

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-4324-00005/00007 Renewal Number: 1



02/09/2007

Facility Identification Data

Name: COMPRESSOR STATION 249
Address: 2840 US RTE 20
CARLISLE, NY 12031

Owner/Firm

Name: TENNESSEE GAS PIPELINE COMPANY
Address: 1001 LOUISIANA ST
PO BOX 2511
HOUSTON, TX 77002, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: KENT P SANDERS
Address: 65561 STATE HIGHWAY 10
SUITE 1
STAMFORD, NY 12167

Division of Air Resources:
Name: DAVID F PICKETT
Address: 1130 N WESTCOTT RD
SCHENECTADY, NY 12301-2014

Air Permitting Contact:
Name: LARRY GREBERT
Address: TENNESSEE GAS PIPELINE CO
5035 ST RTE 66
NASSAU, NY 12123
Phone:5187663611

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. In addition, the facility will add two new 3,785 HP

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Caterpillar G3612 reciprocating internal combustion engines (4-stroke lean-burn) at Station 249. The engines will combust pipeline quality natural gas.

Attainment Status

COMPRESSOR STATION 249 is located in the town of CARLISLE in the county of SCHOHARIE. 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* ATTAINMENT)	TRANSPORT REGION (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

Compressor Station 249 (Carlisle) uses four natural gas fired reciprocating compressor engines. These natural gas prime movers are used to power compressors for pipeline transportation (i.e. the "pump" gas). There are several activities at this compressor station that are trivial or exempt.

Permit Structure and Description of Operations

The Title V permit for COMPRESSOR STATION 249 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.

COMPRESSOR STATION 249 is defined by the following emission unit(s):

Emission unit R24901 - One 5500 HP Cooper Bessemer Model 16V-250 reciprocating compressor engine that fires natural gas.

Emission unit R24901 is associated with the following emission points (EP):

R001A

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

Process: RC1 is located at GROUND, Building 1 - Cooper Bessemer 5500 HP reciprocating compressor engine.

Emission unit R24902 - One 3600 HP Cooper Bessemer Model 8W330 reciprocating compressor engine that fires natural gas.

Emission unit R24902 is associated with the following emission points (EP):

R002A

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

Process: RC2 is located at GROUND, Building 1 - Cooper Bessemer 3600 HP reciprocating compressor engine.

Emission unit R24903 - Two Caterpillar Model 3612 internal combustion engines (4-stroke, lean burn) rated at 3,785 HP each.

Emission unit R24903 is associated with the following emission points (EP):

R003A, R004A

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

Process: RC3 is located at Building 2 - Two 4-stroke lean burn internal combustion engines - natural gas fired.

Title V/Major Source Status

COMPRESSOR STATION 249 is subject to Title V requirements. This determination is based on the following information:

The facility is major because the potential to emit (PTE) for several contaminants is greater than the Title

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V applicability thresholds. The PTE for carbon monoxide (CO) and oxides of nitrogen (NO_x) from the facility are each greater than 100 tons per year which is the Title V applicability threshold. The PTE for formaldehyde is greater than 10 tons per year which is the Title V threshold. The PTE for total hazardous air pollutants (HAP) is greater than 25 tons per year which is the Title V thresholds.

Program Applicability

The following chart summarizes the applicability of COMPRESSOR STATION 249 with regards to the principal air pollution regulatory programs:

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

NOTES:

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

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

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

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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



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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
4922	NATURAL GAS TRANSMISSION

SCC Codes

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

SCC Code	Description
2-02-002-54	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS INTERNAL COMBUSTION ENGINE-INDUSTRIAL: NATURAL GAS: 4-CYCLE LEAN BURN
2-02-002-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS Reciprocating

Facility Emissions Summary

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

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Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		>= 100 tpy but < 250 tpy
000050-00-0	FORMALDEHYDE (HAP)		>= 10 tpy
0NY100-00-0	HAP		>= 25 tpy but < 40 tpy
007439-92-1	LEAD (HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 100 tpy but < 250 tpy
0NY075-00-0	PARTICULATES		>= 10 tpy but < 25 tpy
0NY075-00-5	PM-10		>= 10 tpy but < 25 tpy
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 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.

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

The Department will make available to the public any permit

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against

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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	Regulation	Short Description	Condition
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Facility/EU/EP/Process/ES

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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

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6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)

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

6NYCRR Part 201-6

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

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6NYCRR 201-6.5(a)(4)

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

6NYCRR 201-6.5(a)(7)

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

6NYCRR 201-6.5(a)(8)

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

6NYCRR Part 201-6.5(c)

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

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

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

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

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

6NYCRR 201-6.5(d)(5)

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

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with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)

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

6NYCRR 201-6.5(f)(6)

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

6NYCRR Part 202-1.1

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

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-.2

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

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and there applicability thresholds and sets

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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, COMPRESSOR STATION 249 has been determined to be subject to the following regulations:

40CFR 52-A.21

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

40CFR 63-A

The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40CFR63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that describe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

Section 63.1 relates to general applicability considerations both before and after promulgation of standards for a source category. Section 63.2 contains definitions common to the MACT rules. Section 63.3 contains units and abbreviations used in the MACT rules. Section 63.4 outlines generally prohibited activities such as operating in noncompliance with applicable standards and circumventing the rules. Section 63.5 describes how construction or reconstruction trigger requirements for preconstruction review.

Section 63.6 covers compliance issues such as how default new source and existing source compliance dates are calculated for each MACT rule; operation and maintenance requirements; startup, shutdown, and malfunction plan requirements; methods for determining compliance; alternative emission standards; compliance extensions; and compliance exemptions.

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Section 63.7 covers performance testing requirements such as default notification and test deadlines; quality assurance programs: site-specific test plans; test facilities; general test conduct requirements; use of alternative test methods; data analysis, recordkeeping, and reporting; and performance test waivers.

Section 63.8 covers default monitoring requirements for continuous or periodic parameter monitoring, continuous opacity monitoring, and continuous emission monitoring.

Section 63.9 contains default notification requirements and deadlines for initial notifications, requests for extension of compliance, notification that a source is subject to special compliance requirements, continuous monitoring related notifications, and notifications of compliance status (also referred to as initial compliance reports).

Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot" items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.

40CFR 63-~~DDDDD~~.7506 (c)

The regulation states that existing small gaseous fuel boilers and new or reconstructed small gaseous fuel units are not subject to the initial notification requirements in 40 CFR 63.9(b), Subpart A and are not subject to any requirements in 40 CFR 63, Subpart ~~DDDDD~~ and Subpart A.

40CFR 63-~~ZZZZ~~.6590 (b) (3)

This condition lists the types of engines that are exempt from the provisions in this NESHAP rule. The types of engines include:

- Existing 2-stroke lean burn
- Existing 4-stroke lean burn
- Existing compression ignition
- Existing emergency
- Existing limited-use
- Existing landfill/digester gas fuel-fired

40CFR 63-~~ZZZZ~~.6595 (a) (3)

This condition lists the compliance date for engines that qualify as new affected sources. New engines that were built after August 16, 2004 must be in compliance with this rule by the time they are started up.

40CFR 63-~~ZZZZ~~.6600 (b)

This condition lists the emission limits and operating limits that a new or reconstructed engine that is 2-stroke lean burn, 4-stroke lean burn, or compression ignition reciprocating internal combustion engine (RICE) must meet.

The engine must meet either the concentration listed for the specific type of engine listed in table 2a or reduce the amount of formaldehyde being emitted from the engine by the percentage listed.

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If the engine is using non-selective catalytic reduction to reduce the emission of formaldehyde from the engine, then the facility must monitor the pressure drop and temperature of the catalyst bed and keep it within a certain range of what was measured during the performance test that the facility had to do to prove it was meeting the limits listed above for formaldehyde.

40CFR 63-~~ZZZZ~~.6600 (c)

This condition exempts certain types of engines from having to meet any of the formaldehyde emission limits or operating limits that are listed in tables 1a, 1b, 2a, or 2b.

40CFR 63-~~ZZZZ~~.6605 (a)

This condition states that the facility must meet all emission limits and operating limits that this rule imposes, except when the engine is starting up, shutting down, or malfunctioning.

40CFR 63-~~ZZZZ~~.6605 (b)

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

40CFR 63-~~ZZZZ~~.6610 (a)

This condition reduces emissions of hazardous air pollutants by requiring the facility to conduct a performance test proving that the engine(s) meet the emission limits in this rule within 180 days of the date that the facility must be in compliance.

40CFR 63-~~ZZZZ~~.6620 (b)

This condition reduces emissions of hazardous air pollutants by specifying which methods the facility must use in order to measure the amount of pollutants that are being emitted from the engine(s). This condition also lists other specifics that ensure that the measurements are correct, and this condition specifies how often the tests must be performed.

40CFR 63-~~ZZZZ~~.6620 (c)

This condition prohibits the facility from doing a performance test during periods when the engine is starting up, shutting down, or malfunctioning so that the amount of emissions measured from the engine(s) is representative of normal operating conditions.

40CFR 63-~~ZZZZ~~.6620 (i)

This condition requires the facility to determine the percent load that the engine was operating at during the performance test. The facility must provide written documentation of how the load was determined for each engine.

40CFR 63-~~ZZZZ~~.6625 (b)

This condition reduces the emission of hazardous air pollutants by providing specific regulations on how the facility operates and maintains any continuous parameter monitoring systems (CPMS). The facility must meet the requirements in §63.8 to ensure that the monitoring systems are reading the correct information and that the engine(s) are continuously meeting the emission limits in this rule.

40CFR 63-~~ZZZZ~~.6630 (a)

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This condition reduces the emissions of hazardous air pollutants from reciprocating internal combustion engines (RICE) by listing what the facility has to do to prove that it was initially meeting the emission limits listed in this rule.

The facility must conduct a performance test to measure the emissions of pollutants during normal engine operation, and either install a device to continuously measure these emissions or measure parameters which are representative of what the emissions would be during operation of the engine. Then this information must be submitted to the NYSDEC so that DEC can tell from the compliance reports whether the emission limits are being met.

40CFR 63-~~ZZZZ~~.6635 (b)

This condition requires the facility to continuously monitor either the emissions from the engine or a parameter which was determined during the initial performance test that the emissions would be below the emission limit in this rule. There are specific exemptions which are listed in this condition for when monitoring is not necessary.

40CFR 63-~~ZZZZ~~.6635 (c)

This condition prohibits the facility from using data that was collected during abnormal engine operation to prove that the engine was in compliance with the emission limits in this rule.

40CFR 63-~~ZZZZ~~.6640

This regulation setd forth the requirements for maintaining continous compliance with the NESHAP for stationary internal combustion engines.

40CFR 63-~~ZZZZ~~.6640 (b)

This condition specifies what the facility needs to do in the event that the results of the monitoring show that the facility was not meeting the emission limits in this rule. This is called a deviation from the emission limits and/or operating limits of this rule and must be reported to NYSDEC.

This condition also requires the facility to conduct another performance test and re-establish the operating parameters if the catalyst in the control device is changed.

40CFR 63-~~ZZZZ~~.6640 (d)

If the monitoring shows that the engine(s) was not meeting the emission limits in this rule during a period of starting up, shutting down, or malfunctioning, it will not be considered a violation if the terms of this condition are met.

Additionally, new and reconstructed engines are not in compliance if their monitoring shows the emission limits of this rule are not being met during the first 200 hours of operation from engine startup.

40CFR 63-~~ZZZZ~~.6640 (e)

This condition requires the facility to report when it was not meeting one of the requirements in Table 8 of this rule. Table 8 refers to the provisions in Subpart A (General Provisions) that may or may not apply to facilities subject to this rule.

40CFR 63-~~ZZZZ~~.6645 (a)

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This condition lists all of the notifications that are listed in Subpart A (General Provisions) that need to be submitted by the facility.

40CFR 63-~~ZZZZ~~.6645 (c)

This condition states that facilities must submit an initial notification within 120 days after becoming subject to this rule for new engines.

40CFR 63-~~ZZZZ~~.6645 (d)

This condition lists the items that a facility needs to include in an initial notification if the engine only needs to submit an initial notification and is not subject to any other parts of this rule.

40CFR 63-~~ZZZZ~~.6645 (e)

This condition requires the facility to notify NYSDEC at least 60 days before a performance test is scheduled to begin.

40CFR 63-~~ZZZZ~~.6645 (f) (2)

This condition requires the facility to submit a Notification of Compliance Status report. In the case where a performance test is needed, the NoCS is due 60 days after the initial compliance demonstration.

40CFR 63-~~ZZZZ~~.6650

This regulation sets forth the reporting requirements for the owner or operators of stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40CFR 63-~~ZZZZ~~.6655

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

6NYCRR 201-7

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

6NYCRR 227-1.3 (a)

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

6NYCRR 227-1.6 (a)

This regulation requires that any facility found in violation of the provisions of Part 227 must not operate the affected stationary combustion installation that is in violation unless it is equipped with approved emission control equipment, it is rehabilitated or upgraded in an approved manner; or the fuel is changed to an acceptable type

6NYCRR 227-1.6 (b)

This regulation states that the Department may seal the affected stationary combustion installation that does not comply with the provisions in subdivision 6 NYCRR 227-1.6(a) within the time provided.



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6NYCRR 227-1.6 (c)

This regulation states that no person may operate any affected stationary combustion installation sealed by the commissioner in accordance with this Part 227.

6NYCRR 227-1.6 (d)

This regulation states that no person except Department personnel may remove, tamper with, or destroy any seal affixed to any affected stationary combustion installation.

6NYCRR 227-2.4 (f) (2)

This citation sets emission limits of oxides of nitrogen for lean burn engines.

6NYCRR 231-2.2

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

The purpose of Section 231-2.2 is to define what new or modified facilities are subject to the requirements set forth in the other sections of the rule. In addition, certain exemptions to the rule are also defined in this section.

Compliance Certification

Summary of monitoring activities at COMPRESSOR STATION 249:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
R-24903	intermittent emission testing	72
R-24903	record keeping/maintenance procedures	51
R-24903	intermittent emission testing	52
R-24903	record keeping/maintenance procedures	54
R-24903	record keeping/maintenance procedures	56
R-24903/R003A	intermittent emission testing	73
R-24903/R003A	record keeping/maintenance procedures	74
R-24903/R004A	intermittent emission testing	75
R-24903/R004A	record keeping/maintenance procedures	76
R-24903	record keeping/maintenance procedures	62
R-24903	record keeping/maintenance procedures	63
R-24903	record keeping/maintenance procedures	64
R-24903	record keeping/maintenance procedures	65
R-24903	record keeping/maintenance procedures	66
R-24903	record keeping/maintenance procedures	67
R-24903	record keeping/maintenance procedures	68
R-24903	record keeping/maintenance procedures	69
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
R-24902/-/RC2/0R02A	intermittent emission testing	39
R-24902/-/RC2/0R02A	intermittent emission testing	40
R-24902/-/RC2/0R02A	record keeping/maintenance procedures	41
R-24903	intermittent emission testing	43



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R-24903	intermittent emission testing	44
R-24903	record keeping/maintenance procedures	45
FACILITY	record keeping/maintenance procedures	7
FACILITY	monitoring of process or control device parameters as surrogate	24
R-24901/-/RC1/0R01A	record keeping/maintenance procedures	35
R-24901/-/RC1/0R01A	intermittent emission testing	36
R-24902/-/RC2/0R02A	intermittent emission testing	42
R-24903/-/RC3/R003A	intermittent emission testing	70
R-24903/-/RC3/R004A	intermittent emission testing	71

Basis for Monitoring

Condition 35 --- 6 NYCRR Part 227-2.4(f)(2) - This monitoring condition has been included to address the oxides of nitrogen emission limit requirements. The requirement to monitor source operating parameters ensures that the engine runs at optimum conditions and does not exceed the emission limit. The facility shall follow the Engine Analysis program and Best Management Practices program which includes the monitoring of key operating parameters. The facility shall use fuel consumption as an indicator of the engine's operational status and maintain records of daily fuel consumption on site.

Condition 39 --- 6 NYCRR Part 201-7 (Capping out of 40 CFR 52-A.21) - This monitoring condition has been included to address the carbon monoxide emission limit that the facility established at the time of the installation of the engine in question to avoid the applicability of 40 CFR 52-A.21. Stack testing will be required once during the term of the permit to verify compliance.

Condition 40 --- 6 NYCRR Part 201-7 (Capping out of 40 CFR 52-A.21) - This monitoring condition has been included to address the oxides of nitrogen emission limit that the facility established at the time of the installation of the engine in question to avoid the applicability of 40 CFR 52-A.21. Stack testing will be required once during the term of the permit to verify compliance. Compliance with the limit contained in this condition will also demonstrate compliance with the limit contained in 6 NYCRR Part 227-2.4(f)(2).

Condition 41 --- 6 NYCRR Part 201-7 (Capping out of 40 CFR 52-A.21) - This monitoring condition has been included to address the carbon monoxide and oxides of nitrogen emission limits that the facility established at the time of the installation of the engine in question to avoid the applicability of 40 CFR 52-A.21. The requirement to monitor source operating parameters ensures that the engine runs at optimum conditions and does not exceed the emission limits. The facility shall follow the Engine Analysis program and Best Management Practices program which includes the monitoring of key operating parameters. The facility shall use fuel consumption as an indicator of the engine's operational status and maintain records of daily fuel consumption on site.

Condition 42 --- 6 NYCRR Part 227-2.4(f)(2) - This monitoring condition has been included to address the oxides of nitrogen emission limit requirements. Stack testing will be required once during the term of the permit to verify compliance.

Condition 43 --- 6 NYCRR Part 201-7 (Capping out of 6 NYCRR Part 231-2.2) - This monitoring condition has been included to address the oxides of nitrogen emission limit that the facility is establishing to avoid the applicability of 6 NYCRR Part 231-2.2 for the installation of the new engines at the facility. Stack testing will be required no later than 180 days after initial startup to verify compliance. Compliance with the limit contained in this condition will also demonstrate compliance with the limit contained in 6 NYCRR Part 227-2.4(f)(2).

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Condition 44 --- 6 NYCRR Part 201-7 (Capping out of 6 NYCRR Part 231-2.2) - This monitoring condition has been included to address the volatile organic compound emission limit that the facility is establishing to avoid the applicability of 6 NYCRR Part 231-2.2 for the installation of the new engines at the facility. Stack testing will be required no later than 180 days after initial startup to verify compliance.

Condition 45 --- 6 NYCRR Part 201-7 (Capping out of 40 CFR 52-A.21) - This monitoring condition has been included to address the volatile organic compound and oxides of nitrogen emission limits that the facility is establishing to avoid the applicability of 40 CFR 52-A.21 for the installation of the new engines at the facility. . The requirement to monitor source operating parameters ensures that the engine runs at optimum conditions and does not exceed the emission limits. The facility shall follow the Engine Analysis program and Best Management Practices program which includes the monitoring of key operating parameters. The facility shall use fuel consumption as an indicator of the engine's operational status and maintain records of daily fuel consumption on site.

Condition 48 --- 40 CFR 63.6600(b), Subpart ZZZZ - This monitoring condition has been included to address the carbon monoxide emission reduction required by the regulation. The facility will be required to meet applicable operating limits, demonstrate continuous compliance and perform stack testing to verify compliance.

Condition 70 --- 6 NYCRR Part 227-2.4(f)(2) - This monitoring condition has been included to address the oxides of nitrogen emission limit requirements. Stack testing will be required once during the term of the permit to verify compliance.

Condition 71 --- 6 NYCRR Part 227-2.4(f)(2) - This monitoring condition has been included to address the oxides of nitrogen emission limit requirements. Stack testing will be required once during the term of the permit to verify compliance.

Condition 74 --- 40 CFR 63.6640, Subpart ZZZZ - This monitoring condition has been included to address the continuous parameter monitoring used to demonstrate continuous compliance with the emission limits and operating limits in the regulation. The facility must establish operating limits during the initial stack testing. The facility shall measure the inlet temperature to the control (oxidation catalyst) on a continuous basis and ensure that the four hour rolling average is within the temperature limits contained in the regulation.

Condition 75 --- 40 CFR 63.6640, Subpart ZZZZ - This monitoring condition has been included to address the continuous parameter monitoring used to demonstrate continuous compliance with the emission limits and operating limits in the regulation. The facility must establish operating limits during the initial stack testing. The facility shall measure the pressure drop across the control (oxidation catalyst) once per month to demonstrate that it is within the established operating limits.

Condition 77 --- 40 CFR 63.6640, Subpart ZZZZ - This monitoring condition has been included to address the continuous parameter monitoring used to demonstrate continuous compliance with the emission limits and operating limits in the regulation. The facility must establish operating limits during the initial stack testing. The facility shall measure the inlet temperature to the control (oxidation catalyst) on a continuous basis and ensure that the four hour rolling average is within the temperature limits contained in the regulation.

Condition 78 --- 40 CFR 63.6640, Subpart ZZZZ - This monitoring condition has been included to address the continuous parameter monitoring used to demonstrate continuous compliance with the emission limits and operating limits in the regulation. The facility must establish operating limits during

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the initial stack testing. The facility shall measure the pressure drop across the control (oxidation catalyst) once per month to demonstrate that it is within the established operating limits.