

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3336-00022/00055 Renewal Number: 1



02/07/2007

Facility Identification Data

Name: US ARMY GARRISON
Address: WEST POINT
WEST POINT, NY 10996

Owner/Firm

Name: U S DEPT OF THE ARMY
Address: THE PENTAGON
WASHINGTON, DC 20310, USA
Owner Classification: Federal

Permit Contacts

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667A RUGER RD
WEST POINT, NY 10996

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

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Application for renewal of Air Title V Facility permit.

Attainment Status

US ARMY GARRISON is located in the town of HIGHLANDS in the county of ORANGE. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

This facility is an educational institution and an active Army installation. The mission of the United States Military Academy is to educate and train the Corps of Cadets so that each graduate shall have the attributes essential for professional growth throughout a career as an officer of the Regular Army and to inspire each to a lifetime of service to the nation.

Permit Structure and Description of Operations

The Title V permit for US ARMY GARRISON 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

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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.

US ARMY GARRISON is defined by the following emission unit(s):

Emission unit U1202G - THIS EMISSION UNIT CONSISTS OF A GASOLINE DISPENSING STATION AND THREE 12,000 GALLON GASOLINE UNDERGROUND STORAGE TANKS WITH STAGE 1, SUBMERGED LOADING USING A DEDICATED VAPOR BALANCE SYSTEM, AND STAGE II VAPOR CONTROL ON THE DISPENSING PUMPS AT THE ARMY AIR FORCE EXCHANGE SERVICE STATION LOCATED AT BLDG 1202.

Emission unit U1202G is associated with the following emission points (EP):
STK13

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

Process: 016 is located at ARMY/AIR FORCE EXCHA, Building 1202 - THE FILLING OF AND STORAGE OF GASOLINE IN THREE UNDERGROUND STORAGE TANKS AND THE FUELING OF MOTOR VEHICLES FROM THE DISPENSING PUMPS.

Emission unit U1227G - ONE GASOLINE DISPENSING PUMP AND ONE 300 GALLON GASOLINE ABOVEGROUND STORAGE TANK USED TO REFUEL GOLF COURSE MAINTENANCE EQUIPMENT.

Emission unit U1227G is associated with the following emission points (EP):
STK17

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

Process: 028 is located at GOLF MAINTENANCE BLD, Building 1227 - FILLING AND STORING GASOLINE IN A 300 GALLON ABOVEGROUND STORAGE TANK AND THE FUELING OF GOLF EQUIPMENT FROM THE DISPENSING PUMPS.

Emission unit U1720G - ONE GASOLINE DISPENSING PUMP AND ONE 3,000 GALLON ABOVE GROUND STORAGE TANK EQUIPPED WITH STAGE I, SUBMERGED LOADED USING A DEDICATED VAPOR BALANCE SYSTEM AND STAGE II VAPOR CONTROL SYSTEM. THIS TANK DISPENSES GASOLINE DURING THE SUMMER TRAINING ACTIVITIES AT CAMP NATURAL BRIDGE MAINTENANCE FACILITY BLDG. 1720. THIS IS A SEASONALLY OPERATED GAS STATION. THE FUEL IS TRANSPORTED BY VAC TRUCK FROM THE MOTORPOOL UST'S TO THIS TANK OR BY DIRECT DELIVERY FROM THE SUPPLIER. THIS IS A SIMPLE AST WITH ALL PIPING CONNECTIONS (VENT, FILL) AT THE

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Emission unit U1720G is associated with the following emission points (EP):
STK16

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

Process: 024 is located at CAMP NATURAL BRIDGE, Building 1720 - THE LOADING OF AND STORAGE OF GASOLINE IN ONE 3,000 GALLON ABOVEGROUND STORAGE TANK AND THE FUELING OF MOTOR VEHICLES FROM THE DISPENSING PUMPS.

Emission unit U604BL - THIS EMISSION UNIT CONSISTS OF 3 BOILERS LOCATED IN THE CENTRAL POWER PLANT. THE CENTRAL POWER PLANT GENERATES STEAM TO PROVIDE HEAT TO A NUMBER OF BUILDINGS LOCATED IN THE CENTRAL POST AREA OF WEST POINT AND ALSO TO PROVIDE ELECTRIC POWER AS NECESSARY FOR USE IN INDOOR AND OUTDOOR AREAS THROUGHOUT THE POST. THE BOILERS AT THIS LOCATION DISCHARGE THROUGH A SINGLE COMBINED STACK. BOILER #1 WAS REPLACED AND BECAME OPERATIONAL IN JANUARY 2003. BOILER #2 WAS REPLACED AND BECAME OPERATIONAL IN JANUARY 2005. BOTH OF THESE BOILERS HAVE A MAXIMUM RATED HEAT INPUT OF 155.6 MMBTU/HR. THE TWO BOILERS ARE EQUIPPED WITH LOW NOX BURNERS. BOILER #3 IS A DUAL-FIRED UNIT EQUIPPED WITH A LOW NOX BURNER THAT BURNS EITHER NO. 2 FUEL OIL (RATED HEAT INPUT CAPACITY OF 97.13 MMBTU/HR) OR NATURAL GAS (RATED HEAT INPUT CAPACITY OF 92.13 MMBTU/HR).

Emission unit U604BL is associated with the following emission points (EP):
STK02

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

Process: 003 is located at 1ST FLOOR, Building 604 - NATURAL GAS COMBUSTION ASSOCIATED WITH THE OPERATION OF BOILERS #1, #2, AND #3 AT THE CENTRAL POWER PLANT.

Process: 006 is located at 1ST FLOOR, Building 604 - COMBUSTION OF NO.2 FUEL OIL ASSOCIATED WITH BOILERS #1, #2, AND #3 AT THE CENTRAL POWER PLANT. NO. 2 FUEL OIL IS USED ONLY AS A BACKUP IF NATURAL GAS IS UNAVAILABLE.

Emission unit U604GN - THIS EMISSION UNIT IS A PEAK SHAVING GENERATOR . THIS GENERATOR WILL PROVIDE EMERGENCY POWER FOR THE CENTRAL POWER PLANT, BLDG. 604, AND THE HEADQUARTERS, BLDG 600, DURING A DISRUPTION IN ELECTRIC UTILITY SERVICE. THIS UNIT WILL ALSO BE USED TO REDUCE UTILITY DEMAND (KW) CHARGES DURING PEAK KW DEMAND PERIODS. THERE IS A CAP ON THE ANNUAL HOURS OF OPERATION AT 1,636 HOURS PER YEAR OPERATING AT 100 PERCENT LOAD. THIS PEAK SHAVING GENERATOR IS LOCATED IN BLDG 604, THE CENTRAL POWER PLANT. THIS GENERATOR SET HAS ITS OWN EXHAUST STACK AND OPERATES APPROXIMATELY 250 DAYS PER YEAR FROM 4 TO 6 HOURS PER DAY FOR PEAK SHAVING. THE GENERATOR WILL BE USED DURING POWER DISRUPTION PERIODS FOR UP TO 400 ADDITIONAL HOURS PER YEAR. THIS GENERATOR IS A CATERPILLAR MODEL 3512B RATED AT 1230 KILOWATTS AND WILL BURN DIESEL FUEL ONLY. THE MANUFACTURER PERFORMANCE GUARANTEE FOR NOX IS 29.36 LBS/HR DURING OPERATION OF THE GENERATOR.

Emission unit U604GN is associated with the following emission points (EP):

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STK01

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

Process: 001 is located at OUTDOOR, Building 604 - COMBUSTION OF DIESEL FUEL DURING THE OPERATION OF THE PEAK SHAVING GENERATOR.

Emission unit U685SV - THIS EMISSION UNIT CONSISTS OF A NON-HAP SOLVENT PROCESS USED TO CLEAN BAND INSTRUMENT PARTS. THE PROCESS IS BATCH COLD CLEANING AND IS PERFORMED IN AN IMMERSION TANK. A NON-GASKETED LID IS USED TO REDUCE VOC EMISSIONS.

Emission unit U685SV is associated with the following emission points (EP):

STK12

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

Process: 014 is located at BASEMENT, Building 685 - AN IMMERSION TANK WITH A DIBASIC ESTER SOLVENT IS USED TO CLEAN BAND INSTRUMENT PARTS. A NON-GASKETED COVER IS USED AS A EMISSION REDUCTION METHOD.

Emission unit U700SC - FOUR SMALL BOILERS AND THREE EMERGENCY GENERATORS ARE GROUPED TOGETHER AS ONE EMISSION UNIT. THESE COMBUSTION SOURCES ARE SUBJECT TO 6NYCRR PART 231 NEW SOURCE REVIEW REQUIREMENTS, BECAUSE THEY WERE CONSTRUCTED DURING A CONTEMPORANEOUS PERIOD WITH THE PEAK SHAVING GENERATOR (WHICH HAS NOX EMISSIONS CAPPED AT 24.0 TONS PER YEAR). NOX EMISSIONS FROM THESE COMBUSTION SOURCES WILL BE LIMITED.

Emission unit U700SC is associated with the following emission points (EP):

700GN, 700PT, 701GN, 701PT, 727GN, CCSPT

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

Process: 037THE COMBUSTION OF NO. 2 FUEL OIL IN THE TWO BOILERS IN THE KIMSEY ATHLETIC CENTER AND IN THE BOILER IN THE CADET CREW & SAILING CENTER.

Process: 038THE COMBUSTION OF PROPANE IN THE PRESS BOX BOILER.

Process: 039THE COMBUSTION OF DIESEL FUEL IN THE EMERGENCY GENERATORS LOCATED IN KIMSEY ATHLETIC CENTER, THE ARVIN CADET PHYSICAL DEVELOPMENT CENTER, AND THE PRESS BOX.

Process: 040 is located at Building 806 - THE COMBUSTION OF NATURAL GAS IN THE BOILER IN THE CADET CREW & SAILING CENTER.

Emission unit U714BL - THIS EMISSION UNIT CONSISTS OF 2 IDENTICAL BOILERS EACH RATED AT 14.645 MMBTU/HR. THESE BOILERS ARE USED TO PROVIDE HEAT TO THE HOLLEDER CENTER, AN ATHLETIC FACILITY. BOTH BOILERS EXHAUST TO A COMMON STACK. NORMALLY, ONE BOILER IS ONLINE AND THE OTHER IS OPERATING IN STANDBY MODE.

Emission unit U714BL is associated with the following emission points (EP):

STK05

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

Process: 008 is located at 1ST FLOOR, ROOM 156, Building 714 - COMBUSTION OF NO. 2 FUEL OIL IN THE TWO HOLLEDER CENTER BOILERS.

Process: 042THE COMBUSTION OF NATURAL GAS IN THE TWO BOILERS AT THE HOLLEDER CENTER.

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Emission unit U719GS - TWO GASOLINE DISPENSING PUMPS AND TWO 10,000 GALLON GASOLINE UNDERGROUND STORAGE TANKS EQUIPPED WITH STAGE I SUBMERGED LOADING USING DEDICATED VAPOR BALANCE AND STAGE II VAPOR RECOVERY SYSTEMS AT THE PUMPS. THIS FACILITY DISPENSES GASOLINE TO MOTOR VEHICLES AT THE TRANSPORTATION MOTOR POOL, BLDG. 719.

Emission unit U719GS is associated with the following emission points (EP):
STK14, STK15

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

Process: 020 is located at TRANSP MOTOR POOL, Building 719 - THE FILLING OF AND STORAGE OF GASOLINE IN TWO 10,000 GALLON UNDERGROUND STORAGE TANKS AND THE FUELING OF MOTOR VEHICLES FROM THE DISPENSING PUMPS.

Emission unit U793PT - THIS EMISSION UNIT CONSISTS OF A LARGE, GARAGE-TYPE JBL, INC. SPRAY PAINT BOOTH THAT HAS TWO EXHAUST STACKS. THIS PAINT BOOTH IS USED TO PAINT FURNITURE, SECTIONS OF CARS, WHOLE CARS, ARMY TACTICAL VEHICLES, TRUCKS, AND BUSES. THIS EMISSION UNIT IS EQUIPPED WITH DUAL WATERFALL FILTERS.

Emission unit U793PT is associated with the following emission points (EP):
STK06, STK07

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

Process: 009 is located at MAIN, Building 793 - SPRAY PAINTING OF WOOD FURNITURE AND MOTOR VEHICLES IN THE SPRAY BOOTH AT THE MOTOR POOL.

Emission unit U845BL - THIS UNIT CONSISTS OF TWO DUAL-FIRED BOILERS. EACH WAS PREVIOUSLY RATED AT 55.85 MMBTU/HR WHEN BURNING FUEL OIL AND 58.1 MMBTU/HR WHEN BURNING NATURAL GAS. IN 2002 THE BOILERS WERE DE-RATED TO 48.4 MMBTU/HR. THE BOILERS ARE USED TO PROVIDE HEAT AND HOT WATER TO THE LAUNDRY FACILITY IN BLDG. 845. IN ADDITION, THE BOILERS SUPPLY STEAM TO THE FOLLOWING BLDGS: 719, 759, 781, 793, 845, 817, AND OTHER BUILDINGS NORTH IN THE NORTH SECTION OF THE POST. NATURAL GAS IS THE PRIMARY FUEL AND NUMBER 2 FUEL OIL IS THE BACKUP.

Emission unit U845BL is associated with the following emission points (EP):
STK03, STK04

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

Process: 004 is located at MAIN, Building 845 - NATURAL GAS COMBUSTION FROM THE OPERATION OF TWO COMMERCIAL BOILERS.

Process: 005 is located at MAIN, Building 845 - NO. 2 FUEL OIL COMBUSTION FROM THE OPERATION OF TWO COMMERCIAL BOILERS.

Emission unit U845P3 - FOUR MULTIMATIC HERCULES COMMERCIAL FOURTH GENERATION PERCHLOROETHYLENE DRY CLEANING MACHINES.

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

Process: 011 is located at MAIN FLOOR, Building 845 - THE USE OF PERCHLOROETHYLENE IN THE OPERATION OF FOUR FOURTH GENERATION DRYCLEANING MACHINES IN A STAND-ALONE FACILITY. THE DESIGN CAPACITY OF EACH MACHINE IS 150 POUNDS

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PER LOAD. PERCHLOROETHYLENE EMISSIONS FROM EACH MACHINE ARE CONTROLLELD BY A BUILT IN REFRIGERATED CONDENSER AND CARBON ADSORBER.

Emission unit U847SC - THIS EMISSION UNIT CONSISTS OF TWO EMERGENCY GENERATORS. NOX EMISSIONS FROM THE GENERATORS WILL BE LIMITED IN ORDER TO AVOID NEW SOURCE REVIEW REQUIREMENTS.

Emission unit U847SC is associated with the following emission points (EP):
2101G, 847GN

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

Process: 041THE COMBUSTION OF DIESEL FUEL IN THE EMERGENCY GENERATORS LOCATED AT THE SOUTH DOCK AND SPELLMAN HALL.

Title V/Major Source Status

US ARMY GARRISON is subject to Title V requirements. This determination is based on the following information:

Emissions of carbon monoxide, nitrogen oxides, sulfur dioxide, perchloroethylene, and volatile organic compounds from the facility are above major source thresholds, as defined by the Federal Clean Air Act.

Program Applicability

The following chart summarizes the applicability of US ARMY GARRISON with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	YES
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES

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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.

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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
8069	SPECIALTY HOSPITALS, EXCEPT PSYCHIATRIC
8211	ELEMENTARY AND SECONDARY SCHOOLS
8221	COLLEGES AND UNIVERSITIES, NEC
8299	SCHOOLS & EDUCATIONAL SERVICES
9711	NATIONAL SECURITY

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
1-03-005-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - DISTILLATE OIL 10-100MMBTU/HR **
1-03-005-01	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - DISTILLATE OIL Grades 1 and 2 Oil
1-03-010-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - LIQUEFIED PETROLEUM GAS (LPG)
1-03-006-02	Propane EXTERNAL COMBUSTION BOILERS -

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1-03-006-03	COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS 10-100 MMBtu/Hr EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL
1-01-006-02	COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS Less Than 10 MMBtu/Hr EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - NATURAL GAS Boilers < 100 MBtu/Hr except Tangential
1-02-004-04	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL Grade 5 Oil
2-03-001-02	INTERNAL COMBUSTION ENGINES - COMMERCIAL/INSTITUTIONAL COMMERCIAL/INSTITUTIONAL IC ENGINE - DISTILLATE OIL (DIESEL) Turbine
2-02-004-01	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION LARGE BORE ENGINE Diesel
4-01-002-95	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DEGREASING OTHER NOT CLASSIFIED - GENERAL DEGREASING UNITS
4-01-001-13	PETROLEUM AND SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DRY CLEANING DRY CLEANING - PERCHLOROETHYLENE
4-02-999-95	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS Specify in Comments Field
4-06-003-06	TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS GASOLINE RETAIL OPERATIONS - STAGE I Balanced Submerged Filling
4-06-003-01	TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS GASOLINE RETAIL OPERATIONS - STAGE I Splash Filling

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

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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
000630-08-0	CARBON MONOXIDE		>= 100 tpy but < 250 tpy
0NY100-00-0	HAP		>= 10 tpy but < 25 tpy
007439-92-1	LEAD (HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy
0NY075-00-0	PARTICULATES		>= 50 tpy but < 100 tpy
000127-18-4	PERCHLOROETHYLENE (HAP)	29009	
0NY075-00-5	PM-10		>= 25 tpy but < 40 tpy
007446-09-5	SULFUR DIOXIDE		>= 250 tpy
0NY998-00-0	VOC		>= 25 tpy but < 40 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.

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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 - 6NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would

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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

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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,

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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.

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Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	78
U-604BL	40CFR 52-A.21	Prevention of Significant Deterioration	46
U-604BL	40CFR 60-Db.44b(a) (1)	Standard for Nitrogen Oxides Firing Natural Gas and Distillate Oil. (see narrative)	47
U-604BL	40CFR 60-Db.49b(h) (2)	Reporting and Recordkeeping Requirements.	48
U-604BL/-/006/00104	40CFR 60-Dc.46c(e)	Exemption from Emission Monitoring for Sulfur Dioxide.	51
U-604BL	40CFR 60-Dc.48c(d)	Reporting and Recordkeeping Requirements.	49
U-604BL	40CFR 60-Dc.48c(g)	Reporting and Recordkeeping Requirements.	50
U-845P3	40CFR 63-M.322(n)	National perchloroethylene air emission standards for dry cleaning facilities - standards.	75
FACILITY	40CFR 63-M.323(a)	National perchloroethylene air emission standards for dry cleaning facilities - test methods and monitoring.	35
U-845P3	40CFR 63-M.323(a)	National perchloroethylene air emission standards for dry cleaning facilities - test methods and monitoring.	76
FACILITY	40CFR 68	Chemical accident prevention provisions	20
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	21
FACILITY	40CFR 93-B	General Conformity	36
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	10
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	79
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	22
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	12

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FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	23, 37, 38
FACILITY	6NYCRR 201-6.5 (a) (4)	General conditions	14
FACILITY	6NYCRR 201-6.5 (a) (7)	General conditions	
Fees 2			
FACILITY	6NYCRR 201-6.5 (a) (8)	General conditions	15
FACILITY	6NYCRR 201-6.5 (c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5 (c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5 (d) (5)	Compliance schedules	16
FACILITY	6NYCRR 201-6.5 (e)	Compliance Certification	6
FACILITY	6NYCRR 201-6.5 (f) (6)	Off Permit Changes	17
FACILITY	6NYCRR 201-6.5 (g)	Permit shield	24
FACILITY	6NYCRR 201-7.1	Federally Enforceable Emissions Caps	39
U-604BL	6NYCRR 201-7.1	Federally Enforceable Emissions Caps	45, 46
U-604GN	6NYCRR 201-7.1	Federally Enforceable Emissions Caps	58
U-847SC	6NYCRR 201-7.1	Federally Enforceable Emissions Caps	77
FACILITY	6NYCRR 202-1.1	Required emissions tests.	18
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	80
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FACILITY	6NYCRR 215	Open Fires	9
FACILITY	6NYCRR 225-1.2 (a)	Sulfur in Fuel Limitations.	25
FACILITY	6NYCRR 225-3.3	Prohibitions and requirements - volatility	81
U-685SV	6NYCRR 226.2	General Requirments	59
U-685SV	6NYCRR 226.3 (a) (4)	Equipment specification-cold cleaning; 1.0 mm Hg vapor preasure	60
U-604BL/STK02/006	6NYCRR 227-1.2 (a) (1)	Particulate Emissions from Liquid Fuels.	55
FACILITY	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	26
U-604BL/STK02/003	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	53
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U-845BL	6NYCRR 227-2.4(d)	RACT for Oxides of Nitrogen - small boilers.	74
FACILITY	6NYCRR 227-2.5(b)	System-wide averaging option.	27
U-793PT	6NYCRR 228.10	Handling, storage and disposal of VOCs	72
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U-1720G	6NYCRR 230.2(g)	Daily visual inspections	43
U-719GS	6NYCRR 230.2(g)	Daily visual inspections	65
FACILITY	6NYCRR 230.2(j)	Maintenance of systems	31
U-1202G	6NYCRR 230.2(k)	Testing requirements	41
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U-719GS	6NYCRR 230.2(k)	Testing requirements	66
FACILITY	6NYCRR 230.5(a)	Gasoline Dispensing Sites - Recordkeeping and Reporting.	32
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FACILITY	6NYCRR 230.7(c)	Registration schedules	34
U-604BL	6NYCRR 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region	45
U-604GN	6NYCRR 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region	58
U-847SC	6NYCRR 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region	77
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U-845P3	6NYCRR 232.16	Compliance inspections.	92
FACILITY	6NYCRR 232.18	Posting notice.	82
U-845P3	6NYCRR 232.6 (a)	Requirements for co-located facilities.	84
U-845P3	6NYCRR 232.6 (b) (1)	Equipment standards and specifications -- new stand-alone facilities.	85
U-845P3	6NYCRR 232.7 (a)	Leak Inspection and self monitoring requirements.	86
U-845P3	6NYCRR 232.8	Operation and maintenance requirements.	87
U-845P3	6NYCRR 232.8 (d)	Operation and maintenance requirements -- conditions applicable to all dry cleaning facilities.	88, 89

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

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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.

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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)

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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 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

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 there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

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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, US ARMY GARRISON 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 (PSD) provisions. The facility has accepted limits on sulfur dioxide emissions from the Central Power Plant boilers to stay below PSD emission thresholds, and therefore is not subject to this regulation.

40CFR 60-Db.44b (a) (1)

NO_x emissions from boilers subject to this Subpart are limited to 0.2 pounds per million BTU. NO_x emissions shall be determined by utilizing a Predictive Emission Monitoring System (PEMS) to ensure compliance with this limit.

40CFR 60-Db.49b (h) (2)

This provision requires the facility to report NO_x emissions from boilers subject to this Subpart, if in excess of the 0.2 pound per million BTU limit.

40CFR 60-Dc.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

40CFR 60-Dc.48c (d)

This regulation requires the owner or operator of the facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c, to submit semi-annual reports to the EPA

40CFR 60-Dc.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.

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40CFR 63-M.322 (n)

This provision requires repairs to be made to dry cleaning systems, or parts to be ordered, if the parameters (temperature differences and perc concentrations) monitored do not meet regulatory limitations.

40CFR 63-M.323 (a)

For dry cleaning systems, the temperature difference between the vapor stream entering and exiting the refrigerated condenser must be calculated and must be at least 20 degrees Fahrenheit.

40CFR 93-B

This regulation pertains to determining conformity of federal actions to federal or state implementation plans.

6NYCRR 201-7.1

This regulation allows facilities to accept enforceable permit conditions which restrict emissions from emission units and sources, in order to avoid being subject to an applicable requirement that the facility would otherwise be subject to.

6NYCRR 225-1.2 (a)

This regulation sets the limits for sulfur in fuel being burned at stationary sources in New York State. The limit for sources located in Orange County is 1.50 percent by weight. The facility will comply with this regulation by restricting the sulfur content in any fuel oil delivered and used to 0.50 percent by weight.

6NYCRR 225-3.3

This regulation sets forth the RVP requirements for gasoline sold in the state during various parts of the year.

6NYCRR 226 .2

The facility must minimize VOC emissions from a solvent cleaning tank and keep a record of monthly solvent consumption.

6NYCRR 226 .3 (a) (4)

This provision establishes a limit on the vapor pressure of the solvent to 1.0 mm of mercury or less, at 20 degrees Celsius.

6NYCRR 227-1.2 (a) (1)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units of greater than 250 mmBtu/hr heat input capacity which fire coal, oil, or coal derived fuels.

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.

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6NYCRR 227-1.4 (a)

An owner of a stationary combustion installation, with a total heat input exceeding 250 million BTU per hour, must continuously monitor and record opacity, whenever any fuel other than gas is burned. The instrumentation used must be maintained in accordance with the performance specifications in 40 CFR 60, Appendix B.

6NYCRR 227-1.4 (b)

This regulation requires the specific contents of excess emissions reports for opacity from facilities that employ continuous opacity monitors (COMs).

6NYCRR 227-2.3 (a)

This section of 6NYCRR Part 227-2 requires a facility to submit a plan and specify how compliance with this regulation will be achieved. A permit condition citing this requirement was written for the two laundry plant boilers (Emission Unit U-845BL), because the boilers have been de-rated and measures are being taken to achieve compliance. Oil and natural gas flow to the boilers is limited and the heat input can not exceed 48.4 million BTU per hour for each boiler. This classifies the two laundry plant boilers as small boilers under Part 227-2.

6NYCRR 227-2.4 (c) (2)

This regulation requires mid-size boilers (fuel combustion units with a maximum heat input capacity greater than 50 million Btu per hour and equal to or less than 100 million Btu per hour that produce steam or heats water or any other heat transfer medium) to meet the following emission limits (listed in pounds NO_x per million Btu) by May 31, 1985:

for Gas fuel -	0.10
for Distillate Oil -	0.12
for Residual Oil -	0.30

Compliance with these emission limits are determined with a 1-hour average in accordance with section 227-2.6(a)(4). If CEMs are used to determine compliance, the requirements of 227-2.6(b) apply, including the use of a 24-hour averaging period.

6NYCRR 227-2.4 (d)

This rule 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.

6NYCRR 227-2.5 (b)

The system-wide average shall consist of a weighted average allowable emission rate based upon the weighted average of actual emissions from units that are operating. Excess reductions utilized in the system-wide average may only be counted from the lowest allowable emission rate. Simply put, if there is a more stringent emission limit than RACT already in place on the unit, then excess reductions may only be counted from below that emission rate.

6NYCRR 228 .10

This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6NYCRR 228 .3 (a)

This citation prohibits the use of coatings that exceed the maximum permitted pounds of volatile organic compounds per gallon, unless a coating system meeting certain requirements is used.

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6NYCRR 228 .3 (f) (2)

This citation specifies the application technique requirements for applying any automotive pretreatment primer, automotive primer-surfacer, automotive primer-sealer, automotive topcoat or automotive specialty coatings to mobile equipment or mobile equipment components that contain volatile organic compounds.

6NYCRR 228 .4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6NYCRR 228 .5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228 , to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

6NYCRR 230 .2 (d) (2)

This provision requires stage I and stage II vapor collection systems at gasoline dispensing sites located in lower Orange County and which were constructed or modified after October 15, 1994.

6NYCRR 230 .2 (e) (2)

This provision requires submerged filling for gasoline storage tanks, installed before October 16, 1994, at gasoline dispensing sites with an annual throughput below 120,000 gallons and located in lower Orange County.

6NYCRR 230 .2 (f)

Owners and/or operators of gasoline storage tanks, vehicles, and dispensing stations required to install stage 1 and/or stage 2 vapor recovery equipment must meet these provisions. The provisions include training , correct operation, replacement, and repair of personnel and equipment.

6NYCRR 230 .2 (g)

This regulation requires daily visual inspections of components of stage II vapor collection system to ensure the integrity and efficiency of the system. Dispensers with defective stage II components must be removed from service, locked and sealed to prevent vapor loss from operational dispensers until approved replacement parts are installed. A log will be kept recording the results of the inspections.

6NYCRR 230 .2 (j)

This provision requires facilities with stage II vapor collection systems to maintain vapor return lines so that there is no blockage of the lines.

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6NYCRR 230 .2 (k)

This regulation requires the owners and/or operators of stage II systems to perform dynamic pressure tests at 5 year intervals after commencing operations. The leak test criteria requirements are given in 6 NYCRR Part 230.2(k).

6NYCRR 230 .5 (a)

This section requires record keeping of delivered fuel which must be maintained for two years.

6NYCRR 230 .5 (c)

This regulation requires a gasoline dispensing site to post their copy of the registration form obtained from the NYSDEC.

6NYCRR 230 .7 (c)

This provision requires facilities with a gasoline dispensing site located in lower Orange county to register pursuant to 6NYCRR Part 201 or Part 612.

6NYCRR 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides (NO_x) and volatile organic compounds (VOC) since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. The boilers and generators comprising Emission Unit U-700SC at the facility are subject to this regulation for NO_x emissions. The facility has accepted limits on NO_x emissions from the Central Power Plant boilers, the peak shaving generator, and the generators at the South Dock and Spellman Hall to stay below Part 231 emission thresholds, and therefore is not subject to Part 231 for these emission sources.

6NYCRR 231-2.2 (b) (2)

Facilities subject to New Source Review and are located in the New York City metropolitan area or lower Orange county must achieve a 1.3 to 1 emission offset and must also achieve Lowest Achievable Emission Reduction (LAER).

6NYCRR 231-2.5

A Lowest Achievable Emission Rate (LAER) must be defined and achieved for facilities subject to 6NYCRR Part 231-2.

6NYCRR 231-2.6

The requirements and criteria for creating and certifying emission reduction credits (ERCs) are set forth in section 231-2.6.

6NYCRR 232 .12

This section of the perc dry cleaning regulation requires operators of perc dry cleaning processes to keep records and submit reports as required.

6NYCRR 232 .14

This section of the perc dry cleaning regulation requires perc dry cleaning facility owner/managers and

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machine operators to be trained and certified. Vendors of training courses must be approved by DEC. Owner/manager and operator exam candidates must demonstrate a minimum level of knowledge in order to obtain certification. Registered dry cleaning inspectors and individuals working for them performing Part 232 compliance inspections must obtain owner/manager certification. Certification is valid for three years and can be renewed upon completion of a refresher course. Training course vendor authorization is valid for five years and can be renewed by application.

6NYCRR 232 .16

This section of the perc dry cleaning regulation requires perc dry cleaning facilities to be inspected at least annually for compliance with the perc dry cleaning rule. These inspections shall be performed by a DEC approved registered inspector or individual. Inspections and reports shall be as required by DEC.

6NYCRR 232 .18

This section of the perc dry cleaning regulation requires perc dry cleaners to post a DEC sign in their shop in a location which is visible to the public. The sign informs the public that perc is used in the shop and what possible health problems may occur from exposure to perc. The facility owner is required to fill in blank information on the sign such as the facility name, address, and owner as well as local emergency contact phone numbers. Sign language and minimum dimensions are specified in this section.

6NYCRR 232 .6 (a)

This subdivision of the perc dry cleaning regulation specifies the equipment standards and emissions control specifications which must be met at a minimum. There are specifications for vapor barriers and general exhaust ventilation systems, door fans and local exhaust ventilation systems, process vents, primary emissions control systems, secondary emissions control systems, and spill containment systems.

6NYCRR 232 .6 (b) (1)

Fugitive perc emissions from dry cleaning machines can not exceed 50 ppm.

6NYCRR 232 .7 (a)

This subdivision of the perc dry cleaning regulation specifies that the dry cleaning system must be checked at least weekly for liquid and vapor perc leaks and fugitive perc emissions. The operator must record the status of each component on a checklist supplied by DEC. Checklist must be kept on-site for at least 5 years.

6NYCRR 232 .8

This section of the perc dry cleaning regulation specifies minimum operation and maintenance requirements for perc dry cleaning systems. DEC checklist which document that proper operation and maintenance is being done must be kept on-site for at least five years.

6NYCRR 232 .8 (d)

Operation and maintenance requirements are specified for each generation of equipment and pollution control equipment. Proper operation and maintenance must be performed on button and lint traps. Preparedness and prevention equipment, including spill control and fire control equipment, must be kept on-site and in good working order. All parts of the dry cleaning system where perc may be emitted to the atmosphere must be kept closed except when access is needed for proper maintenance and repair.

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Compliance Certification

Summary of monitoring activities at US ARMY GARRISON:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
U-604BL	monitoring of process or control device parameters as surrogate	47
U-604BL	record keeping/maintenance procedures	48
U-604BL/-/006/00104	work practice involving specific operations	51
U-604BL	record keeping/maintenance procedures	49
U-604BL	record keeping/maintenance procedures	50
U-845P3	record keeping/maintenance procedures	75
U-845P3	monitoring of process or control device parameters as surrogate	76
FACILITY	record keeping/maintenance procedures	36
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
U-604BL	record keeping/maintenance procedures	45
U-604BL	record keeping/maintenance procedures	46
U-604GN	record keeping/maintenance procedures	58
U-847SC	record keeping/maintenance procedures	77
FACILITY	record keeping/maintenance procedures	7
FACILITY	work practice involving specific operations	25
FACILITY	record keeping/maintenance procedures	81
U-685SV	record keeping/maintenance procedures	59
U-685SV	work practice involving specific operations	60
U-604BL/STK02/006	intermittent emission testing	55
FACILITY	monitoring of process or control device parameters as surrogate	26
U-604BL/STK02/003	monitoring of process or control device parameters as surrogate	53
U-604BL/STK02/006	monitoring of process or control device parameters as surrogate	56
U-604BL/STK02	record keeping/maintenance procedures	83
U-604BL/STK02	record keeping/maintenance procedures	52
U-845BL	record keeping/maintenance procedures	73
U-604BL/STK02/003/00104	intermittent emission testing	54
U-604BL/STK02/006/00104	intermittent emission testing	57
U-845BL	record keeping/maintenance procedures	74
FACILITY	record keeping/maintenance procedures	27
U-793PT	record keeping/maintenance procedures	72
U-793PT	work practice involving specific operations	67
U-793PT	work practice involving specific operations	68
U-793PT	work practice involving specific operations	69
U-793PT	monitoring of process or control device parameters as surrogate	70
FACILITY	monitoring of process or control device parameters as surrogate	28
U-793PT	record keeping/maintenance procedures	71
FACILITY	record keeping/maintenance procedures	29

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U-1227G	record keeping/maintenance procedures	42
FACILITY	record keeping/maintenance procedures	30
U-1202G	record keeping/maintenance procedures	40
U-1720G	record keeping/maintenance procedures	43
U-719GS	record keeping/maintenance procedures	65
FACILITY	record keeping/maintenance procedures	31
U-1202G	record keeping/maintenance procedures	41
U-1720G	record keeping/maintenance procedures	44
U-719GS	record keeping/maintenance procedures	66
FACILITY	record keeping/maintenance procedures	32
FACILITY	record keeping/maintenance procedures	33
FACILITY	record keeping/maintenance procedures	34
U-700SC	record keeping/maintenance procedures	61
U-700SC	record keeping/maintenance procedures	62
U-700SC	record keeping/maintenance procedures	63
U-700SC	record keeping/maintenance procedures	64
U-845P3	record keeping/maintenance procedures	90
U-845P3	record keeping/maintenance procedures	91
U-845P3	record keeping/maintenance procedures	92
U-845P3	record keeping/maintenance procedures	84
U-845P3	ambient air monitoring	85
U-845P3	record keeping/maintenance procedures	87
U-845P3	record keeping/maintenance procedures	88
U-845P3	record keeping/maintenance procedures	89

Basis for Monitoring

The monitoring requirements contained in this permit are associated with applicable regulations and previous permits.