New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6201-00045/00001
Renewal Number: 2
07/29/2011

Facility Identification Data
Name: RACHEL BRIDGE CORP
Address: 1365 ST NICHOLAS AVE
NEW YORK, NY 10033

Owner/Firm
Name: RACHEL BRIDGE CORP
Address: 1365 ST NICHOLAS AVE
NEW YORK, NY 10033-6202, USA
Owner Classification: Corporation/Partnership

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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.

Rachel Bridge Corporation is renewing their existing Title V Permit, which has been issued for boiler

operations that supply heat and hot water to four apartment buildingd. The six boilers burn #6 fuel oil and discharge through a common stack. Rachel Bridge Corporation has previously capped out of the requirements of Part 231-2 by limiting fuel use to boiler #6 (Emission Source ES006 - 14.1 MM Btu/hr ROCKMILLS/ Model MP 350SS) to 644,000 gallons per twelve consecutive months.

Attainment Status
RACHEL BRIDGE CORP is located in the town of MANHATTAN in the county of NEW YORK.
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)	MODERATE NON-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:
Rachel Bridge Corporation, located at 1365 St. Nicholas Avenue, is an apartment complex consisting of four buildings and two-hundred and forty apartments. The facility provides heat and hot water to a residential apartment complex, consisting of four apartment buildings and each apartment building has two-hundred and forty units for a total of 960 units, using six boilers that discharge through one common stack. In addition to the residential complex, several commercial and professional offices are supplied from these boilers.

Rachel Bridge Corp. operates six boilers (Emission Unit U-0001) which supply steam for the space heating of the buildings. The steam is produced by five Federal boilers (Emission Sources ES001, ES002, ES003, ES004 & ES005), and one Rockmills boiler (Emission Source ES006). All six boilers operate only on # 6 fuel oil (Process P01). The five Federal boilers have a heat input of 12.6 MM BTU/hr each, and the Rockmills boiler has a heat input of 14.1 MM BTU/hr. Emissions from the six boilers are exhausted through one common stack, which is identified as Emission Point C0001. Rachel Bridge Corporation has previously capped out of the requirements of Part 231-2 by limiting fuel use to boiler #6 (Emission Source ES006 - 14.1 MM Btu/hr ROCKMILLS/ Model MP 350SS) to 818,181 gallons per twelve consecutive months.

The facility operates other sources which are considered exempt from permitting in accordance with 6NYCRR 201-3.2(c), including two underground # 6 fuel oil storage tanks (capacities of <300,000 bbls each).

Permit Structure and Description of Operations

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.

RACHEL BRIDGE CORP is defined by the following emission unit(s):

Emission unit U00001 - Emission Unit U-00001 consists of six steam boilers that operate on # 6 fuel oil (Process P01). The emissions from all six boilers (Emission Sources ES001, ES002, ES003, ES004, ES005 & ES006) exit through a common stack, identified as Emission Point C0001.

Emission unit U00001 is associated with the following emission points (EP):
C0001
Process: P01 is located at BASEMENT, Building 1365 ST. N - Process P01 is the firing of # 6 fuel oil in the six steam boilers (Emission Sources ES001, ES002, ES003, ES004, ES005 & ES006) in Emission Unit U-00001. The emissions from all six boilers exit through a common stack identified as Emission Point C0001.

Title V/Major Source Status
RACHEL BRIDGE CORP is subject to Title V requirements. This determination is based on the following information:
Rachel Bridge Corp. is a major facility because the potential emissions of nitrogen oxides is greater than the major source thresholds, which is 25 tons per year for nitrogen oxides.

Program Applicability
The following chart summarizes the applicability of RACHEL BRIDGE CORP 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)	NO
NSPS	YES
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
6513	APARTMENT BUILDING OPERATORS
6514	DWELLING OPERATORS, EXC. APART

SCC Codes
SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents
a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-004-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL 10-100MMBTU/HR **

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
007440-36-0	ANTIMONY	24	
007440-38-2	ARSENIC	6	
000071-43-2	BENZENE	1	
000095-47-6	BENZENE,1,2-DIMETHYL	0.5	
007440-41-7	BERYLLIUM	0.1	
007440-43-9	CADMIUM	1.8	
000630-08-0	CARBON MONOXIDE	22487	
007440-47-3	CHROMIUM	4.9	
007440-48-4	COBALT	27.1	
000100-41-4	ETHYLBENZENE	0.29	
000050-00-0	FORMALDEHYDE	148.4	
0NY100-00-0	HAP	651	
007439-92-1	LEAD	6.8	
007439-96-5	MANGANESE	13.5	
007439-97-6	MERCURY	0.5	
000091-20-3	NAPHTHALENE	5.1	
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	380	
0NY210-00-0	OXIDES OF NITROGEN	320940	
0NY075-00-0	PARTICULATES	44974	
0NY075-00-5	PM-10	22766	
007782-49-2	SELENIUM	3.1	
007446-09-5	SULFUR DIOXIDE	211826	
000108-88-3	TOLUENE	27.9	
0NY998-00-0	VOC	1259	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 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 - 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 201-6.3(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 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 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 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	44	Powers and Duties of the Department with respect to air pollution control
U-00001/C0001/P01/ES006	40CFR 60-A.14	37	General provisions - Modification
U-00001/C0001/P01/ES006	40CFR 60-A.15	38	General provisions - Reconstruction
U-00001/C0001/P01/ES006	40CFR 60-A.4	34	General provisions - Address
U-00001/C0001/P01/ES006	40CFR 60-A.7(b)	35	Notification and Recordkeeping
U-00001/C0001/P01/ES006	40CFR 60-A.9	36	General provisions - Availability of information
U-00001/C0001/P01/ES006	40CFR 60-Dc.42c(h)	39	Exemption from Averaging Requirements
U-00001/C0001/P01/ES006	40CFR 60-Dc.46c(e)	40	Exemption from Emission Monitoring for Sulfur Dioxide.
U-00001/C0001/P01/ES006	40CFR 60-Dc.48c(f)(2)	41	Reporting and Recordkeeping Requirements (residual oil).
U-00001/C0001/P01/ES006	40CFR 60-Dc.48c(g)	42	Reporting and Recordkeeping Requirements.
U-00001/C0001/P01/ES006	40CFR 60-Dc.48c(i)	43	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	45	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the

			air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 28, 29	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	15	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2	General conditions Fees
FACILITY	6NYCRR 201-6.5(a)(8)	16	General conditions
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	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)(6)	18	Off Permit Changes
FACILITY	6NYCRR 201-7	23	Federally Enforceable Emissions Caps
U-00001/C0001/P01/ES006	6NYCRR 201-7	33	Federally Enforceable Emissions Caps
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 211.2	46	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225.1(a)(3)	27	Sulfur in Fuel Limitations (SIP)
FACILITY	6NYCRR 225-1.2(a)(2)	24	Sulfur in Fuel Limitations Post 12/31/87.
FACILITY	6NYCRR 225-1.2(d)	25	Sulfur-in-fuel limitations - Table 2
FACILITY	6NYCRR 225-1.8(a)	26	Reports, sampling and analysis.
U-00001/-/P01	6NYCRR 227.2(b)(1)	30	Particulate emissions.
U-00001/C0001/P01	6NYCRR 227-1.3	31	Smoke Emission Limitations.
U-00001/C0001/P01	6NYCRR 227-1.3(a)	32	Smoke Emission Limitations.
U-00001/C0001/P01/ES001	6NYCRR 227-2.4(d)	47	Small boilers, small combustion turbines, and small stationary internal combustion engines.

U-00001/C0001/P01/ES006	6NYCRR 231-2	33	New Source Review in Nonattainment Areas and Ozone Transport Region

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 201-6.5 (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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2
This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68
This Part lists the regulated substances and 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, RACHEL BRIDGE CORP has been determined to be subject to the following regulations:
40 CFR 60.14
This regulation defines the term modification and what is and is not considered to be a modification, for

the purpose of rule applicability.

40 CFR 60.15
This regulation defines the term reconstruction and what is and is not considered to be a reconstruction project, for the purpose of rule applicability.

40 CFR 60.4
This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40 CFR 60.42c (h)
This regulation requires that compliance with emission limits and/or fuel oil sulfur limitations be based on a certification from the fuel supplier as stated in paragraph 40 CFR 60-Dc.48c(f)(1), (2), or (3) as applicable

40 CFR 60.46c (e)
This regulation allows facilities subject to paragraphs 40 CFR 60-Dc.42c(h)(1), (2), or (3) who show compliance through vendor certification, to be exempt from the monitoring requirements of section 40 CFR 60-Dc.46c

40 CFR 60.48c (f) (2)
This condition sets forth the requirements to be met by the fuel supplier. These requirements apply to both distillate and residual oil.

40 CFR 60.48c (g)
The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

40 CFR 60.48c (i)
This regulation requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

40 CFR 60.7 (b)
This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40 CFR 60.9
This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

6 NYCRR 225.1 (a) (3)
This regulation limits the amount of sulfur that can be in fuel burned at a stationary source. It references Table 1 of the 1979 version of the sulfur in fuel limitations expressed in terms of percent by weight for fuel oil and pounds per million Btu gross heat content for solid fuel. **NOTE: This citation has been replaced by requirements cited under 225-1.2(a)(2) and is no longer part of current State regulations, however, it remains part of New York State's approved State Implementation Plan (SIP).**

6 NYCRR 225-1.2 (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.

6 NYCRR 225-1.2 (d)
The sulfur-in-fuel limitations for residual and distillate oil and for solid fuel are listed in Tables 1,2 and 3 or 6 NYCRR Part 225-1.2(c), (d) and (e)

6 NYCRR 225-1.8 (a)
Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, 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. All records shall be available for a minimum of three years

6 NYCRR 227.2 (b) (1)
This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6 NYCRR 227-1.3
This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6 NYCRR 227-1.3 (a)
This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 227-2.4 (d)
NOx RACT requirements for small boilers, small combustion turbines, and small stationary internal combustion engines.

6 NYCRR Subpart 201-7
This regulation sets forth an emission cap that cannot be exceeded by the facility. Rachel Bridge Corporation has previously capped out of the requirements of Part 231-2 by limiting fuel use to boiler #6 (Emission Source ES006 - 14.1 MM Btu/hr ROCKMILLS/ Model MP 350SS) to 644,000 gallons per twelve consecutive months.

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

Compliance Certification
Summary of monitoring activities at RACHEL BRIDGE CORP:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-00001/C0001/P01/ES006	41	record keeping/maintenance procedures
U-00001/C0001/P01/ES006	42	record keeping/maintenance procedures
U-00001/C0001/P01/ES006	43	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
U-00001/C0001/P01/ES006	33	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
FACILITY	27	work practice involving specific operations
FACILITY	24	work practice involving specific operations
FACILITY	25	work practice involving specific operations
FACILITY	26	record keeping/maintenance procedures
U-00001/-/P01	30	intermittent emission testing
U-00001/C0001/P01	31	record keeping/maintenance procedures
U-00001/C0001/P01	32	monitoring of process or control device parameters as surrogate
U-00001/C0001/P01/ES001	47	record keeping/maintenance procedures

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

Condition # 5 for 6 NYCRR 201-6.5(c)(3)(ii): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition 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.

Condition # 6 for 6 NYCRR 201-6.5(e): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition specifies the overall permit requirements for compliance certification, including emission limitations, standards or work practices.

Condition # 7 for 6 NYCRR 202-2.1: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition sets forth the applicability criteria for submitting an annual statement of emissions. The criteria is based on annual emission threshold quantities and ozone attainment designation. This condition is a requirements for all Title V facilities. These facilities must submit an annual emission statement by April 15th of each year for emissions of the previous calendar year.

Condition # 24 for 6 NYCRR 225-1.2(a)(2): This is a facility-wide condition. This condition is for Work Practice Involving Specific Operations for sulfur content in fuel oil. This condition 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.

This condition prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations of 0.30 % by weight for residual fuel (# 6 fuel oil). The sulfur content must be determined by the seller. The facility must maintain a log of the sulfur content of oils on a per delivery basis.

Condition # 26 for 6 NYCRR 225-1.8 (a): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition requires upon request any owner or operator of a facility which purchases and fires coal 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. All records shall be available for a minimum of three years.

Condition # 27 for 6 NYCRR 225.1(a)(3): This is a facility-wide condition. This condition is for Work Practice Involving Specific Operations. This condition limits the amount of sulfur that can be in fuel burned at a stationary source. It references Table 1 of the 1979 version of the sulfur in fuel limitations expressed in terms of percent by weight for fuel oil and pounds per million Btu gross heat content for solid fuel. This condition prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations of 0.30 % by weight for residual fuel (# 6 fuel oil). The sulfur content must be determined by the seller. The facility must maintain a log of the sulfur content of oils on a per delivery basis. This citation has been replaced by requirements cited under 225-1.2(a)(2) and is no longer part of current State regulations, however, it remains part of New York State's approved State Implementation Plan (SIP).

Condition # 30 for 6 NYCRR 227.2(b)(1): This condition is an emission unit level and emission point level Intermittent Emission Testing condition for Particulates that applies to EU: U-00001 and EP: C0001. This condition is from the 1972 version of Part 227 and still remains as part of New York's SIP. This condition establishes a particulate limit of 0.10 pounds per million Btus based on a 2 hour average emission for any oil fired stationary combustion installation.

Condition # 31 for 6 NYCRR 227-1.3: This condition is an emission unit level and emission point level condition for Record Keeping/Maintenance Procedures for Particulates for opacity that applies

to EU: U-00001 and EP: C0001. This condition requires a limitation and compliance monitoring for opacity from a stationary combustion installation. This condition requires the facility to conduct Method 9 once per calendar year on the emissions from the combustion sources in order to show compliance with the 20% opacity limit.

Condition # 32 for 6 NYCRR 227-1.3(a): This condition is an emission unit level, emission point level and process level condition for Monitoring of Process or Control Device Parameters as Surrogate for Particulates and opacity that applies to EU: U-00001, EP: C0001 and Proc: P01. This condition prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20 % opacity except for one six-minute period per hour of not more than 27 % opacity. These conditions require a daily inspection for visible emissions. If visible emissions are noted for two consecutive days, a Method 9 test must be performed.

Condition # 33 for 6 NYCRR 201-7, Capping out of 6 NYCRR 231-2: This condition is an emission unit level, emission point level, process level and emission source level condition for Work Practice Involving Specific Operations for # 6 fuel oil that applies to EU: U-00001, EP: C001, Proc: P01, and ES: ES006.

To avoid the requirements of Part 231-2, number 6 fuel oil usage for Emission Source ES006 shall not exceed 818,181 gallons for any twelve consecutive months, which is equivalent to 22.5 tons for any twelve consecutive months.

The PTE for the NOx for the five Federal boilers (Emission Sources ES001, ES002, ES003, ES004 & ES005) calculates out to be 275,940 lbs/yr. And the PTE for the NOx for the facility is the sum of the PTE for the five Federal boilers and the 45,000 lbs/yr cap on the Rockmills boiler (Emission Source ES006), as follows:

PTE facility) = PTE (5 Federal boilers) + PTE cap on the Rockmills boiler =

PTE (facility) = 275,940 lbs/yr + 45,000 lbs/yr = 320,940 lbs/yr of NOx, which is equivalent to 160 tons/yr

Condition # 41 for 40 CFR60.48c(f)(2), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/Maintenence Procedures for # 6 fuel oil that applies to EU: U-00001, EP: C001, Proc: P01, and ES: ES006.

This condition sets forth the requirements to be met by the fuel supplier. These requirements apply to both distillate and residual oil.

Condition # 42 for 40 CFR60.48c(g), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/Maintenence Procedures for # 6 fuel oil that applies to EU: U-00001, EP: C001, Proc: P01, and ES: ES006.

The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

Condition # 43 for 40 CFR60.48c(i), NSPS Subpart Dc: This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/Maintenence Procedures for # 6 fuel oil that applies to EU: U-00001, EP: C001, Proc: P01, and ES: ES006.

This condition requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

Condition # 47 for 6 NYCRR 227-2.4(d): This condition is an emission unit level condition for Record Keeping/Maintenance Procedures for Oxides of Nitrogen that applies to EU: U-00001. This condition is for the NOx RACT condition for small boilers (between 10 and 50 MM Btu/hr that is operating on residual oil in the severe ozone non-attainment area) and applies to the six small boilers in Emission Unit U-00001 that are identified as Emission Sources ES001, ES002, ES003, ES004, ES005 & ES006. Emission Sources ES001, ES002, ES003, ES004 & ES005 are the 12.6 MM Btu/hr each Federal boilers and Emission Source ES006 is the 14.1 MM Btu/hr Rockmills boiler. A boiler tune-up shall be performed annually to the six small boilers in Emission Unit U-00001. All six boilers operate on # 6 fuel oil only (Process P01). The owner or operator of a small boiler must perform an annual tune-up of their equipment. This tune-up should be performed in accordance with the requirements of the DAR-5 guidance document. Records of each tune-up must be kept on-site for a minimum of five years.

This condition specifies that the reasonably available control technology (RACT) requirement for small boilers (< or = 50 million BTUs/hr) at Title V facilities consists of an annual tune-up. The owner or operator of a small boiler (between 20 and 50 mm Btu/hr) shall maintain a log (in the format acceptable to the Department as in Air Guide 5).

Annual tune-up maintenance usually includes not only some aspects of daily, weekly, and monthly scheduled maintenance, but also focuses on tests, evaluations and adjustments necessary for efficient combustion. Annual tune-up maintenance requirements must include a tune-up checklist (see Appendix A of Air Guide 5) and written procedures.