

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1



11/13/2003

Facility Identification Data

Name: DANSKAMMER GENERATING STATION
Address: 994 RIVER RD
NEWBURGH, NY 12550

Owner/Firm

Name: DYNEGY NORTHEAST GENERATION
Address: 992 RIVER RD
NEWBURGH, NY 12550, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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Division of Air Resources:
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Air Permitting Contact:
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992 RIVER ROAD
NEWBURGH, NY 12550
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Permit Description

Introduction

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

Summary Description of Proposed Project

Modification 1

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003



The Environmental Protection Agency (EPA) received a petition from the New York Public Interest Research Group, Inc. (NYPIRG) dated November 18, 2001 requesting that EPA object to the issuance of a state operating permit, pursuant to Title V of the Clean Air Act for the Danskammer Generating Station. EPA issued an "Order Granting in Part and Denying in Part Petition for Objection to Permit" on February 14, 2003. Subsequently, EPA issued a letter dated March 13, 2003 outlining permit revisions required by the Order and outlining additional issues that may require permit revisions.

A summary of changes to the Title V permit required by the February 14, 2003 USEPA Order are listed below.

Modify original Title V permit condition 5 to specify Electrostatic Precipitator operating parameters and require digital or automatic recording of data.

Prepare and submit a complete statement of basis (a "permit review report") pursuant to the requirements of 40 CFR Part 70.7(a)(5). The permit review report must contain specific information pertaining to the utilization of Continuous Opacity Monitors, the Method 9 observation required for the coal handling operation, and Method 9 observation required for the fly and bottom ash handling facility.

Add language to clarify the requirements relating to annual compliance certification reporting and remove the language "unless another quarter has been acceptable to the Department".

Remove excuse provisions that cite 6 NYCRR Part 201-1.4 from the federal side of the permit and incorporate language acknowledging that DEC cannot exercise more discretion than federal requirements allow.

Revise issued permit conditions 72 and 76 of the permit to properly cite the original authority of establishing a particulate emissions limit of 0.03 lb/mmBTU.

Specify emission test method required under issued permit 77.

A summary of additional issues outlined by EPA's March 13, 2003 letter which were identified as may require permit revisions are listed below.

Modify issued permit condition 77 control efficiency to 99.6% to reflect past permitting limit or explain in the statement of basis why 99% baghouse control is sufficient to meet the 6NYCRR 212 emission limit of 0.05 grains/cubic foot.

Revise issued permit condition 6 to include monitoring of baghouse for pressure differential.

Provide additional information under condition 31 - summary of non-applicable requirements.

Revise issued permit condition 44 to indicate fuel oil supplier certification records retention of not less than 5 years.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003



The Modification also includes a number of standard permit condition expirations and replacements consistent with the ongoing enhancements to the implementation of NYSDEC's Title V permitting process. Each permit condition expired and new condition are identified in the complete version of the permit.

As requested by the permittee, additional changes to the Title V permit are incorporated into this modification 1 and are listed below.

Addition of language for low NOx burners to the process descriptions associated with Units 3 and 4.

Correction of the submittal deadline for quarterly opacity reports to 60 days after the calendar quarter.

Change of the non-ozone season start date to October 1, as specified in 6NYCRR Part 227- 2.

Deletion of the initial CEM report due date of 3/1/2002, which is inconsistent with calendar quarter reporting.

Attainment Status

DANSKAMMER GENERATING STATION is located in the town of NEWBURGH in the county of ORANGE.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MODERATE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003

nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

DANSKAMMER GENERATING STATION CONSISTS OF FOUR COMBUSTION ENGINEERING (CE) TANGENTIALLY FIRED STEAM GENERATING BOILERS. UNITS #1 AND #2 ARE RATED AT 65 MEGAWATTS (MW) EACH AND ARE CAPABLE OF FIRING NO 6 FUEL OIL AND NATURAL GAS. UNIT #3 IS RATED AT 135 MW AND IS CAPABLE OF FIRING NO. 6 OIL, NATURAL GAS AND COAL. UNIT #4 IS RATED AT 235 MW AND IS CAPABLE OF FIRING NO. 6 OIL, NATURAL GAS AND COAL. UNITS #1 AND #2 BEGAN COMMERCIAL OPERATION IN 1951 AND 1954 REPECTIVELY. UNIT #3 BEGAN OPERATION IN 1959. UNIT #4 BEGAN OPERATION IN 1967.

Permit Structure and Description of Operations

The Title V permit for DANSKAMMER GENERATING STATION is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

DANSKAMMER GENERATING STATION is defined by the following emission unit(s): Emission unit UD0003 - DANSKAMMER UNIT #3 IS A 135 MW COMBUSTION ENGINEERING TANGENTIALLY FIRED STEAM GENERATING BOILER. THE UNIT BEGAN COMMERCIAL OPERATION IN 1959 (BURNING BITUMINOUS COAL), BUT WAS CONVERTED TO RESIDUAL OIL FIRING IN 1971. THE UNIT OPERATED ON OIL UNTIL A RECONVERSION TO COAL IN 1987. THE UNIT RETAINS THE CAPABILITY TO BURN ALL THREE FUELS.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003



Emission unit UD0003 is associated with the following emission points (EP):
00003

It is further defined by the following process(es):

Process: D30 is located at LOWER LEVEL, Building D3/D4 - THE COMBUSTION OF NO. 6 OIL. THE HEAT INPUT RATING OF THE BOILER IS 1034 MMBTU/HR FOR NO 6 OIL FIRING.

PARTICULATE EMISSIONS ARE CONTROLLED BY A COLD SIDE ELECTROSTATIC RECIPIPARATOR. EMISSIONS OF NOX ARE REDUCED THROUGH THE USE OF SEPARATED OVERFIRE AIR, "BURNERS OUT OF SERVICE" (BOOS), AND LOW NOX BURNERS.

Process: D3C is located at LOWER LEVEL, Building D3/D4 - THE COMBUSTION OF COAL. THE HEAT INPUT RATING OF THE BOILER IS 1348 MMBTU/HR FOR COAL FIRING.

PARTICULATE EMISSIONS ARE CONTROLLED BY A COLD SIDE ELECTROSTATIC PRECIPITATOR. EMISSIONS OF NOX ARE REDUCED THROUGH THE USE OF SEPARATED OVERFIRE AIR, "BURNERS OUT OF SERVICE" (BOOS), AND LOW NOX BURNERS.

Process: D3G is located at LOWER LEVEL, Building D3/D4 - THE COMBUSTION OF NATURAL GAS. THE HEAT INPUT RATING OF THE BOILER IS 1167 MMBTU/HR FOR NATURAL GAS FIRING. EMISSIONS OF NOX ARE REDUCED THROUGH THE USE OF SEPARATED OVERFIRE AIR, "BURNERS OUT OF SERVICE" (BOOS), AND LOW NOX BURNERS.

Emission unit UD0002 - DANSKAMMER UNIT #2 IS A 65 MW COMBUSTION ENGINEERING TANGENTIALLY FIRED STEAM GENERATING BOILER. THE UNIT BEGAN COMMERCIAL OPERATION IN 1954 WITH THE ABILITY TO BURN NATURAL GAS AND BITUMINOUS COAL AND WAS MODIFIED IN 1971 TO BURN NO 6 OIL AND NATURAL GAS.

Emission unit UD0002 is associated with the following emission points (EP):
00002

It is further defined by the following process(es):

Process: D20 is located at LOWER LEVEL, Building D2 - THE COMBUSTION OF NO. 6 OIL. THE HEAT INPUT RATING OF THE BOILER IS 900 MMBTU/HR FOR NO 6 OIL FIRING.

PARTICULATE EMISSIONS ARE CONTROLLED BY A COLD SIDE ELECTROSTATIC PRECIPITATOR. EMISSIONS OF NOX ARE REDUCED THROUGH THE USE OF COMBUSTION AIR MANIPULATION THROUGH THE WINDBOX.

Process: D2G is located at LOWER LEVEL, Building D2 - THE COMBUSTION OF NATURAL GAS. THE HEAT INPUT RATING OF THE BOILER IS 900 MMBTU/HR FOR NATURAL GAS FIRING.

EMISSIONS OF NOX ARE REDUCED THROUGH THE USE OF LOW EXCESS AIR AND COMBUSTION AIR MANIPULATION.

Emission unit UD0007 - EMISSION UNIT #7 IS COMPRISED OF THE FACILITY'S COAL UNLOADING AND HANDLING FACILITIES. COAL IS DELIVERED VIA RAIL AND MARINE VESSELS AND OFFLOADED TO A LARGE OUTDOOR STORAGE PILE. THE COAL IS TRANSFERRED FROM THIS ACTIVE PILE (VIA COVERED CONVEYORS) TO COAL CRUSHERS AND MILLS (OPERATED AT NEGATIVE PRESSURE) WHICH GRIND THE COAL AND FEED IT DIRECTLY INTO THE FIRING AREAS OF UNITS #3 AND #4. A RESERVE COAL PILE, MAINTAINED BY TRUCK, SERVES AS AN ADDITIONAL SOURCE OF COAL IN CASE OF INTERRUPTIONS IN COAL DELIVERIES OR SUPPLY.

Emission unit UD0007 is associated with the following emission points (EP):
1007A, 1007B

It is further defined by the following process(es):

Process: C01COAL IS DELIVERED TO THE SITE VIA RAILCARS AND/OR MARINE VESSELS.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003



THE COAL IS UNLOADED USING A SERIES OF CONVEYORS AND TRANSFERRED TO THE FACILITY'S ACTIVE STORAGE PILE.

Process: C02COAL IS LOADED (DROP LOADED) ON TO THE FACILITY'S ACTIVE AND RESERVE STORAGE PILES VIA CONVEYOR BELT AND TRUCKS RESPECTIVELY.

Process: C03 is located at UPPER LEVEL, Building D3/D4 - COAL IS TRANSFERRED BY BULLDOZER TO CONVEYOR HOPPER AND CONVEYED TO THE COAL CRUSHER.

Process: C04COAL IS CRUSHED PRIOR TO BEING CONVEYED TO STORAGE BUNKERS. FROM THE STORAGE BUNKER THE COAL IS CONVEYED TO COAL MILLS. EMISSIONS FROM BOTH THE STORAGE BUNKERS AND CRUSHERS ARE CONTROLLED BY BAGHOUSES (FABRIC FILTERS).

Emission unit UD0004 - DANSKAMMER UNIT #4 IS A 235 MW COMBUSTION ENGINEERING TANGENTIALLY FIRED STEAM GENERATING BOILER. THE UNIT BEGAN COMMERCIAL OPERATION IN 1967 (PRESSURIZED COAL FIRING), BUT WAS CONVERTED TO RESIDUAL OIL FIRING IN 1970. THE UNIT OPERATED ON OIL UNTIL A RECONVERSION TO COAL IN 1987. THE UNIT RETAINS THE CAPABILITY TO BURN ALL THREE FUELS.

Emission unit UD0004 is associated with the following emission points (EP):
00004

It is further defined by the following process(es):

Process: D40 is located at LOWER LEVEL, Building D3/D4 - THE COMBUSTION OF NO. 6 OIL. THE HEAT INPUT RATING OF THE BOILER IS 2004 MMBTU/HR FOR NO 6 OIL FIRING. PARTICULATE EMISSIONS ARE CONTROLLED BY A COLD SIDE ELECTROSTATIC PRECIPITATOR. EMISSIONS OF NOX ARE REDUCED THROUGH THE USE OF SEPARATED OVERFIRE AIR, "BURNERS OUT OF SERVICE" (BOOS), AND LOW NOX BURNERS.

Process: D4C is located at LOWER LEVEL, Building D3/D4 - THE COMBUSTION OF COAL. THE HEAT INPUT RATING OF THE BOILER IS 2512 MMBTU/HR FOR COAL FIRING. PARTICULATE EMISSIONS ARE CONTROLLED BY A COLD SIDE ELECTROSTATIC PRECIPITATOR. EMISSIONS OF NOX ARE REDUCED THROUGH THE USE OF SEPARATED OVERFIRE AIR, "BURNERS OUT OF SERVICE" (BOOS), AND LOW NOX BURNERS.

Process: D4G is located at LOWER LEVEL, Building D3/D4 - THE COMBUSTION OF NATURAL GAS. THE HEAT INPUT RATING OF THE BOILER IS 2397 MMBTU/HR FOR NATURAL GAS FIRING. PARTICULATE EMISSIONS ARE CONTROLLED BY A COLD SIDE ELECTROSTATIC PRECIPITATOR. EMISSIONS OF NOX ARE REDUCED THROUGH THE USE OF SEPARATED OVERFIRE AIR, "BURNERS OUT OF SERVICE" (BOOS), AND LOW NOX BURNERS.

Emission unit UD0001 - DANSKAMMER UNIT #1 IS A 65 MW COMBUSTION ENGINEERING TANGENTIALLY FIRED STEAM GENERATING BOILER. THE UNIT BEGAN COMMERCIAL OPERATION IN 1951 WITH THE ABILITY TO BURN BITUMINOUS COAL AND WAS MODIFIED IN 1971 TO BURN NO 6 OIL AND NATURAL GAS.

Emission unit UD0001 is associated with the following emission points (EP):
00001

It is further defined by the following process(es):

Process: D10 is located at LOWER LEVEL, Building D1 - THE COMBUSTION OF NO. 6 OIL. THE HEAT INPUT RATING OF THE BOILER IS 900 MMBTU/HR FOR NO. 6 OIL FIRING. PARTICULATE EMISSIONS ARE CONTROLLED BY A COLD SIDE ELECTROSTATIC PRECIPITATOR. EMISSIONS OF NOX ARE REDUCED THROUGH THE USE OF LOW EXCESS AIR AND COMBUSTION AIR MANIPULATION.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003



Process: D1G is located at LOWER LEVEL, Building D1 - THE COMBUSTION OF NATURAL GAS. THE HEAT INPUT RATING OF THE BOILER IS 900 MMBTU/HR FOR NATURAL GAS FIRING. EMISSIONS OF NOX ARE REDUCED THROUGH THE USE OF LOW EXCESS AIR COMBUSTION AIR MANIPULATION.

Emission unit UD0008 - EMISSION UNIT #8 IS COMPRISED OF THE FACILITY'S FLY AND BOTTOM ASH HANDLING FACILITIES AND SOLID WASTE MANAGEMENT (SWM) FACILITY. IN ADDITION TO FLY AND BOTTOM ASH, THE SWM FACILITY IS USED TO DISPOSE OF WATER TREATMENT SLUDGES AND PYRITES.

Emission unit UD0008 is associated with the following emission points (EP):
02007, 02008, 02009, 02010

It is further defined by the following process(es):

Process: F01 THE TRANSFER OF ASH FROM THE ELECTROSTATIC PRECIPITATORS TO THE STORAGE SILOS.

Process: F02 THE STORAGE OF ASH IN THE SILOS.

Title V/Major Source Status

DANSKAMMER GENERATING STATION is subject to Title V requirements. This determination is based on the following information:

The Danskammer Generating Station is a major source for emissions of sulfur dioxide, particulates, oxides of nitrogen and carbon monoxide as defined by 6 NYCRR 201-2.1(21).

Program Applicability

The following chart summarizes the applicability of DANSKAMMER GENERATING STATION with regards to the principal air pollution regulatory programs:

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003



RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003



those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

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

SIC Code	Description
4911	ELECTRIC SERVICES

SCC Codes

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

SCC Code	Description
3-01-060-10	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PHARMACEUTICAL PREPARATIONS Storage/Transfer
1-01-002-12	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - BITUMINOUS COAL PULVERIZED COAL: DRY BOTTOM (TANGENTIAL) (BITUMINOUS COAL)
1-01-006-01	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - NATURAL GAS Boilers > 100 MBtu/Hr except Tangential
1-01-004-01	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - RESIDUAL OIL Grade 6 Oil: Normal Firing
3-05-010-11	MINERAL PRODUCTS COAL MINING, CLEANING & MATL HANDLING (SEE 3-05-310 FOR DIFF

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003

UNITS)
 MINERAL PROD - COAL MINING, CLEANING & MATL HANDL: COAL
 TRANSFER
 3-05-010-17 MINERAL PRODUCTS
 COAL MINING, CLEANING & MATL HANDLING (SEE 3-05-310 FOR DIFF
 UNITS)
 MINERAL PROD - COAL MINING, CLEANING & MATL HANDL: SECONDARY
 CRUSHING
 3-05-010-43 MINERAL PRODUCTS
 COAL MINING, CLEANING & MATL HANDLING (SEE 3-05-310 FOR DIFF
 UNITS)
 Open Storage Pile: Coal
 3-05-010-44 MINERAL PRODUCTS
 COAL MINING, CLEANING & MATL HANDLING (SEE 3-05-310 FOR DIFF
 UNITS)
 Train Loading: Coal

Facility Emissions Summary

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		>= 250 tpy
0NY100-00-0	HAP		>= 25 tpy but < 40 tpy
007439-92-1	LEAD (HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy
0NY075-00-0	PARTICULATES		>= 250 tpy
0NY075-00-5	PM-10		>= 250 tpy
007446-09-5	SULFUR DIOXIDE		>= 250 tpy
0NY998-00-0	VOC		>= 250 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1



11/13/2003

Item A: Sealing - 6NYCRR Part 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

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.

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

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.

Item D: Unpermitted Emission Sources - 6NYCRR Part 201-1.2

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1



11/13/2003

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air -

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1



11/13/2003

6NYCRR Part 201-1.8

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.

Item H: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 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 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item I: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 201-3.2(a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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 J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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 K: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1



11/13/2003

permit renewal purposes.

Item L: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(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 M: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(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 N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(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 O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)

The permittee 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. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1



11/13/2003

Item Q: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

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

Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted facility 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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Item T: Severability - 6 NYCRR Part 201-6.5(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 U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003



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.

Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

Item W: Permit Shield - 6 NYCRR Part 201-6.5(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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1



11/13/2003

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 X: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1



11/13/2003

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 Y: Required Emission Tests - 6 NYCRR Part 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

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.

Item AA: Open Fires - 6 NYCRR Part 215

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Item BB: 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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1



11/13/2003

Item CC: Federally Enforceable Requirements - 40 CFR 70.6(b)
 All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	1-25
U-D0007/-/C01/SDHND	40CFR 60-Y.252 (c)	Standards of Performance for Coal Preparation Plants -standards for particulate matter	79
FACILITY	40CFR 68	Chemical accident prevention provisions	1-12
FACILITY	40CFR 72-A.9	Standard requirements	54

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003

FACILITY	40CFR 75-B.10 (a)	Continuous emission monitoring - general operating requirements	1-13
FACILITY	40CFR 75-B.10 (b)	Continuous emission monitoring - general operating requirements	1-14
FACILITY	40CFR 75-B.10 (c)	Continuous emission monitoring - general operating requirements	1-15
FACILITY	40CFR 75-B.10 (d)	Continuous emission monitoring - general operating requirements	1-16
FACILITY	40CFR 75-B.13 (a)	Continuous emission monitoring - specific provisions for monitoring CO2 emissions	59
FACILITY	40CFR 75-C.20	CEM operation and maintenance requirements - certification and recertification procedures	60
FACILITY	40CFR 75-G.64 (a)	CEM reporting requirements - quarterly reports	1-17
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	3
U-D0003/00003/D3C/SD003	6NYCRR 200.6	Acceptable ambient air quality.	71
U-D0004/00004/D4C/SD004	6NYCRR 200.6	Acceptable ambient air quality.	75
FACILITY	6NYCRR 200.7	Maintenance of equipment.	1-2, 1-1
U-D0003/00003/D3C/SD003	6NYCRR 200.7	Maintenance of equipment.	1-21
U-D0004/00004/D4C/SD004	6NYCRR 200.7	Maintenance of equipment.	1-23
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	1-26
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	27, 63, 64
FACILITY	6NYCRR 201-6.5 (c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	1-3
FACILITY	6NYCRR 201-6.5 (c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	1-4
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	1-5
FACILITY	6NYCRR 201-6.5 (e)	Compliance Certification	1-6
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	33
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	34
FACILITY	6NYCRR 204-1.6	Standard Requirements	35
FACILITY	6NYCRR 204-4.1	Compliance Certification Report	36, 37
FACILITY	6NYCRR 204-8.1	General Requirements	40, 39
FACILITY	6NYCRR 204-8.4	Notifications	38
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution	83

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003

U-D0007	6NYCRR 212.4 (c)	prohibited. General Process Emission Sources - emissions from new processes and/or modifications	1-24
U-D0007	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	78
U-D0008	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	80
FACILITY	6NYCRR 225-1.8 (a)	Reports, sampling and analysis.	1-7
U-D0001/00001/D10/SD001	6NYCRR 227-1.2 (a) (1)	Particulate Emissions from Liquid Fuels.	66
U-D0002/00002/D20/SD002	6NYCRR 227-1.2 (a) (1)	Particulate Emissions from Liquid Fuels.	68
U-D0003/00003/D30/SD003	6NYCRR 227-1.2 (a) (1)	Particulate Emissions from Liquid Fuels.	70
U-D0004/00004/D40/SD004	6NYCRR 227-1.2 (a) (1)	Particulate Emissions from Liquid Fuels.	74
U-D0001/00001	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	1-18
U-D0002/00002	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	1-19
U-D0003/00003	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	1-20
U-D0004/00004	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	1-22
FACILITY	6NYCRR 227-1.4 (a)	Stack Monitoring. (see narrative)	84
FACILITY	6NYCRR 227-1.4 (b)	Stack Monitoring	45
FACILITY	6NYCRR 227-2.5 (b)	System-wide averaging option.	1-8
FACILITY	6NYCRR 227-2.6 (b) (3) (i)	RACT for Oxides of Nitrogen - CEMS monitoring requirements	1-9
FACILITY	6NYCRR 227-2.6 (b) (4) (iv)	CEMS requirements	1-10
FACILITY	6NYCRR 227-3.12	AARs - Authorized Account Representatives.	49
FACILITY	6NYCRR 227-3.13	Emissions Monitoring	
50			
FACILITY	6NYCRR 227-3.15	Reporting	1-11
FACILITY	6NYCRR 227-3.16	Annual Reconciliation of Allowances and NOx Emissions	52
FACILITY	6NYCRR 227-3.17	Compliance Certification	53

Applicability Discussion:

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

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.6



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1



11/13/2003

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

Facility Specific Requirements

In addition to Title V, DANSKAMMER GENERATING STATION has been determined to be subject to the following regulations:

40CFR 60-Y.252 (c)

This condition requires the facility to conduct a Method 9 opacity evaluation during the transport of coal from marine vessels to the coal pile.

40CFR 72-A.9

A designated representative of each source of air contamination affected by the acid rain program must submit a complete Acid Rain permit application (including a compliance plan) in accordance with the deadlines specified in § 72.30;

40CFR 75-B.10 (a)

This section specifies the primary measurement requirements for opacity, and all SO₂, NO_x, and CO₂ emissions from the facility. It details how often measurements are to be made and the general type of systems to be used.

40CFR 75-B.10 (b)

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003



This section requires the facility to meet the equipment, installation, and performance specifications in appendix A ; and the quality assurance and quality control procedures of appendix B to this part.

40CFR 75-B.10 (c)

This section requires heat input measurements, for every hour or part of an hour any fuel is combusted, following the procedures in appendix F to this part.

40CFR 75-B.10 (d)

This section specifies the operating requirements of the monitoring systems. It requires the facility to ensure that all monitoring systems in operation and functioning as specified, at all times fuel is being burned ,except as provided in § 75.11(e) and during other specified periods.

40CFR 75-B.13 (a)

This section specifies requirements in addition to the general monitoring requirements for the measurement of CO₂. c

40CFR 75-C.20

This section requires the facility to ensure that each emission or opacity monitoring system, including automated data acquisition and handling systems, meet the initial certification requirements of this section. It requires that all applicable initial certification tests are completed by the deadlines specified in § 75.4 and prior to use in the Acid Rain Program.

40CFR 75-G.64 (a)

This section requires the electronic submission of specific information. It details what information must be reported and when.

6NYCRR 201-6.5 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 204-1.6

This condition requires the designated representative of the permittee to make submissions for the NO_x Budget Program. The Program is designed to mitigate the interstate transport of ground level ozone and nitrogen oxides, a ground level ozone precursor.

6NYCRR 204-4.1

This condition covers the compliance certification report requirements for the NO_x Budget Program.

6NYCRR 204-8.1

This condition lists the general requirements for the NO_x Budget trading program. They include, but are not limited to monitoring requirements, certification, record keeping and reporting.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003



6NYCRR 204-8.4

This condition lists the addresses where monitoring plans and their modifications, compliance certifications, recertifications, quarterly QA/QC reports and petitions for alternative monitoring shall be sent.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 225-1.8 (a)

Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of five years

6NYCRR 227-1.2 (a) (1)

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

6NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-1.4 (a)

Subdivisions (a) and (f) of this section (227-1.4) have not been approved by EPA and have not been included in the NYS SIP.

6NYCRR 227-1.4 (b)

This regulation requires the specific contents of excess emissions reports for opacity from facilities that employ continuous opacity monitors (COMs).

6NYCRR 227-2.5 (b)

The system-wide average shall consist of a weighted average allowable emission rate based upon the weighted average of actual emissions from units that are operating. Excess reductions utilized in the system-wide average may only be counted from the lowest allowable emission rate. Simply put, if there is a more stringent emission limit than RACT already in place on the unit, then excess reductions may only be counted from below that emission rate.

6NYCRR 227-2.6 (b) (3) (i)

This rule specifies the data averaging requirements for continuous emissions monitors (CEM) of oxides of



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003

nitrogen (NOx) for sources subject to this requirement.

6NYCRR 227-2.6 (b) (4) (iv)

This condition requires the facility provide quarterly reports containing a tabulation of parameter monitoring, measured emissions and data assessment.

6NYCRR 227-3.12

This condition requires the facility to have an Authorized Account Representative for the Pre 2003 NOx Budget Trading Program.

6NYCRR 227-3.13

This condition included the emissions monitoring requirements for the Pre 2003 NOx Budget Trading Program.

6NYCRR 227-3.15

This condition spells out the reporting requirements for the Pre 2003 NOx Budget Trading Program.

6NYCRR 227-3.16

This condition spells out the requirements for surrender of allowances for the Pre 2003 NOx Budget Program.

6NYCRR 227-3.17

This condition lists the requirements for compliance certification for the Pre 2003 NOx Budget Trading Program.

Compliance Certification

Summary of monitoring activities at DANSKAMMER GENERATING STATION:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
U-D0007/-/C01/SDHND	intermittent emission testing	79
FACILITY	record keeping/maintenance procedures	54
FACILITY	record keeping/maintenance procedures	1-13
FACILITY	record keeping/maintenance procedures	1-14
FACILITY	record keeping/maintenance procedures	1-15
FACILITY	record keeping/maintenance procedures	1-16
FACILITY	record keeping/maintenance procedures	59
FACILITY	record keeping/maintenance procedures	60
FACILITY	record keeping/maintenance procedures	1-17
FACILITY	work practice involving specific operations	3
U-D0003/00003/D3C/SD003	continuous emission monitoring (cem)	71
U-D0004/00004/D4C/SD004	continuous emission monitoring (cem)	75
FACILITY	record keeping/maintenance procedures	1-1
FACILITY	record keeping/maintenance procedures	1-2
U-D0003/00003/D3C/SD003	intermittent emission testing	1-21
U-D0004/00004/D4C/SD004	intermittent emission testing	1-23
FACILITY	record keeping/maintenance procedures	1-5
FACILITY	record keeping/maintenance procedures	1-6



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 3-3346-00011/00017 Modification Number: 1

11/13/2003

FACILITY	record keeping/maintenance procedures	33
FACILITY	record keeping/maintenance procedures	37
FACILITY	record keeping/maintenance procedures	38
U-D0007	intermittent emission testing	1-24
U-D0007	intermittent emission testing	78
U-D0008	intermittent emission testing	80
FACILITY	record keeping/maintenance procedures	1-7
U-D0001/00001/D10/SD001	intermittent emission testing	66
U-D0002/00002/D20/SD002	intermittent emission testing	68
U-D0003/00003/D30/SD003	intermittent emission testing	70
U-D0004/00004/D40/SD004	intermittent emission testing	74
U-D0001/00001	monitoring of process or control device parameters as surrogate	1-18
U-D0002/00002	monitoring of process or control device parameters as surrogate	1-19
U-D0003/00003	monitoring of process or control device parameters as surrogate	1-20
U-D0004/00004	monitoring of process or control device parameters as surrogate	1-22
FACILITY	record keeping/maintenance procedures	84
FACILITY	record keeping/maintenance procedures	45
FACILITY	record keeping/maintenance procedures	1-8
FACILITY	record keeping/maintenance procedures	1-9
FACILITY	record keeping/maintenance procedures	1-10
FACILITY	record keeping/maintenance procedures	1-11
FACILITY	record keeping/maintenance procedures	52
FACILITY	record keeping/maintenance procedures	53

Basis for Monitoring

The Danskammer Generating Station must continuously monitor, maintain and certify monitoring systems for opacity, SO2 emissions, NOx emissions, CO2 emissions and volumetric flow rate as required by 40 CFR Part 75. This applies to the Danskammer Generating Station as an affected unit subject to the Acid Rain program under Title IV of the Clean Air Act. Specifically, boiler units 1, 2, 3, and 4 are affected units and are subject to sulfur dioxide allowances and NOx emission limits.

Oxides of Nitrogen emissions are limited by 6 NYCRR Part 227-2, Reasonably Available Control Technology for Oxides of Nitrogen. The facility utilizes continuous emissions monitors, operated in accordance with 40 CFR Part 75, to effectively demonstrate compliance with the imposed limit. A strategy of system wide averaging is utilized which incorporates emission units that are regionally owned and operated by Dynegy Northeast Generation. A NOx Emissions Compliance Plan specifies system wide averaging methodology. Reports detailing measured emissions and status of compliance are submitted quarterly.

The Danskammer Generating Station boilers 3 and 4 are subject to a particulate emissions limit of 0.03 lbs/mmBTU while firing coal. This limit was established under a February 27, 1987 Certificate to Operate. While firing No. 6 fuel oil, utility boilers 1, 2, 3, and 4 are subject to a particulate limit of 0.1 lbs/mmBTU in accordance with 6 NYCRR 227. A performance test to demonstrate compliance with the 0.1 lbs/mmBTU limit is required once during the term. Utility boilers 1, 2, 3 and 4 are equipped with Electrostatic Precipitators (ESP) to control particulate emissions.

The continuous opacity monitors are installed and operated according to 40 CFR Part 75. Each COM associated with the facility's boilers are tested, calibrated, and audited as per USEPA requirements. Utilization of COM's provides reliable information necessary to continuously compile data and evaluate 6 minute average values.

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Coal handling operations at the Danskammer plant involve moving of coal, which is typically moist. The coal particles are also of larger diameter, typically orders of magnitude larger than the one micron in diameter. Due to the larger particle diameter and moist conditions, the coal handling operations are less likely to create visible plumes. Therefore, the Department has required an initial Method 9 evaluation (within 180 days of permit issuance), followed by annual Method 9 evaluations. The annual Method 9 is sufficient to assure that the handling operations do not create a visible plume.

Fly ash at the site is generated in dry form while the bottom ash is generated in moist or wet form. Both fly ash and bottom ash handling facilities are equipped with baghouse as particulate control device. Each baghouse undergoes monthly maintenance inspection to ensure that they are in good repair and are operated according manufacturer's operating procedures [Note: any unforeseen baghouse malfunction is noticed during routine facility operations, and appropriate corrective action is undertaken]. Additionally, the Department has required the facility to conduct weekly visual inspection of the affected baghouse control devices with appropriate documentation. The annual Method 9 evaluation in combination with monthly maintenance inspection and the additional stipulation of weekly visual inspection is sufficient to assure compliance with the opacity limit.

Issued permit condition 77 relating to particulate emissions from the coal crushing and coal storage emission sources has been expired as part of permit modification 1. This condition required baghouse efficiency of 99% control. To avoid further permitting confusion, condition 1-24 has been added which limits baghouse exhaust to 0.05 grains of particulate per dry standard cubic foot. This limit is based the requirement of 6NYCRR 212.4(c) and is listed appropriately as a permissible emission in the certificate to operate issued March 24, 1988. Control efficiency has been deleted for clarification and is not enforceable. The facility is required to demonstrate compliance once during the term of the permit.

Issued permit condition 31 - Non Applicable Requirements, has been expired as part of permit modification 1. This condition contained introductory statements without identifying a summary of non-applicable requirements. At the time of permit issuance, this condition was mandatory for all Title V permits with the appropriate summary of non applicable requirements taken from the permit application as necessary. In the case of the Danskammer Title V permit, the text field allocated for the summary was blank consistent with the application. DEC cannot identify specific non applicable requirements pertinent to the cited regulation. Accordingly, the condition has been expired.

Modified permit condition 1-6 replaces expired condition 29 relating to the annual compliance certifications. The modified permit condition 1-6 represents New York States most updated version of the annual compliance certification requirement. EPA's request to remove the language "unless another quarter has been acceptable to the Department" cannot be satisfied due to computer programming difficulties. For clarification, DEC has not accepted another quarter for submitting the annual certification.