

**Division of Air Resources
Permit Review Report**

Permit ID: 2-6301-00006/00081

Renewal Number: 3

Modification Number: 1 02/03/2025

Facility Identification Data

Name: CON ED - ASTORIA FACILITY

Address: 31-01 20TH AVE|(North side of 20th Avenue & West side of Luyster Creek)
Queens (6301), NY 11105

Owner/Firm

Name: CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

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

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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Permit Description

Introduction

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

Summary Description of Proposed Project

The Project entails the in-kind 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

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Facility’s air emissions. This application is for a modification of the Con Ed Astoria Facility’s Title V permit to update emissions unit AS005B to indicate the retirement and replacement of existing gas-fired simple cycle combustion turbine GT014 with a new, lower-emitting gas-fired simple cycle combustion turbine GT015 which will be used to compress nitrogen.

With the combustion turbine replacement, the Plant would be 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.

This replacement project will not trigger a Part 231 New Source Review major modification since the net NOx emission increases of this project is limited to 12.15 tpy, which is less than the significant net emission threshold (25 tpy) for a major Part 231 modification. This net emission increase does not include NOx emissions decreases associated with the retirement of the existing combustion turbine.

Attainment Status

CON ED - ASTORIA FACILITY is located in the town of QUEENS in the county of QUEENS. 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:

This facility houses critical public utility electric and gas infrastructure and ancillary public utility operations. The Liquefied 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

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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).

Permit Structure and Description of Operations

The Title V permit for CON ED - ASTORIA FACILITY

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.

CON ED - ASTORIA FACILITY is defined by the following emission unit(s):

Emission unit AS005B - 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.

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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.

Emission unit AS005B is associated with the following emission points (EP):

GT014, GT015

Process: LNG is located at OUTDOORS, Building LNGFAC - 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 unit AS0021 - Ground combustor to burn natural gas off the top of the LNG tank when the pressure is too high.

Flare stack utilized to safely combust natural gas released from emergency relief valves.

Emission unit AS0021 is associated with the following emission points (EP):

00106, 00107

Process: FLR is located at OUTDOORS, Building LNGFAC - 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.

Process: GND is located at OUTDOORS, Building LNGFAC - 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 unit AS0020 - 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.

Emission unit AS0020 is associated with the following emission points (EP):

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00101, 00102, 00103, 00104, 00105

Process: VAP is located at OUTDOORS, Building LNGFAC - 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 unit AS0007 - 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.

Emission unit AS0007 is associated with the following emission points (EP):

GS001

Process: GSS is located at OUTSIDE, Building GASSTAT - 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 unit AS0008 - Five (5) paint booths: Three underground transformer paint booths (2) for flow coating and (1) for drying), PB001, PB002, & PB003; one (1) pole(overhead) transformer paint booth; 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.

Emission unit AS0008 is associated with the following emission points (EP):

00001, 00002, 00003, 00004, 00005

Process: PBD is located at GROUND, Building BUILD#82 - Five paint spray booths. The transformer repair shop operates four paint booths. Three booths are used to flow coat underground transformers. One booth is used to paint pole type transformers using a "handgun". The Transportation Department operates one autobody spray booth. All the spray booths use disposable mat filers to control over spray.

Emission unit AS0009 - 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 bays 8 through 15 are exhausted through stack 00823. The high frequency soldering machine exhausts through stack 00821.

Emission unit AS0009 is associated with the following emission points (EP):

00821, 00822, 00823

Process: WLD is located at GROUND, Building BUILD#82 - The transformer shop has 17 welding bays and one high frequency soldering machine that are used in repair of transformers.

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Emission unit AS0023 - 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.

Emission unit AS0023 is associated with the following emission points (EP):

BH001

Process: GBL is located at GROUND, Building BUILD#82 - 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.

Title V/Major Source Status

CON ED - ASTORIA FACILITY is subject to Title V requirements. This determination is based on the following information:

This is a major source for NOx emissions.

Program Applicability

The following chart summarizes the applicability of CON ED - ASTORIA FACILITY with regards to the principal air pollution regulatory programs:

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

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SIP	YES
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NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52.21, 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 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

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the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
4911	ELECTRIC SERVICES
4922	NATURAL GAS TRANSMISSION
4932	GAS & OTHER SERVICES COMBINED

SCC Codes

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

SCC Code	Description
2-02-002-09	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS TURBINE: EXHAUST
3-01-900-03	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - FUEL FIRED EQUIPMENT NATURAL GAS: DISTILLATE HEATERS
3-01-900-23	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - FUEL FIRED EQUIPMENT CHEMICAL MFG:FUEL FIRED EQUIPMENT:FLARES- NATURAL GAS
3-09-002-01	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - ABRASIVE BLASTING OF METAL PARTS General
3-09-005-00	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - WELDING FABRICATED METAL PROD-WELDING: GENERAL
4-02-001-10	SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Paint: Solvent-Base
4-06-004-99	TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS FILLING VEHICLE GAS TANKS - STAGE II NOT CLASSIFIED **

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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 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
007440-38-2	ARSENIC		0.0002		
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS		49958	30742474	
000630-08-0	CARBON MONOXIDE		101.36	60065	
007440-47-3	CHROMIUM		0.001		
007440-48-4	COBALT				0.0001
000100-41-4	ETHYLBENZENE		0.1849		
000050-00-0	FORMALDEHYDE		0.3981		
007439-92-1	LEAD		0.0003	0.0124	
007439-96-5	MANGANESE		0.0004		
000091-20-3	NAPHTHALENE	1.38			
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS		0.0073		
0NY210-00-0	OXIDES OF NITROGEN		128.22	70756	
0NY075-00-0	PARTICULATES		339.74		2.17
0NY075-00-5	PM-10		25.28	4978	
007446-09-5	SULFUR DIOXIDE		1.78	773	
000108-88-3	TOLUENE		0.366		
0NY100-00-0	TOTAL HAP		1.64	1239	
0NY998-00-0	VOC		16.12	7211	
001330-20-7	XYLENE, M, O & P MIXT.		0.599		

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)

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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 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

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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 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 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the

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

Item K: Permit Exclusion - ECL 19-0305

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

Item L: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

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.

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(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_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	47	Powers and Duties of the Department with respect to air pollution control
A-S005B/-/LNG/GT015	40CFR 60-A.7(a)	1 -13	Notification and Recordkeeping
A-S005B/-/LNG/GT015	40CFR 60-A.8(a)	1 -14	Performance Tests
A-S005B/-/LNG/GT015	40CFR 60-A.8(d)	1 -15	Performance Tests
A-S0020/-/VAP	40CFR 60-Dc.48c(g)	43	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 60-KKKK	1 -9	Stationary Combustion Turbine NSPS
A-S005B/-/LNG/GT015	40CFR 60-KKKK.4320(a)	1 -16	Stationary Combustion Turbine NSPS - Table 1 NOx emission limits
A-S005B/-/LNG/GT015	40CFR 60-KKKK.4330	1 -17	Stationary Combustion Turbine NSPS - SO2 emission limits
A-S005B	40CFR 60-KKKK.4340(a)	1 -11	Stationary Combustion Turbine NSPS - Continuous compliance with NOx limit
A-S005B/-/LNG/GT015	40CFR 60-KKKK.4400(a)	1 -18	Stationary Combustion Turbine NSPS - Performance test

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A-S005B/-/LNG/GT014	40CFR 60-KKKK.4400(b)	1	-12	methods Stationary Combustion Turbine NSPS - Performance testing for NOx
A-S005B/-/LNG/GT015	40CFR 60-KKKK.4415	1	-19	Stationary Combustion Turbine NSPS - conducting performance tests for sulfur
FACILITY	40CFR 68		19	Chemical accident prevention provisions
FACILITY	40CFR 82-F		20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.3		21	False Statement.
FACILITY	6NYCRR 200.6		1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7		10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4		1	-20 Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7		11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8		12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)		13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)		14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6		22, 29, 30	Title V Permits and the Associated Permit Conditions
A-S005B	6NYCRR 201-6		1	-10 Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)		15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)		2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)		16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)		3	Recordkeeping and Reporting of Compliance Monitoring Records of
FACILITY	6NYCRR 201-6.4(c)(2)		4	Monitoring, Sampling and Measurement Reporting
FACILITY	6NYCRR 201-6.4(c)(3)(ii)		5	Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)		23	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)		6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)		1	-2 Operational Flexibility
FACILITY	6NYCRR 201-6.4(f)(6)		17	Off Permit Changes
FACILITY	6NYCRR 202-1.1		18	Required emissions

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FACILITY	6NYCRR 202-1.2	24	tests.
FACILITY	6NYCRR 202-1.3	25	Notification.
FACILITY	6NYCRR 202-2.1	7	Acceptable procedures.
FACILITY	6NYCRR 202-2.4 (a) (3)	1 -3	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	1 -1	Emission statement methods and procedures
FACILITY	6NYCRR 207	26	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	49	Control Measures for an Air Pollution Episode
FACILITY	6NYCRR 211.2	27	General Prohibitions - air pollution prohibited
A-S0009/-/WLD	6NYCRR 212-1.6 (a)	40	General Prohibitions - visible emissions limited.
A-S0009/-/WLD	6NYCRR 212-2.4 (b)	41	Limiting of Opacity Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 227-1.4 (a)	1 -4	Opacity Standard
A-S0020/-/VAP	6NYCRR 227-2.4 (g)	42	Other combustion installations.
A-S0021/-/FLR	6NYCRR 227-2.4 (g)	44	Other combustion installations.
A-S0021/-/GND	6NYCRR 227-2.4 (g)	45	Other combustion installations.
FACILITY	6NYCRR 227-2.5 (c)	1 -5	Alternative RACT option.
A-S0008/-/PBD	6NYCRR 228-1.3 (a)	34	Surface Coating General Requirements- Opacity
A-S0008/-/PBD	6NYCRR 228-1.3 (b) (1)	35	General Requirements - Record Keeping
A-S0008/-/PBD	6NYCRR 228-1.3 (d)	36	Surface Coating General Requirements- Handling, storage and disposal
A-S0008/-/PBD	6NYCRR 228-1.4 (a)	37	Class A Coating Line
A-S0008/-/PBD	6NYCRR 228-1.4 (b) (4)	38	Miscellaneous Metal Parts Coatings
A-S0008/-/PBD	6NYCRR 228-1.6 (a)	39	Surface coating VOC analysis.
A-S0007	6NYCRR 230.2 (f)	32	Requirements
A-S0007	6NYCRR 230.5 (a)	33	Gasoline Dispensing Sites - Recordkeeping and Reporting.
FACILITY	6NYCRR 231-3.8	1 -6	Facility Shakedown Period
FACILITY	6NYCRR 231-6.2	1 -7, 1 -8	Netting

Applicability Discussion:

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

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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.

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.

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6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

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.

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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 202-2.5

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, CON ED - ASTORIA FACILITY has been determined to be subject to the following regulations:

40 CFR 60.4320 (a)

This regulation states that the owner or operator of a stationary combustion turbine must meet the applicable oxides of nitrogen limit in Table 1 of 40 CFR 60 Subpart KKKK.

40 CFR 60.4330

This regulation specifies that the emission limit for sulfur dioxide from a stationary combustion turbine is 0.060 lb SO₂/MMBtu heat input.

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40 CFR 60.4340 (a)

This condition specifies NO_x annual testing requirement for turbines.

40 CFR 60.4400 (a)

This condition specifies initial and subsequent NO_x testing requirements.

40 CFR 60.4400 (b)

This condition specifies NO_x performance testing requirements.

40 CFR 60.4415

This condition specifies initial and subsequent performance testing requirements for sulfur.

40 CFR 60.48c (g)

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

40 CFR 60.7 (a)

This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

40 CFR 60.8 (a)

This regulation contains the requirements for the completion date and reporting of Performance Testing (stack testing), at the facility. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, the owner or operator of the facility must conduct performance test(s) and furnish a written report of the test results.

40 CFR 60.8 (d)

This regulation contains the requirements for advance notification of Performance (stack) testing.

40 CFR Part 60, Subpart KKKK

Subpart KKKK applies to stationary combustion turbines with a heat input capacity greater than 10 million British thermal units per hour which commenced construction, modification, or reconstruction after February 18, 2005. Sources subject to Subpart KKKK must comply with emission standards for nitrogen oxides and sulfur dioxide.

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6 NYCRR 200.3

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

6 NYCRR 201-6.4 (f)

This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 202-1.2

This regulation specifies that the department is to be notified at least 30 days in advance of any required stack test. The notification is to include a list of the procedures to be used that are acceptable to the department. Finally, free access to observe the stack test is to be provided to the department's representative.

6 NYCRR 202-1.3

This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. Alternate methods may be also be used provided they are determined to be acceptable by the department. Finally, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

6 NYCRR 202-2.4 (a) (3)

Once a facility is required to submit annual emission statements electronically, emission statements must be submitted to the department per the specified schedule, in this regulation beginning the reporting year that a Title V permit containing a condition mandating electronic submittal is issued.

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.

6 NYCRR 212-1.6 (a)

This provisions requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater

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from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 227-1.4 (a)

This subdivisions sets the opacity standard for subject stationary combustion installations.

6 NYCRR 227-2.4 (g)

This subdivision establishes NO_x RACT for emission sources that are subject to this rule but not specifically regulated under the other source categories of this rule.

6 NYCRR 227-2.5 (c)

This provision allows the owner or operator to demonstrate that the applicable presumptive RACT emission limit in section 227-2.4 of this Subpart is not economically or technically feasible. Based on this determination the Department is allowed to set a higher emission source specific emission limit.

6 NYCRR 228-1.3 (a)

This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (b) (1)

This regulation requires the facility owner or operator to maintain a certification from

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the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Part 228-1.

6 NYCRR 228-1.3 (d)

This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.4 (a)

6 NYCRR 228-1.4 (b) (4)

6 NYCRR 228-1.6 (a)

This citation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirements of the regulation.

6 NYCRR 230.2 (f)

Owners and/or operators of gasoline storage tanks, vehicles, and dispensing stations required to install stage 1 and/or stage 2 vapor recovery equipment must meet these provisions. The provisions include training , correct operation, replacement, and repair of personnel and equipment.

6 NYCRR 230.5 (a)

This section requires record keeping of delivered fuel which must be maintained for two years.

6 NYCRR 231-3.8

This section sets the allowable amount of time a facility may take for shakedown.

6 NYCRR 231-6.2

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This section establishes the requirements for performing a netting analysis.

6 NYCRR Part 207

This regulation requires the owner or operator to submit an episode action plan to the Department in accordance with the requirements of 6NYCRR Part 207. The plan must contain detailed steps which will be taken by the facility to reduce air contaminant emissions during each stage of an air pollution episode. Once approved, the facility shall take whatever actions are prescribed by the episode action plan when an air pollution episode is in effect.

Compliance Certification

Summary of monitoring activities at CON ED - ASTORIA FACILITY:

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

A-S0020/-/VAP	43	record keeping/maintenance procedures
A-S005B/-/LNG/GT015	1-16	intermittent emission testing
A-S005B/-/LNG/GT015	1-17	intermittent emission testing
A-S005B	1-11	record keeping/maintenance procedures
A-S005B	1-10	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
A-S0009/-/WLD	40	monitoring of process or control device parameters as surrogate
A-S0009/-/WLD	41	intermittent emission testing
FACILITY	1-4	monitoring of process or control device parameters as surrogate
A-S0020/-/VAP	42	record keeping/maintenance procedures
A-S0021/-/FLR	44	record keeping/maintenance procedures
A-S0021/-/GND	45	record keeping/maintenance procedures
FACILITY	1-5	intermittent emission testing
A-S0008/-/PBD	34	monitoring of process or control device parameters as surrogate
A-S0008/-/PBD	35	record keeping/maintenance procedures
A-S0008/-/PBD	36	record keeping/maintenance procedures
A-S0008/-/PBD	37	record keeping/maintenance procedures
A-S0008/-/PBD	38	monitoring of process or control device parameters as surrogate
A-S0008/-/PBD	39	record keeping/maintenance procedures
A-S0007	33	record keeping/maintenance procedures
FACILITY	1-6	record keeping/maintenance procedures
FACILITY	1-7	monitoring of process or control device parameters as surrogate
FACILITY	1-8	work practice involving specific operations

Basis for Monitoring

40 CFR 60 KKKK: The new turbine GT015 is subject to the applicable requirements of this subpart. The NOx emissions of this gas burning turbine rated 54 mmbtu/hr is limited to 25 ppmvd

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at 15% O₂. The SO₂ emission limit is 0.06 lb/mmbtu. The facility is required to perform stack test to demonstrate compliance 60 days after achieving the maximum production rate, but not later than 180 days after the initial startup, and later on annually for NO_x and once every five years for SO₂.

6 NYCRR 227-2.4(e)(1)(i): The simple cycle combustion Turbine GT015 which burns only natural gas is also subject to this subpart's NO_x RACT limit 50 ppmvd corrected to 15%O₂, but this requirement is not placed in this permit since this turbine is required to comply with more stringent NO_x limit 25 ppmvd @15% O₂ by 40 CFR 60 subpart KKKK, which also requires an annual stack emission testing.

6 NYCRR 227-2.5(c): This condition with a NO_x RACT variance limit 92 ppmvd corrected to 15% oxygen is applicable to the existing turbine GT014 which the facility proposes to replace with a more efficient one, GT015, which will have a NO_x limit 25 ppmvd(@15%O₂).

40 CFR 63 YYYY is not applicable since this is not a major source for HAPs.

40 CFR 60 TTTT is not applicable to this project since the new turbine (54mmbtu/hr) is not an electric generating unit and its base load is less than 250 mmbtu/hr.

40 CFR Part 64: The new turbine is subject to 40 CFR 60 Subpart KKKK, which was promulgated after November 15, 1990. Accordingly, this unit is exempt from the requirements of Part 64 as described in 40 CFR 64.2(b)(1)(i).

6 NYCRR Part 231-6.2 : The NO_x emission increases of GT015 are limited to 12.15 tpy, which is less than the Significant Net Emission threshold (25 tpy) for a major Part 231 modification. The facility is required to calculate NO_x emissions based on the most recent stack test data and fuel usage to demonstrate compliance with this limit. Another condition also limits GT015 annual operation to 4380 hours to confirm the compliance. Manufacturer guaranteed turbine NO_x emission rates is 25 ppmvd @15% O₂ or 0.1027 lb/mmbtu.

CLCPA: As part of this application, Con Ed Astoria facility has submitted a CLCPA Section 7(2) analysis showing that the turbine replacement project will result in a reduction of GHG emissions. The CLCPA Section 7(3) analysis provided by Con Ed demonstrated that this project will also decrease co-pollutant emissions. Since the project will result in an emissions decrease, Con Ed was not required to consider potential alternatives or mitigation measures at this time.

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