



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

February 28, 2022

Mr. Thomas John
Section Chief, Division of Air Resources
New York State Department of Environmental Conservation, Region 2
47-40 21st Street
Long Island City, NY 11101
thomas.john@dec.ny.gov

Re: Draft Title V Operating Permit for Starrett City Power Plant,
Permit ID # 2-6105-00263/00008, Brooklyn, Kings County, NY

Dear Mr. John:

Thank you for the opportunity to comment on the draft renewal title V operating permit (with modifications) for the Starrett City Power Plant (“Starrett” or “facility”) that the New York State Department of Environmental Conservation Region 2 office (NYSDEC) issued for public review on February 2, 2022. The public comment period will end March 4, 2022.

Starrett City is a Housing Development in Brooklyn, NY that produces all of its own electricity, heating, and cooling through its power plant. The plant has a total electric generating capacity of 12 MW. This draft permit includes the following modifications: (1) addition of two new identical CAT 175-20 diesel engines (model year 2018) for emergency use, each rated at 5,647 HP and 4 MW, both have already been constructed and commenced operation¹; (2) addition of 46 new natural gas fired boilers, each with a rated heat input of less than 10 MMBTU/hr, all have already been constructed and commenced operation²; and (3) reclassification of the 2 existing identical Nordberg diesel engines, each rated at 2 MW, from non-emergency to emergency purposes and removal of the third Nordberg engine from the facility.

Starrett is an existing major source under the Nonattainment New Source Review (NNSR) program³, so the proposed modification constitutes a modification to an existing major source. NYSDEC determined that the proposed project would not be subject to NNSR requirements.

We reviewed the draft title V permit, permit review report (PRR)², and application and have identified several concerns regarding the draft permit. To ensure that the draft permit complies with New York’s approved title V Operating Permit Program, NYSDEC’s air regulations, and applicable Clean Air Act (CAA) requirements, and that the permit record adequately supports NYSDEC’s permitting decision, EPA recommends that DEC address the comments included in Attachment 1 to this letter.

¹ Based on the title V application, the 2 new CAT engines were constructed/installed on 5/1/2019 and commenced operation on 11/1/2020.

² Based on the title V application, the 46 new boilers were constructed/installed between 4/1/2020 to 7/1/2020 and commenced operation on 11/1/2020.

³ The EPA has approved New York’s Nonattainment New Source Review (NNSR) and Prevention of Significant Deterioration (PSD) regulations contained in 6 NYCRR Part 231 as consistent with the requirements of 40 CFR § 51.165 and 40 CFR § 51.166, respectively.

We look forward to working with you to address these comments. If you have any further questions or wish to discuss any of these issues, please feel free to contact me at 212-637-4019 or chan.suilin@epa.gov, or Viorica Petriman at 212-637-4021 or petriman.viorica@epa.gov.

Sincerely,

Suilin W. Chan, Chief
Permitting Section
Air and Radiation Division

Enclosures

cc:

Sam Lieblich , NYSDEC
Cicily Nirappel, NYSDEC
Michael Cronin, NYSDEC
Denise Prunier, NYSDEC
Michael Miliani, NYSDEC