



Permit Review Report

Permit ID: 6-3013-00183/00006  
12/09/2008

**Facility Identification Data**

Name: GRIFFISS CENTRAL HEAT PLANT  
Address: 655 ELLSWORTH RD  
ROME, NY 13441

**Owner/Firm**

Name: GRIFFISS UTILITY SERVICES CORP  
Address: 153 BROOKS RD  
ROME, NY 13441, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

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ROME, NY 13441  
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**Permit Description**

**Introduction**

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

**Summary Description of Proposed Project**

THE GRIFFISS CENTRAL HEAT PLANT, OWNED AND OPERATED BY THE GRIFFISS UTILITY SERVICES CORPORATION, PROVIDES ELECTRICITY AND HEAT TO THE GRIFFISS BUSINESS AND TECHNOLOGY PARK. THE GRIFFISS UTILITY SERVICES CORPORATION IS A NOT-FOR-PROFIT 501 © 3. THE EXISTING PLANT EQUIPMENT INCLUDES TWO NATURAL GAS OR OIL FIRED WATER TUBE BOILERS. THE PROPOSED REPLACEMENT EQUIPMENT THAT WILL BE UTILIZED INCLUDES TWO 85



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MMBTU/HR GASIFIERS AND TWO (2) HEAT RECOVERY STEAM GENERATORS. THE EXISTING STEAM PLANT EQUIPMENT WILL BE LEFT FOR BACK UP ONLY AND WILL NOT BE HELD IN WARM STAND-BY.

**Attainment Status**

GRIFFISS CENTRAL HEAT PLANT is located in the town of ROME in the county of ONEIDA. 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

\* 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

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**Permit Structure and Description of Operations**

The Title V permit for GRIFFISS CENTRAL HEAT PLANT 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



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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.

GRIFFISS CENTRAL HEAT PLANT is defined by the following emission unit(s):

Emission unit U0029C - The emission unit includes two 85 mmBTU/hr gasification vessels that use woody biomass, including industrial residue material extracted from construction and demolition debris, each followed by a 50000 PPH SNY-gas combustion and steam generation unit using heat recovery steam generators. There will be one common stack. In addition, a wood-chipper will be part of this emission unit to reduce the size of any off spec wood.

Emission unit U0029C is associated with the following emission points (EP):  
0029C, 0029D

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

Process: WOD is located at Building NEWBH - This process is the proposed biomass gasification process with syn-gas combustion and steam generation using heat recovery steam generators. The process includes control equipment such as the electrostatic precipitator and selective non-catalytic reduction (SNCR).

Emission unit U0029A - The emission unit includes the two existing natural gas or oil firing water tube boilers with low NOx burners and flue gas recirculation and two decommissioned coal fired boilers. Each two boilers share a single stack (for 2 total emission points).

Emission unit U0029A is associated with the following emission points (EP):  
0029A, 0029B

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

Process: GAS is located at FIRST, Building 16 - This is a gas fired backup boiler in an existing building.

Process: OIL is located at FIRST, Building 16 - This process is for oil combustion in an existing boiler.

Process: SD1 is located at Building 16 - This process involves the permanent shutdown of boilers 2 & 4. No further operation is allowed.

**Title V/Major Source Status**

GRIFFISS CENTRAL HEAT PLANT is subject to Title V requirements. This determination is based on the following information:

The facility is major for Nitrogen Oxides (NOx) and Carbon Monoxide (CO).

**Program Applicability**

The following chart summarizes the applicability of GRIFFISS CENTRAL HEAT PLANT with regards to the principal air pollution regulatory programs:

**Regulatory Program**

**Applicability**



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

## NOTES:

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

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

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

**MACT** Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

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



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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**

4931

**Description**

ELEC & OTHER SERVICES COMBINED

**SCC Codes**

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

**SCC Code**

1-02-002-04

**Description**

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL  
 INDUSTRIAL BOILER - SUBBITUMINOUS COAL  
 Spreader Stoker

1-02-005-01

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL  
 INDUSTRIAL BOILER - DISTILLATE OIL  
 Grades 1 and 2 Oil





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

**Item E: Requirement to Comply With All Conditions - 6 NYCRR Part**

201-6.5(a)(2)  
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

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

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

**Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR**

Part 201-6.5(a)(5)  
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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

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

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

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

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing



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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 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



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Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)**  
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.  
**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**  
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

## Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY		51	Powers and Duties of the Department with respect to air pollution control
U-0029C	40CFR 52-A.21	41, 42, 43, 44	Prevention of Significant Deterioration
U-0029C/-/WOD/029C3	40CFR 60-Dc.40c	46	Steam generators 10-100 million Btu per hour
U-0029C/-/WOD/029C3	40CFR 60-Dc.48c(a)	47	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 60-Dc.48c(g)	28	Reporting and Recordkeeping Requirements.
U-0029C/-/WOD/029C3	40CFR 60-Dc.48c(i)	48	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	
FACILITY	6NYCRR 201-1.4	52	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof

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FACILITY	6NYCRR 201-3.3 (a)	14	of eligibility Trivial Activities -
FACILITY	6NYCRR 201-6	23, 29, 30	proof of eligibility Title V Permits and the Associated Permit Conditions
U-0029C	6NYCRR 201-6.1	39, 40	
FACILITY	6NYCRR 201-6.1 (a)	24, 26	Requirement for a Title V facility permit
U-0029A/0029A/GAS/029A1	6NYCRR 201-6.1 (a)	37	Requirement for a Title V facility permit
U-0029A/0029A/OIL/029A1	6NYCRR 201-6.1 (a)	38	Requirement for a Title V facility permit
FACILITY	6NYCRR 201-6.5 (a) (4)	15	
FACILITY	6NYCRR 201-6.5 (a) (7)	2	
FACILITY	6NYCRR 201-6.5 (a) (8)	16	
FACILITY	6NYCRR 201-6.5 (c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	17	
FACILITY	6NYCRR 201-6.5 (e)	6	
FACILITY	6NYCRR 201-6.5 (f) (6)	18	
FACILITY	6NYCRR 201-7.1	25, 26, 31	Federally Enforceable Emissions Caps
U-0029C	6NYCRR 201-7.1	41, 42, 43, 44	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	19	
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	53	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
U-0029C/-/WOD/029C6	6NYCRR 212.4 (c)	49	General Process Emission Sources - emissions from new processes and/or modifications
U-0029C/-/WOD/029C6	6NYCRR 212.6 (a)	50	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215	9	
FACILITY	6NYCRR 225-1.2 (a) (2)	27	Sulfur in Fuel Limitations Post 12/31/87.
U-0029A/-/OIL	6NYCRR 225-1.8 (a)	34	Reports, sampling and analysis.
U-0029A	6NYCRR 225-1.8 (d)	32	Reports, sampling, and analysis
U-0029A	6NYCRR 227-1.3 (a)	33	Smoke Emission Limitations.
U-0029C	6NYCRR 227-1.3 (a)	45	Smoke Emission Limitations.
U-0029A/-/SD1/029A2	6NYCRR 231-2.7	35	
U-0029A/-/SD1/029B4	6NYCRR 231-2.7	36	

**Applicability Discussion:**



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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

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.



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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 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



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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 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.



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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, 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, GRIFFISS CENTRAL HEAT PLANT 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 60-Dc.40c

This regulation requires the source owner or operator to comply with the applicable General Provisions of 40 CFR 60 Subpart Dc. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.

40CFR 60-Dc.48c (a)

This regulation requires the owner and operator of each affected facility to submit notification of the date of construction or reconstruction, anticipated startup, and actual startup of the facility. The notification must include the following information:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

40CFR 60-Dc.48c (g)

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



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40CFR 60-Dc.48c (i)

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

6NYCRR 201-6.1

This section sets forth the applicability requirements for a Title V facility permit and preconstruction permits for stationary sources. It also defines those stationary source categories exempted or deferred from the permitting requirements to obtain a Title V permit. This section also allows any stationary source, that so desires, to apply for a Title V facility permit. Finally, applicable facilities with multiple stationary sources are to be issued a single Title V permit unless a request is made otherwise.

6NYCRR 201-6.1 (a)

This regulation requires the following stationary sources to obtain a Title V permit:

1. Any major stationary source;
2. Any stationary source subject to a New Source Performance Standard (NSPS) in 40 CFR 60;
3. Any stationary source regulating hazardous air pollutants (HAP's);
4. Any affected source (subject to the Acid Rain requirements under Title IV of the Act);
5. Any stationary source in a category designated by the EPA or the department as per rulemaking.

6NYCRR 201-7.1

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

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 225-1.2 (a) (2)

This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.8 (a)

Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years

6NYCRR 225-1.8 (d)

This requires that sampling, compositing and analysis of fuel samples must be done in accordance with methods acceptable to the commissioner.

6NYCRR 227-1.3 (a)

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



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6NYCRR 231-2.7

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

Pursuant to section 231-2.7, existing major facilities may avoid the requirements of Subpart 231-2 by conducting a netting analysis. This is done by utilizing the following equation:

$$NEI = PEP + CEI - ERCs$$

where:

NEI = net emission increase

PEP = project emission potential for the proposed source project

CEI = creditable emission increases

ERCs = emission reduction credits

All of the creditable emission increases and emission reduction credits must have occurred at the facility for which the netting analysis is being conducted and must have occurred during the contemporaneous period for the proposed project. If the net emission increase is less than the threshold values incorporated into sections 231-2.12 and 231-2.13, then the the proposed source project is not subject to the requirements of Subpart 231-2.

**Compliance Certification**

Summary of monitoring activities at GRIFFISS CENTRAL HEAT PLANT:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-0029C/-/WOD/029C3	47	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
U-0029C/-/WOD/029C3	48	record keeping/maintenance procedures
U-0029C	39	work practice involving specific operations
U-0029C	40	work practice involving specific operations
FACILITY	24	work practice involving specific operations
U-0029A/0029A/GAS/029A1	37	intermittent emission testing
U-0029A/0029A/OIL/029A1	38	intermittent emission testing
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	26	work practice involving specific operations
U-0029C	41	intermittent emission testing
U-0029C	42	intermittent emission testing
U-0029C	43	intermittent emission testing
U-0029C	44	intermittent emission testing
FACILITY	7	record keeping/maintenance procedures
U-0029C/-/WOD/029C6	49	intermittent emission testing
U-0029C/-/WOD/029C6	50	monitoring of process or



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FACILITY	27	control device parameters as surrogate
U-0029A/-/OIL	34	work practice involving specific operations
U-0029A	33	record keeping/maintenance procedures
U-0029C	45	monitoring of process or control device parameters as surrogate
U-0029A/-/SD1/029A2	35	monitoring of process or control device parameters as surrogate
U-0029A/-/SD1/029B4	36	record keeping/maintenance procedures

**Basis for Monitoring**

1. Condition 5 - This condition requires the facility to perform semi-annual reporting.
2. Condition 6 - This condition requires the facility to perform annual reporting.
3. Condition 7 - This condition requires the facility to prepare yearly emission statements.
4. Condition 24 - This condition limits the amount of fuel oil that the facility can burn.
5. Condition 26 - This condition limits emergency generator usage to 500 hours per year.
6. Condition 27 - This condition limits the amount of sulfur that the fuel oil can have.
7. Condition 28 - This condition requires the facility to maintain records of the type and amount of fuel burned in the new boilers.
8. Condition 33 - This condition limits the opacity of emission unit U-0029A to 20%.
9. Condition 34 - This condition requires the facility to retain fuel oil supplier certifications for each shipment of oil.
10. Condition 35 - This condition prohibits the coal boiler 029A2 from operating again.
11. Condition 35 - This condition prohibits the coal boiler 029B4 from operating again.
12. Condition 37 - This condition limits NOx emissions to 0.1 lb/mmBtu for emission unit U-0029A while firing gas.
13. Condition 38 - This condition limits NOx emissions to 0.1 lb/mmBtu for emission unit U-0029A while firing oil.
14. Condition 39 - This condition limits waste wood usage to 30% by weight of the total fuel.
15. Condition 40 - This condition limits waste material in the waste wood to 10%.
16. Condition 41 - This condition limits PM/PM10 emissions to 0.134 lb/mmBtu on emission unit U-0029C.
17. Condition 42 - This condition limits NOx emissions to 0.134 lb/mmBtu on emission unit U-0029C.
18. Condition 43 - This condition limits CO emissions to 0.171 lb/mmBtu on emission unit U-0029C.
19. Condition 44 - This condition limits VOC emissions to 0.067 lb/mmBtu on emission unit U-0029C.
20. Condition 45 - This condition limits the opacity of emission unit U-0029C to 20%.
21. Condition 47 - This condition requires the subject facility to submit to EPA the date of construction, anticipated startup, and actual startup.
22. Condition 48 - This condition requires the facility to maintain records for a period of five years.
23. Condition 49 - This condition requires the facility to limit PM emissions to 0.05 gr/dscf from the oversized wood grinder.
24. Condition 50 - This condition limits the opacity to 20% from the oversized wood grinder.

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