



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 6-2156-00018/00021

Renewal Number: 2

Modification Number: 1 07/22/2010

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 77252-2511, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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UTICA, NY 13501

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Division of Air Resources:

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Air Permitting Contact:

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8 ANNGINA DR

ENFIELD, CT 06082

Phone: 8607636012

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

This modification is to remove emission points that were associated with Emission unit R-24501 that was removed in 2007 and not removed in the renewal.



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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 (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT
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* 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:

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 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



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that is not included in the above categories.

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

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

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

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

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

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

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

Emission unit R24505 - Two caterpillar model 3612 internal combustion engines (4-stroke, lean burn) rated at 3785 hp each.

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

R010A, R011A

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

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. This engine is in the same building where the auxiliary engines that were removed.

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

R012A



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Process: RC6 is located at Building 3 - Caterpillar 4-stroke lean burn internal combustion engine. Natural

Title V/Major Source Status

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

The facility is major because the engines emit carbon monoxide, oxides of nitrogen, formaldehyde, and VOC's above major threshold levels

Program Applicability

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

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

NOTES:

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

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

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

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is



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required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

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

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

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

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

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

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis

of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

Description

4922
4923

NATURAL GAS TRANSMISSION
GAS TRANSMISSION AND DISTRIBUTION

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes

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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
2-01-001-06	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 Reciprocating
2-01-002-06	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS RECIPROCATING: EVAPORATIVE LOSSES (FUEL DELIVERY SYSTEM)
2-02-002-54	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 Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount of 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	Range
		lbs/yr	
000630-08-0	CARBON MONOXIDE		>= 250 tpy
000050-00-0	FORMALDEHYDE		>= 10 tpy
0NY100-00-0	HAP		>= 25 tpy but < 40



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007439-92-1	LEAD	tpy > 0 but < 10 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 - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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

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

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

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based



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on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR 201-6.5(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.
- Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)**
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:
- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;



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- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

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



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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

**Item A: General Provisions for State Enforceable Permit Terms and Condition - 6
 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

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

FACILITY	ECL 19-0301	82	Powers and Duties of the Department with respect to air pollution control
R-24505	40CFR 52-A.21	73	Prevention of Significant Deterioration
R-24505	40CFR 52-A.21(j)(3)	74	BACT (see narrative)
R-24506/-/RC6/OR12A	40CFR 63- ZZZZ.6590(b)(1)	81	Stationary Reciprocating Internal Combustion Engines - Stationary RICE subject to limited requirements
FACILITY	40CFR 63- ZZZZ.6595(a)(3)	37	Stationary Reciprocating Internal Combustion Engines - new or reconstructed stationary RICE
FACILITY	40CFR 63-ZZZZ.6600(c)	38	Stationary



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FACILITY	40CFR 63-ZZZZ.6605 (a)	39	Reciprocating Internal Combustion Engines - existing RICE Stationary Reciprocating Internal Combustion Engines - compliance at all times except startup, shutdown or malfunction
FACILITY	40CFR 63-ZZZZ.6605 (b)	40	Stationary Reciprocating Internal Combustion Engines - operate and maintain air pollution control and monitoring equipment
FACILITY	40CFR 63-ZZZZ.6610 (a)	41	Stationary Reciprocating Internal Combustion Engines - date of initial compliance test
R-24505	40CFR 63-ZZZZ.6620 (b)	76	Stationary Reciprocating Internal Combustion Engines - performance tests
FACILITY	40CFR 63-ZZZZ.6620 (c)	42	Stationary Reciprocating Internal Combustion Engines - performance tests
FACILITY	40CFR 63- ZZZZ.6620 (e) (2)	43	Stationary Reciprocating Internal Combustion Engines - performance tests
FACILITY	40CFR 63-ZZZZ.6620 (i)	44	Stationary Reciprocating Internal Combustion Engines - performance tests
FACILITY	40CFR 63-ZZZZ.6640 (a)	45, 46	Stationary Reciprocating Internal Combustion Engines - continuous parameter monitoring system (CPMS) operation
FACILITY	40CFR 63-ZZZZ.6640 (b)	47	Stationary Reciprocating Internal Combustion Engines - deviations and catalyst changing
FACILITY	40CFR 63-ZZZZ.6640 (c)	48	Stationary Reciprocating Internal Combustion Engines - operation during periods of startup, shutdown and malfunction
FACILITY	40CFR 63-ZZZZ.6640 (d)	49	Stationary



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FACILITY	40CFR 63-ZZZZ.6640 (e)	50	Reciprocating Internal Combustion Engines - treatment of deviations during periods of SS&M
FACILITY	40CFR 63-ZZZZ.6645 (a)	51	Stationary Reciprocating Internal Combustion Engines - non- compliance with NESHAP General Provisions
R-24505/-/RC5/OR10A	40CFR 63-ZZZZ.6645 (c)	78	Stationary Reciprocating Internal Combustion Engines - NESHAP General Provision notifications
R-24505/-/RC5/OR11A	40CFR 63-ZZZZ.6645 (c)	79	Stationary Reciprocating Internal Combustion Engines - initial notification for new or reconstructed RICE
FACILITY	40CFR 63-ZZZZ.6645 (e)	52	Stationary Reciprocating Internal Combustion Engines - notification of intent to conduct performance test
FACILITY	40CFR 63-ZZZZ.6645 (f)	53	Stationary RICE - Notification of complinance status
FACILITY	40CFR 63- ZZZZ.6645 (h) (2)	54	Stationary Reciprocating Internal Combustion Engines - notification of compliance status for performance tests
R-24505	40CFR 63-ZZZZ.6650	77	Stationary Reciprocating Internal Combustion Engines - Reporting requirements
FACILITY	40CFR 63- ZZZZ.6650 (b) (5)	55	Stationary Reciprocating Internal Combustion Engines - compliance reports
FACILITY	40CFR 63-ZZZZ.6650 (c)	56	Stationary Reciprocating Internal Combustion Engines - contents of compliance reports
FACILITY	40CFR 63-ZZZZ.6650 (e)	57	Stationary Reciprocating

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FACILITY	40CFR 63-ZZZZ.6655 (a)	58	Internal Combustion Engines - deviation reporting contained in compliance reports
			Stationary Reciprocating Internal Combustion Engines - records that must be kept
FACILITY	40CFR 63-ZZZZ.6655 (b)	59	Stationary Reciprocating Internal Combustion Engines - records that must be kept for CEMS and CPMS
FACILITY	40CFR 63-ZZZZ.6660	60	Stationary Reciprocating Internal Combustion Engines - record retention
FACILITY	40CFR 63-ZZZZ.6665	61	Stationary Reciprocating Internal Combustion Engines - General provisions
FACILITY	40CFR 68	22	Chemical accident prevention provisions
FACILITY	40CFR 82-F	23	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	11	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	83	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	12	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	13	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	15	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	24, 62, 63	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	16	General conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	2	General conditions
			Fees
FACILITY	6NYCRR 201-6.5 (a) (8)	17	General conditions
FACILITY	6NYCRR 201-6.5 (c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-	5	Permit conditions for

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	6.5 (c) (3) (ii)			Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	18		Compliance schedules
FACILITY	6NYCRR 201-6.5 (e)	6		Compliance Certification
FACILITY	6NYCRR 201-6.5 (f) (6)	19		Off Permit Changes
FACILITY	6NYCRR 201-7.2	64		Emissions capping using synthetic minor permits
R-24505	6NYCRR 201-7.2	71, 72, 73, 74		Emissions capping using synthetic minor permits
FACILITY	6NYCRR 202-1.1	1 -1		Required emissions tests.
FACILITY	6NYCRR 202-1.2	26		Notification.
FACILITY	6NYCRR 202-1.3	27, 28		Acceptable procedures.
FACILITY	6NYCRR 202-1.3 (a)	29		Acceptable procedures - reference methods
FACILITY	6NYCRR 202-1.4	30		Separate emission tests by the commissioner.
FACILITY	6NYCRR 202-1.5	31		Prohibitions.
FACILITY	6NYCRR 202-2.1	7		Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8		Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	84		General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	21		General Prohibitions - visible emissions limited
FACILITY	6NYCRR 215	10		Open Fires
FACILITY	6NYCRR 215.2	9		Open Fires - Prohibitions
FACILITY	6NYCRR 226	1 -2		SOLVENT METAL CLEANING PROCESSES
FACILITY	6NYCRR 227-1.3 (a)	32		Smoke Emission Limitations.
FACILITY	6NYCRR 227-1.6 (b)	33		Corrective Action: Facility Shutdown.
FACILITY	6NYCRR 227-1.6 (c)	34		Corrective Action: Facility Shutdown
FACILITY	6NYCRR 227-1.6 (d)	35		Prohibitions.
R-24505	6NYCRR 227-1.7	75		Corrective Action: Facility Shutdown
R-24504	6NYCRR 227-2.4 (f) (2) (i)	69, 70		Prohibitions.
R-24506	6NYCRR 227-2.4 (f) (4)	80		General Emission Data.
R-24502	6NYCRR 227-2.5 (c)	65, 66		Emission limitation for NOx for lean burn internal combustion engines with spark-ignited sources
				Exemption for emergency power generating units and units that operate during emergency situations.
				Alterative emission



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R-24503	6NYCRR 227-2.5(c)	67, 68	limits Alternative emission limits
FACILITY	6NYCRR 227-2.6(c)	36	Stack Test Requirements.
R-24505	6NYCRR 231-2	71, 72, 73	New Source Review in Nonattainment Areas and Ozone Transport Region

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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



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6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.5 (a) (4)

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

6 NYCRR 201-6.5 (a) (7)

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

6 NYCRR 201-6.5 (a) (8)

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

6 NYCRR 201-6.5 (c)

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

6 NYCRR 201-6.5 (c) (2)

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

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

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

6 NYCRR 201-6.5 (d) (5)

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



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semiannually.

6 NYCRR 201-6.5 (e)

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

6 NYCRR 201-6.5 (f) (6)

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

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

This regulation 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 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

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

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable



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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, TGP COMPRESSOR STATION 245 has been determined to be subject to the following regulations:

40 CFR 52.21

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) .

40 CFR 52.21 (j) (3)

BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61. Emission and operational limitations required from a BACT determination will have to be entered into the special permit conditions, separately by the permit reviewer.

40 CFR 63.6590 (b) (1) (i)

This condition allows engines that meet the definition of an emergency engine to only have to submit an initial notification. Emergency engines do not need to meet the rest of the provisions in this NESHAP rule.

40 CFR 63.6595 (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. The installation of these engines now requires the facility to be regulated by the MACT requirements of 40 CFR 63 Subpart ZZZZ.

40 CFR 63.6600 (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.

40 CFR 63.6605 (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.



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40 CFR 63.6605 (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.

40 CFR 63.6610 (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.

40 CFR 63.6620 (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.

40 CFR 63.6620 (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.

40 CFR 63.6620 (e) (2)

This condition lists how the facility must calculate the concentration of formaldehyde during the performance test in order to prove that the engine(s) is meeting the concentration limit in this rule for formaldehyde.

40 CFR 63.6620 (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.

40 CFR 63.6640 (a)

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 is continuously meeting the emission limits listed in this rule.

When the facility conducted the performance test to measure the emissions of pollutants during normal engine operation, the facility had to 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.

40 CFR 63.6640 (b)



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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.

40 CFR 63.6640 (c)

40 CFR 63.6640 (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.

40 CFR 63.6640 (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.

40 CFR 63.6645 (a)

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

40 CFR 63.6645 (c)

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

40 CFR 63.6645 (e)

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

40 CFR 63.6645 (f)

This regulation requires the facility to submit its initial notification in the format specified in 40 CFR 63 Subpart A.

40 CFR 63.6645 (h) (2)

This is a one time notification of compliance the facility has to submit indicating the



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sources are in compliance by the use of a performance test

40 CFR 63.6650

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.

40 CFR 63.6650 (b) (5)

This condition allows the facility to time the submission of the semiannual compliance reports that are required in this rule to coincide with the Title V compliance reports submission schedule.

40 CFR 63.6650 (c)

This condition lists what the facility needs to submit with the semiannual compliance report required in this rule.

40 CFR 63.6650 (e)

This condition lists what information the facility needs to submit for each deviation from an emission limit or operating limit.

40 CFR 63.6655 (a)

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.

40 CFR 63.6655 (b)

This regulation sets forth the record keeping requirements for each continuous emission monitor or continuous parameter monitoring system for stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40 CFR 63.6660

This condition specifies how long the facility must keep records of the results of the monitoring that was done to prove that the engine(s) was meeting the emission limits in this rule.

40 CFR 63.6665

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.

6 NYCRR 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. These conditions are being used to verify emission from the New project in order to verify that the project PTE



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to Emit will be less than the significant source project threshold of 40 tons per year for New Source review under 6 NYCRR Part 231 and PSD under 40 CFR Part 50.21

6 NYCRR 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.

6 NYCRR 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 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.

6 NYCRR 202-1.3 (a)

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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 227-1.3 (a)

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

6 NYCRR 227-1.6 (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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6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 227-1.7

6 NYCRR 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, and is the current RACT Limit for these types of sources.

6 NYCRR 227-2.4 (f) (4)

6 NYCRR 227-2.5 (c)

This regulation allows an Alternative RACT Emission limit in certain situations. TGP has requested an alternative RACT emission limit on 2 Sources, both of which are Internal combustion engines. Variances have been submitted and approved by the New York State Department of Environmental Conservation and have been submitted to be included in the Department's SIP.

6 NYCRR 227-2.6 (c)

6 NYCRR Part 226

This regulation specifies the general requirements, equipment specifications and operating requirements for open-top vapor, conveyorized and cold cleaning degreasers.

6 NYCRR Subpart 231-2

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

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Compliance Certification

Summary of monitoring activities at TGP COMPRESSOR STATION 245:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

R-24505	76	intermittent emission testing
FACILITY	44	record keeping/maintenance procedures
FACILITY	45	monitoring of process or control device parameters as surrogate
FACILITY	46	monitoring of process or control device parameters as surrogate
FACILITY	51	record keeping/maintenance procedures
R-24505/-/RC5/OR10A	78	record keeping/maintenance procedures
R-24505/-/RC5/OR11A	79	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
R-24505	77	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
FACILITY	59	record keeping/maintenance procedures
FACILITY	60	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
R-24505	71	intermittent emission testing
R-24505	72	intermittent emission testing
R-24505	73	intermittent emission testing
R-24505	74	intermittent emission testing
FACILITY	7	record keeping/maintenance procedures
FACILITY	1-2	record keeping/maintenance procedures
FACILITY	32	monitoring of process or control device parameters as surrogate
R-24504	69	record keeping/maintenance procedures
R-24504	70	intermittent emission testing
R-24506	80	work practice involving specific operations
R-24502	65	record keeping/maintenance procedures
R-24502	66	intermittent emission testing
R-24503	67	record keeping/maintenance procedures
R-24503	68	intermittent emission testing
FACILITY	36	record keeping/maintenance procedures

Basis for Monitoring

The engines are monitored using best management practices to ensure the engines are operating at optimum in order to maintain emission limits for 6 NYCRR Part 227

The catalyst temperature and pressure drop is monitored to ensure the catalyst is reducing emission as required under the regulations for 40 CFR 63 Subpart ZZZZ



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