

**Division of Air Resources
Permit Review Report**

Permit ID: 8-3234-00013/00011
Renewal Number: 4
10/11/2022

Facility Identification Data

Name: TGP COMPRESSOR STATION 237
Address: 2001 ARCHER RD
CLIFTON SPRINGS, NY 14432-9349

Owner/Firm

Name: TENNESSEE GAS PIPELINE COMPANY LLC
Address: 1001 LOUISIANA ST
HOUSTON, TX 77002, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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Division of Air Resources:
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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

Application for Renewal 4 of Air Title V Facility permit. This renewal does not include any proposed equipment changes or modifications. Minor changes and/or corrections to permit conditions, applicable regulations, and permitted sources have been made as part of this renewal as required. Facility operations are subject to the recently promulgated 6 NYCRR Part 203 for the Oil and Gas Sector. Applicable 6

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NYCRR Part 203 requirements have been added as part of this renewal.

Attainment Status

TGP COMPRESSOR STATION 237 is located in the town of HOPEWELL in the county of ONTARIO. 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*	TRANSPORT REGION (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:

Tennessee Gas Pipeline Company, Compressor Station 237 (Clifton Springs) is a natural gas transmission compressor station. The facility operates three natural gas-fired reciprocating compressor engines, two 2000-hp units and one 4000-hp unit, to supply power to compressors which pressurize the natural gas within the gas distribution network.

Permit Structure and Description of Operations

The Title V permit for TGP COMPRESSOR STATION 237

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

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that is not included in the above categories.

TGP COMPRESSOR STATION 237 is defined by the following emission unit(s):

Emission unit R23701 - Two 2,000-hp Ingersoll Rand KVS-412 reciprocating compressor engines. The engines fire natural gas and have been retrofitted with a low emissions combustion kit. The engines are used to drive compressors that pressurize natural gas within the gas pipeline network.

Emission unit R23701 is associated with the following emission points (EP):
R001A, R002A

Process: RC1 is located at GROUND, Building 1 - Operation of two natural gas-fired reciprocating internal combustion engines used to drive compressors that pressurize natural gas within the gas transmission pipeline network.

Emission unit R23702 - One 4,000-hp Clark TCV-12 reciprocating compressor engines. The engine fires natural gas and has been retrofitted with a low emissions combustion kit. The engine is used to drive a compressor that pressurizes natural gas within the gas pipeline network.

Emission unit R23702 is associated with the following emission points (EP):
R003A

Process: RC2 is located at GROUND, Building 1 - Operation of one natural gas-fired reciprocating internal combustion engine used to drive a compressor that pressurizes natural gas within the gas transmission pipeline network.

Title V/Major Source Status

TGP COMPRESSOR STATION 237 is subject to Title V requirements. This determination is based on the following information:

This facility is a major source since it has potential-to-emit carbon monoxide, oxides of nitrogen, formaldehyde, and total HAP emissions greater than the 100, 100, 10, and 25 tons per year major source thresholds, respectively.

Program Applicability

The following chart summarizes the applicability of TGP COMPRESSOR STATION 237 with regards to the principal air pollution regulatory programs:

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

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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.

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,

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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
4922	NATURAL GAS TRANSMISSION
4923	GAS TRANSMISSION AND DISTRIBUTION

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
2-02-002-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS Reciprocating

Facility Emissions Summary

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

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

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS		43901		
000630-08-0	CARBON MONOXIDE		215.96		
000050-00-0	FORMALDEHYDE		19.32		
0NY210-00-0	OXIDES OF NITROGEN		120.57		
0NY075-00-0	PARTICULATES		10.64		
0NY075-02-5	PM 2.5		10.64		
0NY075-00-5	PM-10		10.64		
007446-09-5	SULFUR DIOXIDE		0.5		
0NY100-00-0	TOTAL HAP		27.19		
0NY998-00-0	VOC		42.64		

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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)

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This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item G: Property Rights - 6 NYCRR 201-6.4(a)(6)

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

Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit 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

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this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

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.

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Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_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	Regulation	Condition	Short Description
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Facility/EU/EP/Process/ES

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FACILITY	ECL 19-0301	49		Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 63-A	37		Subpart A - General Provisions apply to all NESHAP affected sources
FACILITY	40CFR 63- DDDDD.7500 (e)	38		ICI Boiler Major Source NESHAP - Gas 1 boiler tune-up requirements
FACILITY	40CFR 63- DDDDD.7515 (d)	39		ICI Boiler Major Source NESHAP - Boiler Tune-ups
FACILITY	40CFR 63- DDDDD.7540 (a) (40		ICI Boiler Major Source NESHAP - Tune-up Requirements
FACILITY	40CFR 63- DDDDD.7550 (b)	41		ICI Boiler Major Source NESHAP - Reporting Requirements
FACILITY	40CFR 63- DDDDD.7550 (c)	42		ICI Boiler Major Source NESHAP - Compliance Reports
FACILITY	40CFR 63- DDDDD.7555 (a)	43		ICI Boiler Major Source NESHAP - Recordkeeping
FACILITY	40CFR 63-DDDDD.7560	44		ICI Boiler Major Source NESHAP - Record Format
FACILITY	40CFR 63-DDDDD.7565	45		ICI Boiler Major Source NESHAP - General Provisions
FACILITY	40CFR 63-ZZZZ	46		Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	18		Chemical accident prevention provisions
FACILITY	40CFR 82-F	19		Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1		Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10		Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	50		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	20, 47, 48		Title V Permits and

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FACILITY	6NYCRR 201-6.4 (a) (4)	15	the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (7)	2	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (8)	16	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c) (2)	4	Recordkeeping and Reporting of Compliance Monitoring 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)	21	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f)	22	Operational Flexibility
FACILITY	6NYCRR 201-6.5 (a)	51	State Enforceable Requirements
FACILITY	6NYCRR 202-1.1	17	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.4	23	Emission Statement - methods and procedures
FACILITY	6NYCRR 202-2.4 (a) (3)	24	Emission statement methods and procedures
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 203-10.3	32	Compressor Station Reporting Requirements
FACILITY	6NYCRR 203-4.2 (b)	25	Continuous Bleed Natural Gas Pneumatic Devices
FACILITY	6NYCRR 203-4.4 (c)	26	Reciprocating Compressor Monitoring Requirements
FACILITY	6NYCRR 203-4.4 (e)	27	Reciprocating Compressor Repair Requirements
FACILITY	6NYCRR 203-4.5 (b)	28, 29	Compressor Station Blowdown Requirements
FACILITY	6NYCRR 203-7.2 (c)	30	Compressor Station Monitoring Methods and Requirements
FACILITY	6NYCRR 203-7.3	31	Compressor Station Leak Repair Requirements
FACILITY	6NYCRR 211.1	52	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	33	General Prohibitions - visible emissions

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FACILITY	6NYCRR 215.2	9	limited.
FACILITY	6NYCRR 227-1.4 (a)	34	Open Fires -
FACILITY	6NYCRR 227-2.4 (f) (1)	35, 36	Prohibitions
			Opacity Standard
			Emission limit for
			natural gas fired
			engines.

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.

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.

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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 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.

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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 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, TGP COMPRESSOR STATION 237 has been determined to be subject to the following regulations:

40 CFR 63.7500 (e)

This citation states the tune-up requirements for gas 1 boilers.

40 CFR 63.7515 (d)

This regulation requires facilities with industrial, commercial or institutional boilers to tune-up their

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boilers on an annual, biennial, or every five years basis.

40 CFR 63.7540 (a) (12)

This citation specifies the tune-up requirements for boilers equipped with continuous oxygen trim systems that maintain optimum air to fuel ratios and that are subject to the requirements of 40 CFR 63 Subpart DDDDD.

40 CFR 63.7550 (b)

This condition states when reports must be submitted.

40 CFR 63.7550 (c)

This condition states the requirements for the compliance report

40 CFR 63.7555 (a)

This condition states what records must be kept.

40 CFR 63.7560

This condition states in what form the records must be kept.

40 CFR 63.7565

This regulation specifies which provisions of the General provisions (Subpart A of 40 CFR 63) apply to the owner or operators of industrial, commercial, and institutional boilers at major source facilities of hazardous air pollutants.

40 CFR Part 63, Subpart A

The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40 CFR 63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that describe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

40 CFR Part 63, Subpart ZZZZ

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Subpart ZZZZ applies to reciprocating internal combustion engines. Sources subject to Subpart ZZZZ must limit emissions of carbon monoxide and formaldehyde. Sources must also comply with work practice standards and operating limits.

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 201-6.5 (a)

This subdivision states that the Department shall include state enforceable conditions in Title V permits. State enforceable conditions related to regulations developed pursuant to the Climate Leadership and Community Protection Act (CLCPA) and Article 75 of New York State Environmental Conservation Law may be included in future versions of this permit, as applicable.

6 NYCRR 202-2.4

This regulation specifies that any required emission statement must be submitted to the Department before April 15 each year for emissions of the previous calendar year. The regulation also establishes a set of acceptable emissions estimation methods that may be used including the use of monitoring methods, if accepted by the department, and the transmittal of the emission statement information to the Department. Finally, such information may be designated as confidential, as per department approval, except for the following information: emissions, estimated emissions method, and the Source Classification Code.

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 203-10.3

This section sets the reporting requirements for compressor stations.

6 NYCRR 203-4.2 (b)

This subdivision regulates continuous bleed natural gas actuated pneumatic devices installed prior to January 1, 2023.

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6 NYCRR 203-4.4 (c)

This subdivision establishes the monitoring requirements for reciprocating compressors.

6 NYCRR 203-4.4 (e)

This subdivision establishes the repair requirements for reciprocating compressors.

6 NYCRR 203-4.5 (b)

This subdivision regulates both planned and unplanned compressor station blowdowns of greater than 10,000 standard cubic feet of natural gas.

6 NYCRR 203-7.2 (c)

This subdivision establishes the monitoring methods and inspection time frames for compressor stations.

6 NYCRR 203-7.3

This section lists the requirements for repairing leaks at compressor stations.

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 227-1.4 (a)

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

6 NYCRR 227-2.4 (f) (1)

Presumptive NOx RACT emission limit for natural gas fired stationary internal combustion engines.

Compliance Certification

Summary of monitoring activities at TGP COMPRESSOR STATION 237:

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

FACILITY	37	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
FACILITY	42	record keeping/maintenance procedures
FACILITY	43	record keeping/maintenance procedures
FACILITY	44	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
FACILITY	34	monitoring of process or control device parameters as surrogate
FACILITY	35	record keeping/maintenance procedures
FACILITY	36	intermittent emission testing

Basis for Monitoring

6 NYCRR Part 203 Oil and Natural Gas Sector

- 6 NYCRR 203-4 – The facility operates as a natural gas transmission compressor station and therefore subject to applicable requirements under 6 NYCRR Subpart 203-4 for reciprocating compressors, pneumatic devices/pumps, and pigging operations. The facility does not have centrifugal compressors nor storage vessels which meet the applicability criteria under 203-4.1.
- 6 NYCRR 203-4.4(e) – Beginning January 1, 2023, compressor vent stacks for vent rod packing or seal emissions must either be controlled with a vapor collection system per 203-4.4(d) or comply with the repair requirements under 203-4.4(e). The facility owner or operator is electing to comply with the repair requirements under 203-4.4(e) and therefore no condition is included for 203-4.4(d).

6 NYCRR Part 225 Sulfur in Fuel

- 6 NYCRR 225 – The facility only burns natural gas and therefore is not subject to the requirements of 6 NYCRR Part 225.

6 NYCRR Part 227 Stationary Combustion Installations

- 6 NYCRR 227-1.4(a) – Specifies the applicable opacity limit for stationary combustion installations. Minimal or no visible emissions are expected from natural gas fired sources and therefore a monitoring condition has been included requiring an annual Method 9 test to demonstrate compliance. The monitoring condition also requires that the facility investigate all instances where there is cause to believe the opacity limit has been exceeded.
- 6 NYCRR 227-2.4(f)(1) – Establishes the presumptive NOx RACT emission limit for natural gas-fired stationary internal combustion engines that applies to the three natural gas-fired compressor engines (ES 0R01A, ES 0R02A, ES 0R03A).

Two monitoring conditions are included for these sources to demonstrate compliance with NOx RACT requirements. The first monitoring condition requires that the facility conduct emissions testing to show compliance with the limit once every five years. This monitoring method and frequency are consistent with the regulation, as specified under 6 NYCRR 227-2.6(a)(6)(i). The second monitoring condition requires the facility develop and adhere to a best management program (BMP) for periodic

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maintenance and process monitoring to ensure proper operation of the engines between required emissions tests.

Please note that in the prior permit, three redundant RACT conditions were included (one condition for each engine.) As part of this renewal these RACT conditions have been streamlined into two conditions covering the three engines: one condition for emissions testing requirements and one condition for the best management program.

- 6 NYCRR 227-2.4(f)(6) – As specified in this citation, emergency power generating engines are exempt from NO_x RACT requirements under 6 NYCRR 227-2. Therefore, no conditions have been included under this citation.

40 CFR 60, Subpart A NSPS General Provisions

- 40 CFR 60, Subpart A – Specifies the general requirements for monitoring, recordkeeping, and reporting for operations subject to Federal New Source Performance Standards (NSPS).

40 CFR 63, Subpart ZZZZ Reciprocating Internal Combustion Engine NESHAP

- The facility operates four natural gas-fired stationary internal combustion engines: ES 0R01A (2,000 hp 4SLB engine), ES 0R02A (2,000 hp 4SLB engine), ES 0R03A (4,000 hp 2SLB engine), and a permit-exempt 715-hp emergency generator.

Construction of the three compressor engines (0R01A, 0R02A, 0R03A) commenced before December 19, 2002 and these engines qualify as existing stationary RICE greater than 500 bhp located at a major source of HAP. Therefore, they meet the exemption under 40 CFR 63.6590(b)(3)(i) and “...do not have to meet the requirements of this subpart [Subpart ZZZZ] and of subpart A of this part [Part 63], including initial notification requirements.” Accordingly, no conditions have been included for this subpart for these engines.

Based on the facility owner or operator’s records, the emergency generator was originally constructed and operated at another facility operated by the facility owner in Louisiana circa 2005. The emergency generator was relocated to the Compressor Station 237 facility in 2014. A manufacture date is not listed on the generator engine, however, per recent correspondence with the manufacturer (Caterpillar), they [the manufacturer] estimate that the engine was originally manufactured prior to 1990 based on the make and model number. Exact dates of construction and operation are unavailable.

Per the definition under 40 CFR 63.2, construction does not include the removal of an affected source from an existing location and reinstallation at a new location. Therefore, the date construction commenced is the date the emergency generator was constructed at the Louisiana facility (i.e. 2005). However, the status (i.e., major vs. area source of HAPs) of the Louisiana facility at the time of construction is unknown. Per the applicability dates for new stationary RICE greater than 500 bhp at area and major sources of HAPs (June 12, 2006 and December 19, 2002, respectively) the emergency generator is either an existing stationary RICE at an area source of HAPs or a new stationary RICE greater than 500 bhp at a major source of HAPs. Both of these categories of affected sources are subject to applicable requirements under Subpart ZZZZ.

The emergency generator is not enrolled or contractually obligated for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii). Per 40 CFR 63.6590(b)(1)(i), new emergency stationary RICE greater than 500 bhp hours at major sources of HAPs not enrolled in a demand response program are only subject to the initial notification requirements of 40 CFR 63.6640(f)(2)(ii) and (iii). Since the facility owner or operator has not provided sufficient information regarding the Louisiana facility status at the

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time of construction, it is not possible to make a clear determination on whether the emergency generator is new or existing under Subpart ZZZZ. Therefore, the facility owner or operator should meet the more stringent requirements applicable to existing stationary RICE at area sources of HAPs unless an alternative decision is made by EPA or the facility provides sufficient information to determine applicability.

New York State has not accepted delegation of 40 CFR 63, Subpart ZZZZ. Additionally, the emergency generator is exempt from permitting per 6 NYCRR 201-3.2(c)(6). Therefore, a general facility-level condition for this rule has been included in the permit to address the requirements applicable to the emergency generator as part of this renewal permit. Please note that the prior ATV permit (Ren 3) assumed that the emergency generator was exempt from Subpart ZZZZ. The facility owner or operator is responsible for complying with all applicable requirements under Subpart ZZZZ.

40 CFR 63, Subpart DDDDD Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP

- The facility owns and operates a 1.7 MMBtu/hr comfort heater that is exempt from permitting per 6 NYCRR 201-3.2(c)(1)(i). This boiler is an affected source under 40 CFR 63, Subpart DDDDD as an existing gas 1 boiler or process heater less than 5 MMBtu/hr. Per Table 3 and 40 CFR 63.7500(e), the facility owner or operator must complete a tune-up of the comfort heater every five years. Gas 1 boilers and heaters are not subject to emission or operating limits under Subpart DDDDD.

In the prior permit, this exempt source was included as an emission unit/emission source. However, it qualifies as exempt from permitting per 6 NYCRR 201-3.2(c)(1)(i). Furthermore, affected sources of this subcategory are not required to obtain an Air Title V permit under Subpart DDDDD. Therefore, this exempt source has been removed from the permit as part of this renewal. However, facility-level permit conditions with the work practice, recordkeeping, and reporting requirements applicable to the exempt comfort heater have been included as part of this renewal.

- 40 CFR 63.7510 – Specifies the initial compliance requirements for affected sources. Since the compliance date for existing affected sources has passed, for permit streamlining, no condition has been included in this permit under this citation.
- 40 CFR 63.7545(b) – Specifies the initial notification requirement for existing affected sources. Since this compliance date has passed, for permit streamlining, no condition has been included in this permit under this citation.
- 40 CFR 63.7545(e) – Specifies the requirements and deadlines for submission of the Notification of Compliance status. Since the deadline for this requirement for existing affected sources has passed, for permit streamlining, no condition has been included in this permit.

40 CFR 64, Compliance Assurance Monitoring

- Facility emission units do not use control devices to comply with an emission limit or standard or do not have uncontrolled emissions greater than major source thresholds. Therefore, Compliance Assurance Monitoring (CAM) requirements do not apply to emission units at this facility.