



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6005-00139/00002

Renewal Number: 3

Modification Number: 1 09/09/2019

Facility Identification Data

Name: PARKCHESTER SOUTH CONDOMINIUM

Address: 2020 E TREMONT AVE

BRONX, NY 10462

Owner/Firm

Name: PARKCHESTER SOUTH CONDOMINIUM

Address: 2000 E TREMONT AVE

BRONX, NY 10462-5703, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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Address: PARKCHESTER SOUTH CONDOMINIUM

2000 E TREMONT AVE

BRONX, NY 10462

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Permit Description

Introduction

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

Summary Description of Proposed Project

This is a minor modification to the Title V permit (Renewal #3). The facility is applying for a Title V permit modification due to the conversion of dual burners from using natural gas and #6 fuel oil to using a combination of natural gas and #2 ultra low-sulfur distillate (ULSD) fuel oil, natural gas still being the



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primary fuel source.

The modification will apply to the following:

- Replacement Burner Tips
- Replacement Burner Guns
- The burners (TODD COMB., INC - Model VARIFLAME V545FGOXXX), counting 2 per each boiler, will remain in place.

The modification (project) consists of the following:

1. The facility is converting the existing four (4) Foster Wheeler Type D boilers' secondary fuel type from # 6 fuel oil (residual) to # 2 fuel oil (ULSD - ultra low-sulfur distillate with a limit of 0.0015 % sulfur content by weight). Natural gas will remain as the primary fuel source for these four boilers. As a result, this will reduce the Sulfur Dioxide emissions from 130 tpy to < 25 tpy. With this fuel oil conversion to ULSD, Parkchester will not be considered a Major Facility for SO₂ emission, since their potential to emit will be below the threshold of 25 tons/year for sulfur dioxide. With the replacement of the oil guns (2 on each boiler), each of these four boiler have a maximum design capacity of 133 MM Btu/hr, but the boilers are re-classified from 99 MM Btu/hr to 104 MM Btu/hr each. This new value is related to the new oil guns (2 on each boiler) proposed for the conversion from #6 fuel oil to #2 ULSD fuel oil. The 104 MM Btu/hr value, from which the boilers were de-rated to 99 MM Btu/hr on July 1, 2014, was associated with the old oil gun maximum design capacity. The start-up date for the first boiler (Emission Source 00001) on #2 ULSD fuel oil is 7/29/2019 and all four boilers should be running on #2 ULSD fuel oil by 10/21/2019 with a maximum heat input of 133 MM Btu/hr for each boiler after the conversion.

2. The facility is re-classifying the four existing Foster Wheeler Type D boilers from mid-size (99 MM Btu/hr) to large boilers (104 MM btu/hr). With the replacement of the oil guns (2 on each boiler), each of these four boiler have a maximum design capacity of 133 MM Btu/hr. A mid-size boiler is defined as "a boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour", and a large boiler is defined as " a boiler with a maximum heat input capacity greater than 100 million Btu per hour and equal to or less than 250 million Btu per hour." As a result, the NO_x RACT emission limit will change from 0.20 lbs/ MM Btu to 0.15 lbs/MM Btu. Also, the NO_x emissions equation cap of 0.15 lbs/MM Btu will be the new NO_x RACT for the large boilers operating on natural gas (Process 001) and # 2 ULSD fuel oil (Process 020). Hence, the maximum annual usage of #2 ULSD fuel oil will not be exceeding 31% of the total annual fuel consumption, on a BTU basis will be amended.

Part 231-2, New Source Review in non-attainment areas and ozone transport region is not applicable to this facility because these boilers have been in existence at this facility since 1939 and there is no increase in actual NO_x emissions, but a decrease from 243 tpy to 66 tpy. Also, the facility must comply with a lower NO_x RACT limit of 0.15 lbs/MM Btu and not 0.20 lbs/MM Btu.

Parkchester South Condominium (Parkchester), located at 2020 E. Tremont Avenue in Bronx, New York, provides heat and hot water to an apartment complex consisting of one hundred and seventy-two (172) buildings and twelve thousand two hundred and seventy-one (12,271) apartments. The facility operates four (4) dual fuel (natural gas & # 6 fuel oil to be converted to natural gas & #2 fuel oil) boilers that discharge through one common stack. Each boiler is connected to 2 burners for natural gas and # 6 fuel oil (to be converted to #2 ULSD fuel oil with a sulfur content limit of 0.0015 % sulfur by weight). With the conversion to #2 fuel oil, Parkchester will use ultra low sulfur diesel (ULSD) with sulfur content of 15 PPM (0.0015% by weight) in compliance with 6 NYCRR Part 225-1.2 (f). Parkchester obtained ULSD sample analysis from their fuel vendor confirming that sulfur content is 15 PPM, and will request such



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certification at every #2 fuel oil delivery. The boilers (Emission Sources 00001, 00002, 00003 & 00004) supply steam for the space heating of their buildings. The four (4) boilers were constructed in 1939. The four (4) boilers are collectively identified as Emission Unit U-00001. Emissions from the four (4) boilers are exhausted through one common stack which is identified as Emission Point 00001. Current Emission Unit, Emission Sources, and Emission Point will remain the same, Process 001 (natural gas) will remain the same and Process 020 will be the conversion from #6 to #2 ULSD fuel oil.

Attainment Status

PARKCHESTER SOUTH CONDOMINIUM is located in the town of BRONX in the county of BRONX. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

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

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

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

Facility Description:

Parkchester South Condominium (Parkchester), located at 2020 E. Tremont Avenue in Bronx, New York, provides heat and hot water to an apartment complex consisting of one hundred and seventy-two (172) buildings and twelve thousand two hundred and seventy-one (12,271) apartments. The facility operates four (4) dual fuel (natural gas & # 6 fuel oil to be converted to natural gas & #2 fuel oil) boilers that discharge through one common stack. Each boiler is connected to 2 burners for natural gas and # 6 fuel oil (to be converted to #2 ULSD fuel oil with a sulfur content limit of 0.0015 % sulfur by weight). With the replacement of the oil guns (2 on each boiler), each of these four boiler have a maximum design capacity of 133 MM Btu/hr. The boilers are being re-classified from a mid-size (99 MM Btu/hr) to large boilers (104 MM btu/hr). A mid-size boiler is defined as "a boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour," and a large boiler is defined as " a boiler with a maximum heat input capacity greater than 100 million Btu per hour and equal to or less than 250 million Btu per hour." As a result, the NOx RACT emission limit will change from 0.20 lbs/ MM Btu to 0.15 lbs/MM Btu. This facility has been in existence since 1939. With the conversion to #2 fuel oil, Parkchester will use ultra low sulfur diesel (ULSD) with sulfur content of 15 PPM (0.0015% by weight) in compliance with 6 NYCRR Part 225-1.2 (f). Parkchester obtained ULSD sample analysis from their fuel vendor confirming that sulfur content is 15 PPM, and will request such certification at every #2 fuel oil delivery. The boilers (Emission Sources 00001, 00002, 00003 & 00004) supply steam for the space heating of their buildings. The four (4) boilers were constructed in 1939. The four (4) boilers are collectively identified as Emission Unit U-00001. Emissions from the four (4) boilers are exhausted through one common stack which is identified as Emission Point 00001. Current Emission Unit, Emission



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Sources, and Emission Point will remain the same, Process 001 (natural gas) will remain the same and Process 020 will be the conversion from #6 to #2 ULSD fuel oil.

The facility operates other sources which are considered exempt from permitting in accordance with 6NYCRR 201-3.2(c), including four (4) #2 ULSD fuel oil storage tanks (<300,000 bbls) each. There are no emergency generators at this facility.

Permit Structure and Description of Operations

The Title V permit for PARKCHESTER SOUTH CONDOMINIUM

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

PARKCHESTER SOUTH CONDOMINIUM is defined by the following emission unit(s):

Emission unit U00001 - Emission Unit U-00001 is comprised of four Foster Wheeler boilers, Boilers 001, 002, 003 and 004 (Emission Sources 00001, 00002, 00003 & 00004; respectively). Parkchester will operate the four boilers as large boilers (a boiler with a maximum heat input capacity greater than 100 million Btu per hour and equal to or less than 250 million Btu per hour). All four boilers discharge through a common stack, identified as Emission Point 00001. The four boilers will burn both natural gas (Process 001) and # 2 ULSD fuel oil (Process 020). The conversion of #6 to #2 fuel oil will result in modification of Process 020 (#2 ULSD fuel oil) and modification of oil guns/nozzles for each boiler (Emission Sources 0001, 0002, 0003 and 0004). With the replacement of the oil guns (2 on each boiler), each of these four boiler have a maximum design capacity of 133 MM Btu/hr.

The start-up date for the first boiler (Emission Source 00001) on #2 ULSD fuel oil is 7/29/2019 and all four boilers should be running on #2 ULSD fuel oil by 10/21/2019 with a maximum heat input of 133 MM Btu/hr for each boiler after the conversion.

The four Foster Wheeler boilers, Boilers 001, 002, 003 and 004 (Emission Sources 00001, 00002, 00003 & 00004) fire both natural gas & ULSD #2 fuel oil. On or after July 1, 2014, the NO_x RACT compliance plan rule limit for large boilers is 0.15 lb/MM Btu.

Emission unit U00001 is associated with the following emission points (EP):



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00001

Process: 001 is located at FIRST FLOOR, Building BPLANT - Process 001 is the firing of natural gas in Boilers 001, 002, 003 & 004 (Emission Sources 00001, 00002, 00003 & 00004, respectively) in Emission Unit U-00001. These four Foster Wheeler boilers will burn both natural gas (Process 001) and # 2 ULSD fuel oil (Process 020), and each boiler will be re-classified as Large Boiler category from Mid-size Boilers (99 MM Btu/hr to 104 MM Btu/hr) by 7/29/2019. All four boilers discharge through a common stack, identified as Emission Point 00001.

With the replacement of the oil guns (2 on each boiler), each of these four boiler have a maximum design capacity of 133 MM Btu/hr, but the boilers are re-classified from 99 MM Btu/hr to 104 MM Btu/hr each.

Mid-size boiler: A boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour.

A large boiler is defined as a boiler with a maximum heat input capacity greater than 100 million Btu per hour and equal to or less than 250 million Btu per hour.

On or after July 1, 2014, the NOx RACT rule limit for large gas/oil boilers will be 0.15 lb/MM Btu.

Process: 020 is located at 1st Floor, Building BPLANT - Process 020 is the firing of #2 ULSD fuel oil in Boilers 001, 002, 003 & 004 (Emission Sources 00001, 00002, 00003 & 00004, respectively) in Emission Unit U-00001. These four Foster Wheeler boilers will burn both natural gas (Process 001) and #2 ULSD fuel oil (Process 020) and natural gas (Process 001), and each boiler will be re-classified as Large Boiler category from Mid-size Boilers (99 MM Btu/hr to 104 MM Btu/hr). With the replacement of the oil guns (2 on each boiler), each of these four boiler have a maximum design capacity of 133 MM Btu/hr. All four boilers discharge through a common stack, identified as Emission Point 00001.

The start-up date for the first boiler (Emission Source 00001) on #2 ULSD fuel oil is 7/29/2019 and all four boilers should be running on #2 ULSD fuel oil by 10/21/2019 with a maximum heat input of 133 MM Btu/hr for each boiler after the conversion.

Mid-size boiler: A boiler with a maximum heat input capacity greater than 25 million Btu per hour and equal to or less than 100 million Btu per hour.

A large boiler is defined as a boiler with a maximum heat input capacity greater than 100 million Btu per hour and equal to or less than 250 million Btu per hour.

Title V/Major Source Status

PARKCHESTER SOUTH CONDOMINIUM is subject to Title V requirements. This determination is based on the following information:

Parkchester South Condominium is a major facility because the potential emissions of nitrogen oxides is greater than the major source thresholds, which is 25 tons per year for nitrogen oxides. But, the potential emissions of sulfur dioxide is less than the major source thresholds, which is 25 tons per year for sulfur dioxide due to the switching of #6 fuel oil (residual) to #2 fuel oil (distillate) in the four (4) Foster Wheeler Type D large boilers (Emission Sources 00001, 00002, 00003 & 00004).



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Program Applicability

The following chart summarizes the applicability of PARKCHESTER SOUTH CONDOMINIUM with regards to the principal air pollution regulatory programs:

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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to



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major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of



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activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
6513	APARTMENT BUILDING OPERATORS

SCC Codes

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

SCC Code	Description
1-03-004-01	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - RESIDUAL OIL Grade 6 Oil
1-03-005-01	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - DISTILLATE OIL Grades 1 and 2 Oil
1-03-006-01	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS Over 100 MMBtu/Hr
1-03-006-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS 10-100 MMBtu/Hr

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In



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addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
0NY502-00-0	40 CFR 60-63 - TOTAL ORGANIC COMPOUNDS (TOC)	33687.46		9257.73	
007440-38-2	ARSENIC	6.39		0.36	
000071-43-2	BENZENE	6.4		1.77	
007440-41-7	BERYLLIUM	4.37		0.16	
007440-43-9	CADMIUM	7.8		1.07	
000124-38-9	CARBON DIOXIDE	598245775		108781685	
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS	598245780		108781685	
000630-08-0	CARBON MONOXIDE	308980		72441.63	
007440-47-3	CHROMIUM	8.6		1.32	
007440-50-8	COPPER	11.27		1.01	
025321-22-6	DICHLOROBENZE NE	3.6		1.01	
000050-00-0	FORMALDEHYDE	860		84.41	
000110-54-3	HEXANE	5520		1514.9	
007439-92-1	LEAD	20		0.86	
007439-96-5	MANGANESE	9.83		0.61	
007439-97-6	MERCURY	5.13		0.37	
000074-82-8	METHANE	9280		2011.14	
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	20		1.77	
010024-97-2	NITROUS OXIDE	9420		1942.35	
0NY210-00-0	OXIDES OF NITROGEN	698520		132098.93	
0NY075-00-0	PARTICULATES	32384			
0NY075-02-5	PM 2.5	31860		6686.13	
0NY075-00-5	PM-10	34460		6733.44	
007782-49-2	SELENIUM	21.74		0.75	
007446-09-5	SULFUR DIOXIDE	4040		579.36	
007446-11-9	SULFUR TRIOXIDE	80		2.99	
000108-88-3	TOLUENE	20		2.86	
0NY100-00-0	TOTAL HAP	6480		1612.17	
0NY998-00-0	VOC	22600		4823.05	
007440-66-6	ZINC	94.59		24.6	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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.



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Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 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 Part 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 Part 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 Part 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 Part 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 Part 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



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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 Part 201-6.4(i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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



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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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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.



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(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

**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 standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

Regulatory Analysis

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

FACILITY	ECL 19-0301	37	Powers and Duties of the Department with respect to air
FACILITY	40CFR 68	19	pollution control
FACILITY	40CFR 82-F	20	Chemical accident prevention provisions
FACILITY	6NYCRR 200.6	1	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.7	10	Acceptable ambient air quality.
FACILITY	6NYCRR 201-1.4	38	Maintenance of equipment.
FACILITY	6NYCRR 201-1.7	11	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.8	12	Recycling and Salvage
FACILITY	6NYCRR 201-3.2(a)	13	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.3(a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	21, 34, 35	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.4(a)(4)	15	Title V Permits and the Associated Permit Conditions
FACILITY			General Conditions - Requirement to



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FACILITY	6NYCRR 201-6.4(a)(7)	2	Provide Information
FACILITY	6NYCRR 201-6.4(a)(8)	16, 1 -2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)(2)	4	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(d)(4)	22	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(e)	1 -1	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(f)(6)	17	Compliance Certification
FACILITY	6NYCRR 201-6.4(g)	1 -3	Off Permit Changes
FACILITY	6NYCRR 202-1.1	18	Permit Shield
FACILITY	6NYCRR 202-2.1	7	Required emissions tests.
FACILITY	6NYCRR 202-2.5	8	Emission Statements - Applicability
FACILITY	6NYCRR 211.1	26	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	39	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 215.2	9	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 225-1.2(h)	1 -4	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.6	1 -5	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 227.2(b)(1)	1 -12	Reports, Sampling, and Analysis
FACILITY	6NYCRR 227-1.3	1 -6	Particulate emissions.
FACILITY	6NYCRR 227-1.3(a)	1 -7	Smoke Emission Limitations.
FACILITY	6NYCRR 227-1.4(a)	1 -13	Smoke Emission Limitations.
FACILITY	6NYCRR 227-2.4(b)(1)(ii)	1 -8, 1 -9	Stack Monitoring. (see narrative)
FACILITY	6NYCRR 227-2.6(a)	1 -10	2010 NOx RACT presumptive limits.
FACILITY	6NYCRR 227-2.6(c)	1 -11	Applicable testing and/or monitoring requirements.
			Stack Test Requirements.

Applicability Discussion:

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

ECL 19-0301

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



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6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide



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information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

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

6 NYCRR 201-6.4 (a) (8)

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

6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

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

6 NYCRR 201-6.4 (c) (3) (ii)

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

6 NYCRR 201-6.4 (d) (4)

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

6 NYCRR 201-6.4 (e)

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

6 NYCRR 201-6.4 (f) (6)

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

6 NYCRR 201-6.4 (g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for



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natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, PARKCHESTER SOUTH CONDOMINIUM has been determined to be subject to the following regulations:

6 NYCRR 211.1

This regulation requires that 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.



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6 NYCRR 225-1.2 (h)

Sulfur-in-fuel limitation for the firing of distillate oil on or after July 1, 2016.

6 NYCRR 225-1.6

This section establishes the requirements for reporting, sampling, and analyzing fuel by subject facilities.

6 NYCRR 227.2 (b) (1)

This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6 NYCRR 227-1.3

This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6 NYCRR 227-1.3 (a)

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

6 NYCRR 227-1.4 (a)

Subdivisions (a) and (f) of this section (227-1.4) have not been approved by EPA and have not been included in the NYS SIP.

6 NYCRR 227-2.4 (b) (1) (ii)

Future NOx RACT presumptive limits effective 7/1/14.

6 NYCRR 227-2.6 (a)

Applicable testing and/or monitoring requirements for emission sources subject to NOx RACT.

6 NYCRR 227-2.6 (c)



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Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	40 CFR 52.21 (j)	Best Available Control Technology

Reason: The facility is converting the existing four (4) Foster Wheeler Type D boilers' secondary fuel type from # 6 fuel oil (residual) to # 2 fuel oil (ULSD - ultra low-sulfur distillate with a limit of 0.0015 % sulfur content by weight). Natural gas will remain as the primary fuel source for these four boilers. As a result, this will reduce the Sulfur Dioxide emissions from 130 tpy to < 25 tpy. With this fuel oil conversion to ULSD, Parkchester will not be considered a Major Facility for SO2 emission, since their potential to emit will be below the threshold of 25 tons/year for sulfur dioxide.

Therefore; 40 CFR 52-A.21, Prevention of Significant Deterioration for Sulfur Dioxide is not applicable to Parkchester South Condominium because the facility will no longer use # 6 residual fuel oil with a sulfur limit of 0.30% by weight, instead the facility will use ULSD (Ultra Low Sulfur Distillate) with a sulfur limit of 0.0015% by weight.

FACILITY	6 NYCRR Subpart 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region
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Reason: The facility is converting the existing four (4) Foster Wheeler Type D boilers' secondary fuel type from # 6 fuel oil (residual) to # 2 fuel oil (ULSD - ultra low-sulfur distillate with a limit of 0.0015 % sulfur content by weight). Natural gas will remain as the primary fuel source for these four boilers. As a result, this will reduce the Sulfur Dioxide emissions from 130 tpy to < 25 tpy.

The start-up date for the first boiler (Emission Source 00001) on #2 ULSD fuel oil is 7/29/2019 and all four boilers should be running on #2 ULSD fuel oil by 10/21/2019 with a maximum heat input of 133 MM Btu/hr for each boiler after the conversion.

The facility is reclassifying the four existing Foster Wheeler Type D boilers from mid-size (99 MM Btu/hr) to large boilers (133 MM btu/hr). With the replacement of the oil guns (2 on each boiler), each of these four boiler have a maximum design capacity of 133 MM Btu/hr, so the boilers are re-classified from 99 MM Btu/hr to 133 MM Btu/hr each. As a result, the NOx RACT emission limit will change from 0.20 lbs/ MM Btu to 0.15 lbs/MM Btu. Also, the NOx emissions equation cap of 0.15 lbs/MM Btu will be the new NOx RACT for the large boilers operating on natural gas (Process 001) and # 2 ULSD fuel oil (Process 020). Hence, the maximum annual usage of #2 ULSD fuel oil will not be exceeding 31% of



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the total annual fuel consumption, on a BTU basis will be amended.

New Source Review is not applicable because the facility and these boilers have been in existence since 1939 and there are no increase in actual NOx emissions, but a decrease from 243 tpy to 66 tpy. Also, the facility must comply with a lower NOx RACT of 0.15 lbs/MM Btu and not 0.20 lbs/MM Btu.

Therefore, New Source Review, 6 NYCRR 231-2 is not applicable to this facility for the above reasons.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at PARKCHESTER SOUTH CONDOMINIUM:

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

FACILITY	5	record keeping/maintenance procedures
FACILITY	1-1	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	1-4	work practice involving specific operations
FACILITY	1-5	record keeping/maintenance procedures
FACILITY	1-12	intermittent emission testing
FACILITY	1-6	continuous emission monitoring (cem)
FACILITY	1-7	monitoring of process or control device parameters as surrogate
FACILITY	1-13	monitoring of process or control device parameters as surrogate
FACILITY	1-8	monitoring of process or control device parameters as surrogate
FACILITY	1-9	intermittent emission testing
FACILITY	1-10	record keeping/maintenance procedures
FACILITY	1-11	record keeping/maintenance procedures

Basis for Monitoring

This facility is subject to the requirements of Title V. The facility is required, under the provisions of 6 NYCRR Subpart 201-6, to submit semiannual compliance reports and an annual Compliance Certification. In addition to record keeping/maintenance procedures



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requirements, this facility is required to comply with the following monitoring conditions:

Condition #5 for 6 NYCRR 201-6.4 (c) (3) (ii): This is a facility-wide condition for Record Keeping/Maintenance Procedures. This condition specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

Condition # 1-1 for 6 NYCRR 201-6.4 (e): This is a facility-wide condition for Record Keeping/Maintenance Procedures. This condition specifies the overall permit requirements for compliance certification, including emission limitations, standards or work practices.

Condition # 7 for 6 NYCRR 202-2.1: This is a facility-wide condition for Record Keeping/Maintenance Procedures. This condition sets forth the applicability criteria for submitting an annual statement of emissions. The criteria is based on annual emission threshold quantities and ozone attainment designation. This condition applies to all Title V facilities and these facilities must submit an annual emission statement by April 15th of each year.

Condition # 1-4 for 6 NYCRR 225-1.2 (h): This is a facility-wide condition. This condition is for Work Practice Involving Specific Operations for Sulfur Dioxide for sulfur content limit of 0.0015 percent by weight. The distillate fuel oil (#2 heating oil) purchase is limited to 0.0015 percent sulfur by weight on or after July 1, 2016. Compliance with this limit will be based on vendor certifications.

Condition # 1-5 for 6 NYCRR 225-1.6: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for Sulfur Dioxide. The owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years.

Condition # 1-6 for 6 NYCRR 227-1.3: This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00001, EP: 00001, Process: 020 and ES: 00001, 00002, 00003 & 00004 for Continuous Emission Monitoring (CEM) for Particulates for visible emissions for opacity. This condition requires a limitation and compliance monitoring for opacity from



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a stationary combustion installation. This condition is for monitoring continuously the visible emissions using a Continuous Opacity Monitor (COM).

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

This condition requires stack opacity not exceed 20 percent (six minute average), except for one six-minute period per hour of not more than 27 percent opacity. Compliance with this standard may be determined by EPA Reference Method 9, Continuous Opacity Monitoring System (COMS) data, and/or any other credible evidence. The owner shall install, operate in accordance with manufacturer's instructions, and properly maintain, a COMS in the stack satisfying the criteria Appendix B of 40 CFR Part 60.

The owner shall submit an accurate excess emissions and monitoring system performance report to the Department for each calendar year quarter. All reports shall be certified by a responsible corporate official as true, accurate and complete and postmarked by the 60th day following the end of each calendar year quarter. The quarterly excess emissions report shall be submitted in a form acceptable to the Department.

Condition # 1-7 for 6 NYCRR 227-1.3 (a): This condition is for Monitoring of Process or Control Device Parameters as Surrogate. This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to Emission Unit: U-00001, Emission Point: 00001, Process: 020 and emission sources 00001, 00002, 00003 & 00004 for Monitoring for Monitoring of Process or Control Device Parameters as Surrogate Particulates for Opacity.

This condition requires a limitation and compliance monitoring for opacity from a stationary combustion installation. Opacity is limited to 20% from any stationary combustion installation which fires liquid fuels. This condition prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

Condition # 1-8 for 6 NYCRR 227-2.4 (b)(1)(ii): This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to Emission Unit: U-00001, Emission Point: 00001, Processes: 001 & 020 and Emission Sources/Controls: 00001, 00002, 00003 & 00004 for Monitoring of Process or Control Device Parameters as Surrogate for Oxides of Nitrogen.



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Parkchester South condominium has re-classified the four Foster Wheeler Type D boilers from mid-size boilers (99 MM Btu/hr) to large boilers (133 MM Btu/hr) with the replacement of the new oil guns (2 on each boiler). Parkchester South Condominium is required to perform testing the four large boilers, the four 133 MM Btu/hr each Foster Wheeler Type D boilers (Emission Sources 00001, 00002, 00003 & 00004), to verify the NO_x emission limit compliance. A large boiler is a boiler with a maximum heat input capacity greater than 100 million Btu per hour and equal to or less than 250 million Btu per hour. All four boilers operate on natural gas (Process 001) and on #2 fuel oil (Process 020).

On or after July 1, 2014, the owner/operator of large boilers (> or equal to 100 MM Btu/hr and <250 MM Btu/hr) boilers operating on # distillate fuel oil/natural gas have a new limit of 0.15 pounds of NO_x per million Btus under the NO_x RACT plan for large boilers. The allowable mass emissions change based on the quantity of Btus combusted. Allowable emissions will be determined by calculating the annual MM Btu combusted using heating value of 139,620 Btu/gal for #2 ULSD fuel oil and 1,050 Btu/scf for natural gas (NG) times the amount of the corresponding fuel, and then comparing that result to the actual corresponding emissions.

Actual corresponding emissions is calculated as the product of the gallons of #2 ULSD fuel oil, the 139,620 Btu/gal heat value for #2 ULSD fuel oil and the 0.172 lbs NO_x/MM Btu for #2 ULSD fuel oil emission factor added to the product of MM SCF natural gas, the 1,050 Btu/SCF heat value and the 0.14 lbs NO_x/MM Btu emission factor. Compliance is achieved if the actual NO_x emission is < the allowable NO_x emission.

Prior to July 1, 2014, emission factors that were measured during the November 17, 2010 stack test will be used to determine the actual NO_x emissions from the combustion process.

Emission Factors from the November 17, 2010:

0.15 lbs NO_x/MM Btu Allowable

0.14 lbs NO_x/MM Btu for natural gas

[24 lb NO_x/1000 gal (as listed in AP-42, Table 1.3-1)] x [1 gal/139,620 Btu] =
0.172 lbs NO_x/MM Btu for #2 ULSD fuel oil

The maximum annual usage ratio of #2 oil was determined based on the following assumptions:



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1. Emission factor of 0.14 lbs NO_x/MM Btu for natural gas as per the November 17, 2010 Stack Test Results.
2. Emission factor of 0.172 lbs NO_x/MM Btu for #2 ULSD fuel oil obtained by dividing the #2 ULSD fuel oil emission factor of 24 lbs NO_x/1000 gal (as listed in AP-42, Table 1.3-1) by #2 ULSD heating value of 139,620 Btu/gal.
3. The following equation is true:

$[EF(\text{gas}) * \text{Usage}(\text{gas})] + EF[(\text{ULSD fuel oil}) * (\#2 \text{ ULSD fuel oil})] < \text{or equal to NO}_x \text{ RACT Limit}$

$[0.14 (\text{lb/MM Btu}) * (1-U)] + 0.172 (\text{lb/MM Btu}) * (U) < \text{or equal to } 0.15 (\text{lb/MM Btu})$

Therefore: Usage of #2 ULSD fuel oil (on a BTU basis): $U < \text{or equal to } 31\%$
Usage of natural gas (on a BTU basis); $(1-U) > 69\%$

Solving the equation above, provides a maximum percentage of # 2 ULSD fuel oil consumption of the total annual fuel consumption, on a BTU basis. If an annual # 2 ULSD fuel oil consumption (on a BTU basis) exceeds 31% of the total annual fuel consumption, then the NO_x RACT limit of 6 NYCRR 227-2.4 will be exceeded causing non-compliance with the NO_x RACT rules and regulations. Considering the # 6 fuel oil consumption during the last 3 years (2016 - 2018) ranging from 2 % - 9% of the total annual fuel consumption, on a BTU basis, the facility believes that the goal of #2 ULSD fuel oil consumption within 31% of the total annual fuel consumption, is attainable.

Reasonable Available Control Technology (RACT) requirements of 6 NYCRR Part 227-2.4 for major facilities state that large boilers (boilers with a capacity of > or equal to 100 MM Btu/hour and <250 MM Btu/hr) burning a combination of gas and oil must comply with a presumptive NO_x limit of 0.15 lbs/MM Btu. Parkchester South Condominium (Parkchester) complies with this requirement providing the maximum annual usage of #2 ULSD fuel oil not exceeding 31% of the total annual fuel consumption, on a BTU basis.

Parkchester must comply with the NO_x RACT emission limit of 0.15 lbs/MM Btu. Parkchester will comply with this standard (regulation) by restricting (limiting) the ULSD # 2 fuel oil usage to a quantity that will not make the #2 ULSD fuel oil exceed 31% of total yearly (annual) fuel (natural gas and #2 ULSD fuel oil) consumption, on a BTU 12-month rolling basis.



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Total NOx emissions = [(gallons of #2 fuel oil x 139,620 Btu/gal x 0.172 lbs NOx/MM Btus)] + [(Cubic feet of natural gas x 1,050 Btu/SCF x 0.14 lbs NOx/MM Btus)]

The natural gas consumption (in scf) will be quantified by gas meter of local provider (Con Edison). The #2 ULSD fuel oil usage (consumption) quantities will be quantified by fuel oil flowmeter that will be newly installed.

This percentage may change when a NOx results are obtained from Air Emission Stack Testing for # 2 ULSD fuel oil. When a new NOx Emission Factor for #2 ULSD fuel oil is obtained, the maximum annual percentage of # 2 ULSD fuel oil consumption should be calculated to comply with the NOx RACT requirements of 6 NYCRR 227-2.4.

This condition applies to the four large boilers, the four 133 MM Btu/hr each Foster Wheeler Type D boilers (Emission Sources 00001, 00002, 00003 & 00004), to verify the NOx emission limit compliance.

See related Condition # 1-9 for 6 NYCRR 227-2.4 (b) (1) (ii).

Condition # 1-9 for 6 NYCRR 227-2.4 (b) (1) (ii): This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to Emission Unit: U-00001, Emission Point: 00001, Processes: 001 & 020 and Emission Sources/Controls: 00001, 00002, 00003 & 00004 for Intermittent Emission Testing for Oxides of Nitrogen.

Parkchester South condominium has re-classified the four Foster Wheeler Type D boilers from mid-size boilers (99 MM Btu/hr) to large boilers (133 MM Btu/hr) with the replacement of the new oil guns (2 on each boiler). Parkchester South Condominium is required to perform testing the four large boilers, the four 133 MM Btu/hr each Foster Wheeler Type D boilers (Emission Sources 00001, 00002, 00003 & 00004), to verify the NOx emission limit compliance. A large boiler is a boiler with a maximum heat input capacity greater than 100 million Btu per hour and equal to or less than 250 million Btu per hour. All four boilers operate on natural gas (Process 001) and on #2 fuel oil (Process 020).

On or after July 1, 2014, the owner/operator of large boilers (> or equal to 100 MM Btu/hr and <250 MM Btu/hr) boilers operating on # distillate fuel oil/natural gas have a new limit of 0.15 pounds of NOx per million Btus under the NOx RACT plan for large boilers. The allowable mass emissions change based on the quantity of Btus combusted. Allowable emissions will be determined by calculating the annual MM Btu combusted using heating value of 139,620 Btu/gal for #2 ULSD fuel oil and



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1,050 Btu/scf for natural gas (NG) times the amount of the corresponding fuel, and then comparing that result to the actual corresponding emissions.

Actual corresponding emissions is calculated as the product of the gallons of #2 ULSD fuel oil, the 139,620 Btu/gal heat value for #2 ULSD fuel oil and the 0.172 lbs NO_x/MM Btu for #2 ULSD fuel oil emission factor added to the product of MM SCF natural gas, the 1,050 Btu/SCF heat value and the 0.14 lbs NO_x/MM Btu emission factor. Compliance is achieved if the actual NO_x emission is < the allowable NO_x emission.

Prior to July 1, 2014, emission factors that were measured during the November 17, 2010 stack test will be used to determine the actual NO_x emissions from the combustion process.

Emission Factors from the November 17, 2010:

0.15 lbs NO_x/MM Btu Allowable

0.14 lbs NO_x/MM Btu for natural gas

[24 lb NO_x/1000 gal (as listed in AP-42, Table 1.3-1)] x [1 gal/139,620 Btu] =
0.172 lbs NO_x/MM Btu for #2 ULSD fuel oil

The maximum annual usage ratio of #2 oil was determined based on the following assumptions:

1. Emission factor of 0.14 lbs NO_x/MM Btu for natural gas as per the November 17, 2010 Stack Test Results.
2. Emission factor of 0.172 lbs NO_x/MM Btu for #2 ULSD fuel oil obtained by dividing the #2 ULSD fuel oil emission factor of 24 lbs NO_x/1000 gal (as listed in AP-42, Table 1.3-1) by #2 ULSD heating value of 139,620 Btu/gal.
3. The following equation is true:

$[EF(\text{gas}) * \text{Usage}(\text{gas})] + EF[(\text{ULSD fuel oil}) * (\#2 \text{ ULSD fuel oil})] < \text{or equal to NO}_x \text{ RACT Limit}$

$[0.14 (\text{lb/MM Btu}) * (1-U)] + 0.172 (\text{lb/MM Btu}) * (U) < \text{or equal to } 0.15 (\text{lb/MM Btu})$

Therefore: Usage of #2 ULSD fuel oil (on a BTU basis): $U < \text{or equal to } 31\%$
Usage of natural gas (on a BTU basis): $(1-U) > 69\%$



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Solving the equation above, provides a maximum percentage of # 2 ULSD fuel oil consumption of the total annual fuel consumption, on a BTU basis. If an annual # 2 ULSD fuel oil consumption (on a BTU basis) exceeds 31% of the total annual fuel consumption, then the NO_x RACT limit of 6 NYCRR 227-2.4 will be exceeded causing non-compliance with the NO_x RACT rules and regulations. Considering the # 6 fuel oil consumption during the last 3 years (2016 - 2018) ranging from 2 % - 9% of the total annual fuel consumption, on a BTU basis, the facility believes that the goal of #2 ULSD fuel oil consumption within 31% of the total annual fuel consumption, is attainable.

Reasonable Available Control Technology (RACT) requirements of 6 NYCRR Part 227-2.4 for major facilities state that large boilers (boilers with a capacity of > or equal to 100 MM Btu/hour and <250 MM Btu/hr) burning a combination of gas and oil must comply with a presumptive NO_x limit of 0.15 lbs/MM Btu. Parkchester South Condominium (Parkchester) complies with this requirement providing the maximum annual usage of #2 ULSD fuel oil not exceeding 31% of the total annual fuel consumption, on a BTU basis.

Parkchester must comply with the NO_x RACT emission limit of 0.15 lbs/MM Btu. Parkchester will comply with this standard (regulation) by restricting (limiting) the ULSD # 2 fuel oil usage to a quantity that will not make the #2 ULSD fuel oil exceed 31% of total yearly (annual) fuel (natural gas and #2 ULSD fuel oil) consumption, on a BTU 12-month rolling basis.

Total NO_x emissions = [(gallons of #2 fuel oil x 139,620 Btu/gal x 0.172 lbs NO_x/MM Btus)] + [(Cubic feet of natural gas x 1,050 Btu/SCF x 0.14 lbs NO_x/MM Btus)]

The natural gas consumption (in scf) will be quantified by gas meter of local provider (Con Edison). The #2 ULSD fuel oil usage (consumption) quantities will be quantified by fuel oil flowmeter that will be newly installed.

This percentage may change when a NO_x results are obtained from Air Emission Stack Testing for # 2 ULSD fuel oil. When a new NO_x Emission Factor for #2 ULSD fuel oil is obtained, the maximum annual percentage of # 2 ULSD fuel oil consumption should be calculated to comply with the NO_x RACT requirements of 6 NYCRR 227-2.4.

This condition applies to the four large boilers, the four 133 MM Btu/hr each Foster Wheeler Type D boilers (Emission Sources 00001, 00002, 00003 & 00004), to verify the NO_x emission limit compliance.



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See related Condition # 1-8 for 6 NYCRR 227-2.4 (b) (1) (ii).

Condition # 1-10 for 6 NYCRR 227-2.6 (a): This condition is an emission unit level, emission point level, process level and emission source/control level. This condition applies to Emission Unit: U-00001, Emission Point: 00001, Processes: 001 & 020 and Emission Sources/Controls: 00001, 00002, 00003 & 00004 for Record Keeping/Maintenance Procedures for Oxides of Nitrogen for large boilers. This condition applies to all large boilers (Emission Sources 00001, 00002, 00003 & 00004) operating on natural gas (Process 001 and on ULSD distillate fuel oil (Process 020). The NO_x RACT for large boilers operating on distillate oil/natural gas is a limit of 0.15 pounds per million Btu per hour on or after July 1, 2014. A large boiler is defined as a boiler with a maximum heat input capacity greater than 100 million Btu per hour and equal to or less than 250 million Btu per hour.

With the replacement of the oil guns (2 on each boiler), each of these four boiler have a maximum design capacity of 133 MM Btu/hr, so the boilers are re-classified from 99 MM Btu/hr to 133 MM Btu/hr each.

Condition # 1-11 for 6 NYCRR 227-2.6 (c): This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to Emission Unit: U-00001, Emission Point: 00001, Processes: 001 & 020 and Emission Sources/Controls: 00001, 00002, 00003 & 00004 for Record Keeping/Maintenance Procedures for Oxides of Nitrogen.

This condition is for stack test requirements. This condition applies to the four large size 133 Million Btus each Foster Wheeler boilers (Emission Sources 00001, 00002, 00003 & 00004) to verify the NO_x emission limit compliance. The owner/operator of large size boilers shall perform testing to verify NO_x emissions to demonstrate compliance with 227-2.6. A large boiler is a boiler with a maximum heat input capacity greater than 100 million Btu per hour and equal to or less than 250 million Btu per hour. The owner/operator of large boilers shall measure NO_x emissions by performing stack tests described in subdivision (c) of section 227-2.6. The NO_x RACT limit is 0.15 pounds per million Btus on or after July 1, 2014 for large oil/natural gas boilers. The owner or operator of the facility is required to test for NO_x emission and follow monitoring and reporting requirements. The stack testing for NO_x emission requires the facility to:

(1) Submit a compliance test protocol to the department for approval at least 90 days prior to emission testing. The condition of the testing and the locations of the sampling devices must be acceptable to the department; and



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(2) Utilize procedures set forth in 40 CFR Part 60, Appendix A or any other method acceptable to the department and EPA for determining compliance with the appropriate NO_x limit in section 227-2.4 of this Subpart, and shall follow the procedures set forth in Part 202 of this Title.

(i) For large and mid-size boilers, utilize Method 7, 7E, or 19 from 40 CFR Part 60, Appendix A or another reference method approved by the department.

Condition # 1-12 for 6 NYCRR 227.2 (b) (1): This condition is an emission unit level, emission point level, process level and emission source/control condition that applies to Emission Unit: U-00001, Emission Point: 00001, Process: 020 and emission sources 00001, 00002, 00003 & 00004 for Intermittent Emission Testing for Particulates. The upper limit is 0.10 pounds per million Btus.

Particulate emission limit for stationary combustion installation firing oil. The owner or operator shall complete the following once per term of this permit:

- 1) Submit to the Department an acceptable protocol for the testing of particulate emission limit cited in this condition.
- 2) Perform a stack test, based upon the approved test protocol, to determine compliance with the particulate emission limit cited in this condition.
- 3) All records shall be maintained at the facility for a minimum of five years.

This condition is from the 1972 version of Part 227 and still remains as part of New York's SIP. The condition establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

Condition # 1-13 for 6 NYCRR 227-1.4 (a): This condition is an emission unit level, emission point level and process level condition that applies to Emission Unit: U-00001, Emission Point: 00001 and Process: 020 for Monitoring of Process or Control Device Parameters as Surrogate for opacity. The upper limit for Opacity is 20%.

This condition requires any person who owns a stationary combustion installation (excluding gas turbines), with a total maximum heat input capacity exceeding 250 million Btu per hour to install, operate in accordance with manufacturer's instructions, and properly maintain, accurate instruments satisfying the criteria in appendix B of title 40, part 60 of the Code of Federal Regulations, or approved by the commissioner on an individual case basis, for continuously monitoring and recording opacity, and when sulfur dioxide continuous monitoring is required by Part 225 of this Title, for continuously monitoring and recording either the percent oxygen or carbon dioxide in the



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flue gases from such installations at all times that the combustion installation is in service. Where gas is the only fuel burned, monitoring and recording of opacity is not require.

Condition # 33 for 6 NYCRR 227-2.6 (c): This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to Emission Unit: U-00001, Emission Point: 00001, Processes: 001 & 020 and Emission Sources/Controls: 00001, 00002, 00003 & 00004 for Intermittent Emission Testing for Oxides of Nitrogen.

This condition is for stack test requirements. This condition applies to the four large 133 Million Btus each Foster Wheeler boilers (Emission Sources 00001, 00002, 00003 & 00004) to verify the NO_x emission limit compliance. The owner/operator of large boilers shall perform testing to verify NO_x emissions to demonstrate compliance with 227-2.6. A mid-size boiler is a boiler with a maximum heat input capacity greater than 100 million Btu per hour and equal to or less than 250 million Btu per hour. The owner/operator of large boilers shall measure NO_x emissions by performing stack tests described in subdivision (c) of section 227-2.6. The NO_x RACT limit is 0.15 pounds per million Btus on or after July 1, 2014 for mid-size oil/natural gas boilers. The owner or operator of the facility is required to test for NO_x emission and follow monitoring and reporting requirements. The stack testing for NO_x emission requires the facility to:

- (1) Submit a compliance test protocol to the department for approval at least 90 days prior to emission testing. The condition of the testing and the locations of the sampling devices must be acceptable to the department; and
- (2) Utilize procedures set forth in 40 CFR Part 60, Appendix A or any other method acceptable to the department and EPA for determining compliance with the appropriate NO_x limit in section 227-2.4 of this Subpart, and shall follow the procedures set forth in Part 202 of this Title.
 - (i) For large and mid-size boilers, utilize Method 7, 7E, or 19 from 40 CFR Part 60, Appendix A or another reference method approved by the department.

Condition #1-13 for 6 NYCRR 227-1.4 (a): This condition is an emission unit level, emission point level and process level condition that applies to Emission Unit: U-00001, Emission Point: 00001 and Process: 020 for Monitoring of Process or Control Device Parameters as Surrogate for opacity. The upper limit for Opacity is 20%.

This condition requires any person who owns a stationary combustion installation (excluding gas turbines), with a total maximum heat input capacity exceeding 250 million



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Btu per hour to install, operate in accordance with manufacturer's instructions, and properly maintain, accurate instruments satisfying the criteria in appendix B of title 40, part 60 of the Code of Federal Regulations, or approved by the commissioner on an individual case basis, for continuously monitoring and recording opacity, and when sulfur dioxide continuous monitoring is required by Part 225 of this Title, for continuously monitoring and recording either the percent oxygen or carbon dioxide in the flue gases from such installations at all times that the combustion installation is in service. Where gas is the only fuel burned, monitoring and recording of opacity is not require.