

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 7-5024-00007/00004

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Facility Identification Data

Name: CONSOLIDATED GAS BORGER STATION
Address: 219 ELLIS HOLLOW CK RD
City: ITHACA
Zip: 14850

Owner/Firm

Name: DOMINION TRANSMISSION INC
City: CLARKSBURG
State: WV Country: USA Zip: 26302
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: MICHAEL K. BARYLSKI

Division of Air Resources:
Name: REGINALD G. PARKER

Air Permitting Facility Owner Contact:
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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)(2) 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 while the permit review report is based on information found in the accompanying permit, it is not an enforceable document and therefore, has no legal standing.

Summary Description of Proposed Project

THIS IS AN APPLICATION FOR AN INITIAL TITLE V PERMIT FOR AN EXISTING NATURAL GAS TRANSMISSION FACILITY.

Attainment Status

CONSOLIDATED GAS BORGER STATION is located in the town of DRYDEN in the county of TOMPKINS.

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

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air pollutant.)

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

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

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

Facility Description

THIS FACILITY IS A NATURAL GAS TRANSMISSION FACILITY CONSISTING OF THREE (3) PERMITTED NATURAL GAS COMPRESSOR TURBINES; ALONG WITH TWO (2) AUXILIARY GENERATORS; TWO (2) BOILERS; THREE (3) HOT WATER HEATERS; ONE (1) AIR COMPRESSOR; FOUR (4) HEATERS; ONE (1) PARTS WASHER; AND TWO (2) STORAGE TANKS.

Permit Structure and Description of Operations

The Title V permit for CONSOLIDATED GAS BORGER STATION 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

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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.

CONSOLIDATED GAS BORGER STATION is defined by the following emission unit(s):
Emission unit 00000A - TUR01 - TUR03: THREE (3) DRESSER CLARK DC990 5800 HP
NATURAL GAS FIRED STATIONARY COMPRESSOR TURBINES.

Emission unit 00000A is associated with the following emission points (EP):
00001, 00002, 00003

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

Process: T01 is located at GROUND - TUR01: ONE (1) DRESSER CLARK DC 990 5800 HP
NATURAL GAS FIRED STATIONARY COMPRESSOR TURBINE.

Process: T02 is located at GROUND - TUR02: ONE (1) DRESSER CLARK DC 990 5800 HP
NATURAL GAS FIRED STATIONARY COMPRESSOR TURBINE.

Process: T03 is located at GROUND - TUR01: ONE (1) DRESSER CLARK DC 990 5800 HP
NATURAL GAS FIRED STATIONARY COMPRESSOR TURBINE.

Title V/Major Source Status

CONSOLIDATED GAS BORGER STATION is subject to Title V requirements. This determination is based on the following information:

The facility is major based on potential annual NOx and CO emissions (>100 tons/year).

Program Applicability

The following chart summarizes the applicability of CONSOLIDATED GAS BORGER STATION with regards to the principal air pollution regulatory programs:

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

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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.

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

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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	NATURAL GAS TRANSMISSION

SCC Codes

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

iOSCC Code	Description
2-03-002-02	INTERNAL COMBUSTION ENGINES - COMMERCIAL/INSTITUTIONAL COMMERCIAL/INSTITUTIONAL IC ENGINE - NATURAL GAS Turbine

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000092-52-4	1, 1 BIPHENYL (HAP)	> 0	but < 10 tpy
000107-21-1	1, 2-ETHANEDIOL (HAP)	> 0	but < 10 tpy
000106-99-0	1, 3-BUTADIENE (HAP)	> 0	but < 10 tpy
000075-07-0	ACETALDEHYDE (HAP)	> 0	but < 10 tpy
000107-02-8	ACROLEIN (HAP)	> 0	but < 10 tpy
000071-43-2	BENZENE (HAP)	> 0	but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 100 tpy	but < 250 tpy
000100-41-4	ETHYLBENZENE (HAP)	> 0	but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)	> 0	but < 10 tpy
0NY100-00-0	HAP	>= 2.5 tpy	but < 10 tpy
000110-54-3	HEXANE (HAP)	> 0	but < 10 tpy
000091-20-3	NAPHTHALENE (HAP)	> 0	but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy	
0NY075-00-0	PARTICULATES	>= 2.5 tpy	but < 10 tpy
000108-95-2	PHENOL (HAP)	> 0	but < 10 tpy
0NY075-00-5	PM-10	>= 2.5 tpy	but < 10 tpy
007446-09-5	SULFUR DIOXIDE	> 0	but < 2.5 tpy
000108-88-3	TOLUENE (HAP)	> 0	but < 10 tpy
0NY998-00-0	VOC	>= 50 tpy	but < 100 tpy
001330-20-7	XYLENE, M, O & P MIXT. (HAP)	> 0	but < 10 tpy

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	40CFR 52-A.21(i)(2)	Applicability	35
0-0000A/00002/T02/TUR02	40CFR 52-A.21(i)(2)	Applicability	44
0-0000A	40CFR 52-A.21(j)	Best Available Control Technology	37
0-0000A/-/T01/TUR01	40CFR 60-GG.332(a)(2)	NOx Standard units >=10 and <=100 (mmBtu/hr) or with a base load <= 30 MW and 100 mmBtu/hr.	39
0-0000A/-/T02/TUR02	40CFR 60-GG.332(a)(2)	NOx Standard units >=10	40

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0-0000A/-/T03/TUR03	40CFR 60-GG.332(a)(2)	and <=100 (mmBtu/hr) or with a base load <= 30 MW and 100 mmBtu/hr.	41
0-0000A	40CFR 60-GG.334(b)(2)	NOx Standard units >=10 and <=100 (mmBtu/hr) or with a base load <= 30 MW and 100 mmBtu/hr.	41
FACILITY	40CFR 82-F.	Non-bulk Storage Sulfur Monitoring Requirements	38
FACILITY	6NYCRR 200.5	Protection of Stratospheric Ozone - recycling and emissions reduction	32
FACILITY	6NYCRR 200.6	Sealing.	1
FACILITY	6NYCRR 200.7	Acceptable ambient air quality.	2
FACILITY	6NYCRR 201-1.10(b)	Maintenance of equipment.	3
FACILITY	6NYCRR 201-1.2	Permitting - public access to records kept for Title V permitting	8
FACILITY	6NYCRR 201-1.5	Permitting - unpermitted emission sources	4
FACILITY	6NYCRR 201-1.7	Emergency defense	5
FACILITY	6NYCRR 201-1.8	Recycling and Salvage	6
FACILITY	6NYCRR 201-3.2(a)	Prohibition of reintroduction of collected contaminants to the air	7
FACILITY	6NYCRR 201-3.3(a)	Exempt Activities - Proof of eligibility	9
FACILITY	6NYCRR 201-5.	Trivial Activities - proof of eligibility	10
FACILITY	6NYCRR 201-5.3(b)	State Facility Permit General Provisions	46
FACILITY	6NYCRR 201-6.	Permit Content and Terms of Issuance - permit conditions	47
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Title V Permits and the Associated Permit Conditions	12, 17, 19, 11, 14, 15, 18, 20, 21, 22, 13, 16, 23, 33, 34
FACILITY	6NYCRR 201-6.5(e)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	24
FACILITY	6NYCRR 201-6.5(g)	Compliance Certification	25
FACILITY	6NYCRR 202-1.1	Permit shield	26
FACILITY	6NYCRR 202-2.1	Required emissions tests.	27
FACILITY	6NYCRR 202-2.5	Emission Statements - Applicability	28
FACILITY	6NYCRR 211.2	Emission Statements - record keeping requirements.	29
FACILITY	6NYCRR 211.3	General Prohibitions - air pollution prohibited.	48
FACILITY	6NYCRR 215.	General Prohibitions - visible emissions limited	30
0-0000A/00001	6NYCRR 227-1.3(a)	Open Fires	31
0-0000A/00002	6NYCRR 227-1.3(a)	Smoke Emission Limitations.	42
0-0000A/00003	6NYCRR 227-1.3(a)	Smoke Emission Limitations.	43
		Smoke Emission	45

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0-0000A	6NYCRR 227-2.5(c)	Limitations. Alternative emission limits	36
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Applicability Discussion:

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

6NYCRR Part 200-.5

Allows for the sealing of non-compliant air contamination sources

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 201-1.2

Any existing emission source that is required to be permitted or registered but has not done so, must apply for the necessary permit or registration. The source is subject to all regulations that were applicable at the time the original permit or registration was required as well as any subsequent applicable requirements that came into effect since.

6NYCRR Part 201-1.5

An enforcement action may be avoided if the facility can demonstrate that an emergency situation occurred which resulted in an emission limitation or permit violation. The following information would constitute evidence of an emergency situation: a properly signed operating log recorded during the actual event which; identifies the cause(s) of the emergency, indicates that all equipment was operating properly at the time, the person responsible took all reasonable steps to minimize the exceedance or violation, and that the department was notified of the emergency within 2 working days of the event.

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 contaminants to the air

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6NYCRR Part 201-1.10(b)

Any permit application, compliance plan, permit, and monitoring and compliance certification report that is submitted as part of the Title V permit process must be made available to the public as per requirements set forth under 6 NYCRR Part 616 - Public Access to Records and section 114(c) of the Clean Air Act Amendments of 1990.

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)

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

6NYCRR Part 201-5

General Provisions - this requirement applies to those permit terms and conditions which are not federally enforceable; specifies that permittees must maintain emission units and control devices in compliance with all rules; authorizes reasonable access for inspections for department representatives; requires that on-site monitoring recordkeeping be made available for review for at least 5 years.

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

6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

6NYCRR Part 201-6

General provisions for Title V permits including:

Applicable Criteria, Limits, Terms, Conditions and Standards - requires that facility operations take place in accordance with approved criteria, emission limits, terms,

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conditions and standards as specified in the permit and that any documents required by the federally enforceable portion of the permit be certified by a responsible official

Cessation or Reduction of Permitted Activity Not a Defense - specifies that the cessation or reduction of a permitted activity to maintain compliance is not a defense in an enforcement action

Compliance Requirements - lists the information that must be included in any required compliance monitoring records and reports; and requires; compliance with any approved compliance schedule; the submittal of risk management plans as per 112(r) of the Act if necessary; and the submittal of compliance progress reports on a semiannual basis, at a minimum

Federally-Enforceable Requirements - specifies what permit terms and conditions, in general, are federally enforceable

Fees - requires the permittee to pay any required fees

Monitoring, Related Recordkeeping and Reporting Requirements - requires all compliance monitoring and recordkeeping to be conducted according to the terms and conditions of the permit and any Q/A requirements; any monitoring or support information is to be retained for minimum of 5 years.

Permit Revocation, Modification, Reopening, Reissuance or Termination and Associated Information Submission Requirements - specifies that the permit may be modified, revoked, reopened and reissued, or terminated for cause; and the permittee must furnish information regarding the permit to the department upon reasonable request

Permit Shield - sets forth criteria under which the permit shield applies and what authority the department maintains in pursuing violations

Property Rights - specifies that the permit does not convey any property rights

Reopening Cause - sets forth criteria and procedures for reopening a permit

Right to Inspect - establishes authority whereby department representatives may enter and inspect a facility

Severability - establishes that the permit continues to be valid in instances where any provisions, parts or conditions of the permit are found to be invalid or are the subject of a challenge

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 Part 201-6.5(g)



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

6NYCRR Part 202-1.1

Specifies that emissions tests may be required to ascertain compliance with any air pollution codes and rules.

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

Specifies the emission statement records that must be maintained for a 5 year period.

6NYCRR Part 211-.2

General air pollution prohibition

6 NYCRR Part 211.3

Restricts the opacity of visible emissions from any air contamination source.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 82, Subpart F

Requires affected permittees to comply with the recycling and emissions reduction standards specified by this rule when using ozone depleting substances identified under Title VI of the Act. Specifically, these regulations apply to the following persons or activities:

- a. Persons opening appliances for maintenance, service, repair, or disposal
- b. Equipment used during the maintenance, service, repair, or disposal of appliances
- c. Persons performing maintenance, service, repair, or disposal of appliances
- d. Persons disposing of small appliances, motor vehicle air conditioners or MVAC's, and MVAC-like appliances
- e. Persons owning commercial or industrial process refrigeration equipment
- f. Owners/operators of appliances normally containing 50 or more pounds.

If applicable, the above persons or activities may be required to comply with certain disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

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Facility Specific Requirements

In addition to Title V, CONSOLIDATED GAS BORGER STATION has been determined to be subject to the following regulations:

40CFR 52-A.21 (i) (2)

Any stationary source or modification to which the requirements of this regulation apply cannot begin construction without a valid permit

40CFR 52-A.21 (j)

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.

40CFR 60-GG.332 (a) (2)

This regulation provides the equation to be used to determine the allowable emissions of oxides of nitrogen (NOx) from a gas turbine with a heat input greater than 10 million BTU per hour and less than 100 million BTU per hour.

40CFR 60-GG.334 (b) (2)

This regulation requires the owner or operator of a gas turbine which is supplied its fuel without intermediate bulk storage to determine and record the sulfur content and nitrogen content of fuel being fired in the turbine daily. The owners, operators or fuel vendors may develop custom schedules for determination of these values. These custom schedules must be approved by the Administrator before they can be used to determine compliance with this requirement

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

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

6NYCRR 227-1.3 (a)

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

6NYCRR 227-2.5 (c)

This regulatory provision allows for the establishment of an alternative NOx RACT emission limit upon demonstration that the applicable NOx RACT limit is not technically or economically achievable.

Compliance Certification

Summary of monitoring activities at CONSOLIDATED GAS BORGER STATION:

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

0-0000A/00002/T02/TUR02	work practice involving specific operations	44
0-0000A	record keeping/maintenance procedures	37
0-0000A/-/T01/TUR01	intermittent emission testing	39
0-0000A/-/T02/TUR02	intermittent emission testing	40
0-0000A/-/T03/TUR03	intermittent emission testing	41
0-0000A	monitoring of process or control device parameters as surrogate	38
FACILITY	record keeping/maintenance procedures	24
FACILITY	record keeping/maintenance procedures	25
FACILITY	record keeping/maintenance procedures	28
0-0000A/00001	monitoring of process or control device parameters as surrogate	42
0-0000A/00002	monitoring of process or control device parameters as surrogate	43
0-0000A/00003	monitoring of process or control device parameters as surrogate	45
0-0000A	intermittent emission testing	36

Basis for Monitoring

The monitoring requirements contained in this permit are based on specific monitoring requirements listed in each applicable rule. In the event that the regulation does not provide specific monitoring requirements, the Department has established specific compliance monitoring requirements in the permit conditions.