

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 6-2156-00018/00021    Renewal Number: 1**

**Modification Number: 3**



**07/23/2007**

**Facility Identification Data**

Name: TGP COMPRESSOR STATION 245  
Address: 457 BURROWS RD  
WEST WINFIELD, NY 13491

**Owner/Firm**

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

**Permit Contacts**

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**Permit Description**

**Introduction**

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

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#### Summary Description of Proposed Project

This modification is to update information, and remove unnecessary information that is not required since stack testing has been conducted for facility to come into compliance with new NO<sub>x</sub> RACT limits.

#### Attainment Status

TGP COMPRESSOR STATION 245 is located in the town of WINFIELD in the county of HERKIMER.

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 (SO <sub>2</sub> )	ATTAINMENT
Ozone* ATTAINMENT)	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NO <sub>x</sub> )**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

\* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NO<sub>x</sub>) which are ozone precursors.

\*\* NO<sub>x</sub> has a separate ambient air quality standard in addition to being an ozone precursor

#### Facility Description

FACILITY IS AN EXISTING NATURAL GAS COMPRESSOR STATION CONSISTING OF 7 INTERNAL COMBUSTION ENGINES. ALL ENGINES ARE LEAN BURN AND BURN ONLY NATURAL GAS. EXISTING FACILITY ALSO INCLUDES 2 INGERSOLL RAND PSVG-6 AUXILIARY ENGINES. THE FACILITY OPERATES IN ACCORDANCE WITH ITS TITLE V PERMIT #6-2156-00018/00021 DATED 3/17/2005 WITH EXPIRATION DATE OF 3/16/2010.

#### Permit Structure and Description of Operations

The Title V permit for TGP COMPRESSOR STATION 245 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



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units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

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

TGP COMPRESSOR STATION 245 is defined by the following emission unit(s):

Emission unit R24501 - Two 408 hp Ingersoll Rand PSVG-6 auxiliary engines, used for auxiliary electricity, each firing natural gas.

Emission unit R24501 is associated with the following emission points (EP):  
R001A, R002A

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

Process: RC1 is located at Building 3 - Two(2) Ingersoll Rand PSVG-6 Reciprocating auxiliary engines.

Emission unit R24505 - Two caterpillar model 3612 internal combustion engines (4-stroke, lean burn) rated at 3785 hp each. Operation of these engines is expected to begin in the 3rd quarter of 2007.

Emission unit R24505 is associated with the following emission points (EP):  
R010A, R011A

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

Process: RC5 is located at Building 2 - Caterpillar two 4-stroke lean burn internal combustion engines - natural gas fired.

Emission unit R24503 - One Worthington ML-12 compressor engine that fires natural gas.

Emission unit R24503 is associated with the following emission points (EP):  
R008A

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

Process: RC3 is located at Building 1 - Worthington ML-12 reciprocating compressor engine

Emission unit R24506 - Caterpillar model 3516 internal combustion engine (4-stroke, lean burn) rated at 1099 hp for emergency power generation. Operation of this engine is expected to begin in the 3rd quarter of 2007.

Emission unit R24506 is associated with the following emission points (EP):  
R012A

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

Process: RC6 is located at Building 3 - Caterpillar 4-stroke lean burn internal combustion engine. Natural gas fired. Emergency use only with maximum permitted use of 500 hours/year.

Emission unit R24504 - One Dresser Rand (Clark) Model TLAD-6 compressor engine that fires natural gas.

Emission unit R24504 is associated with the following emission points (EP):  
R009A

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

Process: RC4 is located at Building 1 - Dresser Rand (Clark) Model TLAD-6 reciprocating compressor engine.

Emission unit R24502 - Five 1,400 hp Worthington UTC-165 compressor engines. Each fires natural gas and has been retrofitted with a low emissions combustion kit.

Emission unit R24502 is associated with the following emission points (EP):  
R003A, R004A, R005A, R006A, R007A

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

Process: RC2 is located at Building 1 - Five (5) Worthington UTC-165 Reciprocating compressor engines.

**Title V/Major Source Status**

TGP COMPRESSOR STATION 245 is subject to Title V requirements. This determination is based on the following information:

This facility is considered a major source because the facilities potential to emit for oxides of nitrogen exceeds the 100 tons/yr limit, and the facility is not taking a CAP on these emissions

**Program Applicability**

The following chart summarizes the applicability of TGP COMPRESSOR STATION 245 with regards to the principal air pollution regulatory programs:

<b>Regulatory Program</b>	<b>Applicability</b>
PSD	YES
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	YES
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO

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TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

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**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.

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

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

**Compliance Status**

Facility is in compliance with all requirements

**SIC Codes**

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

<b>SIC Code</b>	<b>Description</b>
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.

<b>SCC Code</b>	<b>Description</b>
2-01-001-06	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) RECIPROCATING: EVAPORATIVE LOSSES (FUEL STORAGE AND DELIVERY SYSTEM)
2-01-002-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS

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2-01-002-06	Reciprocating INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS
2-02-002-54	RECIPROCATING: EVAPORATIVE LOSSES (FUEL DELIVERY SYSTEM) INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS INTERNAL COMBUSTION ENGINE-INDUSTRIAL: NATURAL GAS: 4-CYCLE LEAN BURN

**Facility Emissions Summary**

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		>= 250 tpy
000050-00-0	FORMALDEHYDE (HAP)		>= 10 tpy
0NY100-00-0	HAP		>= 25 tpy but < 40 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 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		>= 50 tpy but < 100 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

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all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

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

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

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

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

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and

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completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

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

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

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

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

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

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

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

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

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

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the

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date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of

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the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

**Item L:                    Permit Exclusion - ECL 19-0305**

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

**Item M:                    Federally Enforceable Requirements - 40 CFR 70.6(b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required

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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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>	<b>Condition</b>
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	34
R-24505	40CFR 52-A.21	Prevention of Significant Deterioration	3-13, 3-14
FACILITY	40CFR 63-ZZZZ.63 (f) (1)	Stationary Reciprocating Internal Combustion Engines - notification of compliance status for non-performance test activities	1-15
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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

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.

6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility

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subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)

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

6NYCRR Part 201-6.5(c)

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

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

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

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

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

6NYCRR 201-6.5(d)(5)

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

6NYCRR Part 201-6.5(e)

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

6NYCRR 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit

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to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

#### 6NYCRR Part 202-1.1

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

#### 6NYCRR Part 202-2.1

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

#### 6NYCRR Part 202-2.5

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

#### 6NYCRR Part 211-.2

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

#### 6 NYCRR Part 211.3

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

#### 6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

#### 40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

#### 40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers,

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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, TGP COMPRESSOR STATION 245 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-ZZZZ.63 (f) (1)

Relative to EU: R-24505 for each initial compliance demonstration that does not include a stack test; TGP must submit a Notification of Compliance Status within 30 days of the demonstration.

#### 40CFR 63-ZZZZ.6590 (b) (1) (i)

Details...see NYSDEC permit: 40 CFR 63.6590(b)(1)(i)

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

TGP must comply with limitations in Subpart ZZZZ upon startup of RICE.

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

TGP, as it operates a 4SLB RICE, does not need to comply with the limitations of Tables 1a, 1b, 2a & 2b of Subpart ZZZZ.

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

TGP must comply with the emission limitations Subpart ZZZZ.

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

TGP must utilize its RICE within the confines of good pollution control practices.

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

TGP must conduct their initial performance tests or demonstrations within 180 days of the RICE's listed date.

#### 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.

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40CFR 63-ZZZZ.6620 (c)

TGP may not conduct performance tests during startup, shutdown or malfunction.

40CFR 63-ZZZZ.6620 (e) (2)

Details on the calculation of carbon dioxide correction factor for performance tests.

40CFR 63-ZZZZ.6620 (i)

TGP must document the details of engine loading which occur while a performance test is conducted.

40CFR 63-ZZZZ.6640 (a)

TGP is to install CPMS to record the catalyst inlet temperature of the two engines. Temps must be maintained between 450 and 1350 degrees F. Records of same are to be kept.

40CFR 63-ZZZZ.6640 (b)

Procedural details for deviations and catalyst changes for TGP.

40CFR 63-ZZZZ.6640 (c)

During startup, shutdown and malfunction, TGP must operate to their startup, shutdown & malfunction plan.

40CFR 63-ZZZZ.6640 (d)

TGP's treatment of deviations during startup, shutdown and malfunction.

40CFR 63-ZZZZ.6640 (e)

TGP's reporting of non-compliance with Subpart ZZZZ's general provisions.

40CFR 63-ZZZZ.6645 (a)

TGP must submit all applicable notifications by their specified dates.

40CFR 63-ZZZZ.6645 (c)

TGP must submit an Initial Notification of the new RICE startup within 120 days of Subpart ZZZZ's command.

40CFR 63-ZZZZ.6645 (e)

Performance tests will require a 60 day notification to the NYSEC prior to commencement of such test.

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

For each compliance demonstration that does require a stack test, TGP must submit a Notification of Compliance Status including the test results to the NYSDEC within 60 days of completion of the stack test.

40CFR 63-ZZZZ.6650 (b) (5)

TGP may submit semi-annual reports on a date schedule that has been determined by the NYSDEC.

40CFR 63-ZZZZ.6650 (c)

Compliance reports that are submitted by TGP must disclose the very specific information per 40 CFR

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63.6650 (c) Subpart ZZZZ (see NYSDEC Permit).

40CFR 63-ZZZZ.6650 (e)

Deviations from emission or operating limitations must include very specific and descriptive information as per the 16 points mentioned in NYSDEC permit at 40 CFR 63.6650(e).

40CFR 63-ZZZZ.6655 (a)

TGP must keep records that pertain in any way to compliance, startup, shutdown, malfunction or to performance evaluations or tests.

40CFR 63-ZZZZ.6655 (b)

TGP must keep specific CEMS/CPMS records.

40CFR 63-ZZZZ.6660

TGP must keep 5 years of pertinent regulatory records.

40CFR 63-ZZZZ.6665

This regulation specifies which provisions of the General provisions (Subpart A of 40 CFR 63) apply to the owner or operators of stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

6NYCRR 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 201-7.2

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6NYCRR 202-1.2

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

6NYCRR 202-1.3

This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. Alternate methods may be also be used provided they are determined to be acceptable by the department. Finally, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

6NYCRR 202-1.3 (a)

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This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. In addition, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

#### 6NYCRR 202-1.4

This regulation allows the department discretion to conduct separate or additional emission tests, including preparation of the testing site, at the source owner's expense, to determine compliance.

#### 6NYCRR 202-1.5

This rule prohibits the concealment of an emission by the use of air or other gaseous diluents (diluting agents) to achieve compliance with an emission standard which is based on the concentration of a contaminant in the gases emitted through a stack.

#### 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.

#### 6NYCRR 227-1.6 (c)

This regulation state 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 227-1.7

TGP, as the operator of this stationary combustion installation, is required to provide any pertinent emissions records that may be requested to the NYSDEC. All emissions testing methods are to be current ASTM certified or equivalent.

#### 6NYCRR 227-2.4 (f) (1)

This citation sets an emission limit on oxides of nitrogen for rich burn internal combustion engines.

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### 6NYCRR 227-2.4 (f) (2) (i) ('b')

This regulation sets a NOx emission limit of 1.5 grams per brake horsepower-hour for internal combustion engines with spark-ignited sources. The limit is effective April 1, 2005.

### 6NYCRR 227-2.4 (f) (4)

This regulation states that an emergency generator, which is defined as a generator operating less than 500 hours per year is exempt from the NOx RACT Requirements of Part 227.

### 6NYCRR 227-2.5 (c)

This regulation sets an alternative NOx emission limit that is different than the 1.5 grams per brake horsepower-hour for internal combustion engines with spark-ignited sources. The limit is effective April 1, 2005.

### 6NYCRR 227-2.6 (c)

This regulation sets procedures for conducting a stack test to meet the requirements of Part 227 NOx RACT limits.

### 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 and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

## Compliance Certification

Summary of monitoring activities at TGP COMPRESSOR STATION 245:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	record keeping/maintenance procedures	1-15
R-24505	intermittent emission testing	3-15
FACILITY	record keeping/maintenance procedures	1-23
FACILITY	monitoring of process or control device parameters as surrogate	1-24
FACILITY	monitoring of process or control device parameters as surrogate	1-25
FACILITY	record keeping/maintenance procedures	1-30
FACILITY	record keeping/maintenance procedures	1-31
FACILITY	record keeping/maintenance procedures	1-32
FACILITY	record keeping/maintenance procedures	1-33
FACILITY	record keeping/maintenance procedures	1-34
FACILITY	record keeping/maintenance procedures	1-37
FACILITY	record keeping/maintenance procedures	1-38
FACILITY	record keeping/maintenance procedures	1-39
FACILITY	record keeping/maintenance procedures	4
FACILITY	record keeping/maintenance procedures	5
R-24505	intermittent emission testing	3-12
R-24505	intermittent emission testing	3-13
R-24505	intermittent emission testing	3-14



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R-24505 FACILITY FACILITY R-24501 R-24501 R-24504 R-24504 R-24506 R-24502 R-24502 R-24503 R-24503 FACILITY

Basis for Monitoring

BASIS FOR MONITORING

Condition 1-15

This condition places a cap of 100 ton/yr on CO emissions from Emission Units R24505 and R24506. It also specifically references the required calculations (equations) to be used.

Condition 1-16

This condition places a cap 40 ton/yr on NOx emissions from Emission Units R24505 and R24506. It also specifically references the required calculations (equations) to be used.

Condition 1-17

This condition places a cap 40 ton/yr on VOC emissions from Emission units R24505 and R24506. It also specifically references the required calculations (equations) to be used.

Condition 1-18

For each initial compliance demonstration that does not include a performance test, TGP must submit a Notification of Status to the NYSDEC with 30 days of such demonstration.

Condition 1-27

A report of the average percent load determination must be included with the notice of compliance status. Very specific technical info is to be cited.

Condition 1-28

A Continuous Parametric Monitoring System (CPMS) is to be installed on the oxidation catalysts of the two engines in Emission Unit R24505. Need to maintain 450 to 1350 degrees F.

Condition 1-29

Reporting details of the pressure drop readings that must be made each month for the two engines in Emission Unit R24505.

Condition 1-34

Relative to emission unit R24505, notifications need to be submitted, as required by NYSDEC.

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Condition 1-35

Relative to emission unit R24505, a Initial Notification needs to be submitted within 120 days.

Condition 1-36

Relative to emission unit R24505, TGP could be required to perform a stack test and in that event must inform the NYSDEC 60 days prior.

Condition 1-37

Relative to emission unit R24505, for each initial compliance demonstration that does not include a performance test, TGP must submit a Notification of Status to the NYSDEC with 30 days of such demonstration.

Condition 1-38

Relative to emission unit R24505, for each initial compliance demonstration that does include a performance test, TGP must submit a Notification of Status with performance test results to the NYSDEC with 30 days of such demonstration.

Condition 1-39

Relative to emission unit R24505, TGP shall submit *semi-annual compliance reports* twice per year. The first yearly report is due between January 1 & 31 of each year; the second is due between July 1 & 31 of each year.

Condition 1-42

Relative to emission unit R24505, specific records submission is required.

Condition 1-43

Relative to emission unit R24505, specific records submission about CEMS or CPMS is required.

Condition 1-44

Relative to emission unit R24505, specific records must be kept onsite for 5 years.

Condition 1-48

Emission Unit R24505 is clearly NO<sub>x</sub> limited at 0.50 grams/bhp-hr. Annual reporting required.

Condition 1-49

For Emission Unit R24505, whenever a CO<sub>2</sub> performance test is performed, the O<sub>2</sub> concentration must also be checked; both at the inlet and outlet of the catalyst. Semi-annual reporting is required.

Condition 1-50

For emission unit R24505, this condition details CO stack testing requirements.