Facility DEC ID: 8453200075

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 8-4532-00075/00029
Effective Date: 11/08/2023 Expiration Date: 11/07/2028

Permit Issued To:SENECA ENERGY II LLC
2999 JUDGE RD
OAKFIELD, NY 14125

Contact: JOHN MCNEIL
ARCHAEA ENERGY
4444 WESTHEIMER RD STE G450
HOUSTON, TX 77027
(404) 862-3782

Facility: SENECA ENERGY LFGTE FACILITY
2053 ST RT 414|RENEWABLE RESOURCES PARK
SENECA FALLS, NY 13148

Contact: EMILY ZAMBUTO
ARCHAEA ENERGY INC
4444 WESTHEIMER RD STE 450G
HOUSTON, TX 77027
(585) 948-4616

Description:
Renewal 3, mod 0, of the Title V permit for the Seneca Energy Landfill Gas to Energy (LFGTE) and High BTU facility to add second High BTU Plant.

Seneca Energy Landfill Gas to Energy (LFGTE) facility is an existing 17.6 Mega Watt Landfill Gas to Energy Facility which combusts landfill gas purchased from the Seneca Meadows Landfill (a separately owned facility). Emission Unit (EU) 3-STAGE currently includes fourteen CAT G3516 IC Engines and four CAT G3520 IC engines that are fueled by the landfill gas which produces electricity for sale. The facility also includes a 6,000 cubic feet per minute (scfm) High BTU Plant, EU 1-BTUPL, which beneficially recovers the methane portion of landfill gas thereby generating renewable natural gas (RNG) which is sent to the natural gas pipeline running along Route 414. Waste gas from the refining process is controlled by a 3600 scfm thermal oxidizer. Off-spec gas from the treatment system during upset conditions is combusted in the 3300 scfm open flare.

REN 3 includes a major modification which is the construction and operation of a second High BTU facility (EU 2-BTUPL) which will process 9600 scfm of landfill gas. Similar to EU 1-BTUPL, the new High BTU unit will recover the methane portion of the landfill gas to generate RNG which will be sent to the natural gas pipeline running along Route 414. EU 2-BTUPL will also include a 9600 scfm open flare (5KFLR) and a 4800 scfm thermal oxidizer (5KOXD). The facility will also be adding an additional emergency generator.

As part of the construction of the new High BTU unit, four of the CAT 3516 IC Engines and the four CAT 3520 IC engines in EU 3-STAGE will be converted from being fueled by landfill gas to natural gas to power the High BTU units. The engine stacks will each have an oxidation catalyst. The oxidation catalysts will allow for the reduction in engine exhaust emissions for Carbon Monoxide (93% reduction), Formaldehyde (80% reduction) and VOCs (75% reduction). The ten remaining CAT 3516 IC engines will be permanently shut down and removed from the facility within one year of start-up of EU 2-BTUPL.

Additionally, the REN 3 permit incorporates two Operational Flexibility approvals including the addition of a fire pump engine, the elimination of a 2,000 scfm enclosed flare and modification of existing thermal oxidizer (3KOXD). In addition, the permit includes a minor modification which was the addition of a 3300 scfm open flare (3KFLR) for limited hours for off spec gas.

The applicant was required to do a Screening Analysis to verify the facility remains in compliance with Part 212 AGCs and SGCs and National Ambient Air Quality Standards.

The REN 3 permit maintains conditions for the facility which were in the REN 2 permit. These involve compliance with 6NYCRR Part 231-6 and Part 231-8 Modification to Existing Major Facilities with the existing limits for Oxides of Nitrogen (214.4 tons per year) and Carbon Monoxide (522.9 tons per year) located under 6NYCRR Part 200.6 for EU 1-BTUPL and EU 3-STAGE (engines running on landfill gas) as well as other miscellaneous sources during the transition period. The transition period consists of the construction time for the second High BTU unit and up to one year of operation upon commencement

of operation of the second High BTU unit. These limits may not exceed one year after commencement of operation of the second High BTU unit. During this transition period, the facility must continue to comply with 6 NYCRR Part 227-2 NOx Reasonably Available Control Technology (RACT) Limits for engines firing on landfill gas.

No later than one year of commencement of operation of 2-BTUPL, a new limit for NOx will be established under 6NYCRR Part 201-7 for less than 99.9 tons per year. This limit caps the facility out of 6NYCRR Part 227 NOx RACT. Once the second High BTU plant is in operation, the facility will be non-major for carbon monoxide in terms of 6NYCRR Part 231; it will be less than 250 tons/year and will not require a CO limit. The facility will be greater than 100 tons per year CO, thus they will be subject to Title V, but not 6NYCRR Part 231.

The draft permit does not retain the cap for carbon dioxide equivalents on emission unit 1-BTUPL due to the Supreme Court decision in “Utility Air Regulatory Group vs. EPA (2014)”.

Pursuant to the requirements of Sections 7(2) and 7(3) of the Climate Leadership and Community Protection Act (CLCPA), the Department has requested and received information regarding the project’s consistency with the CLCPA.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: KIMBERLY A MERCHANT
6274 E AVON LIMA RD
AVON, NY 14414-9519

Authorized Signature: _____ Date: ___ / ___ / _____

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

PAGE LOCATION OF CONDITIONS

DEC GENERAL CONDITIONS
****** General Provisions ******
For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item3.2:
The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be

submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:
The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

a) materially false or inaccurate statements in the permit application or supporting papers;
b) failure by the permittee to comply with any terms or conditions of the permit;
c) exceeding the scope of the project as described in the permit application;
d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:
Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(585) 226-2466

Permit ID: 8-4532-00075/00029 **Facility DEC ID: 8453200075**

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:SENECA ENERGY II LLC
2999 JUDGE RD
OAKFIELD, NY 14125

Facility: SENECA ENERGY LFGTE FACILITY
2053 ST RT 414|RENEWABLE RESOURCES PARK
SENECA FALLS, NY 13148

Authorized Activity By Standard Industrial Classification Code:
4911 - ELECTRIC SERVICES
4925 - GAS PRODUCTION/DISTRIBUTION
4931 - ELEC & OTHER SERVICES COMBINED

Permit Effective Date: 11/08/2023 Permit Expiration Date: 11/07/2028

PAGE LOCATION OF CONDITIONS

EU=1-BTUPL,Proc=E10,ES=EGEN2

53 42 40CFR 60, NSPS Subpart IIII: Compliance Certification

EU=1-BTUPL,Proc=GAS,ES=3KFLR

54 43 6 NYCRR 212-1.7 (b) (5): Compliance Certification

EU=1-BTUPL,Proc=GAS,ES=TRMT2

55 44 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification
57 45 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification
59 46 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification
60 47 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification

EU=1-BTUPL,EP=OXD01,Proc=GAS,ES=3KOXD

61 48 6 NYCRR 212-1.7 (b) (1): Compliance Certification

EU=2-BTUPL,Proc=E20,ES=EGEN3

62 49 40CFR 60, NSPS Subpart IIII: Compliance Certification

EU=2-BTUPL,Proc=PL2,ES=5KFLR

63 50 6 NYCRR 212-1.7 (b) (5): Compliance Certification

EU=2-BTUPL,Proc=PL2,ES=TRMT3

64 51 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification
65 52 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification
67 53 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification
69 54 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification

EU=2-BTUPL,EP=OXD02,Proc=PL2,ES=5KOXD

70 55 6 NYCRR 212-1.7 (b) (1): Compliance Certification

EU=3-STAGE,Proc=EMR,ES=EGEN1

71 56 40CFR 63, Subpart ZZZZ: Compliance Certification

EU=3-STAGE,Proc=ST3

72 57 40CFR 60, NSPS Subpart JJJJ: Compliance Certification
74 58 40CFR 60.4230(a)(4)(i), NSPS Subpart JJJJ: Compliance Certification

EU=3-STAGE,Proc=STP

75 59 6 NYCRR 200.6: Compliance Certification
77 60 6 NYCRR 200.6: Compliance Certification
78 61 6 NYCRR 227-2.4 (f) (2): Compliance Certification
80 62 6 NYCRR 227-2.6 (c): Compliance Certification
81 63 40CFR 60.4230(a)(4)(i), NSPS Subpart JJJJ: Compliance Certification
83 64 40CFR 63, Subpart ZZZZ: Compliance Certification

EU=3-STAGE,Proc=STP,ES=TRMT1

84 65 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification
86 66 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification
88 67 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification
91 68 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification
94 69 40CFR 60.33f(c)(3), NSPS Subpart Cf: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

97	70 ECL 19-0301: Contaminant List
97	71 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
98	72 6 NYCRR 201-6.5 (a): Compliance Demonstration

Emission Unit Level

EU=3-STAGE,Proc=ST3

99	73 6 NYCRR 201-6.5 (a): Compliance Demonstration
100	74 6 NYCRR 201-6.5 (a): Compliance Demonstration
101	75 6 NYCRR 201-6.5 (a): Compliance Demonstration
103	76 6 NYCRR 201-6.5 (a): Compliance Demonstration
105	77 6 NYCRR 201-6.5 (a): Compliance Demonstration
106	78 6 NYCRR 201-6.5 (a): Compliance Demonstration
107	79 6 NYCRR 201-6.5 (a): Compliance Demonstration
108	80 6 NYCRR 201-6.5 (a): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.

FEDERALLY ENFORCEABLE CONDITIONS

Renewal 3/FINAL ****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

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 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 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 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 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 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 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 201-6.4 (i)

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

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of 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 the 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 section 201- 6.6 of this Subpart.

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.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: **Acceptable Ambient Air Quality**
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where

contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)

Item 2.1:
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 3: Recordkeeping and Reporting of Compliance Monitoring
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-6.4 (c)

Item 3.1:
The following information must be included in any required compliance monitoring records and reports:

(i) The date, place, and time of sampling or measurements;

(ii) The date(s) analyses were performed;

(iii)The company or entity that performed the analyses;

(iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;

(v) The results of such analyses including quality assurance data where required; and

(vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

Condition 4: Records of Monitoring, Sampling, and Measurement
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (2)

Item 4.1:
Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all

reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (3) (ii)

Item 5.1:
The Compliance Certification activity will be performed for the Facility.

Item 5.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements,

the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual

report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-6.4 (e)

Item 6.1:
The Compliance Certification activity will be performed for the Facility.

Item 6.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

i. Compliance certifications shall contain:
- the identification of each term or condition of the permit that is the basis of the certification;
- the compliance status;
- whether compliance was continuous or intermittent;
- the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
- such other facts as the Department may require to

determine the compliance status of the facility as specified in any special permit terms or conditions; and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Air Compliance Branch
USEPA Region 2 DECA/ACB
290 Broadway, 21st Floor
New York, NY 10007

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
NYSDEC Region 8 Headquarters
6274 East Avon-Lima Road
Avon, NY 14414-9519

The address for the BQA is as follows:

NYSDEC

Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due on the same day each year

Condition 7: Recordkeeping requirements
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 7.1:
(a) The following records shall be maintained for at least five years:

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 8: Open Fires - Prohibitions
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 215.2

Item 8.1:
Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 8.2
Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:
(a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
(b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
(c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
(d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.

(e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
(f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
(g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
(h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
(i) Prescribed burns performed according to Part 194 of this Title.
(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 9: Maintenance of Equipment
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 200.7

Item 9.1:
Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 10: Recycling and Salvage
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 10.1:
Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 11: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 11.1:
No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 12: Exempt Sources - Proof of Eligibility
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 12.1:
The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 13: Trivial Sources - Proof of Eligibility
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 13.1:
The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 14: Requirement to Provide Information
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)

Item 14.1:
The owner and/or operator shall furnish to the department, within a reasonable time, any

information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 15: Right to Inspect
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)

Item 15.1:
The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 16: Required Emissions Tests
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 16.1:
For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 17: Accidental release provisions.
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40 CFR Part 68

Item 17.1:
If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in

quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 18: Recycling and Emissions Reduction
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 82, Subpart F

Item 18.1:
The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 19: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 200.6

Item 19.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 1-BTUPL Emission Point: FLR03

Emission Unit: 2-BTUPL Emission Point: FLR05

Item 19.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with section 212-1.6(a) are detected , the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify The Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department, and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Reference Test Method 9
Monitoring Frequency: WEEKLY
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 20: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 200.6

Item 20.1:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000630-08-0 CARBON MONOXIDE

Item 20.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
The sum of the emissions of carbon monoxide from this facility are limited to 522.9 tons/year calculated on a rolling 12 month total during the construction period of the second High BTU facility. This limit ensures that National Ambient Air Quality Standards are not exceeded. The facility will calculate monthly carbon monoxide emissions from engines 01ENG through 18ENG using daily individual bHp production data based on the amount of electricity that is generated by each engine and the results from the most recent approved stack test report for emission factors (results of monthly instantaneous carbon monoxide monitoring will be used to confirm proper operation of the engines and the accuracy of the emission factors). The facility will include emissions from other sources of carbon monoxide and keep these records in a format acceptable to the Department.

The owner or operator of the facility will permanently shut down and remove from the facility ten (10) of the existing Caterpillar G3516 engines (05ENG through 14ENG) and the TRMT1 source. The engine shut downs and removals are required within 1-year of commencement of operation of Emission Unit 2-BTUPL. The limit of 522.9 tons/year will expire within one year of commencement of operation of 2-BTUPL. The facility will be non-major for carbon monoxide in terms of 6NYCRR Part 231 at less than 250 tons/year and therefore will not require a limit.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: ELECTRICAL LOAD OUTPUT
Parameter Monitored: ELECTRICAL LOAD OUTPUT
Upper Permit Limit: 522.9 tons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 21: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 200.6

Item 21.1:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 21.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
The sum of emissions of oxides of nitrogen from the facility are limited to 214.4 tons/year calculated on a rolling 12 month total during the construction period of the second High BTU plant. This limit ensures that National Ambient Air Quality Standards are not exceeded. The facility will calculate monthly oxides of nitrogen emissions from 01ENG through 18ENG using daily individual engine bHp production data based on the amount of electricity that is generated at each engine and the results from the most recent approved stack test report for emission factors (the results of monthly oxides of nitrogen monitoring will be used to verify proper operation of the engines and confirm the accuracy of the stack test emission factors). The facility will include other sources of oxides of nitrogen and these records will be kept in a format acceptable to the Department.

The owner or operator of the facility will permanently shut down and remove from the facility ten (10) of the existing Caterpillar G3516 engines (05ENG through 14ENG) and the TRMT1 source. The engine shut downs and removals are required within 1-year of commencement of operation of Emission Unit 2-BTUPL. The limit of 214.4 tons/year for NOx will expire within one year of commencement of operation of 2-BTUPL. The facility will be capping out of NOx RACT and the new limit will be less than 99.9 tons/year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: ELECTRICAL LOAD OUTPUT
Parameter Monitored: ELECTRICAL LOAD OUTPUT

Upper Permit Limit: 214.4 tons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 22: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 200.6

Item 22.1:
The Compliance Certification activity will be performed for the Facility.

Item 22.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:

The facility owner or operator shall not allow emissions of sulfur dioxide to violate the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide.

The applicant has demonstrated that sulfur dioxide emissions for this facility are in compliance with the 1-hour NAAQS standard.

The facility owner or operator shall verify the parameters used to demonstrate compliance with the 1-hour NAAQS for sulfur dioxide on a weekly basis. These parameters include, but are not limited to, landfill gas (LFG) flow rate and field testing of LFG hydrogen sulfide concentration at the inlet and outlet to TRMT2 and TRMT3 using direct reading colorimetric gas detection tubes or a handheld monitor. The handheld monitor (e.g., Gas Detection Tube, Landtec GEM 5000+, MRU Optima and, or equivalent) shall be operated, calibrated and maintained in accordance with the manufacturer's specifications. Any significant change to these parameters or any method of operation which could increase the emissions, increase the emission rate potential, decrease the air cleaning control efficiency, or provide cause to alter the environmental rating of any contaminant may require a modification to the permit and will require facility and DEC reevaluation to ensure continued compliance with the NAAQS for sulfur dioxide.

Additionally, the facility owner or operator must

investigate, in a timely manner, any instance where there is reason to believe that there is, or has been, an emission increase above those listed on the application (calculations are based on the concentration of total reduced sulfur as being 20 ppm coming out of TRMT2 and TRMT3), or that the 1-hour NAAQS for sulfur dioxide may have been or continues to be exceeded. In such cases, the facility owner or operator shall investigate the cause, make any corrections, and verify that the potential excess emissions problem has been corrected.

On a yearly basis, the facility shall collect a sample of LFG from the outlet of the treatment systems (TRMT2 and TRMT3) for submission to a National ELAP accredited laboratory (or NYSDOH ELAP accredited laboratory or other DEC approved laboratory) to analyze the concentration of total reduced sulfur compounds and hydrogen sulfide in accordance with EPA Method 3C for fixed gases and ASTM D5504 for reduced sulfide gases (or a DEC approved equivalent method). Field testing of hydrogen sulfide concentrations using colorimetric gas detection tubes shall be taken concurrently with the collection of yearly analytical samples. Analytical results must be submitted to the Department within one week of receipt of the results. The most recent yearly LFG sample analysis result will be used to confirm the accuracy of the colorimetric gas detection tube readings and the calculated weekly SO2 emission rates.

Within 60 days following permit issuance, the facility shall collect the initial yearly LFG sample from the outlet of the treatment system TRMT2. The facility will collect the initial yearly LFG sample from the outlet of the treatment system TRMT3 within 60 days of the treatment system being fully operational (i.e., when LFG gas that is fully processed is being sent to the natural gas pipeline). The collected LFG samples from each treatment system will be submitted to an approved laboratory for analysis as noted above. Concurrently, the colorimetric gas detection tube samples will be taken for comparison for the hydrogen sulfide results.

Analytical results shall be submitted to the Department in the annual report and within one week of receipt of the results.

A log containing weekly readings of LFG flow at the inlet of TRMT2 and TRMT3 as well as hydrogen sulfide readings at the inlet and the outlet of both treatment systems will be maintained onsite. The facility will also note media changeouts in this log. The H2S treatment systems and monitoring (and media changeouts) will be done in

accordance with the Company's Sulfur Removal Monitoring SOP.

Parameter Monitored: HYDROGEN SULFIDE
Upper Permit Limit: 20 parts per million by volume (dry)
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 23: Emission Unit Definition
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 23.1:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-BTUPL
Emission Unit Description:
The emission unit consists of a landfill gas to pipeline grade natural gas conversion plant (High BTU Plant). The landfill gas (LFG) received by the High BTU plant is produced by the decomposition of municipal solid waste in a nearby landfill. A LFG treatment system (initial filtration, compression, cooling and dewatering) will be utilized in accordance with 40 CFR 60.752(b)(iii(C). Components of the specified gas treatment system are not equipped with atmospheric vents. Therefore, all of the LFG received and treated by the system is directed to the open flare during “upset” conditions or on to the refining process designed to recover the methane from the LFG. The gas treatment and refining processes are installed in building BTUPLANT. The product gas will be sold and delivered to customers via a natural gas transmission line. Waste gas from the refining process will be controlled using a thermal oxidizer. In general, the gas refining process consists of the following major unit operations:
a. Sulfur Removal
b. Activated Carbon for NMOC adsorption
c. Membrane separation for CO2 removal
d. Pressure swing adsorption for nitrogen and oxygen removal (as needed)

All pumps and gas compressors in the gas refining process are electricity driven.

2. Ancillary equipment with insignificant emissions

[exempt pursuant to 6NYCRR Part 201-3.1(b)] that supports the High Btu Plant operations.

a. A 100 kW IC engine generator, which is operated to supply the facility with limited temporary power when utility outages occur. The emergency generator is powered with diesel fuel that is supplied from a 200 gallon above ground storage tank.

Building(s): BTUPLANT

Item 23.2:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 2-BTUPL
Emission Unit Description:

This emission unit consists of a landfill gas to pipeline grade natural gas conversion facility (High BTU). The landfill gas (LFG) received at the High BTU Facility is produced by the decomposition of municipal solid waste in the landfill. A 200 kW (324 HP) standby emergency generator (EMG03) is operated to supply the facility when utility outages occur. A LFG Treatment System (TRMT3), which consists of initial filtration, compression, cooling and dewatering, will be utilized in accordance with 40 CFR 60.752(b)(iii)(C). Components of the specified gas treatment system are not equipped with atmospheric vents. Therefore, all the LFG received and treated by the system is directed to the Emergency Open Flare (5KFLR) during upset conditions or on to the refining processes designed to recover the methane from the LFG. The product gas is sold and delivered to customers via a natural gas transmission pipeline. Waste gas from the refining processes are controlled using a Thermal Oxidizer (5KOXD). In general, the gas refining processes consist of the following major unit operations:
- VOC and Siloxane Removal: This step involves temperature swing absorption (TSA) to remove impurities from the gas prior to being sent to the membrane system.

-Polishing of the gas from the TSA using non-regenerable media.

- Carbon Dioxide (CO2) Removal: This step involves in-line gas processing and membranes for CO2 removal from the gas stream.

- Nitrogen/Oxygen (N2/O2) Removal: This step involves vacuum pressure swing absorption (VPSA) separation of N2 and O2 from the gas stream.

- The final RNG product is monitored for gas quality and

then transferred to a natural gas pipeline for distribution to end users.

As a byproduct of the gas refining processes, various waste gas streams are produced. The High BTU Plant will incorporate a Thermal Oxidizer unit and a backup Candlestick Flare as emission control devices to handle these waste gasses. The air emissions associated with these control devices will include criteria air pollutants such as carbon monoxide (CO), oxides of nitrogen (NOx), oxides of sulfur (SOx), and particulate matter (PM) along with volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

Building(s): 2BTU

Item 23.3:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 3-STAGE
Emission Unit Description:

This emission unit will consist of four (4) 4SLB Caterpillar G3516 (01ENG-04ENG) and the four (4) SLB Caterpillar G3520C (15ENG-18ENG) IC gas engines connected to individual electricity generators (with an installed nameplate capacity of 9.6 MWs). The existing engines (01ENG-14ENG and 15ENG-18ENG) are currently fueled with treated landfill gas from TRMT1.
Seneca Energy is proposing to retrofit the eight (8) engine-generator sets to be natural gas-fired, and fit each stack with oxidation catalyst. Ten (10) of the existing Caterpillar G3516 engines (05ENG-14ENG), along with TRMT1, would be permanently shutdown and removed from the permit within 1-year of start-up of the new High BTU Plant (2-BTUPL).

Seneca Energy will retain the Ancillary equipment that supports the current electricity generation with no proposed changes.

a. Each of the IC engines is equipped with a stand-alone fan cooled radiator.

b. Engine radiator coolant (new and used) will be stored in separate above ground holding tanks each having a design capacity of 1,000 gallons.

c. Engine lube oil (new) is stored in separate aboveground storage tanks (ASTs) each having a design capacity of 8,000 gallons and 6,000 gallons. The used oil AST has a capacity of 2,000 gallons.

d. A 100 eKW standby emergency generator (EMG01) is

operated to supply the facility with limited temporary power for emergency lighting when utility outages occur. The diesel fired emergency generator is supplied from a 200 gallon AST.

Building(s): ENGBLDG

Condition 24: Progress Reports Due Semiannually
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)

Item 24.1:
Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 25: Operational Flexibility
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-6.4 (f)

Item 25.1:
A permit modification is not required for changes that are provided for in the permit. Such changes include approved alternate operating scenarios and changes that have been submitted and approved pursuant to an established operational flexibility protocol and the requirements of this section. Each such change cannot be a modification under any provision of Title I of the Clean Air Act or exceed, or cause the facility to exceed, an emissions cap or limitation in the permit. The facility owner or operator must incorporate all changes into any compliance certifications, record keeping, and/or reporting required by the permit.

Condition 26: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (2)

Item 26.1:
The Compliance Certification activity will be performed for the Facility.

Item 26.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Operational Flexibility Protocol

I. Protocol Objective

The objective of this condition is to enable operational flexibility at the facility by building the capability to make certain changes pursuant to this protocol into the Title V permit. As provided under 6 NYCRR Part 201-6.4(f), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.6 unless required by the Department pursuant to 201-6.4(f)(4).

II. Protocol

A. Criteria

1. Changes reviewed under this protocol shall be evaluated in accordance with the following criteria:

a. All underlying federal and state requirements with which the new or changed operation or emission source must comply must exist in the Title V permit. Existing permit conditions may be amended to reference or include the new or changed operation or emission source and any related information, and/or subject to the Department's approval, new conditions proposed, to provide the appropriate monitoring parameters.

b. Any new or changed emission source shall not be part of a source project that results in a significant net emission increase that exceeds the New Source Review (NSR) thresholds identified in 6 NYCRR Part 231.

c. The facility shall not use the protocol to make physical changes or changes in the method of operation of existing emissions sources that would require a new or modified federally enforceable emissions cap. Such changes must be addressed via the significant permit modification provisions.

B. Notification Requirements for Changes Reviewed under the Protocol

1. The facility shall notify the Department in writing of the proposed change at least 15 days in advance of making the proposed change.

2. Notifications made in accordance with this protocol

must include the following information:

a. Identification of the Title V permit emission unit, process(es), emission source(s) and emission point(s) affected by the proposed change with applicable revisions to the Emission Unit structure;

b. Description of the proposed change, including operating parameters affected;

c. Identification and description of emissions control device or technology that will be used; and

d. Documentation of the project's, or emission source's, compliance with respect to all state and/or federally applicable requirements, including the following:

i. Calculations demonstrating the emission rate potential and maximum projected annual actual emission rates for all contaminants affected by the change;

ii. Documentation demonstrating that the change is not subject to the New Source Review requirements described in 6 NYCRR Part 231;

iii. Identification and evaluation of all state and federal regulations applicable to the proposed change;

iv. A description of any additional operating and record keeping procedures necessary to ensure compliance with all applicable requirements; and

v. Any other relevant information used for the evaluation of the proposed change under this protocol.

e. Any other relevant information used for the evaluation of the proposed project or emission source under the Protocol.

C. Review and Approval of Changes

1. The Department shall respond to the permittee in writing with a determination within 15 days of receipt of the notification required by Section II.B of this protocol.

2. The Department may require a permit modification in order to impose new applicable requirements or additional permit conditions if it determines that changes proposed pursuant to the notification do not meet the criteria

under Section II. A above or that the changes may have a significant air quality impact or be otherwise potentially significant under SEQRA (6 NYCRR Part 617).

3. The Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the proposed change, which may include potential air quality impacts and/or applicable requirements. The Department's determination shall include a listing of information required for further review, if necessary.

D. Additional Compliance Obligations for Changes Made Under this Protocol

1. Upon commencement of the change, the facility shall comply with all applicable requirements and permit conditions, including any amended or proposed in accordance with II.A.1.a above.

2. The facility shall provide with the semiannual monitoring report, a summary of the changes made in accordance with this protocol and a statement of the compliance status of each. Changes reported should include all those made during the corresponding period and any earlier changes that have not yet been incorporated into the permit.

3. The facility shall include each change made pursuant to this protocol in the next application for permit modification or renewal, whichever is first. Changes made pursuant to this protocol are not subject to the permit shield provisions described in 6 NYCRR 201-6.4(g) until they are incorporated into the Title V permit.

4. The facility shall maintain a record of each change made pursuant to this protocol at the facility and shall make such records available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 27: Facility Permissible Emissions
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 27.1:
The sum of emissions from the emission units specified in this permit shall not equal or exceed the following
Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY210-00-0 PTE: 199,800 pounds per year
Name: OXIDES OF NITROGEN

Condition 28: Capping Monitoring Condition
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 28.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 227-2

Item 28.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 28.3:
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.

Item 28.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 28.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 28.6:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 28.7:
Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:

To cap out of 6NYCRR Part 227-2 NOx-RACT, total annual oxides of nitrogen (NOx) emissions from the facility are limited to 99.9 tons/year calculated on a rolling 12-month total basis (this limit comes into effect upon commencement of operation of 2-BTUPL). Total facility emissions shall represent the emissions from the following emission sources: 0ENG1-0ENG4, ENG15-ENG18, 3KFLR and 5KFLR, the thermal oxidizers (3KOXD and 5KOXD) as well as any other trivial and exempt sources of NOx.

The facility must maintain records of the metered gas combusted in the emission sources 3KFLR and 5KFLR, and the thermal oxidizers 3KOXD and 5KOXD, on a monthly basis. At the end of the month the facility must calculate the monthly emissions of NOx from gas combusted through the flares and thermal oxidizers.

Additionally, the facility must maintain records of metered gas delivered to the gas to energy facility on a monthly basis. The facility shall record daily readings of the kilowatt hours (kwhr) from the switchgear and maintain a monthly total of the actual gross electrical output from each engine (emission sources 0ENG1-0ENG4 and ENG15-ENG18) in kilowatt-hours (kWh). At the end of the month the facility must calculate the monthly emissions of NOx from the natural gas combustion at the gas to energy facility.

NOx emissions must be calculated utilizing emission rates from the manufacturer, or if testing data is not available for the flares, USEPA AP-42 emission factors may be used as provided in the permit application. Emission factors shall be multiplied by the monthly quantity of landfill gas combusted in all flares, the monthly quantity of gas usage in the thermal oxidizers, and the gross electrical output or gas usage in the engines.

When sufficient new evidence becomes available to substantiate changing any of the emission factors used to calculate the monthly NOx emissions, the Department will discuss utilizing the new emission factors with the applicant prior to the applicant using the revised emission factors.

The combined engine, flare and thermal oxidizers monthly NOx emissions, along with any trivial or exempt sources of NOx emissions, must be added to the previous 11 months of NOx emissions to give a total NOx emission rate over the most recent consecutive 12 month period. The NOx emissions over any consecutive 12 month period shall not exceed the limit below.

The facility owner or operator must maintain records of all monitoring data and supporting information used to demonstrate compliance with this monitoring condition. Records must be maintained for a period of at least five (5) years and made available to the Department upon request. Records must be kept in a format acceptable to the Department.

The facility shall submit a NOx emission cap certification report semi-annually.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: FUEL CONSUMPTION
Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 99.9 tons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 29: Statement dates for emissions statements.
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 202-2.4 (a) (3)

Item 29.1:
This facility is required to submit an annual emission statement electronically and these emissions statements must be submitted to the department as per the following schedule:

(i) March 15th of each year for facilities with three or fewer processes listed in their Title V permit:

(ii) March 31st of each year for facilities with four to six processes listed in their Title V permit:

(iii) April 15th of each year for facilities with 7 to 12 processes listed in their Title V permit:

(iv) April 30th of each year for facilities with 13 or more processes listed in their Title V permit.

Condition 30: Visible Emissions Limited
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 211.2

Item 30.1:
Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 31: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 31.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 1-BTUPL Emission Point: OXD01

Emission Unit: 2-BTUPL Emission Point: OXD02

Item 31.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of an EPA Reference Test Method 9 opacity evaluation at any time during facility operation.

The facility owner or operator shall conduct a visible emissions observation of all emission points specified by this condition weekly while the process is in operation. The facility owner or operator will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard specified below.

The facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If

visible emissions with the potential to exceed the limit specified (except the emission of uncombined water) are observed for three consecutive operating days from the same emission point, the facility owner or operator will notify the Department of the observations within one business day. The facility owner or operator will also perform an EPA Reference Test Method 9 opacity evaluation analysis of the affected emission point and submit the results to the Department.

Weekly records of the visible emissions observations, any follow-up Method 9 observations, investigations, and corrective actions taken are to be maintained on site for a period of at least five years from the date of the record. Such records shall include the date and time of each observation, weather conditions, results of the observation, corrective actions taken, and explanations for days when weather conditions were prohibitive.

All records kept pursuant to this condition must be provided to the Department upon request.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Reference Test Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 227-1.4 (a)

Item 32.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 01ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 02ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 03ENG

Emission Unit: 3-STAGE

Process: ST3 Emission Source: 04ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 15ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 16ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 17ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 18ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 01ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 02ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 03ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 04ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 05ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 06ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 07ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 08ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 09ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 10ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 11ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 12ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 13ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 14ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 15ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 16ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 17ENG

Emission Unit: 3-STAGE
Process: STP Emission Source: 18ENG

Item 32.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
No owner or operator of a stationary combustion installation subject to this Subpart shall operate an emission source which exhibits greater than 20 percent opacity (based on a six minute average), except for one 6 minute period per hour of not more than 27 percent opacity. The owner or operator will conduct a Method 9 test annually at the exhaust stack of each engine type (one CAT 3516 and one CAT 3520 IC engine) on a rotating schedule that is acceptable to the Department. The facility will submit this schedule for review by the Department within 60 days of issuance of this permit.

A report of the results of the Method 9 test will be submitted to the Department within 30 days of the completion of the Method 9 test. All records generated by the permittee must be maintained at the facility, or at an alternative location approved by the Department, for a minimum of 5 years.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: 40 CFR 60, Appendix A, Method 9
Monitoring Frequency: ANNUALLY
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 33: Applicability of Subpart A General Provisions

Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60, NSPS Subpart A

Item 33.1:
This emission source is subject to the applicable general provisions of 40 CFR 60. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

Condition 34: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.4233(f), NSPS Subpart JJJJ

Item 34.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 01ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 02ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 03ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 04ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 15ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 16ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 17ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 18ENG

Item 34.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Any natural gas engine modified after
June 12, 2006 must comply with the
emission standards as follows:

Natural Gas Engines

(non-certified)*

Emission Standards (g/bhp-hr):

Size	Manufacture Date	NOx	CO	VOC
HP>=500	Before 07/01/2007	3.0	4.0	1.0

Emission Standards (ppmvd at 15% O2):

Size	Manufacture Date	NOx	CO	VOC
HP>=500	Before 07/01/2007	250	540	86

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 35: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.4243(b)(2)(ii), NSPS Subpart JJJJ

Item 35.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 01ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 02ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 03ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 04ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 15ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 16ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 17ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 18ENG

Item 35.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The owner or operator of a stationary SI internal combustion engine greater than 500 HP must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, an initial performance test must be performed and subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance must also be conducted.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 36: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.4244, NSPS Subpart JJJJ

Item 36.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 01ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 02ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 03ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 04ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 15ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 16ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 17ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 18ENG

Item 36.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Owners and operators of stationary SI ICE who conduct performance tests must follow the procedures in paragraphs (a) through (f) of 40 CFR 60.4244, including:

- each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and according to the requirements in §60.8 and under the specific conditions that are specified by Table 2 to this subpart.

- The performance tests shall not be conducted during periods of startup, shutdown, or malfunction, as specified in §60.8(c). If the stationary SI internal combustion engine is non-operational, the facility does not need to startup the engine solely to conduct a performance test, but must conduct the performance test immediately upon startup of the engine.

- The facility shall conduct three separate test runs for each performance test required in this section, as specified in §60.8(f). Each test run must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and last at least 1 hour.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 37: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.4245(a), NSPS Subpart JJJJ

Item 37.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 01ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 02ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 03ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 04ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 15ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 16ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 17ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 18ENG

Item 37.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Owners or operators of stationary SI ICE that are subject to the provisions of 40 CFR Subpart JJJJ must meet the following notification, reporting and recordkeeping requirements.

(1) All notifications submitted to comply with this subpart and all documentation supporting any notification.

(2) Maintenance conducted on the engine.

(3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and

information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

(4) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission

standards.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 38: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.4245(c), NSPS Subpart JJJJ

Item 38.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 01ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 02ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 03ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 04ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 15ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 16ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 17ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 18ENG

Item 38.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Owners and operators of stationary SI ICE greater than or equal to 500 HP that have not been certified by an engine manufacturer to meet the emission standards in §60.4231 must submit an initial notification as required in §60.7(a)(1). The notification must include the following:

(1) Name and address of the owner or operator;
(2) The address of the affected source;
(3) Engine information including make, model, engine
(4) Emission control equipment; and
(5) Fuel used.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 39: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.4245(d), NSPS Subpart JJJJ

Item 39.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 01ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 02ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 03ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 04ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 15ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 16ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 17ENG

Emission Unit: 3-STAGE
Process: ST3 Emission Source: 18ENG

Item 39.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

****** Emission Unit Level ******

Condition 40: Emission Point Definition By Emission Unit
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 40.1:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-BTUPL

Emission Point: EMG02
Height (ft.): 8 Diameter (in.): 2
NYTMN (km.): 4753.592 NYTME (km.): 350.331 Building: BTUPLANT

Emission Point: FLR03
Height (ft.): 34 Diameter (in.): 30
NYTMN (km.): 4754.7 NYTME (km.): 349.2 Building: BTUPLANT

Emission Point: OXD01
Height (ft.): 40 Diameter (in.): 70
NYTMN (km.): 4753.592 NYTME (km.): 350.331 Building: BTUPLANT

Item 40.2:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 2-BTUPL

Emission Point: EMG03
Height (ft.): 8 Diameter (in.): 3
NYTMN (km.): 4753.592 NYTME (km.): 350.331 Building: 2BTU

Emission Point: FLR05
Height (ft.): 45 Diameter (in.): 24
NYTMN (km.): 4753.7 NYTME (km.): 349.4 Building: 2BTU

Emission Point: OXD02
Height (ft.): 60 Diameter (in.): 66
NYTMN (km.): 4753.7 NYTME (km.): 349.4 Building: 2BTU

Item 40.3:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 3-STAGE

Emission Point: EMG01
Height (ft.): 8 Diameter (in.): 3
NYTMN (km.): 4753.592 NYTME (km.): 350.331 Building: ENGBLDG

Emission Point: ENG01
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG02
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG03
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG04
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG05
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG06
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG07
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG08
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG09
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG10
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG11
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG12
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG13
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG14
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4754.222 NYTME (km.): 350.031 Building: ENGBLDG

Emission Point: ENG15
Height (ft.): 38 Diameter (in.): 15
NYTMN (km.): 4753.592 NYTME (km.): 350.331 Building: ENGBLDG

Emission Point: ENG16
Height (ft.): 38 Diameter (in.): 15
NYTMN (km.): 4753.592 NYTME (km.): 350.331 Building: ENGBLDG

Emission Point: ENG17
Height (ft.): 38 Diameter (in.): 15
NYTMN (km.): 4753.592 NYTME (km.): 350.331 Building: ENGBLDG

Emission Point: ENG18
Height (ft.): 38 Diameter (in.): 15
NYTMN (km.): 4753.592 NYTME (km.): 350.331 Building: ENGBLDG

Condition 41: Process Definition By Emission Unit
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 41.1:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-BTUPL
Process: E10 Source Classification Code: 2-02-001-02
Process Description:

Process E10 consists of an outdoor Caterpillar Model D100-6 packaged, Diesel-Fired Standby Generator Set, rated for 100 KW standby power (156.7 HP) equipped with a 200 gallon diesel fueled storage tank. The unit provides limited temporary power. The storage tank is exempt under 6NYCRR Part 201-3(c)(21).

The generator will operate no more than 250 hours per year.

Emission Source/Control: EGEN2 - Combustion
Design Capacity: 100 kilowatts

Item 41.2:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-BTUPL
Process: GAS Source Classification Code: 3-10-002-05
Process Description:
EU 1-BTUPL, Process GAS will consist of:

A landfill gas to pipeline grade natural gas conversion facility (6000 scfm High BTU Plant #1). The landfill gas (LFG) received at the High BTU Facility is delivered by Seneca Meadows Landfill. A LFG treatment system [TRMT2](initial filtration, compression, dewatering) will be utilized in accordance with 40 CFR 60.33f(c)(3) or 40 CFR 63.1959(b)(2)(iii)(C).

Components of the specified gas treatment system are not equipped with atmospheric vents. Therefore, all the LFG received and treated by the system is directed to the Emergency Open Flare (3KLR) during upset conditions, or is sent for further refining processes designed to recover the methane from the LFG (approximately 94% recovery). The product gas is sold and delivered to customers via a natural gas transmission pipeline. Waste gas from the refining processes are controlled using a Thermal Oxidizer (3KOXD).

If TRMT2 is not operating, landfill gas directed to High BTU Plant #1 will be directed back to High BTU Plant #2 or redirected back to Seneca Meadows Landfill to be controlled through the facility's flares.

Emission Source/Control: 3KFLR - Control
Control Type: FLARING

Emission Source/Control: 3KOXD - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: TRMT2 - Process

Item 41.3:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 2-BTUPL
Process: E20 Source Classification Code: 2-02-001-02
Process Description:
Process E20 will consist of one (1) Cummins Model DSGAE Package, an emergency standby generator set, rated for 200 KW (324 HP) equipped with a 376 gallon diesel fuel storage tank. The unit provides limited temporary power. The storage tank is exempt under 6NYCRR Part 201-3.2(c)(21).

The generator will operate no more than 250 hours per year.

Emission Source/Control: EGEN3 - Combustion
Design Capacity: 200 kilowatts

Item 41.4:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 2-BTUPL
Process: PL2 Source Classification Code: 3-10-002-05
Process Description:
EU 2-BTUPL, Process PL2 will consist of:

A landfill gas to pipeline grade natural gas conversion facility (High BTU Plant #2). The landfill gas (LFG) received at the High BTU Facility is delivered by Seneca Meadows Landfill. A LFG treatment system [TRMT3](initial filtration, compression, dewatering) will be utilized in accordance with 40 CFR 60.33f(c)(3) or 40 CFR 63.1959(b)(2)(iii)(C).

Components of the specified gas treatment system are not equipped with atmospheric vents. Therefore, all the LFG received and treated by the system is directed to the Emergency Open Flare (5KLR) during upset conditions, or is sent for further refining processes designed to recover the methane from the LFG (approximately 94% recovery). The product gas is sold and delivered to customers via a natural gas transmission pipeline. Waste gas from the refining processes are controlled using a Thermal Oxidizer (5KOXD).

If TRMT3 is not operating, landfill gas directed to High BTU Plant #2 will be directed to High BTU Plant #1 or redirected back to Seneca Meadows Landfill to be controlled through the facility's flares.

Emission Source/Control: 5KFLR - Control
Control Type: FLARING

Emission Source/Control: 5KOXD - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: TRMT3 - Process

Item 41.5:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 3-STAGE
Process: EMR Source Classification Code: 2-02-001-02
Process Description:

Process EMR consists of one (1) Caterpillar emergency standby generator set rated for 210 KW (359 HP), equipped with a 275 gallon diesel fuel storage tank. The unit provides limited temporary power. The storage tank is exempt under 6NYCRR Part 201-3.2(c)(21).

The emergency generator will operate no more than 250 hour/year.

Emission Source/Control: EGEN1 - Combustion
Design Capacity: 210 kilowatts

Item 41.6:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 3-STAGE
Process: ST3 Source Classification Code: 2-01-008-07
Process Description:

Process ST3 will commence once the following engine generator sets are modified to be fueled by natural gas. Process ST3 consists of:

1. Four (4) existing CAT G3516 gas IC engine generator sets modified to be fueled with Natural Gas. Each engine will have a maximum heat input rate of 8.1 MMBtu/hr LHV and use approximately 131 cfm of natural gas fuel to generate electricity. (Ten (10) of the CAT G3516s will be permanently shut down and removed from the permit no later than one year from commencement of operation of the High BTU Plant #2).

2. Four (4) existing CAT G3520C gas IC engine generator sets modified to be fueled with Natural Gas. Each engine will have a maximum heat input rate of 14.1 MMBtu/hr LHV and use approximately 227 cfm of natural gas fuel to generate electricity.

Each engine stack is equipped with an oxidation catalyst.

Emission Source/Control: 01ENG - Combustion
Design Capacity: 810 kilowatts

Emission Source/Control: 02ENG - Combustion
Design Capacity: 810 kilowatts

Emission Source/Control: 03ENG - Combustion
Design Capacity: 810 kilowatts

Emission Source/Control: 04ENG - Combustion
Design Capacity: 810 kilowatts

Emission Source/Control: 15ENG - Combustion
Design Capacity: 1,600 kilowatts

Emission Source/Control: 16ENG - Combustion
Design Capacity: 1,600 kilowatts

Emission Source/Control: 17ENG - Combustion
Design Capacity: 1,600 kilowatts

Emission Source/Control: 18ENG - Combustion
Design Capacity: 1,600 kilowatts

Emission Source/Control: CAT01 - Control
Control Type: CATALYTIC OXIDATION

Emission Source/Control: CAT02 - Control
Control Type: CATALYTIC OXIDATION

Emission Source/Control: CAT03 - Control
Control Type: CATALYTIC OXIDATION

Emission Source/Control: CAT04 - Control
Control Type: CATALYTIC OXIDATION

Emission Source/Control: CAT15 - Control
Control Type: CATALYTIC OXIDATION

Emission Source/Control: CAT16 - Control
Control Type: CATALYTIC OXIDATION

Emission Source/Control: CAT17 - Control
Control Type: CATALYTIC OXIDATION

Emission Source/Control: CAT18 - Control
Control Type: CATALYTIC OXIDATION

Item 41.7:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 3-STAGE
Process: STP Source Classification Code: 2-01-008-07
Process Description:

Process STP consists of the following engine generator sets fueled by landfill gas:

1. 14 CAT G3516 gas IC engine generator sets that have individual maximum heat input rates of 8.6 MMBtu/hr LHV. At the minimum fuel quality utilization value of 420 Btu/cf (LHV), the maximum fuel use rate of each IC engine is approximately 341 cfm.

2. 4 CAT G3520C gas IC engine generator sets that have individual maximum heat input rates of 14.67 MMBtu/hr LHV. At the minimum fuel quality utilization value of 420 Btu/cf (LHV), the maximum fuel use rate of each IC engine is approximately 580 cfm.

3. TRMT1 treats the gas according to 40 CFR 60 Subpart Cf or 40 CFR 63 Subpart AAAA.

This process will terminate within one year of commencement of the operation of Unit 2-BTUPL. The owner or operator of the facility will permanently shut down and remove from the facility ten (10) of the existing Caterpillar 3516 engines (05ENG through 14ENG) and the TRMT1 source. The engine shut downs and removals are required within 1-year of commencement of the operation of Unit 2-BTUPL.

Emission Source/Control: 01ENG - Combustion
Design Capacity: 810 kilowatts

Emission Source/Control: 02ENG - Combustion
Design Capacity: 810 kilowatts

Emission Source/Control: 03ENG - Combustion
Design Capacity: 810 kilowatts

Emission Source/Control: 04ENG - Combustion
Design Capacity: 810 kilowatts

Emission Source/Control: 05ENG - Combustion
Design Capacity: 810 kilowatts

Emission Source/Control: 06ENG - Combustion
Design Capacity: 810 kilowatts

Emission Source/Control: 07ENG - Combustion
Design Capacity: 810 kilowatts

Emission Source/Control: 08ENG - Combustion

Design Capacity: 835 kilowatts

Emission Source/Control: 09ENG - Combustion
Design Capacity: 835 kilowatts

Emission Source/Control: 10ENG - Combustion
Design Capacity: 835 kilowatts

Emission Source/Control: 11ENG - Combustion
Design Capacity: 835 kilowatts

Emission Source/Control: 12ENG - Combustion
Design Capacity: 835 kilowatts

Emission Source/Control: 13ENG - Combustion
Design Capacity: 835 kilowatts

Emission Source/Control: 14ENG - Combustion
Design Capacity: 835 kilowatts

Emission Source/Control: 15ENG - Combustion
Design Capacity: 1,600 kilowatts

Emission Source/Control: 16ENG - Combustion
Design Capacity: 1,600 kilowatts

Emission Source/Control: 17ENG - Combustion
Design Capacity: 1,600 kilowatts

Emission Source/Control: 18ENG - Combustion
Design Capacity: 1,600 kilowatts

Emission Source/Control: TRMT1 - Process

Condition 42: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60, NSPS Subpart IIII

Item 42.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-BTUPL
Process: E10 Emission Source: EGEN2

Item 42.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Standards of Performance for Stationary Compression
Ignition Internal Combustion Engines, 40 CFR Part 60,

Subpart IIII is applicable to the standby emergency generator (EGEN2) since this unit was ordered after July 11, 2005, and manufactured after April 1, 2006. [40 CFR 60.4200]. By meeting the requirements of 40 CFR 60, Subpart IIII, the units also meet the requirements found in the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ.

Below is a summary of the applicable federal 40 CFR Part 60, Subpart IIII requirements:

a. Engines shall be certified by the manufacturer as meeting the emissions standards for new nonroad compression ignition engines found in 40 CFR 60.4201(a). [40 CFR 60.4204(b) and 4211(c)]

b. The fuel fired in the engines shall not exceed 15 ppm sulfur (0.0015% sulfur). [40 CFR 60.4207(b)]

c. The engines shall be operated and maintained according to the manufacturer's emission-related written instructions. [40 CFR 60.4211(a) and (c)]

d. If the engines are equipped with a diesel particulate filter to comply with the emission standards in §60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached. [40 CFR 60.4209(b)]

e. If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3) of this section. [40 CFR 4211(f)]

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 43: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 212-1.7 (b) (5)

Item 43.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-BTUPL
Process: GAS Emission Source: 3KFLR

Item 43.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The flare will be operated according to the following:

1) The flare will be operated with the presence of a flame any time gas is vented to it. The presence of a flare pilot flame shall be continuously monitored and recorded using a thermocouple or any other equivalent device to detect the presence of a flame.

2)Flow to the flare will be continuously monitored and recorded while gas is being sent to the flare.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 44: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 44.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-BTUPL
Process: GAS Emission Source: TRMT2

Item 44.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
In accordance with 40 CFR §60.33f(c)(3) or 40 CFR §63.1959(b)(2)(iii)(C) , landfill gas collected from a MSW landfill may be either combusted in an appropriate control device or routed to a treatment system that processes the collected gas for subsequent sale or use.

Treatment is defined by EPA and the Department as compression, dewatering and filtering of particulates.

The following provides a general description of the landfill gas (LFG) treatment system used at the High BTU Plant.

The equipment for and processes that filter LFG received from the landfill for TRMT2 (prior to being pumped to the natural gas pipeline) consist of:

1. Initial Inlet Coalescing Filter:
The pressure drop across the coalescing filter vessel (difference in gas pressure between the inlet and outlet of the vessel) is continuously monitored with a differential pressure gauge. Increased differential pressure (dP) indicates that the filter is wet, loaded with particulate matter or significant accumulation of condensate is present in the vessel. The flange to flange pressure drop (i.e., pressure drop across the vessel and filter media) is estimated to be no greater than 2.0 pounds per square inch differential (psid, or approximately 50 in.w.c.). If the pressure drop across the coalescing filter is observed to be greater than 2.0 psid, the filter will be replaced and/or investigations will be performed to evaluate potential malfunctions of upstream landfill gas dewatering equipment. The replacement filters will be of comparable designed critical gas service applications where high-efficiency removal of water droplets or oil and particulate solids is required. The filter is rated for particulate matter removal to 8.0 microns.

2. 2nd Coalescing Filter:
A second coalescing filter located after the gas blowers will be designed to remove 100% of dry solid particles greater than or equal to 3 microns. 100% of all liquid droplets greater than or equal to 8 microns in diameter and 99% by mass of solid particles and liquid droplets in the range of 0.5 to 3 microns. The pressure drop across the coalescing filter vessel (difference in gas pressure between the inlet and outlet of the vessel) is monitored with a differential pressure gauge. Increased differential pressure (dP) indicates that the filter is wet, loaded with particulate matter or significant accumulation of condensate is present in the vessel. The flange to flange pressure drop is estimated to be no greater than 2.0 psid. If the pressure drop across the coalescing filter is observed to be greater than 2.0 psid, the filter will be replaced and/or investigations will be performed to evaluate potential malfunctions of upstream landfill gas dewatering equipment. The replacement filters will be of comparable designed for critical gas service applications where high-efficiency removal of water droplets or oil and

particulate solids is required.

At least once daily, the following parameter shall be checked and recorded. Records of daily readings and corrective action taken will be kept on site for 5 years (or at a location acceptable to the Department):

a. The pressure drop across each LFG treatment coalescing filter vessel shall be no greater than 2 pounds per square inch;

Whenever the high BTU Plant is in operation, all treated landfill gas that is not directed to the gas refining process, waste gas from the gas/refining processes; and off-specification product gas that cannot be sold or transferred to the pipeline, shall be controlled in the thermal oxidizer (3KOXD) or the backup open flare (3KFLR) that satisfies the operational monitoring and recordkeeping requirements of this permit.

Parameter Monitored: PRESSURE DROP
Upper Permit Limit: 2 pounds per square inch absolute
Monitoring Frequency: DAILY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 45: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 45.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-BTUPL
Process: GAS Emission Source: TRMT2

Item 45.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
In accordance with 40 CFR §60.33f(c)(3) or 40 CFR §63.1959(b)(2)(iii)(C) , landfill gas collected from a MSW landfill may be either combusted in an appropriate control device or routed to a treatment system that processes the

collected gas for subsequent sale or use.

Treatment is defined by EPA and the Department as compression, dewatering and filtering of particulates.

The following provides a general description of the landfill gas (LFG) treatment system used at the High BTU Plant.

The equipment and processes that compress the gas for TRMT2 is as follows:

1. Gas Blower Compression:
Up to seven (7) positive displacement gas blowers will increase the pressure of the filtered LFG to as high as 10 pounds per square inch gauge (psig). The gas blower discharge is monitored using a pressure gauge and a low-pressure alarm switch.

A blower outlet pressure of less than 5 psig is an indication of potential problems with the operation of the gas compression system. In these instances, an investigation of the blower(s) will be performed and corrective actions implemented.

At least once daily, the following parameter shall be checked and recorded. Records of daily readings and corrective action taken will be kept on site for 5 years (or at a location acceptable to the Department):

a. The LFG treatment blower shall be operated at a discharge pressure no less than 5 pounds per square inch (gauge).

Whenever the high BTU Plant is in operation, all treated landfill gas that is not directed to the gas refining process, waste gas from the gas/refining processes; and off-specification product gas that cannot be sold or transferred to the pipeline, shall be controlled in the thermal oxidizer (3KOXD) or the backup open flare (3KFLR) that satisfies the operational monitoring and recordkeeping requirements of this permit.

Parameter Monitored: PRESSURE
Lower Permit Limit: 5 pounds per square inch gauge
Monitoring Frequency: DAILY
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.

Subsequent reports are due every 6 calendar month(s).

Condition 46: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 46.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-BTUPL
Process: GAS Emission Source: TRMT2

Item 46.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
In accordance with 40 CFR §60.33f(c)(3) or 40 CFR §63.1959(b)(2)(iii)(C) , landfill gas collected from a MSW landfill may be either combusted in an appropriate control device or routed to a treatment system that processes the collected gas for subsequent sale or use.

Treatment is defined by EPA and the Department as compression, dewatering and filtering of particulates.

The following provides a general description of the landfill gas (LFG) treatment system used at the High BTU Plant.

The equipment and process that de-watersLFG received from the landfill for TRMT2 (prior to being pumped to the natural gas pipeline) consists of:

1. 1st After cooler- Air Cooler:
The gas temperature is increased by the gas blower and reduced by a gas-to-air cooler on the blower discharge. The gas temperature at the aftercooler outlet is monitored with a temperature switch that is located before (upstream) of the second filter vessel. The gas-to-air aftercooler on the blower discharge will maintain an exit gas temperature (filter inlet temperature) that is equal to or less than 130 degrees F. Gas temperatures measured downstream of the aftercooler (before the second filter vessel) that are greater than 130 degrees F are an indication of potential problems with the operation of the aftercooler. In these instances, an investigation of the aftercooler will be performed and corrective actions implemented.

At least once daily, the following parameter shall be checked and recorded. Records of daily readings and corrective action taken will be kept on site for 5 years (or at a location acceptable to the Department):

a. The gas temperature at the outlet of the LFG treatment aftercooler shall be no greater than 130 degrees Fahrenheit.

Whenever the high BTU Plant is in operation, all treated landfill gas that is not directed to the gas refining process, waste gas from the gas/refining processes; and off-specification product gas that cannot be sold or transferred to the pipeline, shall be controlled in the thermal oxidizer (3KOXD) or the backup open flare (3KFLR) that satisfies the operational monitoring and recordkeeping requirements of this permit.

Parameter Monitored: TEMPERATURE
Upper Permit Limit: 130 degrees Fahrenheit
Monitoring Frequency: DAILY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 47: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 47.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-BTUPL
Process: GAS Emission Source: TRMT2

Item 47.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
In accordance with 40 CFR 60.33f(c)(3) the facility is authorized to treat landfill gas produced by a municipal solid waste landfill that commenced construction, reconstruction, or modification on or before July 17, 2014.

Landfill gas (LFG) treatment as defined by USEPA is

compression, de-watering, and filtering the LFG down to at least 10 microns (which is considered treatment for the purposes of 60.752 (b) (2) (iii) (C) [Federal Register 71 FR 53272 for Proposed Rule Amendments dated September 8, 2006]). The permittee has committed to installing and maintaining equipment which filters the gas to at least 3 microns, compresses it in a positive displacement blower, cools the gas after compression in an air-to-gas aftercooler and dewaters in the two coalescing filter towers. The LFG treatment system (TRMT2) operated at Seneca Energy meets the requirements set by USEPA.

The permittee has committed to monitoring, recordkeeping and reporting demonstrating LFG treatment systems are maintained. Those requirements are located elsewhere in the permit. The thermal oxidizer (3KOXD) and open flare (3KFLR) are located downstream of the initial LFG treatment system (TRMT2). The control devices are not subject to the requirements of 40 CFR Part 60, Subpart Cf or 40 CFR Part 63, Subpart AAAA.

If the MSW landfill opts in to 40 CFR 63 Subpart AAAA during the term of this permit, the facility would be applicable to 40 CFR 63.1959(b)(2)(iii)(C) as authority to treat landfill gas produced by a municipal solid waste landfill.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 48: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 212-1.7 (b) (1)

Item 48.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-BTUPL Emission Point: OXD01
Process: GAS Emission Source: 3KOXD

Item 48.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:
Facility owners and/or operators of any emission source equipped with a thermal oxidizer, must install continuous monitors and data recorders and must monitor the exhaust gas temperature from the thermal oxidizer prior to start-up of this emission source.

Continuous monitors must be operated at all times when the associated emission control equipment is operating except during any quality assurance and routine maintenance activities. Each monitor must be operated according to the manufacturer's specifications. Alternative monitoring methods may be employed subject to department approval.

Corrective action will be taken if the temperature falls below the prescribed lower limit. The facility will maintain a record of corrective action.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1450 degrees Fahrenheit
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 1-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 49: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60, NSPS Subpart IIII

Item 49.1:
The Compliance Certification activity will be performed for:

Emission Unit: 2-BTUPL
Process: E20 Emission Source: EGEN3

Item 49.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII is applicable to the standby emergency generator (EGEN3) since this unit was ordered after July 11, 2005, and manufactured after April 1, 2006. [40 CFR 60.4200]. By meeting the requirements of 40 CFR 60, Subpart IIII, the units also meet the requirements found

in the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ.

Below is a summary of the applicable federal 40 CFR Part 60, Subpart IIII requirements:

a. Engines shall be certified by the manufacturer as meeting the emissions standards for new nonroad compression ignition engines found in 40 CFR 60.4201(a). [40 CFR 60.4204(b) and 4211(c)]

b. The fuel fired in the engines shall not exceed 15 ppm sulfur (0.0015% sulfur). [40 CFR 60.4207(b)]

c. The engines shall be operated and maintained according to the manufacturer's emission-related written instructions. [40 CFR 60.4211(a) and (c)]

d. If the engines are equipped with a diesel particulate filter to comply with the emission standards in §60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached. [40 CFR 60.4209(b)]

e. If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3) of this section. [40 CFR 4211(f)]

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 50: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 212-1.7 (b) (5)

Item 50.1:
The Compliance Certification activity will be performed for:

Emission Unit: 2-BTUPL
Process: PL2 Emission Source: 5KFLR

Item 50.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The flare will be operated according to the following:

1) The flare will be operated with the presence of a flame any time gas is vented to it. The presence of a flare pilot flame shall be continuously monitored and recorded using a thermocouple or any other equivalent device to detect the presence of a flame.

2) Flow to the flare will be continuously monitored and recorded while gas is being sent to the flare.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 51.1:
The Compliance Certification activity will be performed for:

Emission Unit: 2-BTUPL
Process: PL2 Emission Source: TRMT3

Item 51.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
In accordance with 40 CFR §60.33f(c)(3) or 40 CFR §63.1959(b)(2)(iii)(C) , landfill gas collected from a MSW landfill may be either combusted in an appropriate control device or routed to a treatment system that processes the collected gas for subsequent sale or use.

Treatment is defined by EPA and the Department as compression, dewatering and filtering of particulates.

The following provides a general description of the landfill gas (LFG) treatment system used at the High BTU Plant.

The equipment and processes that de-water the LFG received from the landfill (prior to being pumped to the natural gas pipeline) consist of:

1. After cooler- Air Cooler:
The gas temperature is increased by the gas blower and reduced by a gas-to-air cooler on the blower discharge. The gas temperature at the aftercooler outlet is monitored with a temperature switch that is located before (upstream) of the H2S removal vessels. The gas-to-air aftercooler on the blower discharge will maintain an exit gas temperature (filter inlet temperature) that is equal to or less than 130 degrees F. Gas temperatures measured downstream of the aftercooler (before the H2S removal vessels) that are greater than 130 degrees F are an indication of potential problems with the operation of the aftercooler. In these instances, an investigation of the aftercooler will be performed and corrective actions implemented.

At least once daily, the following parameter shall be checked and recorded. Records of daily readings and corrective action taken will be kept on site for 5 years (or at a location acceptable to the Department):

a. The gas temperature at the outlet of the LFG treatment aftercooler shall be no greater than 130 degrees Fahrenheit.

Whenever the High BTU Plant is in operation, all treated landfill gas that is not directed to the gas refining process, waste gas from the gas/refining processes; and off-specification product gas that cannot be sold or transferred to the pipeline, shall be controlled in the thermal oxidizer (5KOXD) or the backup open flare (5KFLR) that satisfies the operational monitoring and recordkeeping requirements of this permit.

Parameter Monitored: TEMPERATURE
Upper Permit Limit: 130 degrees Fahrenheit
Monitoring Frequency: DAILY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 52: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 52.1:
The Compliance Certification activity will be performed for:

Emission Unit: 2-BTUPL
Process: PL2 Emission Source: TRMT3

Item 52.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:

In accordance with 40 CFR §60.33f(c)(3) or 40 CFR §63.1959(b)(2)(iii)(C) , landfill gas collected from a MSW landfill may be either combusted in an appropriate control device or routed to a treatment system that processes the collected gas for subsequent sale or use.

Treatment is defined by EPA and the Department as compression, dewatering and filtering of particulates.

The following provides a general description of the landfill gas (LFG) treatment system used at the High BTU Plant.

The equipment and processes that compress the LFG received from the landfill (prior to being pumped to the natural gas pipeline) consist of:

1. Gas Blower Compression:
Up to nine (9) positive feed gas compressors will increase the pressure of the filtered LFG to as high as 10 pounds per square inch gauge (psig). The gas blower discharge is monitored using a pressure gauge and a low-pressure alarm switch.

A blower outlet pressure of less than 5 psig is an indication of potential problems with the operation of the gas compression system. In these instances, an investigation of the blower(s) will be performed and corrective actions implemented.

At least once daily, the following parameter shall be checked and recorded. Records of daily readings and corrective action taken will be kept on site for 5 years (or at a location acceptable to the Department):

a. The LFG treatment blower shall be operated at a discharge pressure no less than 5 pounds per square inch

(gauge).

Whenever the high BTU Plant is in operation, all treated landfill gas that is not directed to the gas refining process, waste gas from the gas/refining processes; and off-specification product gas that cannot be sold or transferred to the pipeline, shall be controlled in the thermal oxidizer (5KOXD) or the backup open flare (5KFLR) that satisfies the operational monitoring and recordkeeping requirements of this permit.

Parameter Monitored: PRESSURE
Lower Permit Limit: 5 pounds per square inch gauge
Monitoring Frequency: DAILY
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 53: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 53.1:
The Compliance Certification activity will be performed for:

Emission Unit: 2-BTUPL
Process: PL2 Emission Source: TRMT3

Item 53.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
In accordance with 40 CFR §60.33f(c)(3) or 40 CFR §63.1959(b)(2)(iii)(C) , landfill gas collected from a MSW landfill may be either combusted in an appropriate control device or routed to a treatment system that processes the collected gas for subsequent sale or use.

Treatment is defined by EPA and the Department as compression, dewatering and filtering of particulates.

The following provides a general description of the landfill gas (LFG) treatment system used at the High BTU Plant.

The equipment and processes that filter the LFG received from the landfill (prior to being pumped to the natural gas pipeline) consist of:

1. Initial Inlet Coalescing Filter:
The pressure drop across the coalescing filter vessel (difference in gas pressure between the inlet and outlet of the vessel) is monitored with a differential pressure gauge. Increased differential pressure (dP) indicates that the filter is wet, loaded with particulate matter or significant accumulation of condensate is present in the vessel. The flange to flange pressure drop (i.e., pressure drop across the vessel and filter media) is estimated to be no greater than 2.0 pounds per square inch differential (psid, or approximately 50 in.w.c.). If the pressure drop across the coalescing filter is observed to be greater than 2.0 psid, the filter will be replaced and/or investigations will be performed to evaluate potential malfunctions of upstream landfill gas dewatering equipment. The replacement filters will be of comparable designed critical gas service applications where high-efficiency removal of water droplets or oil and particulate solids is required. The filter is rated for particulate matter removal to 8.0 microns.

At least once daily, the following parameter shall be checked and recorded. Records of daily readings and corrective action taken will be kept on site for 5 years (or at a location acceptable to the Department):

a. The pressure drop across each LFG treatment coalescing filter vessel shall be no greater than 2 pounds per square inch.

Whenever the high BTU Plant is in operation, all treated landfill gas that is not directed to the gas refining process, waste gas from the gas/refining processes; and off-specification product gas that cannot be sold or transferred to the pipeline, shall be controlled in the thermal oxidizer (5KOXD) or the backup open flare (5KFLR) that satisfies the operational monitoring and recordkeeping requirements of this permit.

Parameter Monitored: PRESSURE DROP
Lower Permit Limit: 2 pounds per square inch absolute
Monitoring Frequency: DAILY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.

Subsequent reports are due every 6 calendar month(s).

Condition 54: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 54.1:
The Compliance Certification activity will be performed for:

Emission Unit: 2-BTUPL
Process: PL2 Emission Source: TRMT3

Item 54.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
In accordance with 40 CFR 60.33f(c)(3) the facility is authorized to treat landfill gas produced by a municipal solid waste landfill that commenced construction, reconstruction, or modification on or before July 17, 2014.

Landfill gas (LFG) treatment as defined by USEPA is compression, de-watering, and filtering the LFG down to at least 10 microns (which is considered treatment for the purposes of 60.752 (b) (2) (iii) (C)
[Federal
Register 71 FR 53272 for Proposed Rule Amendments dated September 8, 2006]). The permittee has committed to installing and maintaining equipment which filters the gas to at least 3 microns, compresses
it in a positive displacement blower, cools the gas after compression in an air-to-gas aftercooler and dewaters in the two coalescing filter towers. The LFG treatment system (TRMT3) operated at Seneca Energy meets the requirements set by USEPA.

The permittee has committed to monitoring, recordkeeping and reporting demonstrating LFG treatment systems are maintained. Those requirements are located elsewhere in the permit. The thermal oxidizer (5KOXD) and open flare (5KFLR) are located downstream of the initial LFG treatment system (TRMT3). The control devices are not subject to the requirements of 40 CFR Part 60, Subpart Cf or 40 CFR Part 63, Subpart AAAA.

If the MSW landfill opts in to 40 CFR 63 Subpart AAAA during the term of this permit, the facility would be applicable to 40 CFR 63.1959(b)(2)(iii)(C) as authority to treat landfill gas produced by a municipal solid waste

landfill.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 55: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 212-1.7 (b) (1)

Item 55.1:
The Compliance Certification activity will be performed for:

Emission Unit: 2-BTUPL Emission Point: OXD02
Process: PL2 Emission Source: 5KOXD

Item 55.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Facility owners and/or operators of any emission source equipped with a thermal oxidizer, must install continuous monitors and data recorders and must monitor the exhaust gas temperature from the thermal oxidizer prior to start-up of this emission source.

Continuous monitors must be operated at all times when the associated emission control equipment is operating except during any quality assurance and routine maintenance activities. Each monitor must be operated according to the manufacturer's specifications. Alternative monitoring methods may be employed subject to department approval.

Corrective action will be taken if the temperature falls below the prescribed lower limit. The facility will maintain a record of corrective action.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1450 degrees Fahrenheit
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 1-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.

Subsequent reports are due every 6 calendar month(s).

Condition 56: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 56.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: EMR Emission Source: EGEN1

Item 56.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Facility operates an emergency diesel generator (EGEN1) in order to supply limited temporary power during utility outages. The unit is considered exempt under 6 NYCRR 201-3.2(c). Since the emergency diesel generator was manufactured prior to June 12, 2006, is less than 500 horsepower (HP) in size, and is located at an area source of HAPs, the requirements of 40 CFR Part 63, Subpart ZZZZ applies to this emission source. Below is a summary of the requirements that the Facility must be in compliance with prior to May 3, 2013:

(1) Change oil and filter every 500 hours of operation or annually, whichever comes first;

(2) Inspect spark plugs every 1,000 hours or annually, whichever comes first;

(3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary;

(4) The emergency diesel generator must be operated and maintained according to the manufacturer's emission-related written instructions or a maintenance plan must be developed which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions;

(5) A non-resettable hour must be installed if one is not already installed;

(6) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period

needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to 40 CFR Part 63, Subpart ZZZZ apply;

(7) The Facility has the option of utilizing the oil analysis program described under 40 CFR 63.6625(i) in order to extend the specified oil change requirement described in the first bullet above; and

(8) The records described under 40 CFR 63.6655 must be maintained at the Facility.

(9) On an annual basis, the owner or operator shall submit to the DEC, in the annual compliance certification report, a statement whether the facility is in compliance with these requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 57: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60, NSPS Subpart JJJJ

Item 57.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: ST3

Item 57.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The Caterpillar G3516s & G3520s will be subject to 40 CFR 63, Subpart ZZZZ–National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The generators are subject to this subpart because that are stationary reciprocating internal combustion engines located at an area source of HAP emissions and do not meet any of the exemption criteria under 40 CFR 63.6585. The generators meet the requirements of this subpart by meeting the requirements of 40 CFR 60, Subpart JJJJ.

In accordance with 40 CFR 60, Subpart JJJJ–Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, owners and operators of any modified or reconstructed stationary SI ICE subject to this subpart must meet the requirements as specified in:

§ 60.4230(a)(5) - Owners and operators of stationary SI ICE that are modified or reconstructed after June 12, 2006, and any person that modifies or reconstructs any stationary SI ICE after June 12, 2006.

§ 60.4233(f) - Owners and operators of any modified or reconstructed stationary SI ICE subject to this subpart must meet the requirements as specified in paragraphs (f)(1) through (5) of this section.

§ 60.4234 - Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in §60.4233 over the entire life of the engine.

§ 60.4243(g) - It is expected that air-to-fuel ratio controllers will be used with the operation of three-way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

§ 60.4344 - Owners and operators of stationary SI ICE who conduct performance tests must follow the procedures in paragraphs (a) through (f) of this section.

§ 60.4245 - Owners and operators of stationary SI ICE greater than or equal to 500 HP that have not been certified by an engine manufacturer to meet the emission standards in § 60.4231 must submit an initial notification as required in § 60.7(a)(1). The notification must include the information in paragraphs (c)(1) through (5) of this section.

(1) Name and address of the owner or operator;
(2) The address of the affected source;
(3) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;
(4) Emission control equipment; and
(5) Fuel used.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 58: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.4230(a)(4)(i), NSPS Subpart JJJJ

Item 58.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: ST3

Item 58.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The EPA has promulgated Standards for Performance for Stationary Spark Ignition Combustion Engines, found at 40 CFR 60, Subpart JJJJ. Owners and operators of non-emergency engines are subject to various applicable requirements.

(1) The owner or operator shall comply with the emission standards of 40 CFR 60.4233, as applicable.

(2) The owner or operator shall meet the emissions standards for the life of the engine pursuant to 40 CFR 60.4234.

(3) The owner or operator shall comply with the deadline for importing or installing previous model year engines pursuant to 40 CFR 60.4236, as applicable.

(4) The owner or operator shall comply with the compliance requirements of 40 CFR 60.4243, as required.

(5) The owner or operator shall comply with the testing requirements pursuant to 40 CFR 60.4244, as applicable.

(6) The owner or operator shall comply with the notification requirements of 40 CFR 60.4245, as applicable.

(7) The owner or operator shall comply with the applicable general provisions as specified in 40 CFR 60.4246.

(8) The owner or operator shall determine the

applicability of 40 CFR Part 60, Subpart JJJJ for each reciprocating internal combustion engine. The owner or operator shall develop procedures to determine applicability, and assure compliance, for new purchases, modified, reconstructed and replacements of internal combustion engines at the facility.

(9) On an annual basis, the owner or operator shall submit to the DEC, in the annual compliance certification report, a statement whether the facility is in compliance with these requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 59: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 200.6

Item 59.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: STP

Regulated Contaminant(s):
CAS No: 000630-08-0 CARBON MONOXIDE

Item 59.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
he sum of emissions of carbon monoxide from the facility are limited to 522.9 tons/year calculated on a rolling total month total during the construction period of the second High BTU facility. This limit ensures that National Ambient Air Standards are not exceeded. In order to show compliance with these standards, the facility is required to perform the following periodic monitoring for carbon monoxide (CO) emissions in the exhaust stacks of the 14-CAT 3516 internal combustion (IC) engines (emission sources 01ENG-14ENG) and the 4-CAT 3520 internal IC engines (emission sources 15ENG-18ENG) fueled by landfill gas:

1. CO emissions shall be measured monthly, at a stack location acceptable to the Department, while the engine is operating at base load (base load is a normal operating load) using a properly calibrated portable gas analyzer approved for use by the Department.

2. The CO measurement will consist of the average of three instantaneous concentration readings that are obtained over a 3 minute period.

3. The first of the three CO concentration readings will start after the portable analyzer has sampled engine exhaust for at least one (1) minute.

4. The second and third CO concentration readings will occur at consecutive 1 minute intervals.

5. The three CO concentration readings will be recorded and their average calculated.

6. The calculated average will be the CO measurement for that month and must not exceed the permitted emission rate of the engines. A threshold for CO (ppm) will be established based on the permitted emission factor of the engines (2.17 g/bHp-hr) and the measured exhaust stack conditions from the most recent performance test.

If the threshold is exceeded, the permittee shall take corrective action as soon as possible, but not later than 5 days after detection, and shall retake the CO measurement as outlined above within 24 hours of taking corrective action.

If corrective action taken does not bring the reading back into compliance with this limit, a new stack test shall be scheduled within 60 days of the initial reading in order to verify that the current operating conditions can meet the permitted emission rate of the engines.

If the corrective actions are taken as specified in this Condition, the monitored exceedance is not a violation of the permit operational requirements, however, the permittee shall report these episodes as deviations on the annual compliance certification and the semi-annual monitoring report that cover the monitoring period when the deviations occurred.

The owner or operator of the facility will permanently shut down and remove from the facility ten (10) of the existing Caterpillar G3516 engines (05ENG through 14ENG) and the TRMT1 source. The engine shut downs and removals

are required within 1-year of commencement of operation of Emission Unit 2-BTUPL. The limit of 522.9 tons/year will expire within one year of commencement of operation of 2-BTUPL. The facility will be major for carbon monoxide at less than 250 tons/year and therefore will not require a limit.

Parameter Monitored: CARBON MONOXIDE
Upper Permit Limit: 2.17 grams per brake horsepower-hour
Reference Test Method: Handheld CO monitor
Monitoring Frequency: MONTHLY
Averaging Method: 3-MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 60: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 200.6

Item 60.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: STP

Regulated Contaminant(s):
CAS No: 000630-08-0 CARBON MONOXIDE

Item 60.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
The facility must show that they are in compliance with the 522.9 tons/yr limit for carbon monoxide during the construction period of the second High BTU plant. An emission test using 40CFR60 APP A-10 must be completed on each engine type (one CAT 3516 and one CAT 3520 IC engine) determined by the Department. The Department will base its decision on the NOx and CO emission rates as determined by the portable NOx/CO analyzer prior to the emissions test (the CO and NOx readings shall be taken on the same engine, consecutively, without any adjustment to the engine). The facility is required to show compliance with the 2.17 grams per brakehorsepowe emission rate for carbon monoxide established in the previous permit (REN 2) of this facility.

An emissions test for the 01ENG through ENG18 running on landfill gas must be completed no later than 5 years from the previous stack test.

The owner or operator of the facility will permanently shut down and remove from the facility ten (10) of the existing Caterpillar G3516 engines (05ENG through 14ENG) and the TRMT1 source. The engine shut downs and removals are required within 1-year of commencement of operation of Emission Unit 2-BTUPL. The limit of 522.9 tons/year will expire within one year of commencement of operation of 2-BTUPL. The facility will be major for carbon monoxide at less than 250 tons/year and therefore will not require a limit.

Upper Permit Limit: 2.17 grams per brake horsepower-hour
Reference Test Method: 40 CFR 60 APP A-10
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 61: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 227-2.4 (f) (2)

Item 61.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: STP

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 61.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
In order to show compliance with the NOx RACT standard of sources firing landfill gas of 2.0 grams per brake horsepower-hour, the facility is required to perform the following periodic monitoring for oxides of nitrogen (NOx) emissions in the exhaust stacks of the 14-CAT 3516 internal combustion (IC) engines (emission sources 01ENG-14ENG) and the 4-CAT 3520 internal combustion (IC)

engines (emission sources 15ENG-18ENG) being fueled by landfill gas:

1. NOx emissions shall be measured monthly, at a stack location acceptable to the Department, while the engine is operating at base load (base load is a normal operating load) using a properly calibrated portable gas analyzer approved for use by the Department.

2. The NOx measurement will consist of the average of three instantaneous concentration readings that are obtained over a 3 minute period.

3. The first of the three NOx concentration readings will start after the portable analyzer has sampled engine exhaust for at least one (1) minute.

4. The second and third NOx concentration readings will occur at consecutive 1 minute intervals.

5. The three NOx concentration readings will be recorded and their average calculated.

6. The calculated average will be the NOx measurement for that month and must not exceed the permitted emission rate of the engines. A threshold for NOx (ppm) will be established based on the permitted emission factor of the engines and the measured exhaust stack conditions from the most recent performance test.

If the concentration is greater than 110% of the threshold, the permittee shall take corrective action as soon as possible, but not later than 5 days after detection, and shall retake the NOx measurement as outlined above within 24 hours of taking corrective action.

If corrective action taken does not bring the reading back into compliance with this limit, a new stack test shall be scheduled within 60 days of the initial reading in order to verify that the current operating conditions can meet the permitted emission rate of the engines.

If the corrective actions are taken as specified in this Condition, the monitored exceedance is not a violation of the permit operational requirements, however, the permittee shall report these episodes as deviations on the annual compliance certification and the semi-annual monitoring report that cover the monitoring period when the deviations occurred.

This condition will end once the specified engines have

been converted to natural gas and the rest of the engines have been removed.

Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 2.0 grams per brake horsepower-hour
Reference Test Method: Handheld NOx monitor
Monitoring Frequency: MONTHLY
Averaging Method: 3-MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 62: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:6 NYCRR 227-2.6 (c)

Item 62.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: STP

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 62.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
In order to show compliance with the NOx RACT standard of sources firing landfill gas of 2.0 grams per brake horsepower-hour, the facility is required to conduct an emission test under 6NYCRR Part 227-2.6(a)(7). Those engines subject to the more frequent testing requirement of 40 CFR 60 Subpart JJJJ may satisfy this condition. In accordance with this requirement, the facility must:

1) submit a compliance test protocol to the Department for approval at least 30 days prior to emission testing. The conditions of the testing and the locations of the sampling devices must be acceptable to the Department; and

2) utilize the procedures set forth in 40 CFR Part 60, Appendix A or any other method acceptable to the Department and the Administrator for determining compliance with the NOx limit of 2.0 grams per brake horsepower-hour, and must, in addition, follow the procedures set forth in 6NYCRR Part 202 as follows:

For stationary internal combustion engines, utilize Method 7, 7E, or 19 from 40 CFR Part 60, Appendix A or another reference method approved by the Department;

3) submit a compliance test report containing the results of the emission test to the Department no later than 60 days after completion of the emission test.

The facility must conduct the required emissions test at 100% +/- 10% load on one (1) of the fourteen (14) identical permitted CAT3516 IC engines and one (1) of the four (4) identical permitted CAT 3520 IC engines in Emission Unit 3-STAGE. The Department will base its decision on which engine requires testing using the NOx and CO emission rates as determined by the portable NOx/CO analyzer prior to the emissions test (the CO and NOx readings shall be taken on the same engine, consecutively, without any adjustment to the engine).

The initial testing shall be completed within 180 days of permit issuance for new engines (or engine startup, whichever is later), and once every 5 years thereafter for existing (from the date of the last performance test) and new engines.

If a current engine is replaced, the facility must contact the Department, and the Department reserves the right to require a performance test for the replacement engine.

This condition will end when the specified engines have been converted to natural gas and the remaining engines have been removed.

Upper Permit Limit: 2.0 grams per brake horsepower-hour
Reference Test Method: EPA Method 7, 7E or 19
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 63: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.4230(a)(4)(i), NSPS Subpart JJJJ

Item 63.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: STP

Item 63.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The EPA has promulgated Standards for Performance for Stationary Spark Ignition Combustion Engines, found at 40 CFR 60, Subpart JJJJ. Owners and operators of non-emergency engines are subject to various applicable requirements.

(1) The owner or operator shall comply with the emission standards of 40 CFR 60.4233, as applicable.

(2) The owner or operator shall meet the emissions standards for the life of the engine pursuant to 40 CFR 60.4234.

(3) The owner or operator shall comply with the deadline for importing or installing previous model year engines pursuant to 40 CFR 60.4236, as applicable.

(4) The owner or operator shall comply with the compliance requirements of 40 CFR 60.4243, as required.

(5) The owner or operator shall comply with the testing requirements pursuant to 40 CFR 60.4244, as applicable.

(6) The owner or operator shall comply with the notification requirements of 40 CFR 60.4245, as applicable.

(7) The owner or operator shall comply with the applicable general provisions as specified in 40 CFR 60.4246.

(8) The owner or operator shall determine the applicability of 40 CFR Part 60, Subpart JJJJ for each reciprocating internal combustion engine. The owner or operator shall develop procedures to determine applicability, and assure compliance, for new purchases, modified, reconstructed and replacements of internal combustion engines at the facility.

(9) On an annual basis, the owner or operator shall submit to the DEC, in the annual compliance certification report, a statement whether the facility is in compliance with these requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 64: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 64.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: STP

Item 64.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

A stationary reciprocating internal combustion engine (RICE) located at an area source of HAP emissions is new if construction or reconstruction commenced on or after June 12, 2006.

New or reconstructed stationary RICE located at an area source, must meet the requirements of this part by meeting the requirements of 40 CFR Part 60 Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

Those IC engines constructed prior to June 12, 2006 are subject to the requirements of 40 CFR 63 Subpart ZZZZ since they are landfill gas engines > 500 HP located at an area source of HAPs. Below is a summary of the requirements that the Facility must be in compliance with prior to October 19, 2013:

(1) Change oil and filter every 1,440 hours of operation or annually, whichever comes first;

(2) Inspect spark plugs every 1,440 hours or annually, whichever comes first;

(3) Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary;

(4) The engines must be operated and maintained according to the manufacturer’s emission-related written

instructions or a maintenance plan must be developed which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions;

(5) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to 40 CFR Part 63, Subpart ZZZZ apply;

(6) The Facility has the option of utilizing the oil analysis program described under 40 CFR 63.6625(j) in order to extend the specified oil change requirement described in the first bullet above; and

(7) The records described under 40 CFR 63.6655 must be maintained at the Facility.

(8) The owner or operator shall determine the applicability of 40 CFR Part 63, Subpart ZZZZ for each reciprocating internal combustion engine. The owner or operator shall develop procedures to determine applicability, and assure compliance, for new purchases, modified, reconstructed and replacements of internal combustion engines at the facility.

(9) On an annual basis, the owner or operator shall submit to the DEC, in the annual compliance certification report, a statement whether the facility is in compliance with these requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 65: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 65.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE

Process: STP Emission Source: TRMT1

Item 65.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
In accordance with 40 CFR §60.33f(c)(3) or 40 CFR §63.1959(b)(2)(iii)(C) , landfill gas collected from a MSW landfill may be either combusted in an appropriate control device or routed to a treatment system that processes the collected gas for subsequent sale or use.

Treatment is defined by EPA and the Department as compression, dewatering and filtering of particulates.

The following provides a general description of the landfill gas (LFG) treatment system used at the Engine Facility.

The equipment and processes that treat (de-water, filter and compress) LFG received from the landfill (prior to its combustion as fuel in the IC engines) consist of:

1. An initial inlet filter, which is used to remove liquid aerosols and solid particulates from the gas;
2. Gas blowers, which are used to compress the gas to a required pressure;
3. A water-to-gas cooler (heat exchanger), which will be used to reduce the elevated temperatures of LFG received from the compressor;
4. A second filter, which is used to remove liquid aerosols and solid particulates from the gas;
5. A glycol scrubber (closed system with no atmospheric vents), which is used to remove moisture and other impurities from the gas; and
6. A third (and final) filter, which is used to remove liquid aerosols and solid particulates from the gas.

Components of the specified gas treatment system are not equipped with atmospheric vents. Therefore, all of the LFG received by the system is directed to the IC engines for use as a fuel.

The following is a description of the dewatering system:

Water-to-gas cooler outlet temperature: The temperature

of the gas in the treatment system is continuously monitored with a temperature switch that is located before (upstream) of the second filter vessel.

The landfill gas treatment system (water-to-gas cooler) should be operated so that the maximum temperature observed at the specified monitoring location is equal to or less than 45°F. Gas temperatures measured before the second filter vessel that are greater than 45°F are an indication of problems with the operation of the water-to-gas cooler.

If the temperature of the gas in the treatment system monitored after the polishing filter vessel is greater than 45°F, an investigation of the water-to-gas cooler will be performed and corrective actions implemented.

The facility will record the temperature of the water-to-gas cooling system monitoring location daily. Records of daily readings and corrective actions taken will be kept on site (or at a location acceptable to the Department).

Parameter Monitored: TEMPERATURE
Upper Permit Limit: 45 degrees Fahrenheit
Monitoring Frequency: DAILY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 66: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 66.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: STP Emission Source: TRMT1

Item 66.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
In accordance with 40 CFR §60.33f(c)(3) or 40 CFR

§63.1959(b)(2)(iii)(C) , landfill gas collected from a MSW landfill may be either combusted in an appropriate control device or routed to a treatment system that processes the collected gas for subsequent sale or use.

Treatment is defined by EPA and the Department as compression, dewatering and filtering of particulates.

The following provides a general description of the landfill gas (LFG) treatment system used at the Engine Facility.

The equipment and processes that treat (de-water, filter and compress) LFG received from the landfill (prior to its combustion as fuel in the IC engines) consist of:

1. An initial inlet filter, which is used to remove liquid aerosols and solid particulates from the gas;
2. Gas blowers, which are used to compress the gas to a required pressure;
3. A water-to-gas cooler (heat exchanger), which will be used to reduce the elevated temperatures of LFG received from the compressor;
4. A second filter, which is used to remove liquid aerosols and solid particulates from the gas;
5. A glycol scrubber (closed system with no atmospheric vents), which is used to remove moisture and other impurities from the gas; and
6. A third (and final) filter, which is used to remove liquid aerosols and solid particulates from the gas.

Components of the specified gas treatment system are not equipped with atmospheric vents. Therefore, all of the LFG received by the system is directed to the IC engines for use as a fuel.

This condition is for the compression of the gas as follows:

Blower discharge pressure (gas compression): The pressure of the gas in the treatment system is continuously monitored with a pressure switch that is located before (upstream) of the water-to-gas cooler.

The landfill gas treatment system (blower) should be operated so that the minimum pressure observed at the specified monitoring location is at least 1.5 pounds per square inch gauge (psig). Pressures measured before the water-to-gas cooler that are less than 1.5 psig

are an indication of problems with the gas compression system.

If the pressure of the gas in the treatment system monitored before the water-to-gas cooler is less than 1.5 psig, an investigation of the equipment will be performed and corrective actions implemented.

The facility will monitor the pressure at Blower discharge monitoring location once daily. Records will be kept for daily readings and corrective action taken at the facility (or a location acceptable to the Department).

Parameter Monitored: PRESSURE
Lower Permit Limit: 1.5 pounds per square inch gauge
Monitoring Frequency: DAILY
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 67: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 67.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: STP Emission Source: TRMT1

Item 67.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
In accordance with 40 CFR §60.33f(c)(3) or 40 CFR §63.1959(b)(2)(iii)(C) , landfill gas collected from a MSW landfill may be either combusted in an appropriate control device or routed to a treatment system that processes the collected gas for subsequent sale or use.

Treatment is defined by EPA and the Department as compression, dewatering and filtering of particulates.

The following provides a general description of the landfill gas (LFG) treatment system used at the Engine Facility.

The equipment and processes that filter the LFG received from the landfill (prior to its combustion as fuel in the IC engines) consist of:

1. An initial inlet filter, which is used to remove liquid aerosols and solid particulates from the gas;
2. A second filter, which is used to remove liquid aerosols and solid particulates from the gas;
3. A third (and final) filter, which is used to remove liquid aerosols and solid particulates from the gas.

Components of the specified gas treatment system are not equipped with atmospheric vents. Therefore, all of the LFG received by the system is directed to the IC engines for use as a fuel.

The description of the filtering components are as follows:

1. Initial (primary) filter vessel vacuum pressure: The pressure on the vacuum side of the gas mover (inlet of the gas flow through the vessel) is continuously monitored with a pressure switch. The existence of elevated pressures indicates that the filter is wet, loaded with particulate matter or significant accumulation of condensate is present in the vessel. The pressure at the primary coalescing filter (vacuum side of blower) should be equal to or less than 20 inches of water.

The primary filter typically operates without any noticeable condensate accumulation (no water is typically present in the vessel).

If the vacuum pressure drop at the primary coalescing filter is observed to be greater than 20 inches of water, the filter will be replaced and/or investigations will be performed to evaluate potential malfunctions of upstream landfill gas dewatering equipment.

The replacement filters will be of comparable designed for critical air or gas service applications where high-efficiency removal of oil or water droplets and particulate solids is required. The primary filter is rated for particulate matter removal to 5.0 microns.

2. Second filter vessel differential pressure: The pressure drop across the second coalescing filter (inlet

and outlet of the gas flow through the vessel) is continuously monitored with a pressure differential switch.
Large differential pressures (dP) indicate that the filter is wet or loaded with particulate matter and should be replaced. The dP at the second filter (pressure side of blower and downstream of gas cooler) should be equal to or less than 2.0 pounds per square inch differential (psid).

If the pressure drop across the polishing coalescing filter is greater than 2.0 psid, the filter will be replaced and/or investigations will be performed to evaluate potential malfunctions of upstream landfill gas dewatering equipment.

The replacement filters will be of comparable designed for critical air or gas service applications where high-efficiency removal of oil or water droplets and particulate solids is required. The second filter is rated for particulate matter removal to 1.0 micron.

3.Third (polishing) filter vessel differential pressure:
The pressure drop across the polishing coalescing filter (inlet and outlet of the gas flow through the vessel) is continuously monitored with a pressure differential switch. Large differential pressures (dP) indicate that the filter is wet or loaded with particulate matter and should be replaced. The dP at the polishing filter (pressure side of blower and downstream of the gas cooler) should be equal to or less than 2.0 psid.

If the pressure drop across the polishing coalescing filter is greater than 2.0 psid, the filter will be replaced and/or investigations will be performed to evaluate potential malfunctions of upstream landfill gas dewatering equipment.

The replacement filters will be of comparable designed for critical air or gas service applications where high-efficiency removal of oil or water droplets and particulate solids is required. The polishing filter is rated for particulate matter removal to 0.1 micron.

This condition is for the Initial (primary) filter vessel vacuum pressure. The facility will monitor the pressure once daily. Records will be kept for daily readings and corrective action taken at the facility (or a location acceptable to the Department).

Parameter Monitored: PRESSURE
Upper Permit Limit: 20 inches of water
Monitoring Frequency: DAILY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 68: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 68.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: STP Emission Source: TRMT1

Item 68.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
In accordance with 40 CFR §60.33f(c)(3) or 40 CFR §63.1959(b)(2)(iii)(C) , landfill gas collected from a MSW landfill may be either combusted in an appropriate control device or routed to a treatment system that processes the collected gas for subsequent sale or use.

Treatment is defined by EPA and the Department as compression, dewatering and filtering of particulates.

The following provides a general description of the landfill gas (LFG) treatment system used at the Engine Facility.

The equipment and processes that filter the LFG received from the landfill (prior to its combustion as fuel in the IC engines) consist of:

1. An initial inlet filter, which is used to remove liquid aerosols and solid particulates from the gas;
2. A second filter, which is used to remove liquid aerosols and solid particulates from the gas;

3. A third (and final) filter, which is used to remove liquid aerosols and solid particulates from the gas.

Components of the specified gas treatment system are not equipped with atmospheric vents. Therefore, all of the LFG received by the system is directed to the IC engines for use as a fuel.

The description for the filtering components is as follows:

1. Initial (primary) filter vessel vacuum pressure: The pressure on the vacuum side of the gas mover (inlet of the gas flow through the vessel) is continuously monitored with a pressure switch. The existence of elevated pressures indicates that the filter is wet, loaded with particulate matter or significant accumulation of condensate is present in the vessel. The pressure at the primary coalescing filter (vacuum side of blower) should be equal to or less than 20 inches of water.

The primary filter typically operates without any noticeable condensate accumulation (no water is typically present in the vessel).

If the vacuum pressure drop at the primary coalescing filter is observed to be greater than 20 inches of water, the filter will be replaced and/or investigations will be performed to evaluate potential malfunctions of upstream landfill gas dewatering equipment.

The replacement filters will be of comparable designed for critical air or gas service applications where high-efficiency removal of oil or water droplets and particulate solids is required. The primary filter is rated for particulate matter removal to 5.0 microns.

2. Second filter vessel differential pressure: The pressure drop across the second coalescing filter (inlet and outlet of the gas flow through the vessel) is continuously monitored with a pressure differential switch. Large differential pressures (dP) indicate that the filter is wet or loaded with particulate matter and should be replaced. The dP at the second filter (pressure side of blower and downstream of gas cooler) should be equal to or less than 2.0 pounds per square inch differential (psid).

If the pressure drop across the polishing coalescing filter is greater than 2.0 psid, the filter will be

replaced and/or investigations will be performed to evaluate potential malfunctions of upstream landfill gas dewatering equipment.

The replacement filters will be of comparable designed for critical air or gas service applications where high-efficiency removal of oil or water droplets and particulate solids is required. The second filter is rated for particulate matter removal to 1.0 micron.

3. Third (polishing) filter vessel differential pressure: The pressure drop across the polishing coalescing filter (inlet and outlet of the gas flow through the vessel) is continuously monitored with a pressure differential switch. Large differential pressures (dP) indicate that the filter is wet or loaded with particulate matter and should be replaced. The dP at the polishing filter (pressure side of blower and downstream of the gas cooler) should be equal to or less than 2.0 psid.

If the pressure drop across the polishing coalescing filter is greater than 2.0 psid, the filter will be replaced and/or investigations will be performed to evaluate potential malfunctions of upstream landfill gas dewatering equipment.

The replacement filters will be of comparable designed for critical air or gas service applications where high-efficiency removal of oil or water droplets and particulate solids is required. The polishing filter is rated for particulate matter removal to 0.1 micron.

This condition is for the Second filter vessel differential pressure and the Third (polishing) filter vessel differential pressure . The facility will monitor the pressure at each vessel once daily. Records will be kept for daily readings and corrective action taken at the facility (or a location acceptable to the Department).

Parameter Monitored: PRESSURE DROP
Upper Permit Limit: 2 pounds per square inch absolute
Monitoring Frequency: DAILY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 69: Compliance Certification
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable Federal Requirement:40CFR 60.33f(c)(3), NSPS Subpart Cf

Item 69.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-STAGE
Process: STP Emission Source: TRMT1

Item 69.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
In accordance with 40 CFR 60.33f(c)(3) the facility is authorized to treat landfill gas produced by a municipal solid waste landfill that commenced construction, reconstruction, or modification on or before July 17, 2014.

Landfill gas (LFG) treatment as defined by USEPA is compression, de-watering, and filtering the LFG down to at least 10 microns (which is considered treatment for the purposes of 60.752 (b) (2) (iii) (C) [Federal Register 71 FR 53272 for Proposed Rule Amendments dated September 8, 2006]). The permittee has committed to installing and maintaining equipment which filters the gas to at least 3 microns, compresses it in a positive displacement blower, cools the gas after compression in an air-to-gas aftercooler and dewaters in the two coalescing filter towers. The LFG treatment system (TRMT1) operated at Seneca Energy meets the requirements set by USEPA.

The permittee has committed to monitoring, recordkeeping and reporting demonstrating LFG treatment systems are maintained. Those requirements are located elsewhere in the permit. The engines (ENG01-ENG18) are located downstream of the initial LFG treatment system (TRMT1). The combustion engines are not subject to the requirements of 40 CFR Part 60, Subpart Cf or 40 CFR Part 63, Subpart AAAA.

If the MSW landfill opts in to 40 CFR 63 Subpart AAAA during the term of this permit, the facility would be applicable to 40 CFR 63.1959(b)(2)(iii)(C) as authority to treat landfill gas produced by a municipal solid waste landfill.

Furthermore, this requirement will end within one year of commencement of Emission Unit 2-BTUPL in which ENG01 through ENG04 and ENG15 through ENG18 will be converted to fire natural gas. ENG05 through ENG14 will continue to require TRMT1 until such time landfill gas is no longer being fired through these sources and these sources will cease to operate no later than one year of commencement of Emission Unit 2-BTUPL.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

STATE ONLY ENFORCEABLE CONDITIONS
**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined in 6 NYCRR 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 demonstrate, 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 facility was being properly operated and maintained;
(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction provision contained in any applicable requirement.

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.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 70: Contaminant List
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable State Requirement:ECL 19-0301

Item 70.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000050-00-0
Name: FORMALDEHYDE

CAS No: 000630-08-0
Name: CARBON MONOXIDE

CAS No: 0NY210-00-0
Name: OXIDES OF NITROGEN

Condition 71: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable State Requirement:6 NYCRR 201-1.4

Item 71.1:
(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 72: Compliance Demonstration
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable State Requirement:6 NYCRR 201-6.5 (a)

Item 72.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 72.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
By January 1, 2040, the four (4) Caterpillar 3516 and the four (4) 3520 natural gas fired IC engines shall no longer be used to generate electricity.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

****** Emission Unit Level ******

Condition 73: Compliance Demonstration
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable State Requirement:6 NYCRR 201-6.5 (a)

Item 73.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 3-STAGE
Process: ST3

Regulated Contaminant(s):
CAS No: 000050-00-0 FORMALDEHYDE

Item 73.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
The sum of emissions of formaldehyde from this facility are limited to 9.9 tons/year calculated on a rolling 12 month total. This limit ensures that that the facility meets the reduction in HAP specified in the facility's CLCPA analysis. The facility shall calculate monthly carbon monoxide emissions (as a surrogate) from engines 01ENG through 04ENG and 15ENG through 18ENG using daily individual bHp production data calculated based on the amount of gross electricity that is generated by each engine. Carbon monoxide (CO) emissions must be calculated utilizing emission rates from the most recent approved stack testing results, or in the absence of approved results from the Department, USEPA AP-42 or manufacturer's emission factors may be used as provided in the permit application. Emission factors will be multiplied by the monthly quantity of natural gas combusted in the engines, or the gross electrical output from the engines. (Results of monthly instantaneous carbon monoxide monitoring will be used to confirm proper operation of the engines and the accuracy of the emission factors). The facility shall keep these records in a format acceptable to the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: ELECTRICAL LOAD OUTPUT
Parameter Monitored: ELECTRICAL LOAD OUTPUT
Upper Permit Limit: 9.9 tons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 74: Compliance Demonstration
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable State Requirement:6 NYCRR 201-6.5 (a)

Item 74.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 3-STAGE
Process: ST3

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 74.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
In order to show compliance with the NOx cap for the facility of less than 99.9 tons per year, based on an emission factor of 0.50 grams per brake horsepower-hour for the internal combustion engines, the facility is required to perform the following periodic monitoring for oxides of nitrogen (NOx) emissions in the exhaust stacks of the 4-CAT 3516 internal combustion (IC) engines (emission sources 01ENG-04ENG) and the 4-CAT 3520 internal combustion (IC) engines (emission sources 15ENG-18ENG):

1. NOx emissions shall be measured monthly, at a stack location acceptable to the Department, while the engine is operating at base load (base load is a normal operating load) using a properly calibrated portable gas analyzer approved for use by the Department.

2. The NOx measurement will consist of the average of three instantaneous concentration readings that are obtained over a 3 minute period.

3. The first of the three NOx concentration readings will start after the portable analyzer has sampled engine exhaust for at least one (1) minute.

4. The second and third NOx concentration readings will occur at consecutive 1 minute intervals.

5. The three NOx concentration readings will be recorded and their average calculated.

6. The calculated average will be the NOx measurement for that month and must not exceed the permitted emission rate of the engines. A threshold for NOx (ppm) will be established based on the permitted emission factor of the engines and the measured exhaust stack conditions from the most recent performance test.

If the concentration is greater than 110% of the threshold, the permittee shall take corrective action as soon as possible, but not later than 5 days after detection, and shall retake the NOx measurement as outlined above within 24 hours of taking corrective action.

If corrective action taken does not bring the reading back into compliance with this limit, a new stack test shall be scheduled within 60 days of the initial reading in order to verify that the current operating conditions can meet the permitted emission rate of the engines.

If the corrective actions are taken as specified in this Condition, the monitored exceedance is not a violation of the permit operational requirements, however, the permittee shall report these episodes as deviations on the annual compliance certification and the semi-annual monitoring report that cover the monitoring period when the deviations occurred.

Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 0.5 grams per brake horsepower-hour
Reference Test Method: Handheld NOx monitor
Monitoring Frequency: MONTHLY
Averaging Method: 3-MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 75: Compliance Demonstration
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable State Requirement:6 NYCRR 201-6.5 (a)

Item 75.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 3-STAGE
Process: ST3

Regulated Contaminant(s):
CAS No: 000630-08-0 CARBON MONOXIDE

Item 75.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Consistent with the reduction in HAP emissions specified in the CLCPA Section 7(3) Analysis submitted as part of the Renewal/modification application, total facility formaldehyde emissions are limited to 9.9 tons/year on a 12-month rolling basis. This limit is met through use of the oxidation catalysts on each of the engines. To demonstrate on-going compliance, the facility will ensure the oxidation catalysts and engines are operating properly through meeting the periodic monitoring requirements for carbon monoxide specified below.

The facility is required to perform the following periodic monitoring for carbon monoxide (CO) emissions in the exhaust stacks of the 4-CAT 3516 internal combustion (IC) engines (emission sources 01ENG-04ENG) and the 4-CAT 3520 internal IC engines (emission sources 15ENG-18ENG):

1. CO emissions shall be measured monthly, at a stack location acceptable to the Department, while the engine is operating at base load (base load is a normal operating load) using a properly calibrated portable gas analyzer approved for use by the Department.

2. The CO measurement will consist of the average of three instantaneous concentration readings that are obtained over a 3 minute period.

3. The first of the three CO concentration readings will start after the portable analyzer has sampled engine exhaust for at least one (1) minute.

4. The second and third CO concentration readings will occur at consecutive 1 minute intervals.

5. The three CO concentration readings will be recorded

and the average calculated.

6. The calculated average will be the CO measurement for that month and must not exceed the permitted emission rate of the engines. A threshold for CO (ppm) will be established based on the permitted emission factor of the engines (1.60 g/bHp-hr) and the measured exhaust stack conditions from the most recent performance test.

If the threshold is exceeded, the permittee shall take corrective action as soon as possible, but not later than 5 days after detection, and shall retake the CO measurement as outlined above within 24 hours of taking corrective action.

If corrective action taken does not bring the reading back into compliance with this limit, a new stack test shall be scheduled within 60 days of the initial reading in order to verify that the current operating conditions can meet the permitted emission rate of the engines.

If the corrective actions are taken as specified in this Condition, the monitored exceedance is not a violation of the permit operational requirements, however, the permittee shall report these episodes as deviations on the annual compliance certification and the semi-annual monitoring report that cover the monitoring period when the deviations occurred.

Parameter Monitored: CARBON MONOXIDE
Upper Permit Limit: 1.60 grams per brake horsepower-hour
Reference Test Method: Handheld CO monitor
Monitoring Frequency: MONTHLY
Averaging Method: 3-MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 76: Compliance Demonstration
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable State Requirement:6 NYCRR 201-6.5 (a)

Item 76.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 3-STAGE
Process: ST3

Item 76.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Consistent with the reduction in HAP emissions specified in the CLCPA Section 7(3) Analysis submitted as part of the Renewal/modification application, total facility formaldehyde emissions are limited to 9.9 tons/year on a 12-month rolling basis. This limit is met through use of the oxidation catalysts on each of the engines. The use of oxidation catalysts on each engine have a reduction efficiency of 80% for formaldehyde and 75% for all other HAPs. To demonstrate on-going compliance, the facility will ensure the oxidation catalysts and engines are operating properly.

The facility will maintain a continuous monitor for temperature for the catalyst inlet/outlet which must be no more than 1112 degrees Fahrenheit. The facility will take a daily reading of the catalyst inlet/outlet temperature. If the temperature of the inlet/outlet gas is higher than 1112 degrees Fahrenheit, the facility must do corrective action to bring the gas temperature back into compliance.

If corrective action taken does not bring the reading back into compliance with this limit, a new stack test shall be scheduled within 60 days of the initial reading in order to verify that the current operating conditions can meet the permitted emission rate of the engines.

If the corrective actions are taken as specified in this Condition, the monitored exceedance is not a violation of the permit operational requirements, however, the permittee shall report these episodes as deviations on the annual compliance certification and the semi-annual monitoring report that cover the monitoring period when the deviations occurred.

Instances of the catalyst inlet/outlet temperature being greater than 1112 degrees Fahrenheit and corrective action taken must be kept in a format acceptable to the Department and be made available upon request.

Parameter Monitored: TEMPERATURE
Upper Permit Limit: 1112 degrees Fahrenheit
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1 MINUTE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.

The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 77: Compliance Demonstration
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable State Requirement:6 NYCRR 201-6.5 (a)

Item 77.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 3-STAGE
Process: ST3

Item 77.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:

Consistent with the reduction in HAP emissions specified in the CLCPA Section 7(3) Analysis submitted as part of the Renewal/modification application, total facility formaldehyde emissions are limited to 9.9 tons/year on a 12-month rolling basis. This limit is met through use of the oxidation catalysts on each of the engines. The use of oxidation catalysts on each engine have a reduction efficiency of 80% for formaldehyde and 75% for all other HAPs. To demonstrate on-going compliance, the facility will ensure the oxidation catalysts and engines are operating properly.

The facility will maintain a continuous monitor for temperature for the catalyst inlet which must be no less than 752 degrees Fahrenheit. The facility will take a daily reading of the catalyst inlet temperature. If the temperature of the inlet gas is lower than 752 degrees Fahrenheit, the facility must do corrective action to bring the gas temperature back into compliance.

If corrective action taken does not bring the reading back into compliance with this limit, a new stack test shall be scheduled within 60 days of the initial reading in order to verify that the current operating conditions can meet the permitted emission rate of the engines.

If the corrective actions are taken as specified in this Condition, the monitored exceedance is not a violation of the permit operational requirements, however, the permittee shall report these episodes as deviations on the annual compliance certification and the semi-annual monitoring report that cover the monitoring period when

the deviations occurred.

Instances of the temperature being below 752 degrees Fahrenheit and corrective action taken must be kept in a format acceptable to the Department and be made available upon request.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 752 degrees Fahrenheit
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1 MINUTE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 78: Compliance Demonstration
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable State Requirement:6 NYCRR 201-6.5 (a)

Item 78.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 3-STAGE
Process: ST3

Item 78.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Consistent with the reduction in HAP emissions specified in the CLCPA Section 7(3) Analysis submitted as part of the Renewal/modification application, total facility formaldehyde emissions are limited to 9.9 tons/year on a 12-month rolling basis. This limit is met through use of the oxidation catalysts on each of the engines. The use of oxidation catalysts on each engine have a reduction efficiency of 80% for formaldehyde and 75% for all other HAPs. To demonstrate on-going compliance, the facility will ensure the oxidation catalysts and engines are operating properly.

The facility will maintain a continuous monitor for pressure for the oxidation catalyst inlet/outlet. The facility will take a daily reading of the oxidation catalyst inlet/outlet pressure. If the differential pressure is more than 55 mm water (2 inches of water)

higher than the initial differential pressure, the catalyst should be inspected for excessive ash build-up. If the differential pressure is more than 2 inches of water, the facility must do corrective action to bring the differential pressure back into compliance.

If corrective action taken does not bring the reading back into compliance with this limit, a new stack test shall be scheduled within 60 days of the initial reading in order to verify that the current operating conditions can meet the permitted emission rate of the engines.

If the corrective actions are taken as specified in this Condition, the monitored exceedance is not a violation of the permit operational requirements, however, the permittee shall report these episodes as deviations on the annual compliance certification and the semi-annual monitoring report that cover the monitoring period when the deviations occurred.

Instances of the differential pressure being greater than 2 inches of water and corrective action taken must be kept in a format acceptable to the Department and be made available upon request.

Parameter Monitored: PRESSURE DROP
Upper Permit Limit: 2 inches of water
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 6 calendar month(s).

Condition 79: Compliance Demonstration
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable State Requirement:6 NYCRR 201-6.5 (a)

Item 79.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 3-STAGE
Process: ST3

Regulated Contaminant(s):
CAS No: 000630-08-0 CARBON MONOXIDE

Item 79.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

The facility must show that they are in compliance with the emission rate of 1.60 g/bhp-hr for carbon monoxide for the engine generator sets through the use of oxidation catalysts on each of the engines. This limit ensures that the facility will achieve reductions of 80% for formaldehyde coming from the engines specified in the CLCPA Section 7(3) Analysis submitted as part of the Renewal/modification application for total emissions of formaldehyde of 9.9 tons/year on a 12-month rolling basis.

An emission test using 40CFR60 APP A-10 must be completed on each engine type determined by the Department. The Department will base its decision on the CO emission rates as determined by the portable CO analyzer prior to the emissions test (the CO readings shall be taken on the same engine, consecutively, without any adjustment to the engine).

An emissions test for the above mentioned emission sources must be completed every 5 years. Emission testing subject to 40 CFR 60 Subpart JJJJ may qualify as testing for this condition.

Upper Permit Limit: 1.60 grams per brake horsepower-hour
Reference Test Method: 40CFR60 APP A-10
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 80: Compliance Demonstration
Effective between the dates of 11/08/2023 and 11/07/2028

Applicable State Requirement:6 NYCRR 201-6.5 (a)

Item 80.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 3-STAGE
Process: ST3

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 80.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

In order to show compliance with the facility NOx cap limit of 99.9 lb/yr with internal combustion engines firing natural gas at an emission rate of 0.50 grams per brake horsepower-hour, the facility is required to conduct an emission test once every five years. Those engines subject to the more frequent testing requirement of 40 CFR 60 Subpart JJJJ may satisfy this condition. In accordance with this requirement, the facility must:

1) submit a compliance test protocol to the Department for approval at least 30 days prior to emission testing. The conditions of the testing and the locations of the sampling devices must be acceptable to the Department; and

2) utilize the procedures set forth in 40 CFR Part 60, Appendix A or any other method acceptable to the Department and the Administrator for determining compliance with the NOx limit of 0.50 grams per brake horsepower-hour, and must, in addition, follow the procedures set forth in 6NYCRR Part 202 as follows:

For stationary internal combustion engines, utilize Method 7, 7E, or 19 from 40 CFR Part 60, Appendix A or another reference method approved by the Department;

3) submit a compliance test report containing the results of the emission test to the Department no later than 60 days after completion of the emission test.

The facility must conduct the required emissions test at 100% +/- 10% load on one (1) of the four (4) identical permitted CAT3516 IC engines and one (1) of the four (4) identical permitted CAT 3520 IC engines in Emission Unit 3-STAGE. The Department will base its decision on which engine requires testing using the NOx and CO emission rates as determined by the portable NOx/CO analyzer prior to the emissions test (the CO and NOx readings shall be taken on the same engine, consecutively, without any adjustment to the engine).

The initial testing must be completed within 180 days of permit issuance (or engine startup, whichever is later), and once every five years thereafter, or, any engines that are applicable to 40 CFR 60 Subpart JJJJ performance testing requirements, the testing can be done as per that schedule.

If a current engine is replaced, the facility must contact

the Department, and the Department reserves the right to require a performance test for the replacement engine.

Upper Permit Limit: 0.50 grams per brake horsepower-hour
Reference Test Method: EPA Methods 7,7E or 19
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE