



**Facility Identification Data**

Name: NYC-DEP OWLS HEAD WPCP  
Address: 6700 SHORE RD  
BROOKLYN, NY 11220

**Owner/Firm**

Name: NYC DEPT OF ENVIRONMENTAL PROTECTION  
Address: 96-05 HORACE HARDING EXPWY  
FLUSHING, NY 11368, USA  
Owner Classification: Municipal

**Permit Contacts**

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CORONA, NY 11368  
Phone:7185955050

**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. Also, facility proposes to install three (3) 70 KW micro-turbine generators for research and developmental purposes.

**Attainment Status**

NYC-DEP OWLS HEAD WPCP 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 < 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

This is a 120 million gallon per day (MGD) publicly owned secondary water pollution control plant (WPCP). The facility has three (3) engine - generator systems. The three engines are dual fuel engines; each is rated 3174 bhp and firing primarily sludge digester gas with #2 diesel as pilot fuel. The facility also has five (5) hot water boilers all are considered exempt sources (rated <10 million btu/hr) and able to fire natural gas or digester gas or #2 diesel oil. The plant has also three (3) activated carbon systems installed at the sludge thickening tanks and the scum and grit building for H<sub>2</sub>S odor control purpose. A passive activated carbon system is connected to the wet well room ventilation duct also for H<sub>2</sub>S odor control purpose. There are a total of twenty (20) 50-gallon activated carbon canisters in the facility as temporary measures to prevent potential H<sub>2</sub>S odor generation at the sludge digester and storage tanks and the sludge digester gas extraction tanks. The facility has two exempt 150 bhp engine generator for emergency power and two waste digester gas burners to flare excessive sludge digester gas.

### Permit Structure and Description of Operations

The Title V permit for NYC-DEP OWLS HEAD WPCP is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to



identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

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

NYC-DEP OWLS HEAD WPCP is defined by the following emission unit(s):

Emission unit 1COMBU - This emission unit consists of the plant's combustion equipment processes.

The plant has three (3) Delaval enterprise's DGSR-48 dual fuel engines originally installed in 1988 to replace six old engines. These engines are each rated 3174 bhp and drive three 2250 kw generators. Each engine exhausts through two stacks. These engines are currently undergoing modification of their combustion controls. The normal operation is one engine fires digester gas with diesel pilot dual fuel at 2000 KW with 2821 bhp. Natural gas may also be used once available in future. At the maximum two engines will be operated at a time and at the least one engine should be on standby at all times. The engines may be operated in such a manner as to allow the plant to participate in new york state electrical demand reduction program.

The plant's two (2) waste gas burners (flares) burn the excess sludge digester gas. At times that the sludge digester gas produced at the plant is more than the demand of the plant's engines and boilers, the excess sludge digester gas will be burned at the two waste gas burners. The palnt replaced the the two existng waste sludge digester gas burners with two similar waste sludge digester gas burners from the same manufacturer.

Emission unit 1COMBU is associated with the following emission points (EP):

ENG1A, ENG1B, ENG2A, ENG2B, ENG3A, ENG3B, FLAR1, FLAR2

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

Process: DDP This process is the plant's two ground level diesel dispensing pumps located by the main building. Each pump has a 1000 gallon underground tank that is exempted.

Process: DIE is located at Building MAIN - This process is a supplemental operation mode to the process DUA.

When the engines can't be operated on dual fuel mode, these engines will fire 100% diesel. At all times, at least one engine is kept off-line for standby purposes. The annual total thruput is determined for two engines in operation. These engines drive three 2250 kw generators which provide power to sewage pumps and process air blowers. The engines may be operated in such a manner as to allow the plant to participate in New York state electrical demand reduction program. Exhaust from each of these three engines (ENG01, ENG02, and ENG03) pass through a waste heat recovery boiler and then vented to atmosphere through their own pair of exhaust stacks (ENG1A AND ENG1B, ENG2A AND ENG2B, ENG3A AND ENG3B) respectively.

Process: DUA is located at Building MAIN - This process is the engines' primary operation mode. Under this process, the engines fire dual fuel (sludge digester gas with diesel oil as pilot fuel). Natural gas may also be used once available in future. At all times, at the least one engine is kept off line for standby purposes. The annual total thruput is determined for two engines in operation.

These engines drive three 2250 kw generators which provide power to sewage pumps and process air blowers. The engines may be operated in such a manner as to allow the plant to participate in new York state electrical demand reduction program.

Exhaust from each of these three engines (ENG01, ENG02, and ENG03) pass through a waste heat recovery boiler and then vented to atmosphere through their own pair of exhaust stacks (ENG1A AND ENG1B, ENG2A AND ENG2B, ENG3A AND ENG3B) respectively

Process: FLA is located at Building SLUDGE - This process is the plant's two waste sludge digester gas burners. At times that the sludge digester gas produced at the plant is more than the demand of the plant's engines and boilers.



The excessive sludge digester gas will be burned at either of the two waste digester gas burners (WGBR1 and WGBR2) and exhausted through their own stacks (FLAR1 and FLAR2).

Emission unit 2WWTRE - This emission unit also consists of the plant's sludge handling processes. These processes include gravity thickening, sludge digestion, sludge storage tanks and sludge digester gas holding tank. Two activated carbon adsorber systems - each consists of four vessels installed at the gravity thickening process for H<sub>2</sub>S odor carbon from June through October. A total of twenty (20) passive carbon canisters are installed at sludge digester tanks and storage tank for H<sub>2</sub>S odor control purpose.

This emission unit also consists of the plant's grit and scum residual handling and removal processes within the grit and scum building. An activated carbon adsorption vessel is installed to provide to the building ventilation air for H<sub>2</sub>S odor control from June through October. The grit scum building is undergoing a construction to be expanded and an additional carbon adsorption unit (GSBC2) with exhaust stack (GSBS2) is to be installed at the building.

Emission unit 2WWTRE is associated with the following emission points (EP): GSBS1, GSBS2, PSTCA, PSTCB, PSTCC, PSTCD, PSTCE, PSTCF, PSTCG, PSTCH, PSTCI, SGTS1, SGTS2, WWELL

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

Process: ART This is the plant's wastewater diffused air activated sludge aeration (ART) secondary treatment process. This process includes four diffused air activated sludge aeration tanks (AERTK). In this process, the effluent from the primary settling treatment section is mixed with activated sludge solids and air. These aeration tanks provide the detention time required for the activated sludge to absorb the organic matter in the wastewater. Compressed air is discharged through the tanks to provide mixing and an aerobic environment. After a set mixing period, the mixture flows to the final settling tanks, where the solids are flocculated, settled and collected. Each of these aeration tanks has four "passes". The total thruput is based on dry weather flow

Process: CCT This is the plant's chlorine contact (CCT) disinfection process. This process includes two chlorine contact tanks. The wastewater from the final settling tanks flows to the chlorine contact tanks where sodium hypochlorite is added into the wastewater to destroy and kill the harmful disease-causing organisms and thereby to protect the receiving waters. The total thruput is based on dry weather flow.

Process: FST This is the plant's final settling (FS) process. This process includes sixteen final settling tanks. The purpose of this final settling process is two fold; settle out microorganisms and activated sludge solid waste generated during the aeration process to produce a clarified effluent, and to collect the settled activated sludge for conveyance back to the aeration tanks. The total thruput is based on dry weather flow

Process: GHT This process is the plant's sludge digester gas holding tank (GHT) operation consisting of one (1) sludge digester gas holding tank (GASTK). Digester gas produced in the sludge anaerobic digester tanks will be stored in these tanks for later use at combustion units.

Process: GSB This is the plant's grit and scum handling process (GSB) which consists of the grit and scum handling process in the residual and scum building (GSBL). An activated carbon adsorption unit (GSBC1) exhausts through its own stack (GSBS1) is installed at the building for H<sub>2</sub>S Odor control purpose. The grit scum building is undergoing a construction to be expanded and an additional carbon adsorption unit (GSBC2) with exhaust stack (GSBS2) is to be installed at the building.

Process: PHW is located at Building MAIN - This process is the plant's pre treatment head works (PHW) process including four bar screening chambers (SCREEN) and influent wet well (WWELL).

The bar screens consists of upright bars spaced one to three inches apart. The primary purpose of the bar screening is to remove large pieces of trash (rags, sticks, newspapers, cans, etc) for the protection of the main sewage pumps and other equipment.

A passive activated carbon adsorption unit (WWLOC) is connected to the influent wet well ventilation duct and the total thruput is based on dry weather flow.

Process: PST is located at Building MAIN - This process is the plant's wastewater primary settling (PST) process.



This process includes four primary settling tanks. Primary settling operation is a process in which the solid particles carried in raw sewage are removed by gravity under quiescent conditions in the primary settling tanks. In addition, the primary settling tanks are used to separate and remove floating materials and scum. Solids and grit collected in the tanks are removed as a thin sludge by continuous pumping to cyclone digritters. Each primary settling tank is equipped with sludge collectors, dipping weirs, scum removal equipment, inlet sluice gates overflow weirs. The total throughput is based on dry weather flow

**Process: SAD** This process is the plant's sludge anaerobic digesters (SAD) operation consisting of six cone sludge digester tanks (SADTK). After sludge gravity thickening, for making it safer for the environment, the sludge is placed in oxygen-free tanks called digesters. Digesters are heated to at least 95°F for between 15-20 days stimulating the growth of anaerobic bacteria which consume organic material in the sludge. In the digesters, sludge is converted into water, carbon dioxide and methane gas. The methane gas is often used as an energy source to operate boilers. Relief valve from each of these digester tanks splits into two 50-gallon canisters filled with activated carbon for H<sub>2</sub>S odor control.

**Process: SGT** This process is the plant's sludge gravity thickening (sgt) operation consisting of four (4) sludge gravity thickener tanks (SGTTK). The primary and final settling tanks' sludge (approximately 99% water) is concentrated in these gravity thickening tanks. The water is sent back to the head of the plant or aeration tanks for additional treatment. Odor emissions from this equipment and ventilation are ducted to two odor control systems (SGTC1 and SGTC2) each with four carbon vessels located in the sludge complex and exhausted through their own stacks (SGTS1 and SGTS2).

**Process: SST** This process is the sludge storage tanks (SST) process consisting of two sludge storage tanks (DSSTK). Excessive sludge will be stored in these storage tanks. Exhaust from each of these tanks splits into two activated carbon adsorption systems each has two 50-gallon canisters (a total of 8 canisters) filled with activated carbon for H<sub>2</sub>S odor control

**Emission unit MTURB1** - In order to continue on pilot studying of advance clean power generation technology, the plant is planning to install up to three(3) 70 KW micro-turbine generators for research and development purposes. These micron-turbine generators are considered exempt sources as defined by 6 NYCRR Part 201-6.3(d)(7) and will burn the plant's sludge digester gas, with utility natural gas back-up.

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

**Process: MTB** is located at Building OUTDOOR - In order to continue on pilot studying of advance clean power generation technology, the plant is planning to install up to three(3) 70 KW micro-turbine generators for research and development purposes. These micron-turbine generators are considered exempt sources as defined by 6 NYCRR Part 201-6.3(d)(7) and will burn the plant's sludge digester gas, with utility natural gas back-up.

**Title V/Major Source Status**

NYC-DEP OWLS HEAD WPCP is subject to Title V requirements. This determination is based on the following information:

Facility emissions are greater than the major source thresholds

**Program Applicability**

The following chart summarizes the applicability of NYC-DEP OWLS HEAD WPCP with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO



NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

**NOTES:**

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

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

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

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

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

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

**Title VI** Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or



other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

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

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

**Compliance Status**

Facility is in compliance with all requirements

**SIC Codes**

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

SIC Code	Description
4952	SEWERAGE SYSTEMS

**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
2-02-004-01	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION LARGE BORE ENGINE Diesel
2-02-004-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION LARGE BORE ENGINE Dual Fuel (Oil/Gas)
4-06-006-51	TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS CONSUMER (CORPORATE) FLEET REFUELING - STAGE II DIESEL: VAPOR LOSS W/O CONTROLS
5-01-007-07	SOLID WASTE DISPOSAL - GOVERNMENT SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT POTW: HEADWORKS SCREENING
5-01-007-20	SOLID WASTE DISPOSAL - GOVERNMENT SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT POTW: PRIMARY SETTLING TANK
5-01-007-31	SOLID WASTE DISPOSAL - GOVERNMENT SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT



## Permit Review Report

Permit ID: 2-6102-00005/00017

Renewal Number: 1

02/06/2009

5-01-007-40 POTW: DIFFUSED AIR ACT SLUDGE  
SOLID WASTE DISPOSAL - GOVERNMENT  
SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT

5-01-007-60 POTW: SECONDARY CLARIFIER  
SOLID WASTE DISPOSAL - GOVERNMENT  
SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT

5-01-007-71 POTW: CHLORINE CONTACT TANK  
SOLID WASTE DISPOSAL - GOVERNMENT  
SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT

5-01-007-81 POTW: GRAVITY SLUDGE THICKENER  
SOLID WASTE DISPOSAL - GOVERNMENT  
SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT

5-01-007-89 POTW: ANAEROBIC DIGESTER  
SOLID WASTE DISPOSAL - GOVERNMENT  
SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT

5-01-007-99 SLUDGE DIGESTER GAS FLARE  
SOLID WASTE DISPOSAL - GOVERNMENT  
SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT  
OTHER NOT CLASSIFIED

## Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000079-34-5	1,1,2,2-TETRACHLOROETHANE		> 0 but < 10 tpy
000076-13-1	1,1,2-TRICHLORO-1,2,2-TRIFLUORO ETHANE		>= 2.5 tpy but < 10 tpy
000107-06-2	1,2-DICHLOROETHANE		> 0 but < 10 tpy
000108-38-3	1,3 DIMETHYL BENZENE		> 0 but < 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL		> 0 but < 10 tpy
000071-43-2	BENZENE		> 0 but < 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL)		> 0 but < 10 tpy
000106-46-7	BENZENE, 1,4-DICHLORO-		> 0 but < 10 tpy
000095-50-1	BENZENE,1,2-DICHLORO		>= 2.5 tpy but < 10 tpy
000095-47-6	BENZENE,1,2-DIMETHYL		> 0 but < 10 tpy
000541-73-1	BENZENE,1,3-DICHLORO		>= 2.5 tpy but < 10 tpy
000075-27-4	BROMODICHLOROMETHANE		>= 2.5 tpy but < 10 tpy
000075-25-2	BROMOFORM		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE	450000	
000056-23-5	CARBON TETRACHLORIDE		> 0 but < 10 tpy
000108-90-7	CHLOROBENZENE		> 0 but < 10 tpy
000124-48-1	CHLORODIBROMOMETHANE		>= 2.5 tpy but < 10 tpy
000067-66-3	CHLOROFORM		> 0 but < 10 tpy
000075-71-8	DICHLORODIFLUOROMETHANE		>= 2.5 tpy but < 10 tpy
000075-09-2	DICHLOROMETHANE		> 0 but < 10 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO		> 0 but < 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO		> 0 but < 10 tpy
000075-00-3	ETHANE, CHLORO		> 0 but < 10 tpy
000156-60-5	ETHENE, 1,2-DICHLORO		>= 2.5 tpy but < 10 tpy



## Permit Review Report

Permit ID: 2-6102-00005/00017

Renewal Number: 1

02/06/2009

000156-59-2	ETHENE, 1,2-DICHLORO-	>= 2.5 tpy but < 10 tpy
000075-35-4	ETHENE, 1,1-DICHLORO	> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE	> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE	> 0 but < 10 tpy
0NY100-00-0	HAP	>= 50 tpy but < 100 tpy
007439-92-1	LEAD	> 0 but < 10 tpy
000075-69-4	METHANE, TRICHLOROFLUORO-	>= 2.5 tpy but < 10 tpy
000074-83-9	METHYL BROMIDE	> 0 but < 10 tpy
000074-87-3	METHYL CHLORIDE	> 0 but < 10 tpy
000091-20-3	NAPHTHALENE	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	450000
0NY075-00-0	PARTICULATES	>= 10 tpy but < 25 tpy
000127-18-4	PERCHLOROETHYLENE	> 0 but < 10 tpy
0NY075-00-5	PM-10	>= 10 tpy but < 25 tpy
000078-87-5	PROPANE, 1,2-DICHLORO	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 25 tpy but < 40 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
000079-01-6	TRICHLOROETHYLENE	> 0 but < 10 tpy
000075-01-4	VINYL CHLORIDE	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 50 tpy but < 100 tpy
000106-42-3	XYLENE, PARA-	> 0 but < 10 tpy

### 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 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 - 6 NYCRR 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)**  
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 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 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



## Permit Review Report

Permit ID: 2-6102-00005/00017

Renewal Number: 1

02/06/2009

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		45	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-A.21	25, 26	Prevention of Significant Deterioration
FACILITY	40CFR 63-VVV.1586	31	Non-Industrial POTW Treatment Plant Requirements
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	
FACILITY	6NYCRR 201-1.4	46	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 32, 33	Title V Permits and the Associated Permit Conditions
1-COMBU	6NYCRR 201-6	34	Title V Permits and the Associated Permit Conditions
1-COMBU	6NYCRR 201-6.5	35	Standard Permit Requirements
FACILITY	6NYCRR 201-6.5(a)(4)	15	
FACILITY	6NYCRR 201-6.5(a)(7)	2	
FACILITY	6NYCRR 201-6.5(a)(8)	16	
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)	17	
FACILITY	6NYCRR 201-6.5(e)	6	
FACILITY	6NYCRR 201-6.5(f)(6)	18	
FACILITY	6NYCRR 201-7	24, 25, 26	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	19	
FACILITY	6NYCRR 202-1.2	27	
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping



FACILITY	6NYCRR 211.2	47	requirements. General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
1-COMBU/-/FLA	6NYCRR 212	40	General Process Emission Sources
1-COMBU/FLAR1/FLA/WDGB1	6NYCRR 212.6(a)	42	General Process Emission Sources - opacity of emissions limited
1-COMBU/FLAR2/FLA/WDGB2	6NYCRR 212.6(a)	43	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215	9	
FACILITY	6NYCRR 225-1.2(a)(2)	28	Sulfur in Fuel Limitations Post 12/31/87.
FACILITY	6NYCRR 225-1.8	29	Reports, sampling and analysis.
FACILITY	6NYCRR 227.2(b)(1)	30	
1-COMBU	6NYCRR 227-1.3	36	Smoke Emission Limitations.
1-COMBU	6NYCRR 227-1.3(a)	41	Smoke Emission Limitations.
M-TURB1	6NYCRR 227-2.4(g)	44	Emission limitations for other combustion sources.
1-COMBU	6NYCRR 227-2.5(c)	37	Alterative emission limits
1-COMBU/-/DIE	6NYCRR 227-2.5(c)	38	Alterative emission limits
1-COMBU/-/DUA	6NYCRR 227-2.5(c)	39	Alterative emission limits

### 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)

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 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 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, NYC-DEP OWLS HEAD WPCP has been determined to be subject to the following regulations:

40CFR 52-A.21

This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions; ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i) .



40CFR 63-VVV.1586

This regulation imposes no control requirements for existing non-industrial POTW treatment plants.

6NYCRR 201-6.5

This section of the Title V permitting requirements details the following information: general conditions; permit conditions for monitoring, recordkeeping and reporting of compliance monitoring; compliance certification; operational flexibility; permit shield; term of permits; and reopening for cause.

6NYCRR 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

6NYCRR 202-1.2

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

6NYCRR 212

This condition requires facility to record the digester gas produced and burned at the facility.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 225-1.2 (a) (2)

This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.8

This regulation requires an owner or operator of a facility which purchases and fires coal and/or oil to submit reports to the commissioner containing fuel analysis data, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1.

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

This regulation requires a limitation and compliance monitoring for opacity from a 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 227-2.4 (g)

This subdivision is meant to require RACT on a significant combustion source which has no RACT provisions.

6NYCRR 227-2.5 (c)

For sources for which the owner or operator demonstrates that the applicable presumptive RACT emission limit in



section 227-2.4 of this Subpart is not economically or technically feasible, the owner or operator can request the department to set a higher source specific emission limit. Economic or technical feasibility must include, but is not limited to, the evaluation of fuel switching, selective catalytic reduction or system averaging as compliance options. This alternative RACT emission limit must be approved by the department and by the administrator as a revision to the State Implementation Plan.

### Compliance Certification

Summary of monitoring activities at NYC-DEP OWLS HEAD WPCP:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
1-COMBU	34	record keeping/maintenance procedures
1-COMBU	35	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
1-COMBU/-/FLA	40	record keeping/maintenance procedures
1-COMBU/FLAR1/FLA/WDGB1	42	monitoring of process or control device parameters as surrogate
1-COMBU/FLAR2/FLA/WDGB2	43	monitoring of process or control device parameters as surrogate
FACILITY	28	work practice involving specific operations
FACILITY	29	record keeping/maintenance procedures
FACILITY	30	intermittent emission testing
1-COMBU	36	record keeping/maintenance procedures
1-COMBU	41	monitoring of process or control device parameters as surrogate
M-TURB1	44	record keeping/maintenance procedures
1-COMBU	37	record keeping/maintenance procedures
1-COMBU/-/DIE	38	intermittent emission testing
1-COMBU/-/DUA	39	intermittent emission testing

### Basis for Monitoring

NYCRR Part 201-6.5 (c)(3)(ii): This condition serves several purposes:

- to clarify that all reports required by federally enforceable monitoring conditions are to be submitted at least every 6 months on a calendar year basis in order to comply with Title V requirements. The reporting requirement supercedes any of the reporting requirement that may be listed for an individual permit monitoring condition which may have incorrectly listed a reporting period exceeding 6 months. Any monitoring conditions that may have more frequent reporting requirements will remain in effect as displayed in the condition. This condition corrects a deficiency noted by the USEPA for previously issued Title V permits;
- to clearly specify both the obligation and procedures the facility must meet and follow in reporting permit deviations or exceedances;
- to clearly state that no violations of federal rules may be excused during start-up, shutdown, malfunctions or upsets unless allowed by the specific requirement.



NYCRR 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.

NYCRR Part 201-7. These capping conditions for NO<sub>x</sub> and CO are added to the permit in response to DEP's request to make this facility a minor source for PSD purposes. DEP proposed to cap their facility wide NO<sub>x</sub> and CO emissions at 225 tpy each. Permit emission limits and AP 42 emission factors are used to calculate emissions.

Part 225-1.2(a)(2)): This condition limits the sulfur content of distillate oil used at the facility to 0.20 percent by weight. The condition requires facility to maintain a log of the sulfur content of oil on a per delivery basis.

Part 225-1.8: This condition requires an owner or operator of a facility which purchases and fires coal and/or oil to submit reports to the commissioner containing fuel analysis data, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225- 1.

NYCRR 227-1.3(a): Conditions require the facility to comply with the specified opacity limits and requires facility to monitor the stacks for visible emissions on a daily basis when oil is being burned in the engines. If no plume is observed from a stack, it can be assumed that the opacity limit is being met. However, if a plume is observed, it is possible that the opacity limit is being exceeded. If a visible plume is observed two consecutive days of firing oil, then the facility must conduct a Method 9 analysis to measure the opacity. While Part 227 provides that Method 9 analyses are acceptable methods for determining compliance with the opacity standards for the combustion units, the circumstances under which Method 9 analyses are required are not defined. The Department has developed a standard method that results in a consistent approach to determining compliance with the opacity requirements of Part 227 as well as other rules which contain an opacity limit. The approach requires that the facility owner look for the presence of visible emissions once per day. If visible emissions are detected two days in a row, a Method 9 observation must be done.

NYCRR Part 227-2.5(c): The three lean burn dual fuel engines are subject to the requirements of Part 227-2.4(f) Facility submitted a NO<sub>x</sub> RACT compliance plan dated June 29, 2004 for their engines and demonstrated that the presumptive NO<sub>x</sub> emission limit of 2.3 grams/bhp-hr is not feasible since there is no commercially-proven NO<sub>x</sub> technology for IC engines burning digester gas. The Facility requested higher alternative NO<sub>x</sub> emission limits for their engines. The proposed permit limits are 6.05 grams/bhp-hr when burning 100% diesel oil and 3.16 grams/bhp-hr on dual fuel (with 10% tolerance to the stack test results). The request has been granted. NYCDEP must continue to investigate NO<sub>x</sub> control technologies, and must provide the Department reports on the progress of the investigations and may conduct pilot testing with Department's approval.

NYCRR Part 227.2(b)(1): Conditions establish a particulate limit of 0.10 lbs/MMBtu for all combustion units burning oil. Compliance is demonstrated via a periodic stack test as required under the regulation. The regulation is from the 1972 version of Part 227 which still remains as part of New York's SIP.

New York State Department of Environmental Conservation



Permit ID: 2-6102-00005/00017

Permit Review Report  
Renewal Number: 1

02/06/2009