Condition limits the percent by weight of sulfur in distillate oil burned at the facility. Monitoring is required per fuel oil delivery which in turn determines compliance with the requirement prior to burning. Condition requires the permittee to maintain fuel oil supplier certifications for each oil shipment received at the facility. The monitoring method being employed deemed appropriate for the sulfur-in-fuel applicable requirement for this facility. This condition satisfies NSPS requirement as the turbines are also subject to 40 CFR 60 GG .

40 CFR 68 contains the 112(r) requirements and sets forth the list of regulated substances and thresholds, the petition process for adding or deleting substances to the list of regulated substances and the requirements for owners or operators of stationary sources concerning the prevention of accidental releases. New York state does not currently have delegation for this program consequently it is the Department's position that the EPA has sole responsibility for making an applicability or other regulatory determination under this rule. As per the information received from EPA this facility is not currently subject to these requirements. If the EPA determines this to be applicable at a later date, this facility will be required to meet the requirements of the rule and demonstrate compliance to the EPA.

6 NYCRR Part 231-2 The plant initiated operations in 1996 under a Permit to Construct and Certificate to operate issued by the NYSDEC. BNYCP performed BACT/LAER and Air Quality Impact Analysis as required by Federal PSD and New York State New Source Review requirements. BNYCP obtained and retired emissions offsets at the 1.3:1 ration as required by 6 NYCRR part 231. The facility has obtained 189.5 Emission Reduction Credits (ERCs) from Long Island Lighting Company (Lilco) Port Jefferson Facility and have LAER for the turbines. The total NOx emissions from Brooklyn Navy Yard Cogen Plant is limited to 145.77 tpy rolled daily. The emissions are required to be calculated by using CEMS data for turbines and most recent stack test results for emergency generators.

The facility installed continuous emissions monitors (CEMs) for ammonia, carbon monoxide, and oxides of nitrogen on each of the two gas turbine stacks. The facility has permit limits for NOx VOC, Ammonia PM10, Sulfur and CO. VOC and PM10 emissions to be measured once during the permit term, and the rest of the contaminants are measured continuously.

The two combustion turbines are NOx Budget and SO2 budget units and are subject to the 6 NYCRR Parts 204, 237 and 238 requirements.

40 CFR 60-A.21(j): BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61.

40 CFR 60-GG.332 (b): This regulation establishes the equation to be used to determine the emissions for NOx for gas turbines with a heat input greater than 100 mmBTU/hour.