



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 3-3336-00022/00055

Renewal Number: 3

Modification Number: 1 11/30/2017

Facility Identification Data

Name: US ARMY GARRISON

Address: IMNE-MIL-PWE-M|BLDG 667A RUGER RD
WEST POINT, NY 10996

Owner/Firm

Name: US DEPT OF THE ARMY

Address: THE PENTAGON
WASHINGTON, DC 20310, USA

Owner Classification: Federal

Permit Contacts

Division of Environmental Permits:

Name: SCOTT BALLARD

Address: NYSDEC - REGION 3
21 S PUTT CORNERS RD
NEW PALTZ, NY 12561-1696
Phone:8452562250

Division of Air Resources:

Name: JEFFREY C LAWYER

Address: NYSDEC - REGION 3
21 S PUTT CORNERS RD
NEW PALTZ, NY 12561-1696
Phone:8452563056

Air Permitting Contact:

Name: ENZO PALAU

Address: US ARMY GARRISON
667 RUGER RD
WEST POINT, NY 10996
Phone:

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 US Army Garrison at West Point, NY proposes to replace its existing Target Hill Wastewater Treatment Plant with the objective of increasing treatment capacity from the current 2.06 million gallons per day to 3.5 million gallons per day to meet current and projected needs.



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Attainment Status

US ARMY GARRISON is located in the town of HIGHLANDS in the county of ORANGE. 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:

The facility is an educational institution and an active army installation. The mission of the United States Military Academy is to educate and train the Corp of Cadets so that each graduate shall have the attributes essential for professional growth throughout a career as an officer of the Regular Army and to inspire each to a lifetime of service to the nation.

Permit Structure and Description of Operations

The Title V permit for US ARMY GARRISON

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.

US ARMY GARRISON is defined by the following emission unit(s):



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Emission unit 1WWTMP - The new wastewater treatment plant includes primary, secondary, and tertiary wastewater treatment, and associated operations.

Emission unit 1WWTMP is associated with the following emission points (EP):

STK27, STK28, STK29, STK31

Process: CGN This process includes a 150 KW cogen operation used to burn the biogas generated from the digesters. The cogen is used to produce electricity with the reject heat being used to heat the digesters. If the biogas is not used in the cogen or if there is excess, it is directed to two boilers or to a flare.

Process: FLR A flare is used to burn excess digester biogas that is not consumed by the generator or digester boilers.

Process: MCS This process consists of miscellaneous combustion sources associated with the wastewater treatment plant, including two 1.0 MMBTU/hr natural gas/biogas boilers, two 2.0 MMBTU/hr HVAC heating units, two 1.5 MMBTU/hr tank heaters, eighteen hot water heaters, and a 1250 KW emergency diesel generator.

Process: OC1 is located at Building HIP - This process includes sources associated with the headworks operations and its associated odor control system. Headworks operations include two grit washers, two screenings washer/compactors, two screens, two grit removal units, and two wet wells.

Process: OC2 is located at Building PTF - This process includes sources associated with the primary treatment operations and its associated odor control system. Primary treatment operations include a primary sludge well, influent distribution box, two primary filters, primary clarifiers, and biological distribution box.

Process: OC3 is located at Building SHB - This process includes sources associated with solids handling and its odor control system. Solids handling operations include three unthickened sludge storage tanks, two thickeners, thickened sludge storage tank, sidestream EQ/digested sludge storage tank, two dewatering presses, a dump station, solid waste slurry tank, and a liquid waste slurry tank.

Emission unit U706GN - Two diesel generators located at the Athletic Department Maintenance Building.

Emission unit U706GN is associated with the following emission points (EP):

0706C, 0706D

Process: 052 is located at Building 706 - Combustion of diesel fuel in the generators at the Athletic Department Maintenance Building.

Emission unit U845BL - This unit consists of two boilers at the Laundry Plant. Each boiler was previously rated at 55.85 MMBTU/hr when burning fuel oil and 58.1 MMBTU/hr when burning natural gas. In 2002 the boilers were de-rated to 48.4 MMBTU/hr. In 2010 6NYCRR Subpart 227-2 was revised, and these boilers are now defined as mid-sized rather than small, but will retain their de-rated configuration. The boilers are used to provide heat and hot water to the Laundry Plant in Building 845, and supply steam to Buildings 719, 759, 781, 793, 845, 817, USMA prep school, and other buildings in the north section of the post. Natural gas is the primary fuel and number 2 fuel oil is the backup.



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Emission unit U845BL is associated with the following emission points (EP):
STK03, STK04

Process: 004 is located at MAIN, Building 845 - Natural gas combustion from the operation of two commercial boilers at the Laundry Boiler Plant.

Process: 005 is located at MAIN, Building 845 - No. 2 fuel oil combustion from the operation of two commercial boilers at the Laundry Boiler Plant.

Emission unit U1940G - Gasoline is dispensed to motor vehicles at the new Transportation Motor Pool. Equipment used includes one dispensing pump and one 10,000 gallon storage tank. Vapors are controlled by stage I submerged loading with dedicated vapor balance and stage II vapor recovery systems at the pumps.

Emission unit U1940G is associated with the following emission points (EP):
STK20

Process: 020 The loading and storage of gasoline in one 10,000 gallon underground storage tank and the fueling of motor vehicles from the dispensing pumps at the Transportation Motor Pool.

Emission unit U907GN - A diesel-fired emergency generator located at the Secondary Refueling Station is used for emergency power.

Process: 047 The combustion of diesel oil in the generator used for emergency power backup at the Secondary Refueling Station.

Emission unit U1202G - This emission unit consists of a gasoline dispensing station and three 12,000 gallon gasoline underground storage tanks with stage I, submerged loading using a dedicated vapor balance system, and stage II vapor control on the dispensing pumps at the Army Air Force Exchange Service Station located at Building 1202.

Emission unit U1202G is associated with the following emission points (EP):
STK13

Process: 016 is located at ARMY/AIR FORCE EXCHA, Building 1202 - The filling of and storage of gasoline in three underground storage tanks and the fueling of motor vehicles from the dispensing pumps at the Army Air Force Exchange.

Emission unit UKELL1 - Two emergency generators at Keller Hospital are rated at 563 KW each.



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Emission unit UKELL1 is associated with the following emission points (EP):

KELL1

Process: 051 is located at Building 900D - Combustion of diesel fuel in the emergency generators at the Keller Hospital.

Emission unit U0GOLF - Two above ground storage tanks (500 gallon gasoline and 500 gallon diesel) are used to refuel golf carts and various maintenance equipment. The 500 gallon gasoline tank is equipped with stage I dedicated vapor balance.

Emission unit U0GOLF is associated with the following emission points (EP):

STK18

Process: 028 Filling and storing gasoline in a 500 gallon aboveground storage tank and refueling of golf carts and grounds maintenance equipment.

Emission unit U753GN - Two emergency generators located at the Science Center with total NOx emissions for both generators together limited to 4 tons per year.

Emission unit U753GN is associated with the following emission points (EP):

STK24, STK25

Process: 050 is located at Roof, Building 753 - The combustion of diesel oil in the generators used for emergency power at the Science Center.

Emission unit U845P3 - Four multomatic Hercules commercial fourth generation perchloroethylene dry cleaning machines.

Process: 011 is located at MAIN FLOOR, Building 845 - The use of perchloroethylene in the operation of four fourth generation drycleaning machines in a stand-alone facility. The design capacity of each machine is 150 pounds per load. Perchloroethylene emissions from each machine are controlled by a built-in refrigerated condenser and carbon adsorber.

Emission unit U604BL - This emission unit consists of 3 boilers located in the Central Power Plant. The Central Power Plant generates steam to provide heat to a number of buildings located in the central post area of West Point and also to provide electric power as necessary for use in indoor and outdoor areas throughout the post. The boilers at this location discharge through a single combined stack. Boiler #1 was replaced and became operational in January 2003. Boiler #2 was replaced and became operational in January 2005. Both of these boilers have a maximum rated heat input of 155.6 MMBTU/hr. Boilers #1 and #2 run on natural gas or no. 2 fuel oil as a backup. The two boilers are equipped with low NOx burners (COEN model #7755 dual delta NOx 24 burners). Boiler #3 is also equipped with a low NOx burner, and burns either natural gas (rated heat input capacity of 92.13 MMBTU/hr) or no. 2 fuel oil (rated heat input capacity of 97.13 MMBTU/hr) as a backup.



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Emission unit U604BL is associated with the following emission points (EP):
STK02

Process: 003 is located at 1ST FLOOR, Building 604 - Natural gas combustion associated with the operation of Boilers #1, #2, and #3 at the Central Power Plant.

Process: 006 is located at 1ST FLOOR, Building 604 - Combustion of no.2 fuel oil associated with Boilers #1, #2, and #3 at the Central Power Plant. No. 2 fuel oil is used only during testing and during a gas supply emergency.

Emission unit U293CS - The Transportation Motor Pool consists of five propane boilers to heat various buildings and five diesel generators for emergency power. The Motor Pool was relocated in 2010 to an area off of Route 293.

Process: 045 The combustion of propane in the boilers used for heating the buildings located at the Transportation Motor Pool along Route 293.

Process: 046 The combustion of diesel oil in the generators used for emergency power backup at the Transportation Motor Pool.

Emission unit U714BL - This emission unit consists of 2 identical boilers each rated at 14.47 million BTU per hour. These boilers are used to provide heat to the Holleder Center, an athletic facility. Both boilers exhaust to a common stack. Normally, one boiler is on line and the other is operating in standby mode.

Emission unit U714BL is associated with the following emission points (EP):
STK05

Process: 008 is located at 1ST FLOOR, ROOM 156, Building 714 - Combustion of no. 2 fuel oil in the two Holleder Center boilers.

Process: 042 The combustion of natural gas in the two boilers at the Holleder Center.

Emission unit U907GS - Secondary Refueling Station provides fuel to army vehicles on post. Two tanks which contain diesel and e-85 (ethanol) are not regulated. One 10,000 gallon tank of gasoline is equipped with stage I submerged loading using dedicated vapor balance and stage II vapor recovery system at the pump.

Emission unit U907GS is associated with the following emission points (EP):



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STK19

Process: 043 is located at Building 912 - The loading and storage of gasoline in one 10,000 gallon underground storage tank and the refueling of motor vehicles from the dispensing pumps at the Secondary Refueling Station.

Emission unit U700SC - Three small boilers and three emergency generators are grouped together as one emission unit. These combustion sources are subject to 6NYCRR Part 231 New Source Review requirements, because they were constructed during a contemporaneous period with the Central Power Plant diesel generator (which has NOx emissions capped at 24.0 tons per year).

Emission unit U700SC is associated with the following emission points (EP):

700GN, 700PT, 701GN, 701PT, 727GN, CCSPT

Process: 037 The combustion of no. 2 fuel oil in the boiler in the Cadet Crew & Sailing Center.

Process: 039 The combustion of diesel fuel in the emergency generators located in Kimsey Athletic Center, the Arvin Cadet Physical Development Center, and the Press Box.

Process: 040 The combustion of natural gas in the boilers in the Kimsey Athletic Center.

Emission unit U1900C - An emergency generator used for backup electric power at the US Military Academy Prep School.

Process: 049 The combustion of natural gas used in the emergency generator for backup electric power at the US Military Academy Prep School.

Emission unit U604GN - This emission unit has been converted for use as an emergency generator only at the Central Power Plant. This generator will provide emergency power for the Central Power Plant (Building 604) and the headquarters (Building 600) during a disruption in electric utility service. The generator will be used up to 500 hours per year. The generator is a Caterpillar Model 3512B rated at 1230 kilowatts and will burn diesel fuel only. The manufacturer performance guarantee for NOx is 29.35 pounds per hour during operation of the generator.

Emission unit U604GN is associated with the following emission points (EP):

STK01

Process: 001 is located at OUTDOOR, Building 604 - Combustion of diesel fuel during the operation of the emergency generator at the Central Power Plant.

Emission unit U950LF - Landfill gas collection and flare system located at the former Transportation



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Motor Pool site off Washington gate. The gas control system is designed to extract landfill gas from pipes and valves embedded in the landfill cap cover soil. Gas will be actively removed from the landfill through extraction wells and directed to a flare using a blower (vacuum) device. The flare is solar powered and will ignite if there is a sufficient amount of landfill gas. Otherwise, the landfill gas is vented directly to the atmosphere.

Emission unit U950LF is associated with the following emission points (EP):
STK23

Process: 044 Landfill gas from the former Transportation Motor Pool site is collected, and is sent to a flare to be burned or is vented directly to the atmosphere.

Emission unit U1940P - This emission unit consists of a large, garage-type spray paint booth that has two exhaust stacks. The paint booth is used to paint sections of cars, whole cars, army tactical vehicles, trucks, and buses.

Emission unit U1940P is associated with the following emission points (EP):
STK21, STK22

Process: 009 Spray painting of motor vehicles and motor vehicle parts in the spray booth at the Transportation Motor Pool by Area V.

Emission unit U847SC - This emission unit consists of two emergency generators. One generator is located at the South Dock and the other is located at Spellman Hall. NOx emissions from the generators are limited in order to avoid New Source Review requirements.

Emission unit U847SC is associated with the following emission points (EP):
2101G, 847GN

Process: 041 The combustion of diesel fuel in the emergency generators located at the South Dock and Spellman Hall.

Title V/Major Source Status

US ARMY GARRISON is subject to Title V requirements. This determination is based on the following information:

The facility is a major source and subject to Title V requirements. This is because the potential to emit carbon monoxide, nitrogen oxides, sulfur dioxide, and volatile organic compounds is greater than major source thresholds. The thresholds are 100 tons per year for carbon monoxide and sulfur dioxide, and 25 tons per year for nitrogen oxides and volatile organic compounds.

Program Applicability

The following chart summarizes the applicability of US ARMY GARRISON with regards to the principal



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air pollution
regulatory programs:

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



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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, 226, 227-2, 228, 229, 230, 232, 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 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
5541	GASOLINE SERVICE STATIONS
7532	TOP AND BODY REPAIR AND PAINT SHOPS
8069	SPECIALTY HOSPITALS, EXCEPT PSYCHIATRIC
8211	ELEMENTARY AND SECONDARY SCHOOLS
8221	COLLEGES AND UNIVERSITIES, NEC
9711	NATIONAL SECURITY

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
1-01-006-02	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - NATURAL GAS Boilers < 100 MBtu/Hr except Tangential
1-03-005-01	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER -



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1-03-005-02	DISTILLATE OIL Grades 1 and 2 Oil EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - DISTILLATE OIL
1-03-006-02	10-100MMBTU/HR ** EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS
1-03-006-03	10-100 MMBtu/Hr EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS
1-03-010-02	Less Than 10 MMBtu/Hr EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - LIQUEFIED PETROLEUM GAS (LPG)
2-01-001-07	Propane INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL)
2-02-004-01	RECIPROCATING: EXHAUST INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION LARGE BORE ENGINE
2-03-001-02	Diesel INTERNAL COMBUSTION ENGINES - COMMERCIAL/INSTITUTIONAL COMMERCIAL/INSTITUTIONAL IC ENGINE - DISTILLATE OIL (DIESEL)
2-03-002-01	Turbine INTERNAL COMBUSTION ENGINES - COMMERCIAL/INSTITUTIONAL COMMERCIAL/INSTITUTIONAL IC ENGINE - NATURAL GAS
2-03-007-02	Reciprocating INTERNAL COMBUSTION ENGINES - COMMERCIAL/INSTITUTIONAL COMMERCIAL/INSTITUTIONAL IC ENGINE - DIGESTER GAS
4-01-001-13	RECIPROCATING IC ENGINE: POTW DIGESTER GAS PETROLEUM AND SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DRY CLEANING DRY CLEANING - PERCHLOROETHYLENE
4-02-999-95	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS Specify in Comments Field
4-06-003-01	TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS GASOLINE RETAIL OPERATIONS - STAGE I Splash Filling
4-06-003-06	TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS GASOLINE RETAIL OPERATIONS - STAGE I Balanced Submerged Filling
5-01-004-10	SOLID WASTE DISPOSAL - GOVERNMENT SOLID WASTE DISPOSAL: GOVERNMENT - LANDFILL DUMP WASTE GAS DESTRUCTION: WASTE GAS FLARES



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5-01-007-07	SOLID WASTE DISPOSAL - GOVERNMENT SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT
5-01-007-71	POTW: HEADWORKS SCREENING SOLID WASTE DISPOSAL - GOVERNMENT SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT
5-01-007-89	POTW: GRAVITY SLUDGE THICKENER SOLID WASTE DISPOSAL - GOVERNMENT SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT
5-01-007-99	SLUDGE DIGESTER GAS FLARE SOLID WASTE DISPOSAL - GOVERNMENT SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE TREATMENT OTHER NOT CLASSIFIED

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
007664-41-7	AMMONIA	65			
007783-06-4	HYDROGEN SULFIDE	128			
0NY210-00-0	OXIDES OF NITROGEN	432880			
000127-18-4	PERCHLOROETHY LENE	14777			

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



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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 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



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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 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



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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	82	Powers and Duties of the Department with respect to air pollution control
U-604BL	40CFR 60-Db.44b(a)(1)	62	Standard for Nitrogen Oxides Firing Natural Gas and Distillate Oil. (see narrative)
U-604BL	40CFR 60-Db.46b(e)	63	Compliance and Performance Test Methods and Procedures for Particulate Matter and and Nitrogen Oxides.
U-604BL	40CFR 60-Db.48b(f)	64	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
U-604BL	40CFR 60-Db.49b(g)	65	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 60-Dc.48c(e)(11)	39	Reporting and Recordkeeping requirements - fuel supplier
U-604BL	40CFR 60-Dc.48c(g)	66	certifications Reporting and Recordkeeping Requirements.



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U-714BL	40CFR 60-Dc.48c(g)(2)	77	Alternative recordkeeping
FACILITY	40CFR 60-IIII	40, 41	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
1-WWTMP/-/MCS/WWEDG	40CFR 60-IIII	1 -8	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
FACILITY	40CFR 60-JJJJ	42, 43	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
1-WWTMP/-/CGN/COGEN	40CFR 60-JJJJ	1 -5	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
FACILITY	40CFR 63-CCCCC.11116	47	Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline
U-1202G	40CFR 63-CCCCC.11118	51	Requirements for facilities with monthly throughput of 100,000 gallons or more
U-1202G	40CFR 63-CCCCC.11120	52	Testing and monitoring requirements
FACILITY	40CFR 63-M.322(c)	44	National perchloroethylene air emission standards for dry cleaning facilities - standards.
FACILITY	40CFR 63-M.322(i)	45	National perchloroethylene air emission standards for dry cleaning facilities - standards
FACILITY	40CFR 63-M.322(j)	46	National perchloroethylene air emission standards for dry cleaning facilities - standards
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of



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1-WWTMP	6NYCRR 200.7	1	-1	equipment.
FACILITY	6NYCRR 201-1.4	83		Maintenance of equipment.
FACILITY	6NYCRR 201-1.7	11, 12		Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.8	13		Recycling and Salvage
FACILITY	6NYCRR 201-3.2(a)	14		Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.3(a)	15		Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	22, 48, 49		Trivial Activities - proof of eligibility
1-WWTMP	6NYCRR 201-6.2(d)(3)(xi)	1	-2	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	16		Application Content - Emission Point Description
FACILITY	6NYCRR 201-6.4(a)(7)	2		General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(8)	17		General Conditions - Fees
1-WWTMP/-/FLR/FLAR1	6NYCRR 201-6.4(b)	1	-6	General Conditions - Right to Inspect
1-WWTMP/-/MCS/WWEDG	6NYCRR 201-6.4(b)	1	-7	Permit Conditions for Monitoring
U-950LF/STK23/044	6NYCRR 201-6.4(b)	79		Permit Conditions for Monitoring
FACILITY	6NYCRR 201-6.4(c)	3		Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4		Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5		Reporting 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)(6)	18		Off Permit Changes
FACILITY	6NYCRR 201-6.4(g)	24		Permit Shield
FACILITY	6NYCRR 201-7.1	50		Emission Capping in Facility Permits
FACILITY	6NYCRR 202-1.1	19		Required emissions tests.
FACILITY	6NYCRR 202-2.1	7		Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8		Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	25		General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	84		General Prohibitions



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				- visible emissions limited.
U-950LF/STK23/044/00175 FACILITY	6NYCRR 212-1.6(a)	80		Limiting of Opacity
	6NYCRR 212-2.3(b)	1	-10	State Air Program Non-Criteria air contaminants subject Table 4
FACILITY	6NYCRR 215.2	9		Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2(f)	26		Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.2(g)	27		Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-3.3	85		Prohibitions and requirements - volatility
U-604BL/STK02/006 FACILITY	6NYCRR 227-1.2(a)(1)	69		Particulate Emissions from Liquid Fuels.
	6NYCRR 227-1.3(a)	28,	29	Smoke Emission Limitations.
1-WWTMP	6NYCRR 227-1.3(a)	1	-3	Smoke Emission Limitations.
U-604BL/STK02	6NYCRR 227-1.3(a)	67		Smoke Emission Limitations.
U-604BL/STK02	6NYCRR 227-1.4(a)	94		Stack Monitoring. (see narrative)
U-604BL/STK02	6NYCRR 227-1.4(b)	68		Stack Monitoring
U-714BL	6NYCRR 227-2.4(d)	76		Small boilers, small combustion turbines, and small stationary internal combustion engines.
FACILITY	6NYCRR 227-2.5(b)	30		System averaging plan.
FACILITY	6NYCRR 228-1.3(a)	31		Surface Coating General Requirements- Opacity
U-1940P	6NYCRR 228-1.3(b)(1)	53		General Requirements - Record Keeping
U-1940P	6NYCRR 228-1.3(d)	54		Surface Coating General Requirements- Handling, storage and disposal
U-1940P	6NYCRR 228-1.3(e)	55		Surface Coating - General control requirements (Class A & most B)
U-1940P	6NYCRR 228-1.4(a)	56,	57, 58	Class A Coating Line
U-1940P	6NYCRR 228-1.6(a)	59		Surface coating VOC analysis.
FACILITY	6NYCRR 230.2(d)(2)	32		Stage I and II required for new tanks after 10/15/94 in LOCMA
FACILITY	6NYCRR 230.2(f)	33		Requirements
FACILITY	6NYCRR 230.5(a)	34		Gasoline Dispensing Sites - Recordkeeping and Reporting.
FACILITY	6NYCRR 230.5(c)	35		Gasoline dispensing sites - recordkeeping and reporting.
FACILITY	6NYCRR 230.7(c)	36		Registration schedules



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U-KELL1	6NYCRR 231-11.2	81	Reasonable Possibility requirements for insignificant mods
U-700SC	6NYCRR 231-2.2(b)(2)	71	Severe Ozone Nonattainment Area - Special Rules
U-700SC	6NYCRR 231-2.5	72, 73	Lowest achievable emission rate, LAER
U-700SC	6NYCRR 231-2.6	74	Emission reduction credits
FACILITY	6NYCRR 231-6.2	37, 38	Netting
1-WWTMP	6NYCRR 231-6.2	1 -4	Netting
FACILITY	6NYCRR 232.12	92	Reporting and record keeping.
U-845P3	6NYCRR 232.14	99	Dry cleaning owner/manager and operator training and certification.
U-845P3	6NYCRR 232.16	100	Compliance inspections.
FACILITY	6NYCRR 232.18	93	Posting notice.
U-845P3	6NYCRR 232.6(a)	95	Requirements for co-located facilities.
U-845P3	6NYCRR 232.6(b)(1)	96	Equipment standards and specifications -- new stand-alone facilities.
FACILITY	6NYCRR 232.7(a)	86	Leak Inspection and self monitoring requirements.
FACILITY	6NYCRR 232.7(b)	87	Leak inspection and self monitoring requirements.
FACILITY	6NYCRR 232.7(c)	88	Leak inspection and self monitoring requirements.
FACILITY	6NYCRR 232.7(g)	89	Leak detection and self monitoring requirements.
FACILITY	6NYCRR 232.8	90	Operation and maintenance requirements.
U-845P3	6NYCRR 232.8(d)(1)	97, 98	Operation and maintenance requirements -- fourth generation machines.
FACILITY	6NYCRR 232.8(d)(7)	91	Operation and Maintenance - Preparedness and Prevention

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 information that the Department may request in writing, within a reasonable time, in order to determine whether cause



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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) (5)

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



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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, US ARMY GARRISON has been determined to be subject to the following regulations:

40 CFR 60.44b (a) (1)

These standards apply to boilers (with a heat input between 10 and 100 million BTU per hour) firing natural gas and/or distillate oil, except as provided in 40 CFR 60.44b(a)(4) Duct Burners Used in a Combined Cycle System. The applicable NOx standard is 0.2 pounds per million BTU for Central Power Plant boilers #1 and #2.

40 CFR 60.46b (e)



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This citation requires an initial performance test to demonstrate compliance with the NOx limit.

40 CFR 60.48b (f)

This citation specifies the methods and requirements for obtaining minimum emissions data for oxides of nitrogen when the continuous monitoring system is not available.

40 CFR 60.48c (e) (11)

The facility is using fuel supplier certifications to demonstrate compliance with the sulfur content limit in number 2 oil, and therefore, records must contain the information specified in 60.48c(f)(1).

40 CFR 60.48c (g)

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

40 CFR 60.48c (g) (2)

This citation allows the owner or operator of the affected boilers to record and maintain records of the amount of each fuel combusted during each calendar month.

40 CFR 60.49b (g)

This subdivision lists the information which must be kept in regard to affected boilers and associated NOx emissions.

40 CFR 63.11116

This section of the rule lists the requirements for gasoline dispensing sites with a monthly gasoline throughput of less than 10,000 gallons.

40 CFR 63.11118

This section of the rule lists the requirements for gasoline dispensing sites with a monthly gasoline throughput of 100,000 gallons or more.

40 CFR 63.11120

This section of the rule specifies the pressure tests required.

40 CFR 63.322 (c)

The owner or operator shall close the door of each dry cleaning machine immediately after transferring articles to or from the machine, and shall keep the door closed at all other times to minimize the escape of perchloroethylene emissions from the machine.



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40 CFR 63.322 (i)

Cartridge filters must be drained in their housing or other sealed container for at least 24 hours, or be treated in an equivalent manner, before removal from the dry cleaning facility. 6NYCRR Part 232.8(d)(1)(iv) also contains this requirement.

40 CFR 63.322 (j)

All perchloroethylene and wastes that contain perchloroethylene must be stored in non-leaking solvent tanks or solvent containers.

40 CFR Part 60, Subpart IIII

This rule contains requirements for compression ignition engines.

40 CFR Part 60, Subpart JJJJ

This rule contains requirements for spark ignition engines.

6 NYCRR 201-6.2 (d) (3) (xi)

This citation requires that emission point information be submitted.

6 NYCRR 201-6.4 (b)

This section allows permit conditions for monitoring to assure compliance with applicable limits and requirements.

6 NYCRR 201-7.1

This section allows emission capping of emission sources in facility permits, in order to avoid being subject to applicable requirements. This permit contains the following emission caps.

1. Sulfur dioxide emissions from the Central Power Plant boilers are limited to 91.9 tons per year, in order to avoid New Source Review major modification requirements. This is based on a 7 ton increase from past actuals and less than 33 tons from other new emission sources in the 5 year contemporaneous period, in order to stay below the applicability of a 40 ton per year emission increase.
2. NOx emissions from the Central Power Plant boilers are limited to 77.1 tons per year, in order to avoid New Source Review major modification requirements. This is based on a zero increase from past actuals and less than 25 tons from other emission sources in the 5 year contemporaneous period, in order to stay below the applicability of a 25 ton per year emission increase.
3. Total NOx emissions from both the South Dock and Spellman Hall diesel generators are limited to 1.98 tons per year, to stay below the 2.5 ton per year significant project threshold, as specified in Part 231, and thus, avoid New Source Review major modification requirements.
4. NOx emissions from the Central Power Plant diesel generator are limited to 24.0 tons per year, in order to avoid New Source Review major modification requirements.



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5. Hours of operation of the two diesel generators at the Athletic Department Maintenance Building are limited to 1700 hours per year. This will keep NOx emissions from the generators below 25 tons per year, the applicability for New Source Review major modification requirements.

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

6 NYCRR 212-2.3 (b)

This section specifies the degree of air cleaning required, or if air dispersion modeling is required to demonstrate that emissions are within guideline concentrations.

6 NYCRR 225-1.2 (f)

This citation limits the sulfur content in #2 heating oil purchased on or after July 1, 2012.

6 NYCRR 225-1.2 (g)

This citation limits the sulfur content in distillate oil purchased on or after July 1, 2014.

6 NYCRR 225-3.3

This regulation sets forth the RVP requirements for gasoline sold in the state during various parts of the year.

6 NYCRR 227-1.2 (a) (1)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units of greater than 250 mmBtu/hr heat input capacity which fire coal, oil, or coal derived fuels.

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.



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6 NYCRR 227-1.4 (a)

The continuous opacity monitoring system must be maintained in accordance with the performance specifications in appendix B of 40 CFR 60.

6 NYCRR 227-1.4 (b)

This regulation requires the specific contents of excess emissions reports for opacity from facilities that utilizes continuous opacity monitors.

6 NYCRR 227-2.4 (d)

This section includes NO_x RACT requirements for small boilers, small combustion turbines, and small stationary internal combustion engines.

6 NYCRR 227-2.5 (b)

The regulation provides the option to use system wide averaging to comply with NO_x RACT requirements. The facility uses system wide averaging for the two large boilers and one mid-size boiler at the Central Power Plant, and the two mid-size boilers at the Laundry Plant.

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 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.



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6 NYCRR 228-1.3 (e)

This regulation outlines the general control requirements for emissions of volatile organic compounds related to surface coating, and includes which coating application techniques can be used for mobile equipment repair and refinishing coating lines.

6 NYCRR 228-1.4 (a)

This subdivision of the rule contains VOC content limits in automotive coatings, including primer-sealer, primer-surfacer, and topcoats.

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 (d) (2)

Stage 1 vapor collection is required in lower Orange County, regardless of gasoline throughput.

6 NYCRR 230.2 (f)

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

6 NYCRR 230.5 (a)

This section requires record keeping of the quantity of delivered gasoline.

6 NYCRR 230.5 (c)

This regulation requires a gasoline dispensing site to post their copy of the registration form obtained from the NYSDEC.

6 NYCRR 230.7 (c)

The owner or operator of gasoline dispensing sites in lower Orange County must register the storage tanks with the Department pursuant Part 612 or 201.

6 NYCRR 231-11.2

This section contains the reasonable possibility requirements for insignificant modifications.

6 NYCRR 231-2.2 (b) (2)



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The provisions of Subpart 231-2 apply to new or modified major facilities between November 15, 1992 and February 19, 2009. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. Under subsection 231-2.2(b) of the section, facilities located in the severe ozone non-attainment area with emission sources part of a significant source project must meet emission offset and lowest achievable emission rate requirements.

6 NYCRR 231-2.5

Emission controls equivalent to the lowest achievable emission rate (LAER) must be implemented for each contaminant for which Subpart 231-2 is applicable for a given source project or new major facility. LAER is defined as the most stringent emission limitation achieved in practice or which can be expected to be achieved in practice for a category of emission sources taking into consideration each air contaminant which must be controlled (6 NYCRR 200.1(ak)).

6 NYCRR 231-2.6

The requirements and criteria for creating and certifying emission reduction credits (ERCs) are set forth in section 231-2.6.

6 NYCRR 231-6.2

This section specifies the procedures for determining a net emission increase when a modification exceeds the significant project threshold. The requirements that apply if the increase is less than the major modification threshold are also specified. These requirements include establishing an emission limit in the permit.

6 NYCRR 232.12

This section of the perc dry cleaning regulation requires operators of perc dry cleaning facilities to keep records of perc consumption, dates when dry cleaning components are inspected for leaks, dates of machine repairs and when parts are ordered, and temperature results of refrigerated condenser monitoring. 40 CFR 63.232(d) requires keeping a record of perc consumption.

6 NYCRR 232.14

This section of the perc dry cleaning regulation requires perc dry cleaning facility owner/managers and machine operators to be trained and certified.

6 NYCRR 232.16

This section of the perc dry cleaning regulation requires perc dry cleaning facilities to be inspected at least annually for compliance with the perc dry cleaning rule. These inspections shall be performed by a DEC approved registered inspector or individual. Inspection reports shall be submitted to DEC. If a leak or malfunction is discovered during the inspection the facility must be repaired and reinspected within one month.



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6 NYCRR 232.18

This section of the perc dry cleaning regulation requires perc dry cleaners to post a DEC sign in their shop in a location which is visible to the public. The sign informs the public that perc is used in the shop and what possible health problems may occur from exposure to perc. The facility owner is required to fill in blank information on the sign such as the facility name, address, and owner as well as local emergency contact phone numbers. Sign language and minimum dimensions are specified in this section.

6 NYCRR 232.6 (a)

This subdivision of the perc dry cleaning regulation includes requirements for emission control of perc and for a spill containment system.

6 NYCRR 232.6 (b) (1)

This paragraph of the perc dry cleaning regulation specifies the types of equipment which can be installed in a perc dry cleaning shop which began operation on or after May 15, 1997. The paragraph also includes requirements for emission controls and spill containment. 40 CFR 63.322(b)(1) also requires emission controls on perc dry cleaning machines.

6 NYCRR 232.7 (a)

This subdivision of the Part 232 regulation and 40 CFR 63.322(k) specify that the dry cleaning system must be checked at least weekly for liquid and vapor perc leaks and fugitive perc emissions. Also pursuant to 232.7(a), the operator must record the status of each component on a checklist supplied by DEC.

6 NYCRR 232.7 (b)

Part 232.7(b) and 40 CFR 63.322(k) require specific components of the dry cleaning system to be inspected weekly for perceptible liquid and vapor leaks and for proper operation while the system is operating. Components which must be inspected include: hose and pipe connections, fittings, couplings and valves, door gaskets and seatings, filter gaskets and seatings, pumps, solvent (including spent solvent) tanks and containers, water separators, musk cookers, stills, exhaust dampers, diverter valves, and cartridge filter housings.

6 NYCRR 232.7 (c)

This subdivision of the perc dry cleaning regulation requires carbon adsorber vents to be tested weekly using a colorimetric detector tube or halogen detector. Test results must be recorded on the DEC checklist.

6 NYCRR 232.7 (g)

This subdivision of Part 232 and 40 CFR 63.322(m) require prompt repair of all liquid leaks, vapor leaks and malfunctions. If leaks cannot be repaired immediately they must be repaired within the regulatory time frames.



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6 NYCRR 232.8

Part 232.8 and 40 CFR 63.322(c) require that a dry cleaning machine be operated and maintained in accordance with manufacturer specifications. Also pursuant to 232.8, a DEC checklist to document that proper operation and maintenance is being done, as well as the dry cleaner machine design specifications and operating manual must be kept on site.

6 NYCRR 232.8 (d) (1)

The following temperatures must be maintained in regard to the refrigerated condenser on a perc dry cleaning machine. The condenser exhaust temperature must be equal to or less than 45 degrees Fahrenheit. This is also specified in 40 CFR 63.323(a)(1)(ii). The difference between the exhaust entering and exiting the condenser must be equal to or greater than 20 degrees Fahrenheit. This is also specified in 40 CFR 63.323(a)(2).

6 NYCRR 232.8 (d) (7)

This regulation sets forth the requirements to prevent spills at the dry cleaning system. It requires that all dry cleaning operations must be equipped with the following: adequate spill control equipment including sorbent materials, or alternative method for absorbing spills; vapor-proof containers for storing spill-contaminated material; and fire control equipment. Also, the facility owner must maintain aisle space to allow proper inspection of the dry cleaning equipment. Finally, a reasonable supply of spare parts for repairing dry cleaning equipment must be available at the dry cleaning facility.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	40 CFR Part 63, Subpart JJJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

Reason: The boilers at the Central Power Plant, Laundry Plant, and Hollender Center are exempt from the requirements of 40 CFR 63 Subpart JJJJJJ (Boiler MACT for area sources), since these boilers qualify as gas-fired boilers as defined in this regulation. The use of number 2 oil occurs only during testing or during a gas supply emergency.

FACILITY	40 CFR Part 63, Subpart Reciprocating Internal
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ZZZZ

Combustion Engine
(RICE) NESHAP

Reason: The facility is not subject to 40 CFR 63 Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines (RICE) NESHAP, because the facility is an educational institution.

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 US ARMY GARRISON:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-604BL	62	continuous emission monitoring (cem)
U-604BL	63	continuous emission monitoring (cem)
U-604BL	65	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
U-604BL	66	record keeping/maintenance procedures
U-714BL	77	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
1-WWTMP/-/MCS/WWEDG	1-8	record keeping/maintenance procedures
FACILITY	43	record keeping/maintenance procedures
1-WWTMP/-/CGN/COGEN	1-5	record keeping/maintenance procedures
U-1202G	51	record keeping/maintenance procedures
U-1202G	52	record keeping/maintenance procedures
1-WWTMP	1-1	record keeping/maintenance procedures
1-WWTMP	1-2	record keeping/maintenance procedures
1-WWTMP/-/FLR/FLAR1	1-6	work practice involving specific operations
1-WWTMP/-/MCS/WWEDG	1-7	work practice involving specific operations
U-950LF/STK23/044	79	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
U-604BL	60	monitoring of process or control device parameters as surrogate
U-604BL	61	monitoring of process or control device parameters as surrogate
U-604GN	70	monitoring of process or control device parameters as surrogate
U-706GN	1-9	work practice involving specific operations
U-847SC	78	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
U-950LF/STK23/044/00175	80	monitoring of process or control device parameters as surrogate
FACILITY	1-10	record keeping/maintenance procedures
FACILITY	26	work practice involving specific operations



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FACILITY	27	work practice involving specific operations
FACILITY	85	record keeping/maintenance procedures
U-604BL/STK02/006	69	intermittent emission testing
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	29	monitoring of process or control device parameters as surrogate
1-WWTMP	1-3	monitoring of process or control device parameters as surrogate
U-604BL/STK02	67	monitoring of process or control device parameters as surrogate
U-604BL/STK02	94	record keeping/maintenance procedures
U-604BL/STK02	68	record keeping/maintenance procedures
U-714BL	76	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
FACILITY	31	monitoring of process or control device parameters as surrogate
U-1940P	53	record keeping/maintenance procedures
U-1940P	56	work practice involving specific operations
U-1940P	57	work practice involving specific operations
U-1940P	58	work practice involving specific operations
U-1940P	59	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
U-KELL1	81	monitoring of process or control device parameters as surrogate
U-700SC	71	record keeping/maintenance procedures
U-700SC	72	record keeping/maintenance procedures
U-700SC	73	record keeping/maintenance procedures
U-700SC	74	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
1-WWTMP	1-4	record keeping/maintenance procedures
U-845P3	99	record keeping/maintenance procedures
U-845P3	100	record keeping/maintenance procedures
U-845P3	95	record keeping/maintenance procedures
U-845P3	96	ambient air monitoring
U-845P3	97	monitoring of process or control device parameters as surrogate
U-845P3	98	monitoring of process or control device parameters as surrogate
FACILITY	91	record keeping/maintenance procedures

Basis for Monitoring

The following permit conditions with applicable requirements explain the basis for monitoring in the permit, which are not specifically identified in regulation.

Condition 28 - 6NYCRR Part 227-1.3(a)

Visible emission evaluations for the combustion sources comprising the emission units that are listed in this permit condition are required only if directed by the Department. This is because these sources are operated only part of the year or infrequently, and because past evaluations of these sources showed that there were little or no visible emissions.

Condition 29 - 6NYCRR Part 227-1.3(a)

Visible emissions from the Central Power Plant generator, the Laundry Plant boilers, and the Holleder Center boilers will be observed and documented annually to demonstrate compliance with the opacity limit.

Condition 30 - 6NYCRR Part 227-2.5(b)



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The facility utilizes system wide averaging to comply with NO_x RACT (reasonably Available Control Technology) requirements for the Central Power Plant boilers and Laundry Plant boilers. NO_x emissions and the NO_x limit will be calculated monthly, since it is an annual limit rolled monthly.

Condition 31 - 6NYCRR Part 228-1.3(a)

Maintaining the filters in the paint spray booth at the Transportation Motor Pool in good condition is required to ensure that visible emissions do not exceed the opacity limit.

Condition 58 - 6NYCRR Part 228-1.4(a)

VOC contents in the base coats and clear coats, and Equation A in Part 228-1, will be used to demonstrate compliance with the VOC content limit in the topcoats used for painting motor vehicles at the Transportation Motor Pool.

Conditions 60, 61, 70, and 78 - 6NYCRR Part 201-7.1

The NO_x emission caps established at the facility are explained in the section for Facility Specific Requirements under 6NYCRR Part 201-7.1. NO_x emissions will be monitored monthly to demonstrate compliance with the caps, which are an annual limit rolled monthly.

Condition 69 - 6NYCRR Part 227-1.2(a)(1)

Testing of particulate emissions from the Central Power Plant boiler stack to demonstrate compliance with the particulate limit is required only if directed by the Department, because oil is the backup fuel and is used infrequently.

Condition 72 - 6NYCRR Part 231-2.5

NO_x emissions from the Kimsey Athletic Center boiler and Cadet Crew and Sailing Center boiler will be calculated monthly, since the NO_x limit is an annual limit rolled monthly.

Condition 73 - 6NYCRR Part 231-2.5

NO_x emissions from the emergency generators at the Kimsey Athletic Center, Press Box, and Arvin Gym will be calculated monthly, since the NO_x limit is an annual limit rolled monthly.

Condition 75 - 6NYCRR Part 231-11.2

Hours of operation of the emergency generator at the Athletic Department Maintenance Building are limited so that NO_x emissions are less than the significant project threshold of 2.5 tons per year. Therefore, monitoring and recording monthly and annual hours of operation is required.

Condition 79 - 6NYCRR Part 201-6.4(b)

Monitoring the landfill gas flow rate on a monthly basis is required to ensure that the flow rate is within the permitted limit. Potential NO_x emissions are based on this limit, and therefore, no NO_x emission requirements are triggered.

Condition 80 - 6NYCRR Part 212-1.6(a)

Visible emissions from the landfill gas flare will be observed only if directed by the Department, because little or no visible emissions are expected.

Condition 81 - 6NYCRR Part 231-11.2

Hours of operation of the two emergency generators at Keller Hospital are limited so that potential NO_x emissions are less than the significant project threshold of 2.5 tons per year. Therefore, monitoring and recording monthly and annual hours of operation is required.

Condition 85 - 6NYCRR Part 225-3.3



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A certification from the gasoline supplier will be provided to the facility on an annual basis, in order to show that the gasoline supplied from May 1 to September 15 meets the Reid vapor pressure limit.

Condition 1-3 - 6NYCRR Part 227-1.3(a)

Visible emission evaluations for the combustion sources associated with the wastewater treatment plant are required only if directed by the Department. This is because these sources are small or are operated infrequently.

Condition 1-6 - 6NYCRR Part 201-6.4(b)

Operation of the flare at the wastewater treatment plant is limited, as requested by the applicant. Monitoring and recording hours of operation is required.

Condition 1-7 - 6NYCRR Part 201-6.4(b)

Operation of the emergency generator at the wastewater treatment plant is limited, as requested by the applicant. Monitoring and recording hours of operation is required.