

Borger Station Equipment, Savings, Public Health and Safety Proposal

June 4, 2017

(From Stu Berg, resident close to plant,
and Mothers Out Front representatives Katie Quinn-Jacobs and Lizzy Evett)

On May 1, 2017, representatives of Dominion Transmission Inc. spoke at the Varna Community Center in Dryden about operations at the Borger compressor station and changes proposed as part of its "New Market Project." During Q&A, it became apparent that because of old equipment and a lack of certain emission controls, methane and pollutant levels are much higher at Borger, a Title V facility, than at Dominion's other compressor stations. It is appropriate for the Town Board to inquire about improvements that can be implemented to bring the Borger Station up to par with the company's other facilities so that the people of Dryden are afforded the same protection as elsewhere.

A helpful tool is the EPA Natural Gas STAR Program, a voluntary initiative that encourages best practices to minimize the release of methane and other pollutants into the environment while promoting efficient and cost-savings operation. (<https://www.epa.gov/natural-gas-star-program>). Through the program, participants have identified several ways to limit methane loss and reduce levels of pollutants like VOCs (Volatile Organic Compounds), HAPs (Hazardous Air Pollutants), and formaldehyde--all of which are detrimental to human health. The payback for many of these actions is no more than 1 to 3 years, so participants can save a substantial amount of money in a relatively short timeframe. Participation also gives companies recognition for the positive steps they take to reduce emissions.

Although Dominion is one of twenty-six members of the Transmission & Storage Sector of the Natural Gas STAR program, there are significant program measures that it has failed to implement. By making feasible, cost-effective improvements at the Borger station, Dominion has an opportunity to better safeguard the environment, protect the public, and improve the company's image within the community.

Proposal for the Dryden Town Board:

1. Dominion has admitted that none of the gas turbines at the Borger Station are equipped with an oxidation catalyst. An oxidation catalyst is equivalent to a catalytic converter on an automobile--required standard equipment on almost all vehicles produced since the 1970's. It is attached to the combustion exhaust stream to reduce pollutants such as carbon monoxide, formaldehyde, and VOC's. Dominion has committed to installing oxidation catalysts at other facilities impacted by its "New Market Project," including on new turbines at Horseheads, Sheds, and Brookman Corners. Notably, in response to public demand, Dominion has also committed to installing an oxidation catalyst on its **existing** Taurus 60 turbine at the Brookman Corners compressor station by October 2018. **Dominion should explain why oxidation catalysts have not been installed at the Borger station. The town board should ask when this will occur so that the residents of Dryden receive the same level of protection as other communities.** Some references here:
<http://www.synergycatalyst.com/natural-gas-compression-catalyst/>
http://www.meca.org/galleries/files/MECA_comments_on_OTC_Gas_Compr_092611_final.pdf
2. **Two of the three compressors at the Borger station are powered by very old Dresser Clark DC 990 turbines (one dating back to 1984). As such, they produce nitrogen oxide (NOx) emissions and other pollutants that greatly exceed that of the station's third turbine, a Taurus 70 turbine installed in 2010. In fact, during the recent community meeting, Dominion staff admitted that if the station's older turbines were replaced, the facility likely could fall below the Title V threshold for a major pollution source, which at Borger is triggered by NOx. Since the Dresser Clark turbines use wet seals, they also produce more fugitive emissions (methane, VOCs, and HAPs) than modern "dry seal" turbines. In the presence of**

sunlight, NOx and VOCs create harmful ground-level ozone. Dominion staff has also admitted that these antiquated turbines are challenging from a maintenance standpoint.

Pollutant levels can be substantially reduced by replacing the two Dresser Clark turbines at Borger with modern equipment. For example, the Centaur 50 turbine manufactured by Caterpillar (same *Solar* series as the Taurus 70) with approximately 6000 horsepower would be a comparable substitute. (Alternatively, a single Taurus 70 turbine could potentially be used in place of the two Dresser Clark turbines.) Modern Caterpillar turbines have dry seals and are equipped with the lean-burn SoLoNOx feature. They can also be equipped with electric starters. **The town board should request that Dominion replace its old Dresser Clark turbines at Borger with modern equipment like at Horseheads, Sheds, and Brookman Corners.** Although turbine replacement is not inexpensive, costs may be mitigated by savings achieved with less maintenance or downtime and the fact that the older turbines would likely require replacement in the not-too-distant future anyway. (Note: The town board should not support substantially more horsepower that would allow additional compression or gas flow.)

3. The Natural Gas STAR program provides fact sheets on several additional methods for reducing methane loss and emissions at compressor stations and related infrastructure, some of which are identified below. **The town board should ask Dominion to explain whether these improvements are planned for equipment at the Borger station, and if not, why.** It should be noted that replacement of the Dresser Clark turbines would address or obviate many of the compressor issues identified below relating to seals, starters, and air/fuel ratio control. Other Gas STAR fact sheets relating to techniques and process operations may also be applicable. <https://www.epa.gov/natural-gas-star-program/recommended-technologies-reduce-methane-emissions>

Compressors/Engines:

[Wet Seal Degassing Recovery System for Centrifugal Compressors, PRO Fact Sheet](#) (payback 0-1 year)

[Replace Gas Starters with Air or Nitrogen, PRO Fact Sheet #101](#) (payback 0-1 year)

[Reducing Emissions When Taking Compressors Off-Line, Lessons Learned](#) (payback 0-1 year)

[Install Automated Air/Fuel Ratio Controls, PRO Fact Sheet #104](#) (payback 0-1 year)

[Install Electric Motor Starters, PRO Fact Sheet #105](#) (payback 1-3 years)

[Install Electric Compressors, PRO Fact Sheet #103](#) (payback 1-3 years)

[Replacing Wet Seals with Dry Seals in Centrifugal Compressors, Lessons Learned](#) (payback 1-3 years)

Dehydrators:

[Reroute Glycol Skimmer Gas, PRO Fact Sheet #201](#) (payback 0-1 year)

[Pipe Glycol Dehydrator to Vapor Recovery Unit, PRO Fact Sheet #203](#) (payback 0-1 year)

[Replace Glycol Dehydration Units with Methanol Injection, PRO Fact Sheet #205](#) (payback 0-1 year)

[Zero Emissions Dehydrators, PRO Fact Sheet #206](#) (payback 0-1 year)

[Convert Natural Gas-Driven Chemical Pumps, PRO Fact Sheet #202](#) (payback 1-3 years)

[Convert Pneumatics to Mechanical Controls, PRO Fact Sheet #301](#) (payback 1-3 years)

Pneumatics/Controls, Valves, Other:

[Convert Gas Pneumatic Controls to Instrument Air, Lessons Learned](#) (payback 0-1 year)

[Options for Reducing Methane Emissions From Pneumatic Devices in the Natural Gas Industry, Lessons Learned](#) (payback 1-3 years)

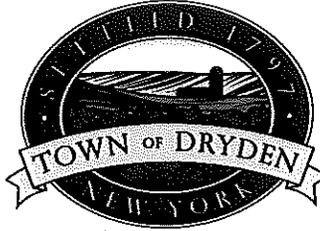
[Replace Burst Plates with Secondary Relief Valves, PRO Fact Sheet #605](#) (payback 0-1 year)

[Install Flares, PRO Fact Sheet #904](#) (payback 0-1 year)

[Install Electronic Flare Ignition Devices, PRO Fact Sheet #903](#) (payback 1-3 years)

[Replace Bi-Directional Orifice Metering with Ultrasonic Meters, PRO Fact Sheet #907](#) (payback 1-3 years)

Office of the Supervisor
93 E Main Street
Dryden, NY 13053



Jason Leifer
607/844-8888
supervisor@dryden.ny.us

October 9, 2018

To: Terri Helliard, Borger Plant Manager, 219 Ellis Hollow Creek Road, Ithaca, NY 14850
From: Jason Leifer, Supervisor,
Town of Dryden Board,
Town of Dryden Safety and Preparedness Committee
Re: Air Title V Facility Permit Application Renewal for Borger Station, 219 Ellis Hollow
Creek Road, Ithaca, NY 14850

We are writing with respect to the Air Title V renewal of Permit ID 7-5024-00007/00004 submitted by Dominion Energy Transmission Inc. on 05/15/2018 to the DEC. We are requesting a meeting with the Dryden Safety and Preparedness Committee to communicate our safety concerns regarding the operation of this facility. Specifically, we are interested in hearing if Dominion has implemented or proposed to make any of the equipment changes or upgrades that were discussed with your team in September 2017, most notably replacing the two Dresser Clark compressor turbines from the 1980s and installing oxidation catalysts on all the compressor turbines.

We are hopeful that Dominion energy will do these upgrades as it would not only benefit the company but also improve the trust, respect and health of the local community. It is our understanding, as we discussed in September 2017, that in the long run it would be cost effective to replace the two old compressor turbines. Doing so will greatly reduce the maintenance issues associated with these older units and, with the installation of oxidation catalysts, greatly reduce pollution from the plant, possibly to below Title V levels at all times.

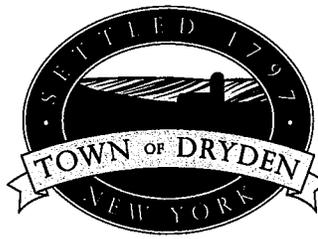
We have also contacted the DEC asking for a meeting of their technical staff with the Town of Dryden Safety and Preparedness Committee to advise us on the status of Dominion Energy's Air Title V renewal permit. Additionally, we have asked them to organize a public hearing to discuss the renewal application.

By meeting with both Dominion Energy and the DEC, the Town of Dryden hopes to ensure that the renewal will be a more robust application and will benefit all parties.

A handwritten signature in black ink, appearing to be "J. Leifer", is written over the bottom of the text block.

Office of the Supervisor

93 E Main Street
Dryden, NY 13053



Jason Leifer
607/844-8888
supervisor@dryden.ny.us

December 16, 2019

Teresa A Phelps
NYSDEC Region 7 Cortland Sub-Office
1285 Fisher Ave
Cortland, NY 13045
(607)753-3095
DEP.R7@dec.ny.gov

RE: Dominion/Borger Station
Title V Permit Renewal

Air Permit# 112719
Facility ID# 7502400007

This letter is to affirm the Town of Dryden's support for the renewal of the updated Title V permit held by Dominion Energy for Borger Station, a natural gas compressor station located at 219 Ellis Hollow Creek Road in the Town of Dryden, NY.

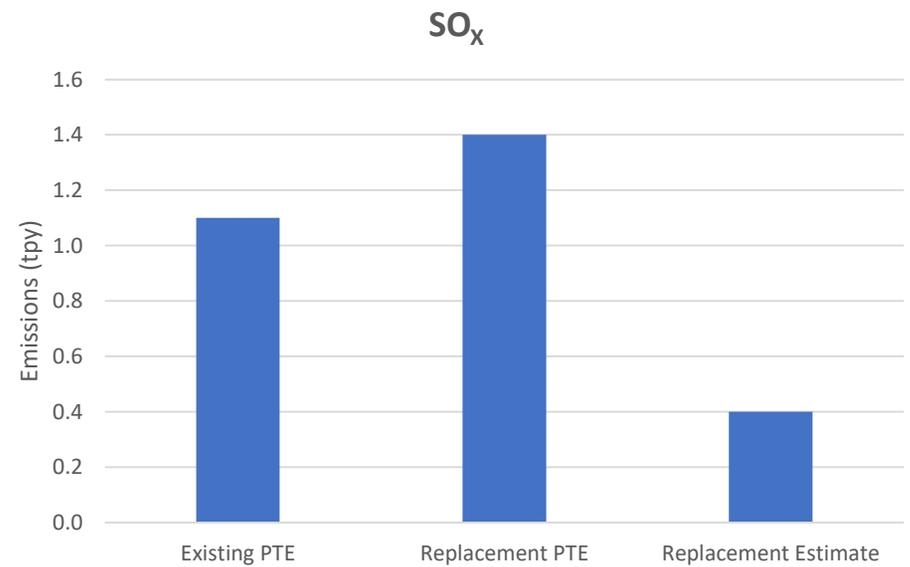
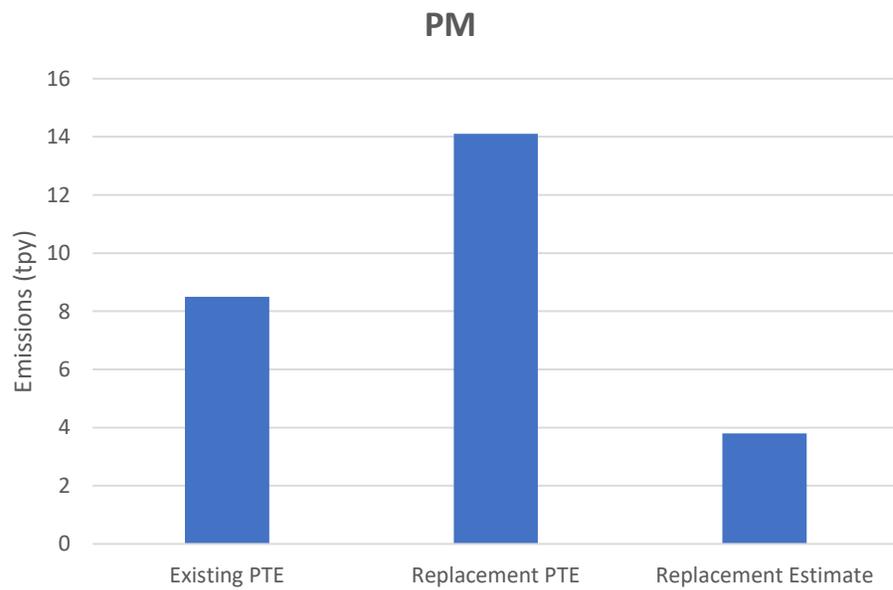
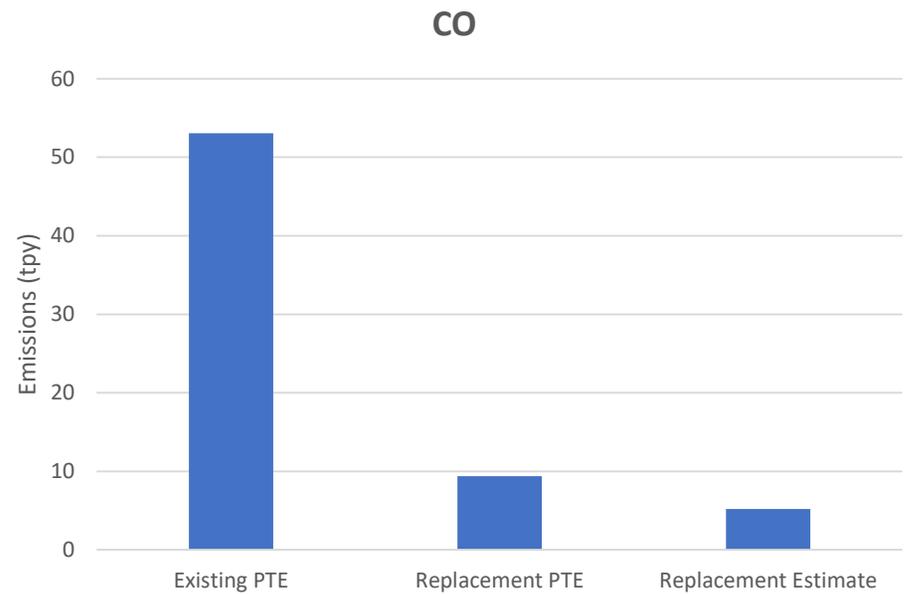
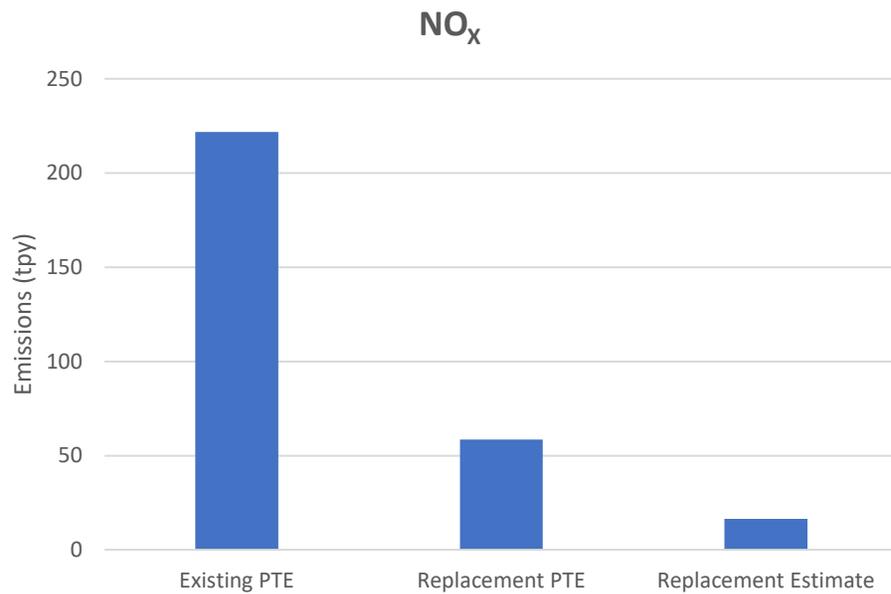
These updates include the installation of two new, low NO_x natural gas turbines (5 and 6) which will be equipped with post combustion oxidation catalysts for control of organics. After the new turbines commence operations, existing, higher-emitting turbines 2 and 3 will be decommissioned. The facility will also be installing a post combustion oxidation catalyst on existing turbine 4 for control of organics. Turbine 4 will remain in service after the new turbines commence operations. A portion of the facility is now subject to 40 CFR Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015. With this, the appropriate fugitive emissions provisions of this subpart have been added to the permit.

Dominion Energy was very responsive to community input and concerns. Their upgrades to Borger station will improve air quality in the surrounding neighborhood. For this reason we are pleased to offer our support to the renewal of this Air Permit.

Sincerely,

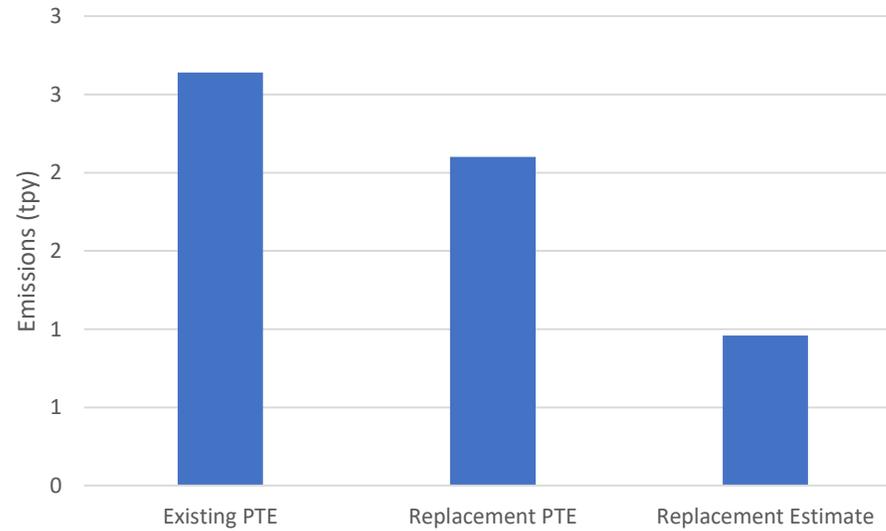
Jason M Leifer, Esq.
Town Supervisor

cc: Matthew Marko, Regional Director
NYS DEC Region 7
615 Erie Blvd West
Syracuse, NY 13204-240

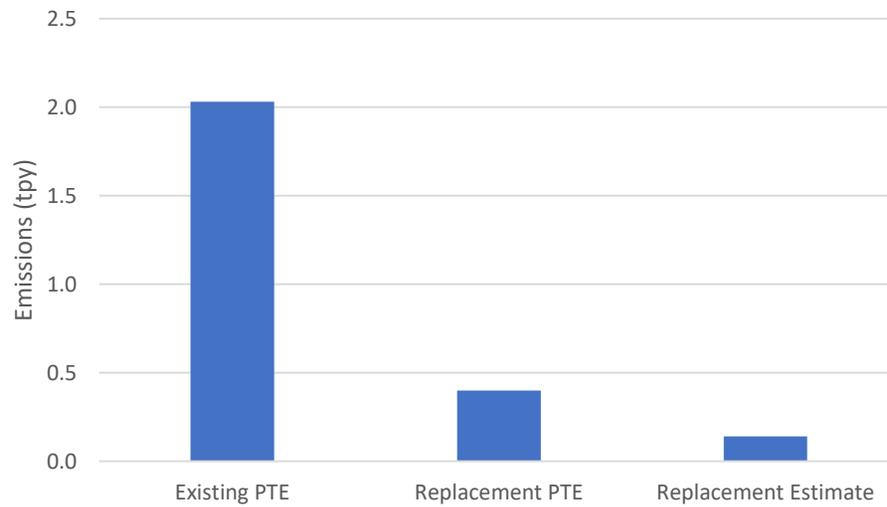


1. PTE for existing facility emissions includes run time restrictions on Engines 2 and 3.
2. Facility would no longer be defined as a “Major” source per regulation; it would be a “Minor” source of air emissions.
3. Major source thresholds for these pollutants are as follows: NO_x = 100 tpy; CO = 100 tpy; PM = 100 tpy; SO₂ = 100 tpy.

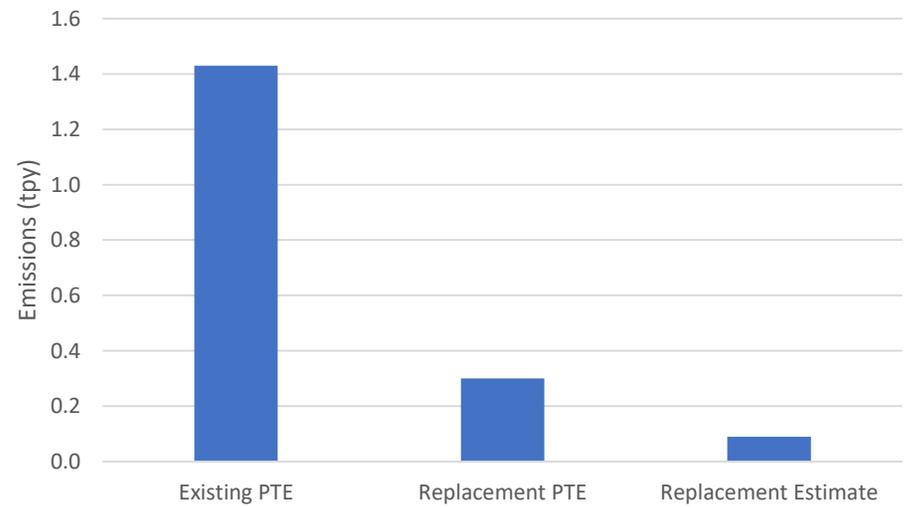
VOCs



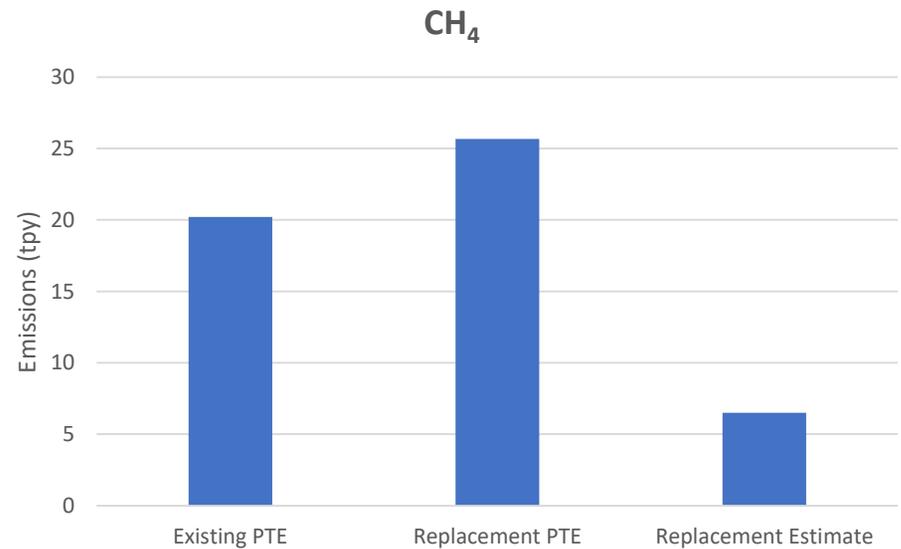
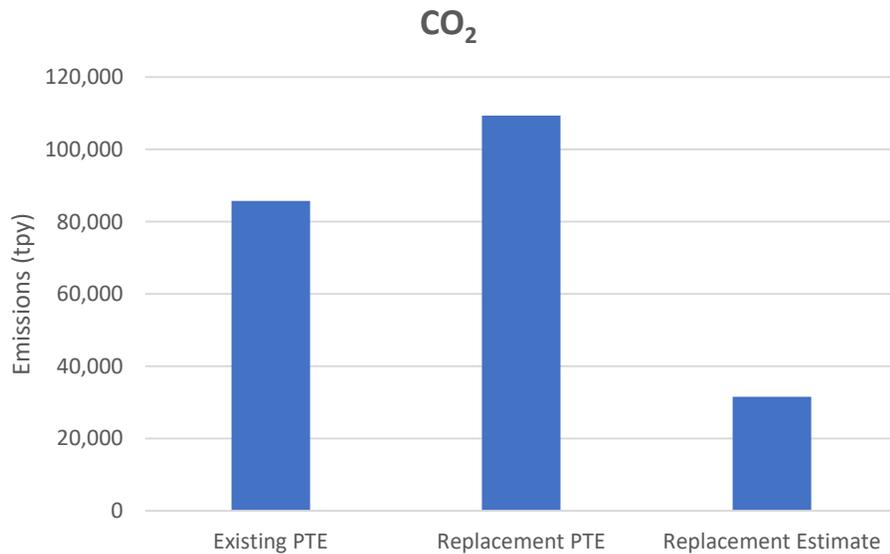
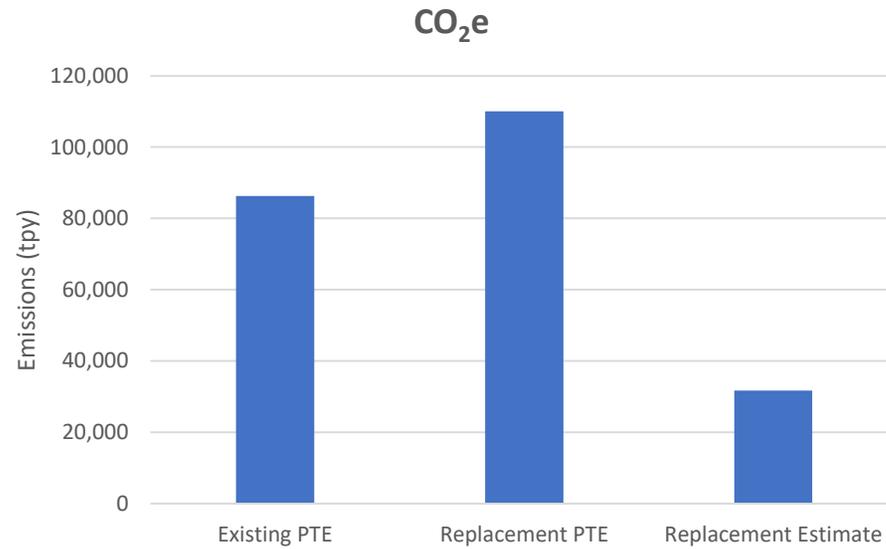
Total HAPS



Formaldehyde



1. PTE for existing facility emissions includes run time restrictions on Engines 2 and 3.
2. Facility would no longer be defined as a "Major" source per regulation; it would be a "Minor" source of air emissions.
3. Major source thresholds for these pollutants are as follows: VOCs = 50 tpy; Total HAPS = 25 tpy; Formaldehyde = 10 tpy.



1. PTE for existing facility emissions includes run time restrictions on Engines 2 and 3.
2. Facility would no longer be defined as a “Major” source per regulation; it would be a “Minor” source of air emissions.
3. Upgraded facility will conduct program to minimize fugitive methane releases by proactively monitoring emissions.

Facility DEC ID: 7502400007

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 7-5024-00007/00004
Effective Date:

Expiration Date:

Permit Issued To: DOMINION ENERGY TRANSMISSION INC
925 WHITE OAK BLVD
BRIDGEPORT, WV 26330

Contact: Gary Comerford
Dominion Gas Environ Services
5000 Dominion Blvd
Glen Allen, VA 23060-3308
(804) 273-2531

Facility: BORGER STATION
219 ELLIS HOLLOW CK RD
ITHACA, NY 14850

Description:
Application for a renewal of the current Title V permit.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: JOSEPH M DLUGOLENSKI
1285 FISHER AVE
CORTLAND, NY 13045-1090

Authorized Signature: _____ Date: ___ / ___ / ___

Facility DEC ID: 7502400007

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

Facility DEC ID: 7502400007

PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- 4 1 Facility Inspection by the Department
- 4 2 Relationship of this Permit to Other Department Orders and Determinations
- 4 3 Applications for permit renewals, modifications and transfers
- 5 4 Permit modifications, suspensions or revocations by the Department

Facility Level

- 5 5 Submission of application for permit modification or renewal-REGION 7 SUBOFFICE - CORTLAND

Facility DEC ID: 7502400007

DEC GENERAL CONDITIONS

**** General Provisions ****

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be

Facility DEC ID: 7502400007

submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 7
SUBOFFICE - CORTLAND
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 7 Sub-office
Division of Environmental Permits
1285 Fisher Avenue
Cortland, NY 13045-1090
(607) 753-3095

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: DOMINION ENERGY TRANSMISSION INC
925 WHITE OAK BLVD
BRIDGEPORT, WV 26330

Facility: BORGER STATION
219 ELLIS HOLLOW CK RD
ITHACA, NY 14850

Authorized Activity By Standard Industrial Classification Code:
4922 - NATURAL GAS TRANSMISSION

Permit Effective Date:

Permit Expiration Date:

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 7 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 8 2 6 NYCRR 201-6.4 (a) (7): Fees
- 8 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 8 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 9 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 11 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 13 7 6 NYCRR 202-2.1: Compliance Certification
- 13 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 13 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 15 10 6 NYCRR 200.7: Maintenance of Equipment
- 15 11 6 NYCRR 201-1.7: Recycling and Salvage
- 15 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 15 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 16 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 16 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 16 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 17 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 17 18 6 NYCRR 202-1.1: Required Emissions Tests
- 17 19 40 CFR Part 68: Accidental release provisions.
- 18 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 18 21 6 NYCRR 200.6: Compliance Certification
- 19 22 6 NYCRR 200.6: Compliance Certification
- 21 23 6 NYCRR Subpart 201-6: Emission Unit Definition
- 21 24 6 NYCRR 201-6.1: Compliance Certification
- 22 25 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 22 26 6 NYCRR 202-1.1: Compliance Certification
- 23 27 6 NYCRR 211.2: Visible Emissions Limited
- 24 28 6 NYCRR 227-1.3 (a): Compliance Certification
- 24 29 6 NYCRR 227-2.4 (d): Compliance Certification
- 25 30 6 NYCRR 227-2.5 (c): Compliance Certification
- 26 31 6 NYCRR 227-2.5 (c): Compliance Certification
- 27 32 6 NYCRR 227-2.5 (c): Compliance Certification
- 28 33 40CFR 52.21(j), Subpart A: Compliance Certification
- 29 34 40CFR 60.7, NSPS Subpart A: Compliance Certification
- 30 35 40CFR 60.332(a)(2), NSPS Subpart GG: Compliance Certification
- 31 36 40CFR 60.334(h), NSPS Subpart GG: Compliance Certification
- 31 37 40CFR 60.4320(a), NSPS Subpart KKKK: Compliance Certification
- 33 38 40CFR 60.4330, NSPS Subpart KKKK: Compliance Certification
- 34 39 40CFR 60.4400, NSPS Subpart KKKK: Compliance Certification
- 36 40 40CFR 60.5410a(j), NSPS Subpart OOOOa: Compliance Certification
- 37 41 40CFR 60.5415a(h), NSPS Subpart OOOOa: Compliance Certification
- 38 **Emission Unit Level**
- 38 42 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

38 43 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=0-0000A,EP=00002,Proc=T02,ES=TUR02

40 44 40CFR 52.21(i)(2), Subpart A: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

43 45 ECL 19-0301: Contaminant List

43 46 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

44 47 6 NYCRR 211.1: Air pollution prohibited

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

FEDERALLY ENFORCEABLE CONDITIONS

Renewal 3/DRAFT

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: 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 B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (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 C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (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 D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (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 E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (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

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (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 G: Property Rights - 6 NYCRR 201-6.4 (a) (6)

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

Item H: Severability - 6 NYCRR 201-6.4 (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 I: Permit Shield - 6 NYCRR 201-6.4 (g)

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

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 J: Reopening for Cause - 6 NYCRR 201-6.4 (i)

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

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of 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 the 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 section 201- 6.6 of this Subpart.

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

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

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

Item L: 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.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

**Condition 1: Acceptable Ambient Air Quality
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 200.6****Item 1.1:**

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

reports required by the permit.

Condition 5: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements,

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department’s Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 6: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-6.4 (e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

determine the compliance status of the facility as specified in any special permit terms or conditions; and

- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Air Compliance Branch
USEPA Region 2 DECA/ACB
290 Broadway, 21st Floor
New York, NY 10007

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
NYSDEC Region 7 Headquarters
615 Erie Boulevard, West
Syracuse, NY 13204-2400

The address for the BQA is as follows:

NYSDEC

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2020.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires - Prohibitions
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 215.2

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Item 9.1:

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

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

**Condition 10: Maintenance of Equipment
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

**Condition 11: Recycling and Salvage
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to
the air
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

**Condition 13: Exempt Sources - Proof of Eligibility
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 13.1:

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 14: Trivial Sources - Proof of Eligibility

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 14.1:

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

**Condition 15: Requirement to Provide Information
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

**Condition 16: Right to Inspect
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Off Permit Changes

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Effective for entire length of Permit**Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)****Item 17.1:**

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

**Condition 18: Required Emissions Tests
Effective for entire length of Permit****Applicable Federal Requirement:6 NYCRR 202-1.1****Item 18.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

**Condition 19: Accidental release provisions.
Effective for entire length of Permit****Applicable Federal Requirement:40 CFR Part 68****Item 19.1:**

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The combustion turbines 4, 5 and 6 shall be equipped with the SoLoNOx lean-mix dry low NOx combustion system and shall only be allowed to operate out of SoLoNOx mode during periods of startup, shutdown, and unavoidable malfunctions.

New combustion turbines 5 and 6 are required to be equipped with Solar Turbine's Pilot Active Control Logic with the goal of maintaining NOx emissions at 42 ppm when ambient temperatures are between zero degrees and minus 20 degrees Fahrenheit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

**Condition 22: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 200.6

Item 22.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-0000A
Process: T05

Emission Point: 00005
Emission Source: TUR05

Emission Unit: 0-0000A
Process: T06

Emission Point: 00006
Emission Source: TUR06

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 22.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Note: This condition shall apply to Turbines 5 and 6 which are subject to 40 CFR 60 subpart KKKK. This condition is more stringent than the emission limit specified in 40 CFR 60 subpart KKKK.

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

1. In order to ensure the facility maintains compliance with the 1-hour NAAQS NO₂ standard, the owner or operator shall not allow the emission of nitrogen oxides in excess of 9.0 ppmv, corrected to 15% oxygen. This NO_x concentration was used in an impact analysis to demonstrate compliance with the 1-hour NAAQS NO₂ standard.
2. Compliance shall be determined through performance testing using 40 CFR Part 60, Appendix A, Method 7E or Method 20. Compliance shall be determined using the average of three test runs, and each test run must be at least 20 minutes long as specified in 40 CFR 60 Subpart KKKK.
3. As specified under 40 CFR 60 KKKK, testing shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test). However, Turbines 5 and 6 will be subject to a more stringent NO_x emission limit than required under 40 CFR 60 KKKK which represents less than 75% of the NO_x emission limit specified under 40 CFR 60 KKKK, Turbines 5 and 6 are required to test once every 2 years (with no more than 26 calendar months following the previous performance test).
4. The performance test must be done at any load condition plus or minus 25% of 100% of peak load. Testing may be performed at the highest achievable load point if at least 75 percent of peak load cannot be achieved in practice.
5. In accordance with 40 CFR 60.4375, the owner or operator must submit to the DEC and EPA a written report of the results of each performance test before the close of business on the 60th day following completion of the performance test.
6. The owner or operator must operate and maintain the stationary combustion turbine in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.
7. On an annual basis the owner or operator must submit to the DEC a report stating whether he or she has complied with this condition. The report shall state whether an emissions test was conducted and, if so, the results of such tests. If no testing was required, the report shall state, no testing was required during the reporting period.

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Upper Permit Limit: 9.0 parts per million by volume
(dry, corrected to 15% O₂)
Reference Test Method: 40 CFR 60, App A, Methods 7E or 20
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 23: Emission Unit Definition
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 23.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0000A

Emission Unit Description:

TUR02 - TUR03: Two (2) Dresser Clark DC990 5800 HP
natural gas fired stationary compressor turbines.

TUR04 is a Solar Turbines Inc. Taurus 70-1030S 12,126 HP
natural gas fired stationary compressor turbine. (The HP
estimate is based on operation at an elevation of 1047 ft,
60% relative humidity and 0 degrees F.)

TUR05 and TUR06: Two (2) natural gas fired Solar Centaur
50LS stationary compression turbines each rated at 6,225
HP (0 degrees F.)

Building(s): 01
02
03
04

Condition 24: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-6.1

Item 24.1:

The Compliance Certification activity will be performed for the Facility.

Item 24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Monitoring Description:

1. Within 180 days of commencing operations of new combustion Turbines 5 and 6, the facility must permanently shut down and decommission existing Turbines 2 and 3.

2. With the exception of testing conditions, the facility shall not simultaneously operate Turbines 2 and 3 along with new combustion turbines 5 and 6.

The facility shall certify that is has complied with this condition.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

**Condition 25: Progress Reports Due Semiannually
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)

Item 25.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**Condition 26: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 26.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-0000A	Emission Point: 00004
Process: T04	Emission Source: TUR04
Emission Unit: 0-0000A	Emission Point: 00005
Process: T05	Emission Source: TUR05

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Emission Unit: 0-0000A
 Process: T06

Emission Point: 00006
 Emission Source: TUR06

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall conduct initial NOx and formaldehyde emissions testing for comparison against the mass emission rates used in the facility’s air quality dispersion model analysis to demonstrate compliance with 1-hr NO2 NAAQS and NYSDEC Short-term (1-hr) and Annual Guideline Concentrations (SGC/AGC) for Formaldehyde, per the Division of Air Resource Guideline 1 (DAR-1). Initial emission testing shall also include testing for CO emissions. Formaldehyde and CO testing shall be conducted on the outlet of the oxidation catalyst. Testing shall coincide with the initial NSPS Subpart KKKK test and shall be based on full load operation (does not include startup/shutdown conditions or below 0 degrees F ambient temperature). Testing shall be conducted in accordance with a protocol approved by the Department in accordance with 6 NYCRR 202-1. Not later than 60 days after the completion of the testing, the facility shall submit to the Department a complete report of the results of such tests. The report shall detail how the results compare with the facility’s air dispersion model. Should there be discrepancies with the emission testing results and the predicted emission results from the facility’s air dispersion model, further examination of the model may be required by the Department. The Department reserves the right to require additional testing based on the results of the emission testing.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 27: Visible Emissions Limited
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 211.2

Item 27.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 28: Compliance Certification

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 227-1.3 (a)

Item 28.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 0-0000A	Emission Point: 00002
Emission Unit: 0-0000A	Emission Point: 00003
Emission Unit: 0-0000A	Emission Point: 00004
Emission Unit: 0-0000A	Emission Point: 00005
Emission Unit: 0-0000A	Emission Point: 00006

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

This condition limits opacity from the stationary gas turbines.

No owner or operator shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average) except for one six minute period per hour of not more than 27 percent opacity (six minute average). Compliance shall be determined using 40 CFR Part 60, Appendix A, Method 9 upon written request from the DEC.

On an annual basis, the owner or operator shall submit to the DEC a report stating whether opacity compliance determinations were required and if so, the results of such tests.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

**Condition 29: Compliance Certification
Effective for entire length of Permit**

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Applicable Federal Requirement:6 NYCRR 227-2.4 (d)

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a small boiler, small combustion turbine, or small internal combustion engine must perform an annual tune-up of their equipment. This tune-up should be performed in accordance with the requirements of the DAR-5 guidance document. Records of each tune-up must be kept on-site for a minimum of five years.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

**Condition 30: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 227-2.5 (c)

Item 30.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-0000A

Process: T02

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

1. To the extent practicable during the period from May 1 to September 30, the facility shall preferentially operate Turbine 4 (T04) rather than the remaining higher-emitting turbine (T02). The owner shall maintain a log showing the operation of the turbines. For those periods during the May 1 to September 30 timeframe where Turbine 2 is

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

operating while Turbine 4 is idle, the log shall explain why the lower-emitting turbine (T04) is not operating in place of the older, higher emitting unit, T02.

2. Except during periods of startup, shutdown, or when the intake air temperature is below zero degrees Fahrenheit, Turbine 4 shall operate in solonox mode (that is, low-NOx emission mode of operation).

3. No later than one year after Turbine 3 emits 72 tons of NOx in any 12 consecutive month period, Turbine 02 must not emit in excess of 150 ppm NOx, corrected to 15% O2. Compliance will be determined using stack testing conducted in accordance with a protocol approved by the DEC. After Turbine 2 becomes subject to this emission limit, testing shall be conducted once per year.

On a calendar year basis, the owner or operator shall, in the annual certification report, state whether he or she has complied with this condition.

Parameter Monitored: OXIDES OF NITROGEN
 Upper Permit Limit: 150 parts per million by volume
 (dry, corrected to 15% O2)
 Reference Test Method: EPA Method 7E or 20
 Monitoring Frequency: ANNUALLY
 Averaging Method: 1-HOUR AVERAGE
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 12 calendar month(s).

Condition 31: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 227-2.5 (c)

Item 31.1:

The Compliance Certification activity will be performed for the facility:
 The Compliance Certification applies to:

Emission Unit: 0-0000A
 Process: T02

Emission Unit: 0-0000A
 Process: T03

Emission Unit: 0-0000A
 Process: T04

Item 31.2:

Compliance Certification shall include the following monitoring:

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This condition is not applicable on and after the date that Turbine 3 complies with the presumptive RACT limit of 50 ppm_{dv} NO_x, corrected to 15 % O₂.

Emissions of NO_x shall not exceed 61 pounds per hour, cumulative emissions from all turbines, Units 2, 3 and 4. This cumulative limit is only applicable provided Unit 4 emissions are less than or equal to 25 ppm_{dv} corrected to 15% O₂. Otherwise, emissions from Units 2 and 3 shall not exceed 56 pounds per hour.

Compliance shall be determined based on stack testing conducted at least once per permit term in accordance with a protocol approved by the DEC and in accordance with the time frames specified in 6 NYCRR 202-1. Testing shall be conducted once per permit term and at any other time when so directed by the DEC.

On an annual basis, the owner or operator shall submit to the DEC a report stating whether testing has been conducted and if so, the results of such testing. The applicant shall also state whether any changes have been made to the turbines or their operation that would change emissions.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 61 pounds per hour

Reference Test Method: EPA Method 7E or 20

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

Condition 32: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 227-2.5 (c)

Item 32.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-0000A

Process: T03

Emission Source: TUR03

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 32.2:

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

1. To the extent practicable during the period from May 1 to September 30, the facility shall preferentially operate Turbine 4 (T04) rather than the remaining higher-emitting turbine (T03). The owner shall maintain a log showing the operation of the turbines. For those periods during the May 1 to September 30 timeframe where Turbine 3 is operating while Turbine 4 is idle, the log shall explain why the lower-emitting turbine (T04) is not operating in place of the older, higher emitting unit, T03. This Item is not applicable once Turbine 3 complies with the presumptive RACT limit of 50 ppmdv NO_x, corrected to 15% O₂.
2. Except during periods of startup, shutdown, or when the intake air temperature is below zero degrees Fahrenheit, Turbine 4 shall operate in solonox mode (that is, low-NO_x emission mode of operation).
3. No later than one year after Turbine 3 emits 72 tons of NO_x in any 12 consecutive month period, Turbine 03 must not emit in excess of 50 ppm NO_x, corrected to 15% O₂. Compliance will be determined using stack testing conducted in accordance with a protocol approved by the DEC. After Turbine 3 becomes subject to this emission limit, testing shall be conducted once per year.

On a calendar year basis, the owner or operator shall, in the annual certification report, state whether he or she has complied with this condition.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 50 parts per million by volume (dry, corrected to 15% O₂)

Reference Test Method: EPA Method 7E or equivalent

Monitoring Frequency: ANNUALLY

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

Condition 33: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 52.21(j), Subpart A

Item 33.1:

The Compliance Certification activity will be performed for the facility:

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

The Compliance Certification applies to:

Emission Unit: 0-0000A	Emission Point: 00002
Process: T02	Emission Source: TUR02
Emission Unit: 0-0000A	Emission Point: 00003
Process: T03	Emission Source: TUR03
Emission Unit: 0-0000A	Emission Point: 00004
Process: T04	Emission Source: TUR04

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Permittee shall maintain records of the annual hours of operation of each turbine at Borger Station. Such records shall be provided to the EPA or NYSDEC upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 34: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 60.7, NSPS Subpart A

Item 34.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-0000A	Emission Point: 00004
Process: T04	Emission Source: TUR04
Emission Unit: 0-0000A	Emission Point: 00005
Process: T05	Emission Source: TUR05
Emission Unit: 0-0000A	Emission Point: 00006
Process: T06	Emission Source: TUR06

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Turbines 4, 5 and 6 are subject to the federal Standards of Performance for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK) and the General Provisions, 40 CFR Part 60, Subpart A. The owner or operator must comply with the provisions of 40 CFR 60.7. (a), (b) and (f) as

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

indicated below.

The owner must comply with the notification requirements of:

1. 40 CFR 60.7(b), which requires the owner or operator to keep records of startup, shutdown or malfunction;
2. 40 CFR 60.7(f), requiring the owner or operator to keep a file of all measurements and tests.

On an annual basis, the owner or operator must submit to the DEC a report stating whether he or she has complied with the requirements of 40 CFR 60.7.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

**Condition 35: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 60.332(a)(2), NSPS Subpart GG

Item 35.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-0000A

Process: T02

Emission Unit: 0-0000A

Process: T03

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No owner or operator shall discharge to the atmosphere from Units 2 or 3 emissions of nitrogen oxides in excess of the following:

$$STD = 0.0150 * [14.4/Y] + F$$

Where: STD = allowable nitrogen oxide emissions in percent volume at 15% excess oxygen on a dry basis,

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Y = manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour) or the actual measured heat rate based on the lower heating value of the fuel as measured at actual peak load of the facility. For this application, Y shall = 14.4.

F = nitrogen oxide emission allowance for fuel bound nitrogen:

Fuel bound nitrogen % by weight, where F equals NOx % by volume

$N \leq 0.015$: $F = 0$

$0.015 < N \leq 0.1$: $0.04N$

$0.1 < N \leq 0.25$: $0.004 + 0.0067(N - 0.1)$

$N > 0.25$: 0.005

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 150 parts per million by volume
(dry, corrected to 15% O₂)

Reference Test Method: EPA Method 20

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

Condition 36: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.334(h), NSPS Subpart GG

Item 36.1:

The Compliance Certification activity will be performed for the Facility.

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner is electing to not use the fuel-bound nitrogen adjustment factor in 40 CFR 60.332 and thus is not required to sample the fuel for nitrogen. Similarly, the owner or operator will combust only pipeline natural gas with a sulfur content no more than 20 grains per 100 scf, and is not required to sample for fuel sulfur.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 37: Compliance Certification
Effective for entire length of Permit

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Applicable Federal Requirement: 40CFR 60.4320(a), NSPS Subpart KKKK**Item 37.1:**

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 0-0000A Emission Point: 00004
Process: T04 Emission Source: TUR04

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

1. The owner or operator shall not allow the emission of nitrogen oxides in excess of 25 ppmv, corrected to 15% oxygen.
2. Compliance shall be determined through performance testing using 40 CFR Part 60, Appendix A, Method 7E or Method 20. Compliance shall be determined using the average of three test runs, and each test run must be at least 20 minutes long.
3. Testing shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test), however, if test results are less than or equal to 18.75 ppmv corrected to 15% O₂, testing may be reduced to once every two years (with no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceeds 18.75 ppm corrected to 15% O₂, annual testing must be resumed.
4. The performance test must be done at any load condition plus or minus 25% of 100% of peak load. Testing may be performed at the highest achievable load point if at least 75 percent of peak load cannot be achieved in practice.
5. In accordance with 40 CFR 60.4375, the owner or operator must submit to the DEC and EPA a written report of the results of each performance test before the close of business on the 60th day following completion of the performance test.
6. The owner or operator must operate and maintain the stationary combustion turbine in a manner consistent with good air pollution control practices for minimizing

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

emissions at all times including during startup, shutdown, and malfunction.

7. On an annual basis the owner or operator must submit to the DEC a report stating whether he or she has complied with this condition. The report shall state whether an emissions test was conducted and, if so, the results of such tests.

Upper Permit Limit: 25 parts per million by volume (dry, corrected to 15% O₂)
 Reference Test Method: 40 CFR Part 60, App A, Methods 7E or 20
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 12 calendar month(s).

**Condition 38: Compliance Certification
 Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 60.4330, NSPS Subpart KKKK

Item 38.1:

The Compliance Certification activity will be performed for the facility:
 The Compliance Certification applies to:

Emission Unit: 0-0000A Process: T04	Emission Point: 00004 Emission Source: TUR04
Emission Unit: 0-0000A Process: T05	Emission Point: 00005 Emission Source: TUR05
Emission Unit: 0-0000A Process: T06	Emission Point: 00006 Emission Source: TUR06

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

In accordance with 40 CFR 60.4365, the facility may elect not to monitor the total sulfur content combusted in the turbine if the fuel is demonstrated to not exceed potential sulfur emissions of 26 ng SO₂/J (0.60 lb SO₂/mmBtu) heat input.

1. The owner or operator must demonstrate that the sulfur content of the fuel meets this standard by showing that the fuel quality characteristics in a current, valid

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

purchase contract, tariff sheet or transportation contract specifies that the total sulfur content for natural gas is 20 grains of sulfur or less per 100 standard cubic feet, or

2. The maximum total sulfur content for oil use is 0.05% by weight (500 ppmv) or less, or

3. Has potential sulfur emissions of less than 26 ng SO₂/J (0.60 lb SO₂/mmBtu) heat input.

On an annual basis, the owner or operator must state whether he or she has complied with this requirement.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

**Condition 39: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 60.4400, NSPS Subpart KKKK

Item 39.1:

The Compliance Certification activity will be performed for the Facility.

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(a) You must conduct an initial performance test, as required in §60.8. Subsequent NO_x performance tests shall be conducted at a frequency determined from previous testing results as specified under 40 cfr 60.4340(a).

(i) Measure the NO_x concentration (in parts per million (ppm)), using either EPA Methods 7E and 3A, or EPA Method 20 in appendix A of this part. Concurrently measure the heat input to the unit, using a fuel flowmeter (or flowmeters), and measure the electrical and thermal output of the unit. Use EPA Method 19 in appendix A of this part to calculate the NO_x emission rate in lb/MMBtu.

(2) Sampling traverse points for NO_x and (if applicable) diluent gas are to be selected following EPA Method 20 or EPA Method 1 (non-particulate procedures), and sampled for

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

equal time intervals. The sampling must be performed with a traversing single-hole probe, or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points.

(3) Notwithstanding paragraph (a)(2) of this section, you may test at fewer points than are specified in EPA Method 1 or EPA Method 20 in appendix A of this part if the following conditions are met:

(i) You may perform a stratification test for NO_x and diluent pursuant to the procedures specified in section 6.5.6.1(a) through (e) of appendix A of part 75 of this chapter.

(ii) Once the stratification sampling is completed, you may use the following alternative sample point selection criteria for the performance test:

(A) If each of the individual traverse point NO_x concentrations is within ± 10 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than ± 5 ppm or ± 0.5 percent CO₂ (or O₂) from the mean for all traverse points, then you may use three points (located either 16.7, 50.0 and 83.3 percent of the way across the stack or duct, or, for circular stacks or ducts greater than 2.4 meters (7.8 feet) in diameter, at 0.4, 1.2, and 2.0 meters from the wall). The three points must be located along the measurement line that exhibited the highest average NO_x concentration during the stratification test; or

(B) For turbines with a NO_x standard greater than 15 ppm @ 15% O₂, you may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid if each of the individual traverse point NO_x concentrations is within ± 5 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than ± 3 ppm or ± 0.3 percent CO₂ (or O₂) from the mean for all traverse points; or

(C) For turbines with a NO_x standard less than or equal to 15 ppm @ 15% O₂, you may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid if each of the individual traverse point NO_x concentrations is within ± 2.5 percent of the mean concentration for all traverse points, or the individual

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

traverse point diluent concentrations differs by no more than ± 1 ppm or ± 0.15 percent CO₂ (or O₂) from the mean for all traverse points.

(b) The performance test must be done at any load condition within plus or minus 25 percent of 100 percent of peak load. You may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. You must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes.

(1) If the stationary combustion turbine combusts both oil and gas as primary or backup fuels, separate performance testing is required for each fuel.

(2) Compliance with the applicable emission limit in §60.4320 must be demonstrated at each tested load level. Compliance is achieved if the three-run arithmetic average NO_x emission rate at each tested level meets the applicable emission limit in §60.4320.

(3) The ambient temperature must be greater than 0 °F during the performance test.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 40: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.5410a(j), NSPS Subpart OOOOa

Item 40.1:

The Compliance Certification activity will be performed for the Facility.

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate initial compliance with the fugitive emission standards for each collection of fugitive emissions components at a compressor station, the facility owner or operator must comply with paragraphs (1) through (5) below.

(1) Develop and implement a fugitive emissions monitoring plan as described in 40 CFR 60.5397a(b), (c), and (d).

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

(2) Conduct an initial monitoring survey as required by 40 CFR 60.5397a(f).

(3) Maintain the records specified in 40 CFR 60.5420a(c)(15).

(4) Repair each identified source of fugitive emissions for each affected facility as required in 40 CFR 60.5397a(h).

(5) Submit the initial annual report for each collection of fugitive emissions components at a compressor station as required in 40 CFR 60.5420a(b)(1) and (7).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

**Condition 41: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 60.5415a(h), NSPS Subpart OOOOa

Item 41.1:

The Compliance Certification activity will be performed for the Facility.

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each collection of each collection of fugitive emissions components at a compressor station, the facility owner or operator must demonstrate continuous compliance with the fugitive emission standards specified in 40 CFR 60.5397a according to paragraphs (1) through (4) below.

(1) Conduct periodic monitoring surveys as required in 40 CFR 60.5397a(g).

(2) Repair or replace each identified source of fugitive emissions as required in 40 CFR 60.5397a(h).

(3) Maintain records as specified in 40 CFR 60.5420a(c)(15).

(4) Submit annual reports for each collection of fugitive emissions components at a compressor station as required in 40 CFR 60.5420a(b)(1) and (7).

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

****** Emission Unit Level ******

**Condition 42: Emission Point Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 42.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0000A			
Emission Point: 00002			
Height (ft.): 30	Diameter (in.): 48		
NYTMN (km.): 4699.5	NYTME (km.): 383.7	Building: 01	
Emission Point: 00003			
Height (ft.): 30	Diameter (in.): 48		
NYTMN (km.): 4699.5	NYTME (km.): 383.7	Building: 01	
Emission Point: 00004			
Height (ft.): 50	Diameter (in.): 72		
NYTMN (km.): 4699.509	NYTME (km.): 384.22	Building: 02	
Emission Point: 00005			
Height (ft.): 31	Diameter (in.): 79		
NYTMN (km.): 4699.535	NYTME (km.): 384.247	Building: 03	
Emission Point: 00006			
Height (ft.): 31	Diameter (in.): 79		
NYTMN (km.): 4699.537	NYTME (km.): 384.287	Building: 04	

**Condition 43: Process Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 43.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0000A	
Process: T02	Source Classification Code: 2-03-002-02
Process Description:	

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

TUR02: One (1) Dresser Clark DC 990 5800 HP natural gas fired stationary compressor turbine.

Emission Source/Control: TUR02 - Combustion
Design Capacity: 5,800 horsepower (mechanical)

Item 43.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0000A
Process: T03 Source Classification Code: 2-03-002-02
Process Description:
TUR01: ONE (1) DRESSER CLARK DC 990 5800 HP NATURAL GAS FIRED STATIONARY COMPRESSOR TURBINE.

Emission Source/Control: TUR03 - Combustion
Design Capacity: 5,800 horsepower (mechanical)

Item 43.3:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0000A
Process: T04 Source Classification Code: 2-03-002-02
Process Description:
TUR04. One (1) Solar Turbines Inc. Taurus 70-1030S HP natural gas fired stationary compressor turbine.

Emission Source/Control: TUR04 - Combustion
Design Capacity: 12,126 horsepower (mechanical)

Emission Source/Control: CAT01 - Control
Control Type: OXIDATION CATALYST

Item 43.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0000A
Process: T05 Source Classification Code: 2-03-002-02
Process Description:
One (1) Solar Centaur 50LS 6,225 hp (58.58 MMBtu/hr) natural gas stationary compressor turbine firing natural gas.

Emission Source/Control: TUR05 - Combustion
Design Capacity: 6,225 horsepower (mechanical)

Emission Source/Control: CAT02 - Control
Control Type: OXIDATION CATALYST

Emission Source/Control: TUR5L - Control
Control Type: LOW NOx BURNER

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Item 43.5:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0000A
 Process: T06 Source Classification Code: 2-03-002-02
 Process Description:
 One (1) Solar Centaur 50LS 6,225 hp (58.58 MMBtu/hr)
 natural gas stationary compressor turbine firing natural
 gas.

Emission Source/Control: TUR06 - Combustion
 Design Capacity: 6,225 horsepower (mechanical)

Emission Source/Control: CAT03 - Control
 Control Type: OXIDATION CATALYST

Emission Source/Control: TUR6L - Control
 Control Type: LOW NOx BURNER

**Condition 44: Compliance Certification
 Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 52.21(i)(2), Subpart A

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0000A Emission Point: 00002
 Process: T02 Emission Source: TUR02

Regulated Contaminant(s):
 CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
 OPERATIONS

Monitoring Description:
 This condition limits potential annual NOx emissions from
 gas turbine unit #2 for PSD non applicability for a
 modification that occurred on December 13, 1999.

Work Practice Type: HOURS PER YEAR OPERATION
 Upper Permit Limit: 4474 hours
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
 DESCRIPTION
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 12 calendar month(s).

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;

(3) During the period of the emergency the facility owner 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 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 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: 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

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

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.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 45: Contaminant List
Effective for entire length of Permit

Applicable State Requirement: ECL 19-0301

Item 45.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit (emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY210-00-0
Name: OXIDES OF NITROGEN

Condition 46: Malfunctions and start-up/shutdown activities
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR 201-1.4

Item 46.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007

and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 47: Air pollution prohibited
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR 211.1

Item 47.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Permit ID: 7-5024-00007/00004

Facility DEC ID: 7502400007