

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility Permit ID: 2-6301-00006/00081

Mod 0 Effective Date: 09/27/2019 Expiration Date: 09/26/2024

SAPA Extended Begin Date: 09/27/2024

Mod 1 Effective Date: Expiration Date:

Permit Issued To:CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

4 IRVING PL 15TH FL NE NEW YORK, NY 10003-3502

Contact: FEMI OGUNSOLA

CONSOLIDATED EDISON CO OF NY INC

4 IRVING PL RM 15 NE NEW YORK, NY 10003-3502

(212) 460-1223

Facility: CON ED - ASTORIA FACILITY

31-01 20TH AVE|(North side of 20th Avenue & West side of Luyster Creek)

Queens (6301), NY 11105

Contact: FEMI OGUNSOLA

CONSOLIDATED EDISON CO OF NY INC

4 IRVING PL RM 15 NE NEW YORK, NY 10003-3502

(212) 460-1223

Description:

This facility houses critical public utility electric and gas infrastructure and ancillary public utility operations. The Liquified Natural Gas (LNG) Plant provides a backup supply of natural gas that enables Con Edison to maintain service to utility customers including hospitals, schools, businesses, and homes during unplanned gas supply contingencies and extreme winter weather. Among other equipment, the Plant includes (1) a single gas turbine (GT014), to be replaced in this permit modification, which powers a nitrogen compression refrigeration system used to liquefy natural gas for storage in the Plant's LNG storage tank; (2) five natural gas fired vaporizers (each with four 10.5 MMBtu/hr burners), which convert LNG back to gaseous form for distribution to public utility customers when needed; and a flare and ground combustor, which together manage pressure within the Plant's LNG storage tank. The larger Facility also houses operations to refurbish electric transformers (including five paint booths, 17 welding bays, one large grit blaster and two small grit blasters), a gas station, and two fuel storage tanks (4,000 gals. each).

This Title V permit modification authorizes the replacement of the existing 82 MMBtu/hr gas turbine (GT014) with a new, more efficient Siemens 54 MMBtu/hr gas turbine (GT015) that will reduce the facility's air emissions. With the combustion turbine replacement, the Plant would be

Division of Air Resources



Facility DEC ID: 2630100006

able to meet the design intent of the LNG tank to be filled at approximately 6 million square foot per day. The proposed project would not change the Plant's LNG storage capacity or amount of LNG vaporized.

The new turbine GT015 is subject to 40 CFR subpart 60 KKKK NSPS requirements for NOx and SO2 limits. The NOx emissions from the new turbine will be limited to 12.15 tons per year.

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:	STEPHEN A WATTS			
	47-40 21ST ST			
	LONG ISLAND CITY, NY 11101-5401			
Authorized Signature	Date:	/	/	



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.



PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- 5 1 Facility Inspection by the Department
- 5 2 Relationship of this Permit to Other Department Orders and Determinations
- 5 3 Applications for permit renewals, modifications and transfers
- 6 4 Permit modifications, suspensions or revocations by the Department Facility Level
- 6 5 Submission of application for permit modification or renewal REGION 2 HEADQUARTERS



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.

Item3.2:

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 submitted prior to actual transfer of ownership.

Division of Air Resources



Facility DEC ID: 2630100006

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 2
HEADQUARTERS
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 2 Headquarters Division of Environmental Permits 1 Hunters Point Plaza, 4740 21st Street Long Island City, NY 11101-5407 (718) 482-4997



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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Facility: CON ED - ASTORIA FACILITY

31-01 20TH AVE|(North side of 20th Avenue & West side of Luyster Creek)

Queens (6301), NY 11105

Authorized Activity By Standard Industrial Classification Code:

4911 - ELECTRIC SERVICES

4922 - NATURAL GAS TRANSMISSION

4932 - GAS & OTHER SERVICES COMBINED

Permit Effective Date: Permit Expiration Date:

SAPA Extended Begin Date: 09/27/2024



PAGE LOCATION OF CONDITIONS

PAGE	
	FEDERALLY ENFORCEABLE CONDITIONS
	Facility Level
7	1-1 6 NYCRR 202-2.5: Recordkeeping requirements
8	8 : Recordkeeping requirements
8	22 6 NYCRR Subpart 201-6: Emission Unit Definition
10	1-2 6 NYCRR 201-6.4 (f): Operational Flexibility
11	1-3 6 NYCRR 202-2.4 (a) (3): Statement dates for emissions statements.
11	28 : Compliance Certification
13	1-4 6 NYCRR 227-1.4 (a): Compliance Certification
13	1-5 6 NYCRR 227-2.5 (c): Compliance Certification
14	1-6 6 NYCRR 231-3.8: Compliance Certification
15	1-7 6 NYCRR 231-6.2: Compliance Certification
16	1-8 6 NYCRR 231-6.2: Compliance Certification
17	1-9 40CFR 60, NSPS Subpart KKKK: Applicability
-,	Emission Unit Level
17	29 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
19	30 6 NYCRR Subpart 201-6: Process Definition By Emission Unit
17	30 0 1 1 Telek Suspan 201 0. Trocess Bellinden By Elinesion Onk
	EU=A-S0007
24	31 : No gasoline transfer allowed at sites without
	Stage I controls installed, if required at that site.
	suge i controls instance, it required at that site.
	EU=A-S005B
24	1-10 6 NYCRR Subpart 201-6: Compliance Certification
25	46 : Compliance Certification
25	1-11 40CFR 60.4340(a), NSPS Subpart KKKK: Compliance Certification
23	1-11 -10C1 K 00.+3+0(a), 1131 3 Subpart KKKKK. Compitance Certification
	EU=A-S005B,Proc=LNG,ES=GT014
26	1-12 40CFR 60.4400(b), NSPS Subpart KKKK: NOx performance testing
methodology	
methodology	
	EU=A-S005B,Proc=LNG,ES=GT015
27	1-13 40CFR 60.7(a), NSPS Subpart A: Date of
21	construction notification - If a COM is not used.
28	1-14 40CFR 60.8(a), NSPS Subpart A: Performance testing timeline.
28	1-15 40CFR 60.8(d), NSPS Subpart A: Prior notice.
28	
	1-16 40CFR 60.4320(a), NSPS Subpart KKKK: Compliance Certification
29	1-17 40CFR 60.4330, NSPS Subpart KKKK: Compliance Certification
29	1-18 40CFR 60.4400(a), NSPS Subpart KKKK: Test methods for NOx
30	1-19 40CFR 60.4415, NSPS Subpart KKKK: Testing
	requirements for sulfur dioxide
	CTATE ONLY ENEODOEADLE CONDITIONS
	STATE ONLY ENFORCEABLE CONDITIONS
22	Facility Level
32	47 ECL 19-0301: Contaminant List
32	48: Malfunctions and start-up/shutdown activities
33	1-20 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities



FEDERALLY ENFORCEABLE CONDITIONS

Renewal 3/Mod 1/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 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 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 is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

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 1-1: Recordkeeping requirements Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 202-2.5

Item 1-1.1:

- (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.



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

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

Condition 8: Recordkeeping requirements

Effective between the dates of 09/27/2019 and Permit Expiration Date

Applicable Federal Requirement:

Expired by Mod 1

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.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 22: Emission Unit Definition
Effective between the dates of 09/27/2019 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 22.1(From Mod 1):

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

Emission Unit: A-S005B Emission Unit Description:

> Emissions unit AS005B is associated with the existing GT014 gas turbine, a Hispano Suiza THM 1203 simple cycle combustion turbine rated at 82 MMBtu/hr, used in the LNG Plant's Nitrogen Refrigeration Cycle to drive a Cooper nitrogen compressor that liquifies natural gas for storage in the Plant's storage tank. The Hispano Suiza turbine is obsolete, and the original equipment manufacturer no longer manufactures turbines and cannot provide replacement parts. As a result, Con Edison has had difficulty sourcing spare parts needed to maintain the turbine, a situation that threatens the continued availability and reliability of the LNG Plant to store backup gas and supply public utility customers during system contingencies. To maintain reliable utility operations, the Plant's nitrogen refrigeration system is being replaced, with the existing Hispano Suiza turbine to be retired, removed and swapped with a new Siemens natural



gas turbine rated at 54 MMBtu/hr. The new turbine would be identified in the modified Title V permit as emission Source GT015, associated with Emission unit AS005B, and exhausts to emission point GT015.

Simple cycle combustion turbine (GT015), rated at 54 MMBtu/hr will fire natural gas only. This turbine is used to compress nitrogen as part of the proposed replacement of Nitrogen Refrigeration Cycle (NRC) project.

The current LNG Plant utilizes a Hispano Suiza THM 1203 gas turbine driving a Cooper nitrogen compressor. The compressed nitrogen is used in the Plant's refrigeration system to liquefy and store natural gas in the Plant's storage tank.

Building(s): LNGFAC

Item 22.2(From Mod 0):

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

Emission Unit: A-S0007 Emission Unit Description:

Gas station; includes two 4,000 gallon storage tanks, one for unleaded gasoline and one for diesel fuel, is operated to supply fuel for company vehicles. The Tanks have vapor balanced submerged filling.

Building(s): GASSTAT

Item 22.3(From Mod 0):

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

Emission Unit: A-S0008

Emission Unit Description:

Five (5) paint booths: Three underground transformer paint booths (two for flow coating and one for drying), PB001, PB002, & PB003; one (1) pole(overhead) transformer paint booth, PB004; and one (1) auto body paint spray booth, PB005 for the Transportation Department. Each paint booth is equipped with a panel filter to control over spray.

Operation at the auto body paint booth uses low-specality coatings aggregates less than 55 gallons per year.

Building(s): BUILD#82

Item 22.4(From Mod 0):

The facility is authorized to perform regulated processes under this permit for: Emission Unit: A-S0009

Emission Unit Description:

The transformer shop has seventeen welding bays and one high frequency soldering machine. Welding bays 1 through 7 and 16 and 17 are exhausted through stack 0822. Welding



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

bays 8 through 15 are exhausted through stack 00823. The high frequency soldering machine exhausts through stack 00821.

Building(s): BUILD#82

Item 22.5(From Mod 0):

The facility is authorized to perform regulated processes under this permit for: Emission Unit: A-S0020

Emission Unit Description:

Trane thermal multi-burner sub x vaporizers #1, #2, #3, #4 and #5. There are 5 vaporizers, each with 4 burners. Each burner has a heat input of 10.5 mmbtu/hr, for a total of 42 mmbtu/hr per vaporizer. Each vaporizer has its own stack. These vaporizers are used to heat a hot water bath which surrounds the liquid natural gas tubes, causing the LNG to convert to natural gas. These vaporizers are typically operated in any combination of 1 to 4 at a time, with the fifth as a spare. The vaporizers burn only natural gas.

Building(s): LNGFAC

Item 22.6(From Mod 0):

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

Emission Unit: A-S0021 Emission Unit Description:

Emission from the storage of the liquefied natural gas are controlled with two safety devices when needed: one flare (9090 MMBtu/hr) and one ground combustor (rated at 250 MMBtu/hr). Ground combustor burns natural gas off the top of the LNG tank when the pressure is too high and the flare stack utilized to safely combust natural gas released from emergency relief valves.

Building(s): LNGFAC

Item 22.7(From Mod 0):

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

Emission Unit: A-S0023 Emission Unit Description:

A large grit blaster and manual blast cabinet with two small grit blasters for transformer shop. The Large grit blaster (source ID Grit1) exhausts through a bag house to the outdoors. The manual cabinet with two small grit blasters is a small unit that vents indoors and is an insignificant source of emissions.

Building(s): BUILD#82

Condition 1-2: Operational Flexibility
Effective for entire length of Permit



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

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

Item 1-2.1:

A permit modification is not required for changes that are provided for in the permit. Such changes include approved alternate operating scenarios and changes that have been submitted and approved pursuant to an established operational flexibility protocol and the requirements of this section. Each such change cannot be a modification under any provision of Title I of the Clean Air Act or exceed, or cause the facility to exceed, an emissions cap or limitation in the permit. The facility owner or operator must incorporate all changes into any compliance certifications, record keeping, and/or reporting required by the permit.

Condition 1-3: Statement dates for emissions statements. Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 202-2.4 (a) (3)

Item 1-3.1:

This facility is required to submit an annual emission statement electronically and these emissions statements must be submitted to the department as per the following schedule:

- (i) March 15th of each year for facilities with three or fewer processes listed in their Title V permit:
- (ii) March 31st of each year for facilities with four to six processes listed in their Title V permit:
- (iii) April 15th of each year for facilities with 7 to 12 processes listed in their Title V permit:
- (iv) April 30th of each year for facilities with 13 or more processes listed in their Title V permit.

Condition 28: Compliance Certification Effective between the dates of 09/27/2019 and Permit Expiration Date

Applicable Federal Requirement:

Expired by Mod 1

Item 28.1:

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

Emission Unit: A-S0020 Emission Point: 00101

Emission Unit: A-S0020 Emission Point: 00102

Emission Unit: A-S0020 Emission Point: 00103

Emission Unit: A-S0020 Emission Point: 00104

Air Pollution Control Permit Conditions



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Emission Unit: A-S0020 Emission Point: 00105

Emission Unit: A-S0021 Emission Point: 00106

Emission Unit: A-S0021 Emission Point: 00107

Emission Unit: A-S005B Emission Point: GT014

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one 6 minute period per hour of not more than 27 percent opacity, except only the emission of uncombined water vapor. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct daily observations of visible emissions from the emission unit, process, etc. to which this condition applies while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next two operating days of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the Regional Air Pollution Control Engineer(RAPCE) NYSDEC if the Method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

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

Condition 1-4: Compliance Certification Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 227-1.4 (a)

Item 1-4.1:

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

Emission Unit: A-S005B Emission Point: GT014

Process: LNG

Emission Unit: A-S005B Emission Point: GT015

Process: LNG

Item 1-4.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a stationary combustion installation subject to this Subpart shall operate an emission source which exhibits greater than 20 percent opacity (based on a six minute average), except for one 6 minute period per hour of not more than 27 percent opacity. The owner or operator will conduct a Method 9 test annually. A report of the results of the test will be submitted to the Department within 30 days of the completion of the Method 9 test. All records generated by the permittee must be maintained at the facility or at an alternative location approved by the Department for a minimum of five years.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent

Reference Test Method: 40 CFR 60, Appendix A, Method 9

Monitoring Frequency: ANNUALLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9) Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 1-5: Compliance Certification
Effective for entire length of Permit



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

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

Item 1-5.1:

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

Emission Unit: A-S005B

Process: LNG Emission Source: GT014

Regulated Contaminant(s):

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

Item 1-5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

The NOx emissions of Simple Cycle Combustion turbine GT014 (firing natural gas only) are limited to 92 ppmvd corrected to 15% oxygen or 0.34 lb/mmbtu.

This limit was established based on the March 1, 2024 NOx RACT analysis in which the facility had demonstrated as per 6 NYCRR Part 227-2.5(c) that the cost per ton of NOx reduced with a feasible technology to achieve the presumptive NOx RACT limit will be more than the reasonable cost set by the Department.

The owner or operator shall submit a testing protocol to the Department for approval a minimum of 90 days prior to any stack testing.

The owner or operator will maintain records on-site for a minimum of five years.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 92 parts per million by volume (dry,

corrected to 15% O2)

Reference Test Method: 40 CFR PART 60 Appendix A Method 20

Monitoring Frequency: Once every five years Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 1-6: Compliance Certification Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 231-3.8

Item 1-6.1:

The Compliance Certification activity will be performed for the Facility.



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Item 1-6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Upon commencement of operation, as defined in section 231-4.1(b)(13), of a major facility or new or modified emission source(s) at an existing facility, the owner or operator is allowed a shakedown period for such major facility or modified emission source(s) according to the following provisions:

- (a) The shakedown period shall not exceed 180 days from the date of commencement of operation. For existing facilities, each emission source included in the project may have a separate date for commencement of operation. The department may specify a shakedown period of less than 180 days in a permit.
- (b) The total mass emissions during the shakedown period must be quantified, in a manner approved by the department, and are to be included in the calculation demonstrating compliance with the permitted annual limit in tons per year (tpy) of the facility or emission source(s).
- (c) Emission limits other than annual emission limitations do not apply to a major facility or new or modified emission source(s) at an existing facility during the shakedown period. However, the owner or operator must make all reasonable efforts to minimize emissions during the shakedown period.

The owner or operator must maintain records of the dates the shakedown period starts and concludes and submit a letter, to the Department, within 30 days of the conclusion of the shakedown period showing the start and conclusion dates. These records must be maintained, on site or at an alternative location approved by the Department, for a minimum of 5 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-7: Compliance Certification Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 231-6.2

Item 1-7.1:

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



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Emission Unit: A-S005B

Process: LNG Emission Source: GT015

Regulated Contaminant(s):

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

Item 1-7.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The GT015 turbine NOx emissions shall be limited to 12.15 tpy.

Facility should calculate monthly and 12-month rolling NOx emissions using the following formula, based on fuel usage and the most recent stack test data as required by the condition under 40 CFR 60.4320(a), NSPS Subpart KKKK (which shall also calculate the NOx emission rate in lb/mmbtu by using EPA method 19 in appendix A of 40 CFR).

Annual NOx emissions shall be calculated using the formula:

 $(A \times B)/2000 \text{ lb/ton} \le 12.15 \text{ tpy}$

A - 12-month rolling total turbine heat input in mmbtu
B = NOx emission rate lb/mmbtu verified by most recently approved stack test

The facility shall keep records on-site for a minimum period of five years.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 12.15 tons per year Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 1-8: Compliance Certification Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 231-6.2

Item 1-8.1:

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



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Emission Unit: A-S005B

Process: LNG Emission Source: GT015

Item 1-8.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

OPERATIONS

Monitoring Description:

The GT015 turbine operating hours are limited to 4380

per year.

Work Practice Type: HOURS PER YEAR OPERATION

Upper Permit Limit: 4380 hours Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period. Subsequent reports are due every 6 calendar month(s).

Condition 1-9: Applicability

Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60, NSPS Subpart KKKK

Item 1-9.1:

Facilities with a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005 are subject to the requirements of 40 CFR 60 Subpart KKKK.

**** Emission Unit Level ****

Condition 29: Emission Point Definition By Emission Unit Effective between the dates of 09/27/2019 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 29.1(From Mod 1):

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

Emission Unit: A-S005B

Emission Point: GT014

Height (ft.): 32 Length (in.): 74 Width (in.): 60 NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: LNGFAC

Emission Point: GT015

Height (ft.): 49 Diameter (in.): 68

NYTMN (km.): 4515.47 NYTME (km.): 592.64 Building: LNGFAC

Air Pollution Control Permit Conditions

DRAFT

Renewal 3/Mod 1/Changes Only Page 16



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Item 29.2(From Mod 0):

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

Emission Unit: A-S0007

Emission Point: GS001

Height (ft.): 4 Diameter (in.): 2

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: GASSTAT

Item 29.3(From Mod 0):

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

Emission Unit: A-S0008

Emission Point: 00001

Height (ft.): 42 Diameter (in.): 44

NYTMN (km.): 4515.723 NYTME (km.): 592.533 Building: BUILD#82

Emission Point: 00002

Height (ft.): 42 Diameter (in.): 44

NYTMN (km.): 4515.723 NYTME (km.): 592.533 Building: BUILD#82

Emission Point: 00003

Height (ft.): 42 Diameter (in.): 44

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: BUILD#82

Emission Point: 00004

Height (ft.): 29 Length (in.): 36 Width (in.): 36

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: BUILD#82

Emission Point: 00005

Height (ft.): 15 Diameter (in.): 42

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: BUILD#82

Item 29.4(From Mod 0):

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

Emission Unit: A-S0009

Emission Point: 00821

Height (ft.): 31 Diameter (in.): 8

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: BUILD#82

Emission Point: 00822

Height (ft.): 21 Length (in.): 15 Width (in.): 18 NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: BUILD#82

Emission Point: 00823

Height (ft.): 3 Length (in.): 15 Width (in.): 18

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: BUILD#82

Item 29.5(From Mod 0):

Air Pollution Control Permit Conditions

Renewal 3/Mod 1/Changes Only

Page 17

DRAFT



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

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

Emission Unit: A-S0020

Emission Point: 00101

Height (ft.): 22 Diameter (in.): 36

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: LNGFAC

Emission Point: 00102

Height (ft.): 22 Diameter (in.): 36

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: LNGFAC

Emission Point: 00103

Height (ft.): 22 Diameter (in.): 36

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: LNGFAC

Emission Point: 00104

Height (ft.): 22 Diameter (in.): 36

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: LNGFAC

Emission Point: 00105

Height (ft.): 22 Diameter (in.): 36

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: LNGFAC

Item 29.6(From Mod 0):

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

Emission Unit: A-S0021

Emission Point: 00106

Height (ft.): 135 Diameter (in.): 23

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: LNGFAC

Emission Point: 00107

Height (ft.): 71 Diameter (in.): 138

NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: LNGFAC

Item 29.7(From Mod 0):

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

Emission Unit: A-S0023

Emission Point: BH001

Height (ft.): 23 Length (in.): 19 Width (in.): 22 NYTMN (km.): 4515.7 NYTME (km.): 592.5 Building: BUILD#82

Condition 30: Process Definition By Emission Unit

Effective between the dates of 09/27/2019 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 30.1(From Mod 1):

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

Air Pollution Control Permit Conditions

Renewal 3/Mod 1/Changes Only Page 18 DRAFT



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Emission Unit: A-S005B

Process: LNG Source Classification Code: 2-02-002-09

Process Description:

This process includes simple combustion turbine, GT014 rated at 82 mmbtu/hr fires only natural gas which is used

for compressing natural gas for storage.

After the turbine replacement, this process will be for the new simple cycle combustion turbine (GT015), rated at 54 MM Btu/hr. This combustion turbine will fire natural gas only. This turbine is used to compress nitrogen as part of the proposed replacement of Nitrogen Refrigeration Cycle (NRC) project.

Emission Source/Control: GT014 - Combustion Design Capacity: 82 million Btu per hour

Emission Source/Control: GT015 - Combustion Design Capacity: 54 million Btu per hour

Item 30.2(From Mod 0):

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

Emission Unit: A-S0007

Process: GSS Source Classification Code: 4-06-004-99

Process Description:

The Gas station with two 4,000 gallon storage tanks, one for unleaded gasoline and one for diesel, is operated to supply fuel for company vehicles. The tanks have vapor balanced submerged filling, and the station is equipped

with Stage II Vapor Controls.

Emission Source/Control: 00D05 - Process

Design Capacity: 4 1000 gallons

Emission Source/Control: 00G06 - Process

Design Capacity: 4 1000 gallons

Item 30.3(From Mod 0):

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

Emission Unit: A-S0008

Process: PBD Source Classification Code: 4-02-001-10

Process Description:

Five (5) paint spray booths: Three (3) underground transformer paint booths (2 for flow coating and 1 for drying). PB001, PB002 & PB003; one (1) pole (overhead) transformer paint booth, PB004; and one (1) auto body paint spray booth, PB005 for the Transportation Department. Each paint booth is equipped with a panel filter to control over spray.

Air Pollution Control Permit Conditions



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Emission Source/Control: PBF01 - Control Control Type: MAT OR PANEL FILTER

Emission Source/Control: PBF02 - Control Control Type: MAT OR PANEL FILTER

Emission Source/Control: PBF03 - Control Control Type: MAT OR PANEL FILTER

Emission Source/Control: PBF04 - Control Control Type: MAT OR PANEL FILTER

Emission Source/Control: PBF05 - Control Control Type: MAT OR PANEL FILTER

Emission Source/Control: PB001 - Process

Emission Source/Control: PB002 - Process

Emission Source/Control: PB003 - Process

Emission Source/Control: PB004 - Process

Emission Source/Control: PB005 - Process

Item 30.4(From Mod 0):

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

Emission Unit: A-S0009

Process: WLD Source Classification Code: 3-09-005-00

Process Description:

The transformer shop has 17 welding bays and one high frequency soldering machine that are used in repair of transformers.

Emission Source/Control: 00HFS - Process

Emission Source/Control: WB001 - Process

Emission Source/Control: WB002 - Process

Emission Source/Control: WB003 - Process

Emission Source/Control: WB004 - Process

Emission Source/Control: WB005 - Process

Emission Source/Control: WB006 - Process

Emission Source/Control: WB007 - Process



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Emission Source/Control: WB008 - Process

Emission Source/Control: WB009 - Process

Emission Source/Control: WB010 - Process

Emission Source/Control: WB011 - Process

Emission Source/Control: WB012 - Process

Emission Source/Control: WB013 - Process

Emission Source/Control: WB014 - Process

Emission Source/Control: WB015 - Process

Emission Source/Control: WB016 - Process

Emission Source/Control: WB017 - Process

Item 30.5(From Mod 0):

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

Emission Unit: A-S0020

Process: VAP Source Classification Code: 3-01-900-03

Process Description:

There are 5 vaporizers, each with 4 burners. Each burner has a heat input of 10.5 mmbtu/hr, for a total of 42 mmbtu/hr per vaporizer. Each vaporizer has its own stack. These vaporizers are used to heat a hot water bath which surrounds the liquid natural gas tubes, causing the LNG to convert to natural gas. These vaporizers are typically operated in any combination of 1 to 4 at a time, with the fifth as a spare. The vaporizers burn only natural gas.

Emission Source/Control: VP001 - Combustion Design Capacity: 42 million Btu per hour

Emission Source/Control: VP002 - Combustion Design Capacity: 42 million Btu per hour

Emission Source/Control: VP003 - Combustion Design Capacity: 42 million Btu per hour

Emission Source/Control: VP004 - Combustion Design Capacity: 42 million Btu per hour

Emission Source/Control: VP005 - Combustion Design Capacity: 42 million Btu per hour

Item 30.6(From Mod 0):

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



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Emission Unit: A-S0021

Process: FLR Source Classification Code: 3-01-900-23

Process Description:

The LNG facility has a flare stack utilized to safely combust natural gas released from all the safety valves at the facility. The maximum design capacity of the flare tip is 9090 mmbtu/hr. The flare has a pilot flame which requires a continuous heat input of 1.3 mmbtu/hr.

Emission Source/Control: FL006 - Combustion Design Capacity: 9,090 million Btu per hour

Item 30.7(From Mod 0):

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

Emission Unit: A-S0021

Process: GND Source Classification Code: 3-01-900-23

Process Description:

The LNG facility has a two stage ground combustor which is used to burn natural gas off the top of the LNG storage tank when the pressure is too high. In the first stage, the combustor can burn up to 70,000 scf/hr of natural gas. In the second stage it can burn a maximum of 250,000 scf/hr. There are three pilot lights which are always lit, each with a heat input of 75,000 btu/hr. The ground combustor burns only natural gas.

Emission Source/Control: FL007 - Combustion Design Capacity: 250 million Btu per hour

Item 30.8(From Mod 0):

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

Emission Unit: A-S0023

Process: GBL Source Classification Code: 3-09-002-01

Process Description:

The transformer shop has one large and two small grit blasters for cleaning transformers. Grit2 is a small manual cabinet with two small blasters that vents indoors and is an insignificant source of emissions. Grit1 is an automatic large grit blaster that uses steel shot and is exhausted through a baghouse, which is located outside.

Grit 1 has an exhaust flow of 8,100 cfm.

Emission Source/Control: BH001 - Control

Control Type: FABRIC FILTER

Emission Source/Control: GRIT1 - Process



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Emission Source/Control: GRIT2 - Process

Condition 31: No gasoline transfer allowed at sites without Stage I controls installed, if required at that site.

Effective between the dates of 09/27/2019 and Permit Expiration Date

Applicable Federal Requirement:

Expired by Mod 1

Item 31.1:

This Condition applies to Emission Unit: A-S0007

Item 31.2:

No person may transfer or allow the transfer of gasoline into storage tanks at gasoline dispensing sites whose annual throughput exceeds 120,000 gallons, unless the site has been properly registered pursuant to section 230.7 of 6 NYCRR Part 230 and the gasoline storage tank is equipped with:

- i. a stage I vapor collection system consisting of a vapor-tight return line from the storage tank, or its vent, to the gasoline transport vehicle;
- ii. a properly installed on-site vapor control system connected to a vapor collection system; or
- iii. an equivalent control system.

Condition 1-10: Compliance Certification Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 1-10.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-S005B

Item 1-10.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility shall notify the Department of the shut down and /or removal date of the old turbine GT014 within thirty days of the conclusion of shakedown period of the new turbine GT015.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 46: Compliance Certification



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Effective between the dates of 09/27/2019 and Permit Expiration Date

Applicable Federal Requirement:

Expired by Mod 1

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-S005B

Regulated Contaminant(s):

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

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The NOx emissions of Simple Cycle Combustion turbine GT014 (firing natural gas only) are limited to 92 ppmvd corrected to 15% oxygen or 0.34 lb/mmbtu.

This limit has been established based on the December 2011 NOx RACT analysis (re-submitted on October 18, 2018), in which facility had demonstrated as per 6 NYCRR Part 227-2.5(c) that the cost per ton of NOx reduced with a feasible technology will be more than than the reasonable cost set by the Department.

Upper Permit Limit: 0.34 pounds per million Btus

Reference Test Method: 40 CFR Part 60 Appendix A Method 20

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 45 days after the reporting period.

The initial report is due 8/14/2020.

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

Condition 1-11: Compliance Certification Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.4340(a), NSPS Subpart KKKK

Item 1-11.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-S005B

Regulated Contaminant(s):

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

Item 1-11.2:

Air Pollution Control Permit Conditions

Renewal 3/Mod 1/Changes Only

Page 24

DRAFT



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

If the facility is not using water or steam injection to control NOx emissions, the facility must perform annual performance tests in accordance with §60.4400 to demonstrate continuous compliance.

If the NOx emission result from the performance test is less than or equal to 75% of the NOx emission limit for the turbine, the facility may reduce the frequency of subsequent performance tests to once every two years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceeds 75% of the NOx emission limit for the turbine, the facility must resume annual performance tests.

Reference Test Method: Method 7E or 20

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-12: NOx performance testing methodology Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.4400(b), NSPS Subpart KKKK

Item 1-12.1:

This Condition applies to Emission Unit: A-S005B

Process: LNG Emission Source: GT014

Item 1-12.2:

The performance test must be done at any load condition within +/- 25% of 100% of peak load. The facility may perform testing at the highest achievable load point, if at least 75% of peak load cannot be achieved in practice. The facility must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes.

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

For a combined cycle and CHP turbine systems with supplemental heat (duct burner), the facility must measure the total NOx emissions after the duct burner rather than directly after the turbine. The duct burner must be in operation during the performance test.

If water or steam injection is used to control NOx with no additional post-combustion NOx control and the facility chooses to monitor the steam or water to fuel ratio in accordance with §60.4335, then that monitoring system must be operated concurrently with each EPA



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Method 20 or 7E run and must be used to determine the fuel consumption and the steam or water to fuel ratio necessary to comply with the applicable §60.4320 NOx emission limit.

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 NOx emission rate at each tested level meets the applicable emission limit in §60.4320.

If the facility elects to install a CEMS, the performance evaluation of the CEMS may either be conducted separately or (as described in §60.4405) as part of the initial performance test of the affected unit.

The ambient temperature must be greater than 0F during the performance test.

Condition 1-13: Date of construction notification - If a COM is not used. Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.7(a), NSPS Subpart A

Item 1-13.1:

This Condition applies to Emission Unit: A-S005B

Process: LNG Emission Source: GT015

Item 1-13.2:

Any owner or operator subject to this part shall furnish the Administrator with the following information:

- 1) a notification of the date construction or reconstruction commenced, post marked no later than 30 days after such date;
- 2) [reserved]
- 3) a notification of the actual date of initial start up, post marked within 15 days after such date;
- 4) a notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless the change is specifically exempted under this part. The notice shall be post marked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capability of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional information regarding the change;
- 5) a notification of the date upon which the demonstration of continuous monitoring system performance commences, post marked not less than 30 days prior to such date;
- 6) a notification of the anticipated date for conducting the opacity observations, post marked not less than 30 days prior to such date.

Condition 1-14: Performance testing timeline.



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.8(a), NSPS Subpart A

Item 1-14.1:

This Condition applies to Emission Unit: A-S005B

Process: LNG Emission Source: GT015

Item 1-14.2:

Within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup of the facility, the owner or operator of the facility shall conduct performance testing and provide the results of such tests, in a written report, to the Administrator.

Condition 1-15: Prior notice.

Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.8(d), NSPS Subpart A

Item 1-15.1:

This Condition applies to Emission Unit: A-S005B

Process: LNG Emission Source: GT015

Item 1-15.2:

The owner or operator shall provide the Administrator with prior notice of any performance test at least 30 days in advance of testing.

Condition 1-16: Compliance Certification Effective for entire length of Permit

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

Item 1-16.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-S005B

Process: LNG Emission Source: GT015

Regulated Contaminant(s):

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

Item 1-16.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

For a facility with a new turbine firing natural gas and if the combustion turbine heat input at peak load (HHV) is greater than 50 mmBtu/hr and less than or equal to 850

Air Pollution Control Permit Conditions



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

mmBtu/hr, the facility must not exceed the NOx emission standard of 25 ppm at 15% O2.

Compliance with this emission standard shall be determined according to the annual performance tests as specified in §60.4340(a).

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 25 parts per million by volume (dry,

corrected to 15% O2)

Reference Test Method: EPA Method 7E or EPA Method 20

Monitoring Frequency: ANNUALLY

Averaging Method: 3-HOUR BLOCK AVERAGE Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 1-17: Compliance Certification Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.4330, NSPS Subpart KKKK

Item 1-17.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-S005B

Process: LNG Emission Source: GT015

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emission limit for sulfur dioxide from a stationary combustion turbine is 0.060 lb SO2/MMBtu heat input. If the turbine simultaneously fires multiple fuels, each fuel must meet this requirement.

Parameter Monitored: SULFUR DIOXIDE

Upper Permit Limit: 0.060 pounds per million Btus

Monitoring Frequency: Once every five years

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 1-18: Test methods for NOx

Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.4400(a), NSPS Subpart KKKK

Air Pollution Control Permit Conditions



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

Item 1-18.1:

This Condition applies to Emission Unit: A-S005B

Process: LNG Emission Source: GT015

Item 1-18.2:

The facility must conduct an initial performance test, as required in §60.8. Subsequent performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test).

Performance tests shall be conducted according to the test methodologies listed in §60.4400(a)(1)-(3) as applicable.

Condition 1-19: Testing requirements for sulfur dioxide Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.4415, NSPS Subpart KKKK

Item 1-19.1:

This Condition applies to Emission Unit: A-S005B

Process: LNG Emission Source: GT015

Item 1-19.2: The testing requirements for sulfur dioxide emissions are specified in 40 CFR 60.4415 and must be implemented for this facility.



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 in 6 NYCRR 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 demonstrate, 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 facility was being properly operated and maintained;
- (3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction 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: 2-6301-00006/00081 Facility DEC ID: 2630100006

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 47: Contaminant List

Effective between the dates of 09/27/2019 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 47.1:

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

CAS No: 007446-09-5 Name: SULFUR DIOXIDE

CAS No: 0NY075-00-5

Name: PM-10

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0

Name: VOC

Condition 48: Malfunctions and start-up/shutdown activities

Effective between the dates of 09/27/2019 and Permit Expiration Date

Applicable State Requirement:

Expired by Mod 1

Item 48.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the

Air Pollution Control Permit Conditions



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

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 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 1-20: Malfunctions and Start-up/Shutdown Activities Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR 201-1.4

Item 1-20.1:

- (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 maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006

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 monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

- (c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall 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. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. 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, the air contaminants emitted, and the resulting emission rates and/or opacity.
- (d) The department may also require the facility 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.



Permit ID: 2-6301-00006/00081 Facility DEC ID: 2630100006