



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

Facility Identification Data

Name: SELKIRK COGENERATION PROJECT

Address: 24 POWER PARK DR ON GE PROPERTY

SELKIRK, NY 12158-2299

Owner/Firm

Name: SELKIRK COGEN PARTNERS LP

Address: 24 POWER PARK DR

SELKIRK, NY 12158-2299, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Air Permitting Facility Owner Contact:

Name: JAMES E RYAN

Address: 24 POWER PARK DR

SELKIRK, NY 12158

Phone: 518 475 5773

Permit Description

Introduction

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

Summary Description of Proposed Project

Application for renewal of Air Title V Facility.

Attainment Status

SELKIRK COGENERATION PROJECT is located in the town of BETHLEHEM in the county of ALBANY.

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*	MARGINAL NON-ATTAINMENT



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

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

Facility Description:

Selkirk Cogeneration Project (SCP) is a 345 MW combined cycle cogeneration facility that generates electricity under contract to utility customers and provides steam to an industrial steam customer. The facility consists of two phases. Phase I consists of a gas turbine and associated heat recovery steam generator with supplemental firing and one steam turbine generator. Phase II consists of two combustion turbines, two heat recovery steam generators with supplemental firing and one steam turbine generator. Each gas turbine is equipped with a GE Frame 7 Quiet Combustor low NOx burner and steam injection for NOx control. Units 2 and 3 are also equipped with selective catalytic reduction (SCR) to control the emissions of NOx. SCP operates four utility boilers as secondary steam generator units to assure an uninterrupted supply of steam to the industrial steam customer. The facility was approved a BACT facility for PSD purposes.

Permit Structure and Description of Operations

The Title V permit for SELKIRK COGENERATION PROJECT

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.

SELKIRK COGENERATION PROJECT is defined by the following emission unit(s):

Emission unit U00002 - Emission unit U-00002 consists of 2 General Electric Frame 7 Standard Combustor combustion turbines and associated heat recovery steam generators (HRSGs) each equipped with a duct burner. The turbines may operate on gas, oil or gas/oil. The duct burner may operate only on gas. The rated heat input for each turbine/HRSG combustion unit is 1192.3 MMBtu/hr making the total heat input for the emission unit 2384.6 MMBtu/hr. NOx emissions from the gas turbines/HRSGs are controlled with selective catalytic reduction. There are two emission points associated with this emission unit. The combustion turbines are located in the gas turbine building and HRSGs are located outside.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

Emission unit U00002 is associated with the following emission points (EP):
00002, 00003

Process: 23G One or two GE Frame 7 combustion turbines firing natural gas with or without the supplemental firing of one or two duct burners firing gas with the gas turbines operating at any load. NOx emissions are controlled with steam injection and selective catalytic reduction.

Process: 23O One or two GE Frame 7 combustion turbines firing distillate oil or oil/gas with or without the supplemental firing of one or two duct burners firing natural gas with the gas turbine operating at any load. NOx emissions are controlled with steam injection and selective catalytic reduction.

Note: This condition is included to provide for operational flexibility as defined by NYCRR Part 201-6.5(f). Operational flexibility in this instance, ensures that the SCP can provide reliable power during times when natural gas is commercially unavailable by utilizing the facility's alternate ability to fire it's combustion turbines on fuel oil. Also, under the provisions of operational flexibility, SCP is allowed to suspend the otherwise required fuel oil compliance testing and reporting provisions until SCP actually fires fuel oil for the first time in the permit term. At such time that the combustion turbines are fired on oil, then that date shall be the date of first fire, and the testing and reporting provisions of this condition and all other applicable state and federal requirements are activated.

Process: 2DB Phase 2, units 2 or 3, duct burner firing natural gas.

Process: 2GB Phase 2 GE Frame 7 combustion turbine firing natural gas with or without the supplemental firing of the duct burner also firing natural gas and with the gas turbine unit operating at baseload.

Process: 2GL Phase 2 GE Frame combustion turbine firing natural gas with or without the supplemental firing of the duct burner also firing natural gas and with the gas turbine unit operating at base low flow.

Process: 2OB Phase 2 GE Frame combustion turbine firing oil with or without the supplemental firing of the duct burner firing natural gas and with the gas turbine unit operating at baseload.

Note: This condition is included to provide for operational flexibility as defined by NYCRR Part 201-6.5(f). Operational flexibility in this instance, ensures that the SCP can provide reliable power during times when natural gas is commercially unavailable by utilizing the facility's alternate ability to fire it's combustion turbines on fuel oil. Also, under the provisions of operational flexibility, SCP is allowed to suspend the otherwise required fuel oil compliance testing and reporting provisions until SCP actually fires fuel oil for the first time in the permit term. At such time that the combustion turbines are fired on oil, then that date shall be the date of first fire, and the testing and reporting provisions of this condition and all other applicable state and federal requirements are activated.

Process: 2OL Phase 2 GE Frame combustion turbine firing oil with or without the supplemental firing of the duct burner firing natural gas and with the gas turbine unit operating at base low flow.

Note: This condition is included to provide for operational flexibility as defined by NYCRR Part 201-6.5(f). Operational flexibility in this instance, ensures that the SCP can provide reliable power during times when natural gas is commercially unavailable by utilizing the facility's alternate ability to fire it's combustion turbines on fuel oil. Also, under the provisions of operational flexibility, SCP is allowed to suspend the otherwise required fuel oil compliance testing and reporting provisions until SCP actually fires



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

fuel oil for the first time in the permit term. At such time that the combustion turbines are fired on oil, then that date shall be the date of first fire, and the testing and reporting provisions of this condition and all other applicable state and federal requirements are activated.

Emission unit U00004 - This emission unit consists of four auxiliary boilers. Boiler No. 2 is a Murray Iron Works 77/75 (gas/oil) MMBtu/hr boiler. Boiler No. 3 is a Combustion Engineering A-Type boiler rated at 180 MMBtu/hr. Boilers No 4 & 5 are identical Babcock & Wilcox D-Type boilers rated at 180 MMBtu/hr each. All boilers may fire natural gas, oil or a gas/oil mixture. There are four emissions points for this emission unit. All boilers are operated on an intermittent basis to supplement steam produced by the facility turbine/HRSG combustion units and to assure an uninterruptable steam supply to the industrial steam customer.

Emission unit U00004 is associated with the following emission points (EP):
00601, 00602, 00605, 00607

Process: B2G is located at Building UTILITYBLG - Boiler No. 2 Murray Iron Works boiler firing natural gas.

Process: B2O is located at Building UTILITYBLG - Boiler No. 2 Murray Iron Works boiler firing distillate oil or oil/gas.

Process: B3G Boiler No. 3 Combustion Engineering A-Type package boiler firing natural gas.

Process: B3O Boiler No. 3 Combustion Engineering A-Type package boiler firing distillate oil or oil/gas.

Process: B4G Boiler No. 4 Babcock and Wilcox D-Type package boiler firing natural gas.

Process: B4O Boiler No. 4 Babcock and Wilcox D-Type package boiler firing distillate oil or oil/gas.

Process: B5G Boiler No. 5 Babcock and Wilcox D-Type package boiler firing natural gas.

Process: B5O Boiler No. 5 Babcock and Wilcox D-Type package boiler firing distillate oil or oil/gas.

Emission unit U00005 - This emission unit consists of a 42,000 gallon ammonium hydroxide storage tank. Ammonium hydroxide is used to reduce NOx emissions and is injected into the exhaust gas prior to the selective catalytic reduction (SCR) unit. The tank has a vent that is maintained at 1-2 psi pressure to reduce or prevent the release of NH3 vapors.

Emission unit U00005 is associated with the following emission points (EP):
00005

Process: TNK This unit is a 42,000 gallon tank used to store ammonium hydroxide solution. The maximum amount of ammonium hydroxide stored is 37,800 gallons. Ammonium hydroxide is used to control nitrogen oxides in the gas turbine selective catalytic reduction control systems. The tank relief vent is maintained at 1-2 psi to reduce or prevent the release of ammonia vapors.

Emission unit U00006 -



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

Emission unit U00006 is associated with the following emission points (EP):
00006

Process: AUX Auxiliary generator rated at 3.39 MMBTU/hr firing # 2 fuel oil.

Emission unit U00001 - Emission unit U-00001 consists of a General Electric Frame 7 Quiet Combustor turbine and associated heat recovery steam generator (HRSG) equipped with a duct burner. The turbine may operate on gas, oil, or gas/oil. The duct burner may operate only on gas. The rated heat input for this emission unit is 1161.9 MMBtu/hr. There is one emission point associated with this emission unit. The combustion turbine and HRSG are located outside, therefore no buildings are associated with this emission unit that contain emission points or processes as defined by the application instructions.

Emission unit U00001 is associated with the following emission points (EP):
00001

Process: 1AG Phase 1 GE Frame 7 combustion Turbine firing natural gas with or without the supplemental firing of the duct burner also firing natural gas and with the gas turbine unit operating at any load. NOx emissions are controlled with steam injection.

Process: 1AO Phase 1 GE Frame 7 combustion turbine firing oil with or without the supplemental firing of the duct burner firing natural gas and with the gas turbine operating at any load. NOx emissions are controlled with steam injection.

Note: This process is included to provide for operational flexibility as defined by NYCRR Part 201-6.5(f). Operational flexibility in this instance, ensures that the SCP can provide reliable power during times when natural gas is commercially unavailable by utilizing the facility's alternate ability to fire it's combustion turbines on fuel oil. Also, under the provisions of operational flexibility, SCP is allowed to suspend the otherwise required fuel oil compliance testing and reporting provisions until SCP actually fires fuel oil for the first time in the permit term. At such time that the combustion turbines are fired on oil, then that date shall be the date of first fire, and the testing and reporting provisions of this condition and all other applicable state and federal requirements are activated.

Process: 1BG Phase 1 GE Frame 7 combustion turbine firing natural gas with or without the supplemental firing of the duct burner also firing natural gas and with the gas turbine unit operating at baseload.

Process: 1BO Phase 1 GE Frame 7 combustion turbine firing oil with or without the supplemental firing of the duct burner also firing natural gas and with the gas turbine operating at baseload.

Note: This condition is included to provide for operational flexibility as defined by NYCRR Part 201-6.5(f). Operational flexibility in this instance, ensures that the SCP can provide reliable power during times when natural gas is commercially unavailable by utilizing the facility's alternate ability to fire it's combustion turbines on fuel oil. Also, under the provisions of operational flexibility, SCP is allowed to suspend the otherwise required fuel oil compliance testing and reporting provisions until SCP actually fires fuel oil for the first time in the permit term. At such time that the combustion turbines are fired on oil, then that date shall be the date of first fire, and the testing and reporting provisions of this condition and all other applicable state and federal requirements are activated.

Process: 1DB Phase1, unit 1, duct burner firing natural gas.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

Process: 1GL Phase 1 GE Frame 7 combustion turbine firing natural gas with or without the supplemental firing of the duct burner also firing natural gas and with the gas turbine operating at base low flow.

Process: 1HG GE Frame 7 combustion turbine firing natural gas with or without the supplemental firing of the duct burner also firing natural gas and with the gas turbine unit operating at or above base low flow. NOx emissions are controlled with steam injection.

Process: 1HO GE Frame 7 combustion turbine firing distillate oil or oil/gas with or without the supplemental firing of the duct burner firing natural gas and with the gas turbine operating at or above base low flow. NOx emissions are controlled with steam injection.

Note: This condition is included to provide for operational flexibility as defined by NYCRR Part 201-6.5(f). Operational flexibility in this instance, ensures that the SCP can provide reliable power during times when natural gas is commercially unavailable by utilizing the facility's alternate ability to fire its combustion turbines on fuel oil. Also, under the provisions of operational flexibility, SCP is allowed to suspend the otherwise required fuel oil compliance testing and reporting provisions until SCP actually fires fuel oil for the first time in the permit term. At such time that the combustion turbines are fired on oil, then that date shall be the date of first fire, and the testing and reporting provisions of this condition and all other applicable state and federal requirements are activated.

Process: 1LF Phase 1 GE Frame 7 combustion turbine firing oil with or without the supplemental firing of the duct burner firing natural gas and with the gas turbine operating at base low flow.

Note: This condition is included to provide for operational flexibility as defined by NYCRR Part 201-6.5(f). Operational flexibility in this instance, ensures that the SCP can provide reliable power during times when natural gas is commercially unavailable by utilizing the facility's alternate ability to fire its combustion turbines on fuel oil. Also, under the provisions of operational flexibility, SCP is allowed to suspend the otherwise required fuel oil compliance testing and reporting provisions until SCP actually fires fuel oil for the first time in the permit term. At such time that the combustion turbines are fired on oil, then that date shall be the date of first fire, and the testing and reporting provisions of this condition and all other applicable state and federal requirements are activated.

Process: 1LG GE Frame 7 combustion turbine firing natural gas with or without the supplemental firing of the duct burner also firing natural gas and with the gas turbine operating below the less of 784 MMBtu/hr and base low flow. NOx emissions are controlled with steam injection.

Process: 1LO GE Frame 7 combustion turbine firing distillate oil or oil/gas with or without the supplemental firing of the duct burner firing natural gas and with the gas turbine operating below the lesser of 784 MMBtu/hr and base low flow. NOx emissions from the gas turbine are controlled with steam injection.

Note: This condition is included to provide for operational flexibility as defined by NYCRR Part 201-6.5(f). Operational flexibility in this instance, ensures that the SCP can provide reliable power during times when natural gas is commercially unavailable by utilizing the facility's alternate ability to fire its combustion turbines on fuel oil. Also, under the provisions of operational flexibility, SCP is allowed to suspend the otherwise required fuel oil compliance testing and reporting provisions until SCP actually fires fuel oil for the first time in the permit term. At such time that the combustion turbines are fired on oil, then that date shall be the date of first fire, and the testing and reporting provisions of this condition and all other applicable state and federal requirements are activated.

Process: 1MG GE Frame 7 combustion turbine firing natural gas with or without the supplemental firing of the duct burner firing natural gas and with the gas turbine operating between 784 mmBTU/hr and base low



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1
01/08/2018

flow. NOx emissions from the gas turbine are controlled with steam injection.

Process: 1MO GE Frame 7 combustion turbine firing distillate oil/gas with or without the supplemental firing of the duct burner firing natural gas and with the gas turbine operating between 784 mmBTU/hr and base low flow. NOx emissions are controlled with steam injection.

Note: This condition is included to provide for operational flexibility as defined by NYCRR Part 201-6.5(f). Operational flexibility in this instance, ensures that the SCP can provide reliable power during times when natural gas is commercially unavailable by utilizing the facility's alternate ability to fire it's combustion turbines on fuel oil. Also, under the provisions of operational flexibility, SCP is allowed to suspend the otherwise required fuel oil compliance testing and reporting provisions until SCP actually fires fuel oil for the first time in the permit term. At such time that the combustion turbines are fired on oil, then that date shall be the date of first fire, and the testing and reporting provisions of this condition and all other applicable state and federal requirements are activated.

Title V/Major Source Status

SELKIRK COGENERATION PROJECT is subject to Title V requirements. This determination is based on the following information:

The Selkirk Cogeneration Project (SCP) is subject to Title V or major status permitting requirements. SCP is major facility due to it's potential to emit (PTE) exceeding the major source thresholds for the following air contaminants; NOx, SO2, CO, PM, VOC and HAP.

Program Applicability

The following chart summarizes the applicability of SELKIRK COGENERATION PROJECT with regards to the principal air pollution regulatory programs:

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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1
01/08/2018

National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

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
4931	ELEC & OTHER SERVICES COMBINED

SCC Codes

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

SCC Code

Description

1-01-006-01	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION
	ELECTRIC UTILITY BOILER - NATURAL GAS Boilers > 100 MBtu/Hr except Tangential
1-03-005-01	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - DISTILLATE OIL
	Grades 1 and 2 Oil
1-03-006-01	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS
	Over 100 MMBtu/Hr
1-03-006-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS
	10-100 MMBtu/Hr
2-01-001-01	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION
	ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL)
	Turbine
2-01-001-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION
	ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL)
	Reciprocating
2-01-002-01	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION
	ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS
	Turbine

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

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 of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
007664-41-7	AMMONIA				
007440-36-0	ANTIMONY				
000124-38-9	CARBON				
	DIOXIDE				
000630-08-0	CARBON				
	MONOXIDE				
007440-47-3	CHROMIUM				
000050-00-0	FORMALDEHYDE				
007439-92-1	LEAD				
007439-96-5	MANGANESE				
007440-02-0	NICKEL METAL				
	AND INSOLUBLE				
	COMPOUNDS				
0NY210-00-0	OXIDES OF				
	NITROGEN				
0NY075-00-0	PARTICULATES				
007723-14-0	PHOSPHORUS				
	(YELLOW)				
0NY075-00-5	PM-10				
007446-09-5	SULFUR				
	DIOXIDE				
007664-93-9	SULFURIC ACID				
0NY100-00-0	TOTAL HAP				
0NY998-00-0	VOC				

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1
01/08/2018

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)

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

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

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

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

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

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

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

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as 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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
 - (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
 - (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

Item B: General Provisions for State Enforceable Permit Terms and Condition - 6

NYCRR Part 201-5

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

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	234	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-A.21	47, 48, 49, 50, 51, 52, 53, 54, 55	Prevention of Significant Deterioration
U-00001	40CFR 52-A.21	66, 67	Prevention of Significant Deterioration
U-00001/00001	40CFR 52-A.21	93, 94, 95, 96, 97	Prevention of Significant Deterioration
U-00001/00001/1AG	40CFR 52-A.21	98, 99	Prevention of Significant Deterioration
U-00001/00001/1AG/OOGT1	40CFR 52-A.21	100, 101, 102	Prevention of Significant Deterioration
U-00001/00001/1AO	40CFR 52-A.21	103, 104	Prevention of Significant Deterioration
U-00001/00001/1AO/OOGT1	40CFR 52-A.21	105, 106, 107	Prevention of Significant Deterioration
U-00001/00001/1BG/OOGT1	40CFR 52-A.21	108, 109, 110, 111	Prevention of Significant Deterioration
U-00001/00001/1BO/OOGT1	40CFR 52-A.21	112, 113, 114, 115	Prevention of Significant Deterioration
U-00001/00001/1DB/OODB1	40CFR 52-A.21	116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127	Prevention of Significant Deterioration
U-00001/00001/1GL/OOGT1	40CFR 52-A.21	128, 129, 130, 131	Prevention of Significant Deterioration



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

U-00001/00001/1HG	40CFR 52-A.21	132, 133	Deterioration Prevention of Significant
U-00001/00001/1HG/OOGT1	40CFR 52-A.21	134	Deterioration Prevention of Significant
U-00001/00001/1HO	40CFR 52-A.21	135, 136	Deterioration Prevention of Significant
U-00001/00001/1HO/OOGT1	40CFR 52-A.21	137	Deterioration Prevention of Significant
U-00001/00001/1LF/OOGT1	40CFR 52-A.21	138, 139, 140, 141	Deterioration Prevention of Significant
U-00001/00001/1LG	40CFR 52-A.21	142, 143	Deterioration Prevention of Significant
U-00001/00001/1LG/OOGT1	40CFR 52-A.21	144	Deterioration Prevention of Significant
U-00001/00001/1LO	40CFR 52-A.21	145, 146	Deterioration Prevention of Significant
U-00001/00001/1LO/OOGT1	40CFR 52-A.21	147	Deterioration Prevention of Significant
U-00001/00001/1MG	40CFR 52-A.21	148, 149	Deterioration Prevention of Significant
U-00001/00001/1MG/OOGT1	40CFR 52-A.21	150	Deterioration Prevention of Significant
U-00001/00001/1MO	40CFR 52-A.21	151, 152	Deterioration Prevention of Significant
U-00001/00001/1MO/OOGT1	40CFR 52-A.21	153	Deterioration Prevention of Significant
U-00002	40CFR 52-A.21	156, 157, 158, 159	Deterioration Prevention of Significant
U-00002/-/23G	40CFR 52-A.21	178, 179, 180, 181, 182, 183	Deterioration Prevention of Significant
U-00002/-/23G/OGT23	40CFR 52-A.21	184, 185, 186, 187	Deterioration Prevention of Significant
U-00002/-/23O	40CFR 52-A.21	188, 189, 190, 191, 192, 193	Deterioration Prevention of Significant
U-00002/-/23O/OGT23	40CFR 52-A.21	194, 195, 196, 197, 198, 199	Deterioration Prevention of Significant
U-00002/-/2DB/ODB23	40CFR 52-A.21	202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213	Deterioration Prevention of Significant
U-00002/-/2GB/OGT23	40CFR 52-A.21	214, 215, 216, 217	Deterioration Prevention of Significant
U-00002/-/2GL/OGT23	40CFR 52-A.21	218, 219, 220, 221	Deterioration Prevention of Significant



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

U-00002/-/20B/OGT23	40CFR 52-A.21	222, 223, 224, 225	Prevention of Significant Deterioration
U-00002/-/20L/OGT23	40CFR 52-A.21	226, 227, 228	Prevention of Significant Deterioration
U-00002/00002	40CFR 52-A.21	229, 230	Prevention of Significant Deterioration
U-00002/00003	40CFR 52-A.21	231, 232	Prevention of Significant Deterioration
U-00004	40CFR 52-A.21	233	Prevention of Significant Deterioration
U-00001	40CFR 60-A	68	General provisions
U-00002	40CFR 60-A	160	General provisions
FACILITY	40CFR 60-A.11(d)	57	General provisions - compliance with standards and maintenance requirements
U-00001	40CFR 60-A.12	79	General provisions - Circumvention
U-00002	40CFR 60-A.12	171	General provisions - Circumvention
U-00001	40CFR 60-A.13	80	General provisions - Monitoring requirements
U-00002	40CFR 60-A.13	172	General provisions - Monitoring requirements
U-00001	40CFR 60-A.14	81	General provisions - Modification
U-00002	40CFR 60-A.14	173	General provisions - Modification
U-00001	40CFR 60-A.15	82	General provisions - Reconstruction
U-00002	40CFR 60-A.15	174	General provisions - Reconstruction
FACILITY	40CFR 60-A.4	56	General provisions - Address
U-00001	40CFR 60-A.7(a)	69	Notification and Recordkeeping
U-00002	40CFR 60-A.7(a)	161	Notification and Recordkeeping
U-00001	40CFR 60-A.7(b)	70	Notification and Recordkeeping
U-00002	40CFR 60-A.7(b)	162	Notification and Recordkeeping
U-00001	40CFR 60-A.7(f)	71	Notification and Recordkeeping
U-00002	40CFR 60-A.7(f)	163	Notification and Recordkeeping
U-00001	40CFR 60-A.8(a)	72	Performance Tests
U-00002	40CFR 60-A.8(a)	164	Performance Tests
U-00001	40CFR 60-A.8(b)	73	Performance Tests
U-00002	40CFR 60-A.8(b)	165	Performance Tests
U-00001	40CFR 60-A.8(c)	74	Performance Tests
U-00002	40CFR 60-A.8(c)	166	Performance Tests
U-00001	40CFR 60-A.8(d)	75	Performance Tests
U-00002	40CFR 60-A.8(d)	167	Performance Tests
U-00001	40CFR 60-A.8(e)	76	Performance Tests
U-00002	40CFR 60-A.8(e)	168	Performance Tests



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

U-00001	40CFR 60-A.8(f)	77	Performance Tests
U-00002	40CFR 60-A.8(f)	169	Performance Tests
U-00001	40CFR 60-A.9	78	General provisions -
			Availability of
			information
U-00002	40CFR 60-A.9	170	General provisions -
			Availability of
			information
U-00001/-/1DB	40CFR 60-Db.44b(a)(4)	89	Standard for Nitrogen
			Oxides for Duct
			Burners Used in
			Combined Cycle
			Projects.
U-00002/-/2DB	40CFR 60-Db.44b(a)(4)	200	Standard for Nitrogen
			Oxides for Duct
			Burners Used in
			Combined Cycle
			Projects.
U-00001/-/1DB	40CFR 60-Db.49b	90	Reporting and
			Recordkeeping
			Requirements.
U-00002/-/2DB	40CFR 60-Db.49b	201	Reporting and
			Recordkeeping
			Requirements.
U-00001	40CFR 60-GG.334(b)	83	Monitoring of
			Operations: CEMS
U-00002	40CFR 60-GG.334(b)	175	Monitoring of
			Operations: CEMS
U-00001	40CFR 60-GG.334(h)	84	Fuel Content
U-00002	40CFR 60-GG.334(h)	176	Fuel Content
FACILITY	40CFR 60-GG.334(h)(3)	58	Allowance not to
			monitor sulfur or
			nitrogen for natural
			gas
U-00001	40CFR 60-GG.334(j)	85	Reporting
			Requirements
U-00002	40CFR 60-GG.334(j)	177	Reporting
			Requirements
FACILITY	40CFR 63-JJJJJJ	59	National Emission
			Standards for
			Hazardous Air
			Pollutants for
			Industrial,
			Commercial, and
			Institutional Boilers
			Area Sources
FACILITY	40CFR 63-ZZZZ	60	Reciprocating
			Internal Combustion
			Engine (RICE) NESHP
FACILITY	40CFR 68	19	Chemical accident
			prevention provisions
U-00001	40CFR 72	86	Permits regulation
U-00001	40CFR 75-B.10(a)	87	Continuous emission
			monitoring - general
			operating
			requirements
U-00001	40CFR 75-B.10(d)	88	Continuous emission
			monitoring - general
			operating
			requirements
FACILITY	40CFR 82-F	20	Protection of
			Stratospheric Ozone -
			recycling and
			emissions reduction



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

FACILITY	40CFR 97	61	Federal Cross-State Air Pollution Regulation (CSAPR)
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	235	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 62, 63	Title V Permits and the Associated Permit Conditions
U-00001/00001	6NYCRR 201-6	91, 92	Title V Permits and the Associated Permit Conditions
U-00002	6NYCRR 201-6	154, 155	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-7.1	64	Emission Capping in Facility Permits
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	23	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	236	General Prohibitions

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

FACILITY	6NYCRR 215.2	9	- visible emissions limited.
FACILITY	6NYCRR 225-1.2(g)	24	Open Fires -
FACILITY	6NYCRR 225-1.5(c)	25	Prohibitions
FACILITY	6NYCRR 227-1.3(a)	26	Sulfur-in-Fuel
FACILITY	6NYCRR 227-2.4(b)(1)(ii)	27	Limitations
FACILITY	6NYCRR 227-2.4(c)(1)(ii)	28	Monitoring
FACILITY	6NYCRR 242-1.5	237	Requirements
FACILITY	6NYCRR 242-8	238	Smoke Emission Limitations.
FACILITY	6NYCRR 243-1.6(a)	29	2010 NOx RACT presumptive limits.
FACILITY	6NYCRR 243-1.6(b)	30	2010 NOx RACT presumptive limit.
FACILITY	6NYCRR 243-1.6(c)	31	CO2 Budget Trading Program - Standard requirements
FACILITY	6NYCRR 243-1.6(d)	32	CO2 Budget Trading Program - Monitoring and reporting
FACILITY	6NYCRR 243-1.6(e)	33	Permit Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-2.1	34	Monitoring Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-2.4	35	NOx Ozone Season Emission Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-8.1	36, 37	Excess Emission Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-8.5(d)	38	Recordkeeping and reporting requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-8.5(e)	39	Authorization and responsibilities - CAIR Designated Representative Certificate of representation - CAIR Designated Representative
FACILITY	6NYCRR 244-1	40, 41	General Requirements - Monitoring and Reporting
			Quarterly reports re: recordkeeping and reporting - Monitoring and Reporting
			Compliance certification re: recordkeeping and reporting - Monitoring and Reporting
			CAIR NOx Ozone Annual



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

FACILITY	6NYCRR 244-2	42	Trading Program General Provisions CAIR Designated Representative for CAIR NOx Sources
FACILITY	6NYCRR 244-8	43	Monitoring and Reporting CAIR NOx Allowances
FACILITY	6NYCRR 245-1	44	CAIR SO2 Trading Program General Provisions
FACILITY	6NYCRR 245-2	45	CAIR Designated Representative for CAIR SO2 Sources
FACILITY	6NYCRR 245-8	46	Monitoring and Reporting for CAIR SO2 Trading Program

Applicability Discussion:

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

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

6 NYCRR 201-6.4 (c) (3) (ii)



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

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

6 NYCRR 201-6.4 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

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

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

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

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, SELKIRK COGENERATION PROJECT has been determined to be subject to the following regulations:

40 CFR 52.21

This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions;

ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i) .

40 CFR 60.11 (d)

This regulation specifies the type of opacity monitoring requirements in relation to compliance with the standards and maintenance requirements.

40 CFR 60.12

This regulation prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

40 CFR 60.13

This regulation specifies how monitoring shall be performed and which methods and appendices are used to determine if the monitoring is adequate and in compliance with the regulated standards.

40 CFR 60.14

This regulation defines the term modification and what is and is not considered to be a modification, for the purpose of rule applicability.

40 CFR 60.15

This regulation defines the term reconstruction and what is and is not considered to be a reconstruction project, for the purpose of rule applicability.

40 CFR 60.334 (b)

This regulation allows the owner/operator of a gas turbine to use a CEMS to monitor NOx emissions instead of monitoring fuel and water/steam usage.

40 CFR 60.334 (h)

This regulation requires the applicant to monitor the sulfur and nitrogen content of the fuel being burned in the turbine.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

40 CFR 60.334 (h) (3)

This regulation allows the owner or operator of a gas turbine to not monitor the fuel for sulfur or nitrogen content if the fuel meets the 40 CFR 60.331(u) definition of natural gas.

40 CFR 60.334 (j)

This regulation sets forth the reporting requirements for affected units that continuously monitor parameters or emissions or those that periodically determine the sulfur and/or nitrogen content of the fuel burned in a gas turbine.

40 CFR 60.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40 CFR 60.44b (a) (4)

These standards apply to boilers firing natural gas and/or distillate oil as provided in 40 CFR 60.44b(a)(4) Duct Burners Used in a Combined Cycle System.

40 CFR 60.49b

This rule specifies the reporting and recordkeeping requirements for affected steam generating units.

40 CFR 60.7 (a)

This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

40 CFR 60.7 (b)

This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40 CFR 60.7 (f)

This condition specifies requirements for maintenance of files of all measurements, including continuous monitoring system (CMS), monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices for at least two years.

40 CFR 60.8 (a)

This regulation contains the requirements for the completion date and reporting of Performance Testing (stack testing), at the facility. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, the owner or operator of



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

the facility must conduct performance test(s) and furnish a written report of the test results.

40 CFR 60.8 (b)

This regulation contains the requirements for Performance test methods and procedures, to be used by the owner or operator , of the affected facility.

40 CFR 60.8 (c)

This condition contains the requirements for operating conditions, of the emission source, during performance testing.

40 CFR 60.8 (d)

This regulation contains the requirements for advance notification of Performance (stack) testing.

40 CFR 60.8 (e)

This regulation requires the facility to provide appropriate sampling ports, safe platforms and utilities as necessary for Performance (stack) testing.

40 CFR 60.8 (f)

This regulation requires that Performance (stack) tests consist of three runs unless otherwise specified. The rule also designates the allowable averaging methods for the analysis of the results.

40 CFR 60.9

This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

40 CFR 75.10 (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.

40 CFR 75.10 (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.

40 CFR Part 60, Subpart A

This regulation contains the General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

40 CFR Part 63, Subpart JJJJJ

This regulation covers facilities that own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

40 CFR Part 63, Subpart ZZZZ

40 CFR Part 72

In order to reduce acid rain in the U.S. and Canada, Title IV of the Clean Air Act Amendments of 1990 requires the establishment of a program to reduce emissions of SO₂ and NO_x (sulfur dioxide and oxides of nitrogen). Fossil fuel burning electric utility companies are a major source of these contaminants in the US. These sources were regulated in a phased approach. Phase I, which began in 1995, requires 110 of the higher-emitting utility plants in the eastern and Midwest states to meet intermediate SO₂ emission limitations. Phase II, which began in 2000, tightens the emission limitations and expands the coverage to most fossil fuel burning utilities. The utilities are given "allowances" which is a limited authorization to emit one ton of SO₂. The utilities are required to limit SO₂ emissions to the number of allowances they hold. Some can benefit however by reducing their emissions and selling their excess allowances. Part 72 contains the means of implementing this portion of Title IV of the Clean Air Act.

40 CFR Part 97

Cross-State Air Pollution Rule (CSAPR), requires states to significantly improve air quality by reducing power plant emissions that contribute to ozone and/or fine particle pollution in other states.

6 NYCRR 201-7.1

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 225-1.2 (g)



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

Sulfur-in-fuel limitations for the purchase of distillate oil on or after July 1, 2014.

6 NYCRR 225-1.5 (c)

This citation sets the daily and weekly fuel monitoring requirements for subject emission sources.

6 NYCRR 227-1.3 (a)

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

6 NYCRR 227-2.4 (b) (1) (ii)

Future NOx RACT presumptive limits effective 7/1/14.

6 NYCRR 227-2.4 (c) (1) (ii)

Future NOx RACT presumptive limit effective 7/1/14.

6 NYCRR 242-1.5

This regulation requires that the facility hold enough carbon dioxide allowances in their carbon dioxide budget at least equal to the amount of carbon dioxide emitted from the facility each year.

6 NYCRR 243-1.6 (a)

This condition requires the facility to acknowledge that they are subject to this CAIR regulation and provide owner and contact information. It also requires them to update this information as it changes or provide supplemental information at the Departments request.

6 NYCRR 243-1.6 (b)

This condition obligates the owners and operators of the facility to comply with the monitoring and reporting requirements of the CAIR regulations.

6 NYCRR 243-1.6 (c)

This citation explains the general provisions of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program. This ozone season NOx cap and trade program runs from May 1 through September 30 each year, starting in 2009. Each source shall hold a tonnage equivalent in CAIR NOx Ozone Season allowances that is not less than the total tons of NOx emissions for the ozone season.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

6 NYCRR 243-1.6 (d)

This citation for the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains some of the penalties that can be imposed on a CAIR NOx Ozone Season source that does not surrender enough CAIR NOx Ozone Season allowances to cover their NOx Ozone Season emissions.

6 NYCRR 243-1.6 (e)

This citation for the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program requires that all reports be submitted as required by this program, and that copies of all records and submissions made for this program be kept on site for at least five years.

6 NYCRR 243-2.1

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains that a CAIR NOx Ozone Season designated representative must be selected to submit, sign and certify each submission on behalf of the source for this program.

6 NYCRR 243-2.4

This condition describes the required elements of the "Certificate of Representation" for the CAIR program and the certifying language required with submissions to the Department.

6 NYCRR 243-8.1

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains that CAIR NOx Ozone Season Trading Program sources must install, certify and operate monitoring systems that meet the monitoring, recordkeeping, and reporting requirements in Subpart 6 NYCRR 243-8 and in Subpart H of 40 CFR Part 75.

6 NYCRR 243-8.5 (d)

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains what requirements the quarterly reports must meet.

6 NYCRR 243-8.5 (e)

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains the compliance certification requirements the source must follow for each quarterly report.

6 NYCRR Subpart 242-8

Citation 6NYCRR Part 242-8.5 requires that the record keeping and reporting requirements of 40 CFR Part 75.73 and 6NYCRR Part 242-2.1(e) be followed, that a CO2 monitoring plan(s) be submitted, that the CO2 emission monitor(s) be certified, and that CO2 emissions be reported quarterly in an electronic format.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1
01/08/2018

6 NYCRR Subpart 244-1

This subpart explains the general provisions of the Clean Air Interstate Rule (CAIR) Nitrogen Oxide (NOx) Annual Trading Program. The control period for this annual NOx cap and trade program runs from January 1 to December 31 each year, starting in 2009. Each source shall hold a tonnage equivalent in CAIR NOx allowances that is not less than the total tons of NOx emissions for the control period.

6 NYCRR Subpart 244-2

Each Clean Air Interstate Rule (CAIR) NOx source shall have one CAIR designated representative and may have one alternate representative. Each submission for the CAIR NOx Annual Trading Program shall be submitted, signed, and certified by the CAIR designated representative or the alternate representative.

6 NYCRR Subpart 244-8

The owners, operators, and Clean Air Interstate Rule (CAIR) designated representative of a CAIR NOx unit shall comply with the monitoring, recordkeeping, and reporting requirements as provided in Subpart 6 NYCRR Part 244-8 and in 40 CFR Part 75, Subparts F and G. A certified NOx emission monitoring system must be used to measure NOx emissions. NOx emission reports must be certified and submitted quarterly.

6 NYCRR Subpart 245-1

This subpart explains the general provisions of the Clean Air Interstate Rule (CAIR) sulfur dioxide (SO2) Trading Program. The control period for this annual SO2 cap and trade program runs from January 1 to December 31, starting in the year 2010. Each source shall hold a tonnage equivalent in CAIR SO2 allowances that is not less than the total tons of SO2 emissions for the control period.

6 NYCRR Subpart 245-2

Each Clean Air Interstate Rule (CAIR) SO2 source shall have one CAIR designated representative and may have one alternate representative. Each submission for the CAIR SO2 Trading Program shall be submitted, signed, and certified by the CAIR designated representative or the alternate representative.

6 NYCRR Subpart 245-8

The owners, operators, and Clean Air Interstate Rule (CAIR) designated representative of a CAIR SO2 unit shall comply with the monitoring, recordkeeping, and reporting requirements as provided in Subpart 6 NYCRR Part 245-8 and in 40 CFR Part 75, Subparts F and G. A certified SO2 emission monitoring system must be used to measure SO2 emissions. SO2 emission reports must be certified and submitted quarterly.

The owners, operators, and Clean Air Interstate Rule (CAIR) designated representative of a CAIR SO2 unit shall comply with the monitoring, recordkeeping, and reporting requirements as provided in Subpart 6 NYCRR Part 245-8 and in 40 CFR Part 75, Subparts F and G. A certified SO2 emission monitoring system must be used to measure SO2 emissions. SO2 emission reports must be certified and submitted quarterly.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
U-00001	6 NYCRR 225-1.2 (a) (1)	Sulfur in Fuel Limitations Pre January 1, 1988 (SIP standards).
Reason: SCP's PSD permit requires that the entire facility use fuel oil with a sulfur content lower than specified by 6 NYCRR 225-1.2(a)(1). Therefore, this rule does not apply.		
U-00002	6 NYCRR 225-1.2 (a) (1)	Sulfur in Fuel Limitations Pre January 1, 1988 (SIP standards).
Reason: SCP's PSD permit requires that the entire facility use fuel oil with a sulfur content lower than specified by 6 NYCRR 225-1.2(a)(1). Therefore, this rule does not apply.		
U-00004	6 NYCRR 225-1.2 (a) (2)	Sulfur in Fuel Limitations Post 12/31/87.
Reason: SCP's PSD permit requires that the entire facility use fuel oil with a sulfur content lower than specified by 6 NYCRR 225-1.2(a)(1). Therefore, this rule does not apply.		
U-00001	6 NYCRR 225-1.7	Emission and fuel monitoring.
Reason: A SOx monitor is not required because the facility is subject to representative sampling and sulfur analysis in accordance with 40 CFR 60.334 and 60.335.		
U-00002	6 NYCRR 225-1.7	Emission and fuel monitoring.
Reason: A SOx monitor is not required because the facility is subject to representative sampling and sulfur analysis in accordance with 40 CFR 60.334 and 60.335.		
U-00001	6 NYCRR 227-1.2 (a) (1)	Particulate Emissions from Liquid Fuels.
Reason: SCP's PSD permit provides for a lower particulate emission limit than the 0.1 lb/MMBtu limit specified by 6 NYCRR 227-1.2(a)(1). Therefore, this rule does not apply.		

New York State Department of Environmental Conservation Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

U-00002 6 NYCRR 227-1.2 (a) (1) Particulate Emissions
from Liquid Fuels.

Reason: SCP's PSD permit provides for a lower particulate emission limit than the 0.1 lb/MMBtu limit specified by 6 NYCRR 227-1.2(a)(1). Therefore, this rule does not apply.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at SELKIRK COGENERATION PROJECT:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	48	work practice involving specific operations
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
FACILITY	51	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
U-00001	66	work practice involving specific operations
U-00001	67	record keeping/maintenance procedures
U-00001/00001	93	work practice involving specific operations
U-00001/00001	94	work practice involving specific operations
U-00001/00001	95	work practice involving specific operations
U-00001/00001	96	record keeping/maintenance procedures
U-00001/00001	97	work practice involving specific operations
U-00001/00001/1AG	98	continuous emission monitoring (cem)
U-00001/00001/1AG	99	continuous emission monitoring (cem)
U-00001/00001/1AG/OOGT1	100	intermittent emission testing
U-00001/00001/1AG/OOGT1	101	intermittent emission testing
U-00001/00001/1AG/OOGT1	102	intermittent emission testing
U-00001/00001/1AO	103	continuous emission monitoring (cem)
U-00001/00001/1AO	104	continuous emission monitoring (cem)
U-00001/00001/1AO/OOGT1	105	intermittent emission testing
U-00001/00001/1AO/OOGT1	106	intermittent emission testing
U-00001/00001/1AO/OOGT1	107	intermittent emission testing
U-00001/00001/1BG/OOGT1	108	intermittent emission testing
U-00001/00001/1BG/OOGT1	109	intermittent emission testing
U-00001/00001/1BG/OOGT1	110	intermittent emission testing
U-00001/00001/1BG/OOGT1	111	intermittent emission testing
U-00001/00001/1BO/OOGT1	112	intermittent emission testing
U-00001/00001/1BO/OOGT1	113	intermittent emission testing
U-00001/00001/1BO/OOGT1	114	intermittent emission testing
U-00001/00001/1BO/OOGT1	115	intermittent emission testing
U-00001/00001/1DB/OODB1	116	intermittent emission testing



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

U-00001/00001/1DB/OODB1	117	intermittent emission testing
U-00001/00001/1DB/OODB1	118	intermittent emission testing
U-00001/00001/1DB/OODB1	119	intermittent emission testing
U-00001/00001/1DB/OODB1	120	intermittent emission testing
U-00001/00001/1DB/OODB1	121	intermittent emission testing
U-00001/00001/1DB/OODB1	122	intermittent emission testing
U-00001/00001/1DB/OODB1	123	intermittent emission testing
U-00001/00001/1DB/OODB1	124	intermittent emission testing
U-00001/00001/1DB/OODB1	125	intermittent emission testing
U-00001/00001/1DB/OODB1	126	intermittent emission testing
U-00001/00001/1DB/OODB1	127	intermittent emission testing
U-00001/00001/1GL/OOGT1	128	intermittent emission testing
U-00001/00001/1GL/OOGT1	129	intermittent emission testing
U-00001/00001/1GL/OOGT1	130	intermittent emission testing
U-00001/00001/1GL/OOGT1	131	intermittent emission testing
U-00001/00001/1HG	132	continuous emission monitoring (cem)
U-00001/00001/1HG	133	continuous emission monitoring (cem)
U-00001/00001/1HG/OOGT1	134	intermittent emission testing
U-00001/00001/1HO	135	continuous emission monitoring (cem)
U-00001/00001/1HO	136	continuous emission monitoring (cem)
U-00001/00001/1HO/OOGT1	137	intermittent emission testing
U-00001/00001/1LF/OOGT1	138	intermittent emission testing
U-00001/00001/1LF/OOGT1	139	intermittent emission testing
U-00001/00001/1LF/OOGT1	140	intermittent emission testing
U-00001/00001/1LF/OOGT1	141	intermittent emission testing
U-00001/00001/1LG	142	continuous emission monitoring (cem)
U-00001/00001/1LG	143	continuous emission monitoring (cem)
U-00001/00001/1LG/OOGT1	144	intermittent emission testing
U-00001/00001/1LO	145	continuous emission monitoring (cem)
U-00001/00001/1LO	146	continuous emission monitoring (cem)
U-00001/00001/1LO/OOGT1	147	intermittent emission testing
U-00001/00001/1MG	148	continuous emission monitoring (cem)
U-00001/00001/1MG	149	continuous emission monitoring (cem)
U-00001/00001/1MG/OOGT1	150	intermittent emission testing
U-00001/00001/1MO	151	continuous emission monitoring (cem)
U-00001/00001/1MO	152	continuous emission monitoring (cem)
U-00001/00001/1MO/OOGT1	153	intermittent emission testing
U-00002	156	work practice involving specific operations
U-00002	157	record keeping/maintenance procedures
U-00002	158	record keeping/maintenance procedures
U-00002	159	work practice involving specific operations
U-00002/-/23G	178	continuous emission monitoring (cem)
U-00002/-/23G	179	continuous emission monitoring (cem)
U-00002/-/23G	180	continuous emission monitoring (cem)
U-00002/-/23G	181	continuous emission monitoring (cem)
U-00002/-/23G	182	continuous emission monitoring (cem)
U-00002/-/23G	183	continuous emission monitoring (cem)
U-00002/-/23G/OGT23	184	intermittent emission testing
U-00002/-/23G/OGT23	185	intermittent emission testing
U-00002/-/23G/OGT23	186	intermittent emission testing
U-00002/-/23G/OGT23	187	intermittent emission testing
U-00002/-/23O	188	continuous emission monitoring (cem)
U-00002/-/23O	189	continuous emission monitoring (cem)
U-00002/-/23O	190	continuous emission monitoring (cem)
U-00002/-/23O	191	continuous emission monitoring (cem)
U-00002/-/23O	192	continuous emission monitoring (cem)
U-00002/-/23O	193	continuous emission monitoring (cem)
U-00002/-/23O/OGT23	194	intermittent emission testing
U-00002/-/23O/OGT23	195	intermittent emission testing
U-00002/-/23O/OGT23	196	intermittent emission testing
U-00002/-/23O/OGT23	197	intermittent emission testing
U-00002/-/23O/OGT23	198	intermittent emission testing
U-00002/-/23O/OGT23	199	intermittent emission testing
U-00002/-/2DB/ODB23	202	intermittent emission testing



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

U-00002/-/2DB/ODB23	203	intermittent emission testing
U-00002/-/2DB/ODB23	204	intermittent emission testing
U-00002/-/2DB/ODB23	205	intermittent emission testing
U-00002/-/2DB/ODB23	206	intermittent emission testing
U-00002/-/2DB/ODB23	207	intermittent emission testing
U-00002/-/2DB/ODB23	208	intermittent emission testing
U-00002/-/2DB/ODB23	209	intermittent emission testing
U-00002/-/2DB/ODB23	210	intermittent emission testing
U-00002/-/2DB/ODB23	211	intermittent emission testing
U-00002/-/2DB/ODB23	212	intermittent emission testing
U-00002/-/2DB/ODB23	213	intermittent emission testing
U-00002/-/2GB/OGT23	214	intermittent emission testing
U-00002/-/2GB/OGT23	215	intermittent emission testing
U-00002/-/2GB/OGT23	216	intermittent emission testing
U-00002/-/2GB/OGT23	217	intermittent emission testing
U-00002/-/2GL/OGT23	218	intermittent emission testing
U-00002/-/2GL/OGT23	219	intermittent emission testing
U-00002/-/2GL/OGT23	220	intermittent emission testing
U-00002/-/2GL/OGT23	221	intermittent emission testing
U-00002/-/2OB/OGT23	222	intermittent emission testing
U-00002/-/2OB/OGT23	223	intermittent emission testing
U-00002/-/2OB/OGT23	224	intermittent emission testing
U-00002/-/2OB/OGT23	225	intermittent emission testing
U-00002/-/2OL/OGT23	226	intermittent emission testing
U-00002/-/2OL/OGT23	227	intermittent emission testing
U-00002/-/2OL/OGT23	228	intermittent emission testing
U-00002/00002	229	work practice involving specific operations
U-00002/00002	230	work practice involving specific operations
U-00002/00003	231	work practice involving specific operations
U-00002/00003	232	work practice involving specific operations
U-00004	233	record keeping/maintenance procedures
U-00001	84	record keeping/maintenance procedures
U-00002	176	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
U-00001	85	record keeping/maintenance procedures
U-00002	177	record keeping/maintenance procedures
U-00001	86	record keeping/maintenance procedures
U-00001	87	record keeping/maintenance procedures
U-00001	88	record keeping/maintenance procedures
U-00001/00001	91	continuous emission monitoring (cem)
U-00001/00001	92	continuous emission monitoring (cem)
U-00002	154	continuous emission monitoring (cem)
U-00002	155	continuous emission monitoring (cem)
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
U-00001	65	continuous emission monitoring (cem)
FACILITY	7	record keeping/maintenance procedures
FACILITY	24	work practice involving specific operations
FACILITY	25	record keeping/maintenance procedures
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	intermittent emission testing
FACILITY	28	intermittent emission testing
FACILITY	237	record keeping/maintenance procedures
FACILITY	238	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
FACILITY	42	record keeping/maintenance procedures
FACILITY	43	record keeping/maintenance procedures
FACILITY	46	record keeping/maintenance procedures

Basis for Monitoring

This Title V Air Permit renewal application submitted by Selkirk Cogeneration Partners (SCP) includes



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0122-00078/00013

Renewal Number: 1

01/08/2018

various monitoring activities designed to demonstrate compliance with the rules to which the Selkirk Cogeneration facility is subject. Those monitoring activities include; continuous or monitoring with a continuous emissions monitor which provides a stream real time monitoring data, intermittent or single event emission testing (stack test), work practice or proven measures that limit emissions, and recordkeeping that tracks maintenance, product deliveries, operating parameters like temperature and pressure, and operating hours.