

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

Facility Identification Data

Name: SARANAC POWER PARTNERS COGENERATION FAC
Address: 99 WEED ST EXT
PLATTSBURGH, NY 12901

Owner/Firm

Name: SARANAC POWER PARTNERS LP
Address: 302 S. 36TH ST, SUITE 400
OMAHA, NE 68131, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: WALTER L HAYNES
Address: DIVISION OF ENVIRONMENTAL PERMITS
232 GOLF COURSE RD PO BOX 220
WARRENSBURG, NY 12885-0220
Phone:5186231281

Division of Air Resources:
Name: STEPHEN J BARLOW
Address: NYSDEC
232 GOLF COURSE RD - PO BOX 220
WARRENSBURG, NY 12885-0220
Phone:5186231212

Air Permitting Facility Owner Contact:
Name: DAVID LUCAS
Address: SARANAC POWER PARTNERS
99 WEED ST EXT PO BOX 2985
PLATTSBURGH, NY 12901
Phone:5185631072

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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

Summary Description of Proposed Project

Application for renewal of Air Title V Facility.

Attainment Status

SARANAC POWER PARTNERS COGENERATION FAC is located in the town of PLATTSBURGH in the county of CLINTON.

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* ATTAINMENT)	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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

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

Facility Description

The Saranac Power Partners, LP Cogeneration Facility consists of two gas turbines and two hrsg's with duct burners, which all fire natural gas exclusively. Also at the facility is an auxiliary boiler which burns either natural gas or liquid propane gas. To provide electrical power to the facility when the gas turbines are not operating there are four reciprocating engines: two 1500 kw generators which burn either natural gas or liquid propane gas (lpg), a 1500 kw generator which burns diesel fuel & a 400 kw generator which burns diesel fuel. Steam from the facility is sold to the two steam hosts: Georgia-Pacific and Pactiv is sold to NYS Electric & Gas. Only electricity from the gas and steam turbines is exported from the facility. supplemental firing of the duct burners will vary depending on steam demand and temperature. Emissions controls include the use of dry low NOx burners in the gas turbines and selective catalytic reduction (SCR) and a CO catalyst in the heat recovery steam generators (hrsg's).

Permit Structure and Description of Operations

The Title V permit for SARANAC POWER PARTNERS COGENERATION FAC is structured in terms of the following hierarchy: facility, emission unit,

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

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.

SARANAC POWER PARTNERS COGENERATION FAC is defined by the following emission unit(s):
Emission unit U00001 - This emission unit consists of one emission point (EP #00001) through which seven emission sources are exhausted. Gas turbine #1 (ES 00GT1), duct burner #1 (ES 00DB1), standby generator (ES G102), emergency generator (G103) and maintenance generator (G104) all exhaust out of building B1's west stack (EP #00001). The remaining two emission sources (ES's 0SCR1 and 0COC1, actually air pollution control devices) control emissions of NOx, CO and VOC from the gas turbine/duct burner exhaust. The duct burner is only operated when the gas turbine is operating and both units fire natural gas only. The standby generator may fire natural gas or LPG. The emergency and maintenance generators fire diesel fuel only.

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

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

Process: 2LP is located at GROUND, Building B1 - 1500 kw standby generator which burns LPG to provide electricity to building B1 during gas turbine startups and shutdowns.

Process: 2NG is located at GROUND, Building B1 - 1500 kw standby generator which burns natural gas to provide electricity to building B1 during gas turbine startups and shutdowns.

Process: 3DG is located at GROUND, Building B1 - 1500 kw emergency diesel generator that generates electricity for use in building B1 during gas turbine startups and shutdowns. This generator burns distillate fuel oil #2.

Process: 4DG is located at GROUND, Building B1 - 400 kw maintenance generator burns #2 distillate fuel oil. Provides electrical power to building B1 during gas turbine shutdowns and startups.

Process: GD1 is located at GROUND, Building B1 - GE Frame 7 gas turbine/hrsg unit with supplemental firing of duct burner. Both units fire natural gas.



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1

07/03/2006

Process: GT1 is located at GROUND, Building B1 - GE Frame 7 gas turbine/hrsg unit with no supplemental firing of duct burner. Fuel used is natural gas.

Emission unit U00002 - This emission unit consists of one emission point (EP #00002). Gas turbine #2 (ES 00GT2) and duct burner #2 (ES 00DB2) exhaust out of building B1's east stack (EP #00002). A selective catalytic reduction unit (ES 0SCR2) and a catalytic oxidation device (es 0COC2) control emissions of NOx, CO and VOC from the gas turbine/duct burner exhaust. The duct burner is only operated when the gas turbine is operating and both units fire natural gas only.

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

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

Process: GD2 is located at GROUND, Building B1 - GE Frame 7 gas turbine/hrsg unit with supplemental firing of duct burner. Both units fire natural gas.

Process: GT2 is located at GROUND, Building B1 - GE Frame 7 gas turbine/hrsg unit with no supplemental firing of duct burner. Fuel used is natural gas.

Emission unit U00003 - This emission unit is a D-tube boiler. The boiler can burn either natural gas or LPG. Steam from the boiler is sent to Georgia-Pacific when the gas turbines are not operating.

Emission unit U00003 is associated with the following emission points (EP):
00003

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

Process: AXL is located at GROUND, Building B2 - Auxiliary boiler burns LPG to generate steam for Georgia-Pacific when the gas turbines are not operating.

Process: AXN is located at GROUND, Building B2 - Auxiliary boiler burns natural gas to generate steam for Georgia-Pacific when the gas turbines are not operating.

Emission unit U00004 - This emission unit is a 1500 kw standby generator that can burn either natural gas or LPG. This generator generates electricity for use in building B2 when the gas turbines are not operating.

Emission unit U00004 is associated with the following emission points (EP):
00007

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

Process: 1LP is located at GROUND, Building B2 - 1500 kw standby generator which burns LPG to provide electricity to building B2 during gas turbine startup and shutdown.

Process: 1NG is located at GROUND, Building B2 - 1500 kw standby generator which burns natural gas to provide electricity to building B2 during gas turbine startup and shutdown.

Title V/Major Source Status

SARANAC POWER PARTNERS COGENERATION FAC is subject to Title V requirements. This determination is based on the following information:

This facility is major for the following permitted emissions:

CONTAMINANT	PERMITTED EMISSION RANGE
CO	> 250 TPY

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

NOx > 250 TPY
 VOC > 100 and < 250 TPY
 Formaldehyde > 10 TPY
 Hexane > 10 TPY
 PM-10 > 100 and < 250 TPY

Program Applicability

The following chart summarizes the applicability of SARANAC POWER PARTNERS COGENERATION FAC 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)	NO
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
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,

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

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 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

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
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
1-02-010-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - LIQUEFIED PETROLEUM GAS (LPG) Butane
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
2-02-001-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Reciprocating
2-02-010-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - LIQUEFIED PETROLEUM GAS (LPG) Butane: Reciprocating
2-02-002-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS Reciprocating
2-02-002-03	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS Turbine: Cogeneration

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1

07/03/2006



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
000092-52-4	1, 1 BIPHENYL (HAP)	> 0	but < 10 tpy
000079-34-5	1,1,2,2-TETRACHLOROETHANE (HAP)	> 0	but < 10 tpy
000106-99-0	1,3-BUTADIENE (HAP)	> 0	but < 10 tpy
000542-75-6	1-PROPENE, 1,3-DICHLORO- (HAP)	> 0	but < 10 tpy
000075-07-0	ACETALDEHYDE (HAP)	> 0	but < 10 tpy
000107-02-8	ACROLEIN (HAP)	> 0	but < 10 tpy
007664-41-7	AMMONIA	>= 100 tpy	but < 250 tpy
007440-38-2	ARSENIC (HAP)	> 0	but < 10 tpy
000071-43-2	BENZENE (HAP)	> 0	but < 10 tpy
000106-46-7	BENZENE, 1,4-DICHLORO- (HAP)	> 0	but < 10 tpy
007440-41-7	BERYLLIUM (HAP)	> 0	but < 10 tpy
007440-43-9	CADMIUM (HAP)	> 0	but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 250 tpy	
000056-23-5	CARBON TETRACHLORIDE (HAP)	> 0	but < 10 tpy
000108-90-7	CHLOROBENZENE (HAP)	> 0	but < 10 tpy
000067-66-3	CHLOROFORM (HAP)	> 0	but < 10 tpy
007440-47-3	CHROMIUM (HAP)	> 0	but < 10 tpy
007440-48-4	COBALT (HAP)	> 0	but < 10 tpy
000075-09-2	DICHLOROMETHANE (HAP)	> 0	but < 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO (HAP)	> 0	but < 10 tpy
000106-93-4	ETHANE, 1,2-DIBROMO (HAP)	> 0	but < 10 tpy
000100-41-4	ETHYLBENZENE (HAP)	> 0	but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)	>= 10 tpy	
0NY100-00-0	HAP	>= 10 tpy	but < 25 tpy
000110-54-3	HEXANE (HAP)	>= 10 tpy	
007439-92-1	LEAD (HAP)	> 0	but < 10 tpy
007439-96-5	MANGANESE (HAP)	> 0	but < 10 tpy
007439-97-6	MERCURY (HAP)	> 0	but < 10 tpy
000067-56-1	METHYL ALCOHOL (HAP)	> 0	but < 10 tpy
000091-20-3	NAPHTHALENE (HAP)	> 0	but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS (HAP)	> 0	but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy	
0NY075-00-0	PARTICULATES	>= 50 tpy	but < 100 tpy
000540-84-1	PENTANE, 2,2,4-TRIMETHYL- (HAP)	> 0	but < 10 tpy
0NY075-00-5	PM-10	>= 100 tpy	but < 250 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS (HAP)	> 0	but < 10 tpy
007782-49-2	SELENIUM (HAP)	> 0	but < 10 tpy
000100-42-5	STYRENE (HAP)	> 0	but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 2.5 tpy	but < 10 tpy
000108-88-3	TOLUENE (HAP)	> 0	but < 10 tpy

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1

07/03/2006



000075-01-4	VINYL CHLORIDE (HAP)	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 100 tpy but < 250 tpy
001330-20-7	XYLENE, M, O & P MIXT. (HAP)	> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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 B: 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 C: 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

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 D: 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 E: 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 F: 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 G: 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.

Item H: 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 I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: 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 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 K: 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

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 L:

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

actions under the Clean Air Act brought by the United States or any person.

Item M: 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	150
FACILITY	40CFR 52-A.21	Prevention of Significant Deterioration	39
FACILITY	40CFR 52-A.21(j)	Best Available Control Technology	40, 41, 42, 43, 44, 45, 46, 47,

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

			48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77
U-00001/-/GD1	40CFR 52-A.21 (j)	Best Available Control Technology	116
U-00001/-/GT1	40CFR 52-A.21 (j)	Best Available Control Technology	123
U-00002/00002	40CFR 52-A.21 (j)	Best Available Control Technology	134
U-00003/00003	40CFR 52-A.21 (j)	Best Available Control Technology	143
FACILITY	40CFR 52-A.21 (j) (1)	Control Technology Review	87
U-00001/-/3DG	40CFR 52-A.21 (j) (2)	Best Available Control Technology (BACT) (see narrative)	100, 101, 102, 103, 104, 105, 106, 107
U-00001/-/4DG	40CFR 52-A.21 (j) (2)	Best Available Control Technology (BACT) (see narrative)	108, 109, 110, 111, 112, 113, 114, 115
U-00003/00003	40CFR 52-A.21 (j) (2)	Best Available Control Technology (BACT) (see narrative)	144, 145, 146, 147, 148
U-00001/-/GD1	40CFR 60-A.11 (d)	General provisions - compliance with standards and maintenance requirements	119
U-00001/-/GT1	40CFR 60-A.11 (d)	General provisions - compliance with standards and maintenance requirements	126
U-00002	40CFR 60-A.11 (d)	General provisions - compliance with standards and maintenance requirements	130
U-00003	40CFR 60-A.11 (d)	General provisions - compliance with standards and maintenance requirements	137
FACILITY	40CFR 60-A.12	General provisions - Circumvention	90

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1

07/03/2006

U-00001/-/GD1	40CFR 60-A.13	General provisions -	120
		Monitoring requirements	
U-00001/-/GT1	40CFR 60-A.13	General provisions -	127
		Monitoring requirements	
U-00002	40CFR 60-A.13	General provisions -	131
		Monitoring requirements	
U-00003	40CFR 60-A.13	General provisions -	138
		Monitoring requirements	
FACILITY	40CFR 60-A.13 (i)	General provisions -	91, 92
		Monitoring requirements	
FACILITY	40CFR 60-A.4	General provisions -	88
		Address	
U-00001/-/GD1	40CFR 60-A.7 (b)	Notification and	117
		Recordkeeping	
U-00001/-/GT1	40CFR 60-A.7 (b)	Notification and	124
		Recordkeeping	
U-00002	40CFR 60-A.7 (b)	Notification and	128
		Recordkeeping	
U-00003	40CFR 60-A.7 (b)	Notification and	135
		Recordkeeping	
U-00001/-/GD1	40CFR 60-A.7 (f)	Notification and	118
		Recordkeeping	
U-00001/-/GT1	40CFR 60-A.7 (f)	Notification and	125
		Recordkeeping	
U-00002	40CFR 60-A.7 (f)	Notification and	129
		Recordkeeping	
U-00003	40CFR 60-A.7 (f)	Notification and	136
		Recordkeeping	
FACILITY	40CFR 60-A.9	General provisions -	89
		Availability of	
		information	
U-00001/-/GD1/00DB1	40CFR 60-Da.43a (b) (2)	Standard for Sulfur	121
		Dioxide for liquid or	
		gaseous fuels	
U-00002/-/GD2/00DB2	40CFR 60-Da.43a (b) (2)	Standard for Sulfur	132
		Dioxide for liquid or	
		gaseous fuels	
U-00001/-/GD1/00DB1	40CFR 60-Da.47a (f)	Emission Monitoring.	122
U-00002/-/GD2/00DB2	40CFR 60-Da.47a (f)	Emission Monitoring.	133
FACILITY	40CFR 60-Da.49a	Reporting Requirements.	93
FACILITY	40CFR 60-Da.51a (b)	Reporting Requirements	94
U-00003	40CFR 60-Db.48b (b)	Emission Monitoring for	139
		Particulate Matter and	
		Nitrogen Oxides.	
U-00003/00003	40CFR 60-Db.48b (f)	Emission Monitoring for	149
		Particulate Matter and	
		Nitrogen Oxides.	
U-00003	40CFR 60-Db.49b (d)	Reporting and	140
		Recordkeeping	
		Requirements.	
U-00003	40CFR 60-Db.49b (g)	Reporting and	141
		Recordkeeping	
		Requirements.	
U-00003	40CFR 60-Db.49b (i)	Reporting and	142
		Recordkeeping	
		Requirements.	
FACILITY	40CFR 60-GG.334 (h)	Fuel Content	95
FACILITY	40CFR 68	Chemical accident	21
		prevention provisions	
FACILITY	40CFR 68-A.10 (a)	Applicability	96
FACILITY	40CFR 68-A.10 (e)	Applicability	97
FACILITY	40CFR 82-F	Protection of	22
		Stratospheric Ozone -	

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1

07/03/2006

		recycling and emissions reduction	
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	10
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	151
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	12
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	13
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	14
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	23, 98, 99
FACILITY	6NYCRR 201-6.5(a)(4)	General conditions	15
FACILITY	6NYCRR 201-6.5(a)(7)	General conditions	
Fees 2			
FACILITY	6NYCRR 201-6.5(a)(8)	General conditions	16
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5(c)(2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5(d)(5)	Compliance schedules	17
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	6
FACILITY	6NYCRR 201-6.5(f)(6)	Off Permit Changes	18
FACILITY	6NYCRR 201-6.5(g)	Permit shield	24
FACILITY	6NYCRR 202-1.1	Required emissions tests.	19
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
FACILITY	6NYCRR 204-2	Authorized Account Representative for NOx Budget Sources	25
FACILITY	6NYCRR 204-2.1	Authorization and Responsibilities of the NOx Authorized Account Representative	26
FACILITY	6NYCRR 204-4.1	Compliance Certification Report	27, 28
FACILITY	6NYCRR 204-7.1	Submission of NOx Allowance Transfers	29
FACILITY	6NYCRR 204-8.1	General Requirements	30, 31, 32
FACILITY	6NYCRR 204-8.3	Out of Control Periods	33
FACILITY	6NYCRR 204-8.4	Notifications	34
FACILITY	6NYCRR 204-8.7	Additional Requirements to Provide Heat Input Data for Allocations	35



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1

07/03/2006

FACILITY	6NYCRR 211.2	Purposes General Prohibitions - air pollution prohibited.	152
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	20
FACILITY	6NYCRR 215	Open Fires	9
FACILITY	6NYCRR 221.2	Prohibition.	153
FACILITY	6NYCRR 225-1.8(d)	Reports, sampling, and analysis	36
FACILITY	6NYCRR 227-1.3(a)	Smoke Emission Limitations.	37
FACILITY	6NYCRR 227-2.6(b)	CEMS requirements	38
FACILITY	6NYCRR 237-1.4(a)	Generators equal to or greater than 25 MWe	154
FACILITY	6NYCRR 237-1.6(c)	Nitrogen oxides requirements	155
FACILITY	6NYCRR 237-1.6(e)	Recordkeeping and reporting requirements	156
FACILITY	6NYCRR 237-1.6(f)	Liability	157
FACILITY	6NYCRR 237-1.6(g)	Effect on other authorities	158
FACILITY	6NYCRR 237-2	NOx Athorized account representative for NOx budget sources	159
FACILITY	6NYCRR 237-4.1	Compliance certification report.	160
FACILITY	6NYCRR 237-7.1	Submission of NOx allowance transfers	161
FACILITY	6NYCRR 237-8	MONITORING AND REPORTING	162

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

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

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 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 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.

6NYCRR Part 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.

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.

**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

6NYCRR 201-6.5(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.

6NYCRR 201-6.5(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.

6NYCRR 201-6.5(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.

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.

6NYCRR Part 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 201-6.5(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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

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 201-6.5(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.

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 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.

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.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

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

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, SARANAC POWER PARTNERS COGENERATION FAC has been determined to be subject to the following regulations:

40CFR 52-A.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) .

40CFR 52-A.21 (j)

BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61. Emission and operational limitations required from a BACT determination will have to be entered into the special permit conditions, separately by the permit reviewer.

40CFR 52-A.21 (j) (1)

BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61. Emission and operational limitations required from a BACT determination will have to be entered into the special permit conditions, separately by the permit reviewer.

40CFR 52-A.21 (j) (2)

BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61. Emission and operational limitations required from a

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

BACT determination will have to be entered into the **special** permit conditions, separately by the permit reviewer.

40CFR 60-A.11 (d)

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

40CFR 60-A.12

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

40CFR 60-A.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.

40CFR 60-A.13 (i)

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.

40CFR 60-A.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).

40CFR 60-A.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.

40CFR 60-A.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.

40CFR 60-A.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.

40CFR 60-Da.43a (b) (2)

This regulation requires the owner or operator of the emission source to limit the emissions of sulfur dioxide to less than 0.20 lb/mmBtu when firing gaseous or liquid fuels.

40CFR 60-Da.47a (f)

This regulation specifies minimum data collection requirements for continuous emissions monitoring systems.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1

07/03/2006



40CFR 60-Da.49a

This regulation requires quarterly reports for oxides of nitrogen, sulfur dioxide, and particulate emissions to be submitted to the Administrator where all reports for oxides of nitrogen and sulfur dioxide are based on a 30 day rolling average

40CFR 60-Da.51a (b)

This regulation specifies the reporting requirements for oxides of nitrogen to be submitted to the Administrator based on a 30 day rolling average

40CFR 60-Db.48b (b)

This regulation requires the owner or operator of the facility to install and operate a continuous emissions monitor to monitor emissions of oxides of nitrogen from the facility.

40CFR 60-Db.48b (f)

This regulation requires that standby methods of obtaining minimum emissions data for oxides of nitrogen be specified by the source owner or operator.

40CFR 60-Db.49b (d)

This subdivision requires reporting and recordkeeping for affected steam generating units - annual fuel capacity factors.

40CFR 60-Db.49b (g)

This subdivision requires reporting and recordkeeping for affected steam generating units - specific oxides of nitrogen requirements.

40CFR 60-Db.49b (i)

This regulation requires the submittal of records relative to the emissions of nitrogen oxides as required under paragraph (g) of this section.

40CFR 60-GG.334 (h)

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

40CFR 68-A.10 (a)

(a) An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance is required to comply with the requirements to have an accidental release plan within a defined time, which is no later than:

- (1) June 21, 1999;
- (2) Three years after the date on which a regulated substance is first listed; or
- (3) The date on which a regulated substance is first present above a threshold quantity.

40CFR 68-A.10 (e)

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

If at any time a covered process has a change in its eligibility criteria, the owner or operator shall comply with the requirements associated with the new criteria that applies to the process and update the RMP.

6NYCRR 204-2

This condition states the submission requirements for the NOx Budget Trading Program. The Program is designed to mitigate the interstate transport of ground level ozone and nitrogen oxides, a ground level ozone precursor.

6NYCRR 204-2.1

This condition states the submission requirements for the NOx Budget Trading 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 NOx Budget Program.

6NYCRR 204-7.1

This condition lists the requirements for transfer of allowances in the NOx Budget Program.

6NYCRR 204-8.1

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

6NYCRR 204-8.3

This condition states the requirements for data substitution during times when the monitoring systems do not meet applicable quality assurance requirements.

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 204-8.7

This condition is a requirement for monitoring and reporting if a particular monitoring scenario is utilized.

6NYCRR 221 .2

This regulation prohibits the application of asbestos by means of spraying.

6NYCRR 225-1.8 (d)

This requires that sampling, compositing and analysis of fuel samples must be done in accordance with methods acceptable to the commissioner.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1

07/03/2006



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 227-2.6 (b)

Any owner or operator of a combustion source subject to reasonably available control technology (RACT) requirements, under this subdivision, for NOx and either is required or opts to employ a continuous emissions monitoring system (CEMS) must:

- 1) Submit a CEMS monitoring plan for approval by the Department,
- 2) Submit a CEMS certification protocol,
- 3) Meet CEMS monitoring requirements as detailed in this paragraph of this subdivision, and
- 4) Meet CEMS recordkeeping and reporting requirements as detailed in this paragraph of this subdivision.

6NYCRR 237-1.4 (a)

This condition specifies that any emission unit or facility with a unit; that at any time on or after January 1, 1999, serves a generator with a nameplate capacity equal to or greater than 25 MWe, and sells any amount of electricity, is a NOx budget unit and subject to the requirements of NYCRR 237

6NYCRR 237-1.6 (c)

This subdivision outlines the standard requirements of the Acid Deposition Reduction NOx Budget Trading Program for oxides of nitrogen.

6NYCRR 237-1.6 (e)

This requires the owners and operators of the NOx budget source and each NOx budget unit at the source to keep pertinent documents at the site for a period of 5 years; and lists which documents are pertinent.

6NYCRR 237-1.6 (f)

This describes the liability issues regarding the requirements of the ADR NOx Budget Trading Program .

6NYCRR 237-1.6 (g)

This item states that no provision of the ADR NOx Budget Trading Program, a NOx budget permit application, or a NOx budget permit, will exempt or exclude the owners and operators from compliance with any other provisions of applicable State and federal law and regulations.

6NYCRR 237-2

This condition requires the permittee to select and authorize one person to manage, and represent the owners of any NOx budget unit; and specifies the responsibilities of this NOx authorized account representative

6NYCRR 237-4.1

This item specifies the requirements of the compliance certification report.

6NYCRR 237-7.1

This item specifies what information and actions are necessary in order to record the transfer of NOx

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

allowances. t

6NYCRR 237-8

This item requires the owners and operators of a NOx budget unit to comply with the monitoring and reporting requirements of NYCRR 237-8 and Subpart H of 40 CFR part 75; and allows NOx budget units which are also NOx budget units under NYCRR Part 204 to be summarily referenced in order to demonstrate compliance with the requirements of this item.

Compliance Certification

Summary of monitoring activities at SARANAC POWER PARTNERS COGENERATION FAC:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	record keeping/maintenance procedures	40
FACILITY	intermittent emission testing	41
FACILITY	intermittent emission testing	42
FACILITY	continuous emission monitoring (cem)	43
FACILITY	intermittent emission testing	44
FACILITY	record keeping/maintenance procedures	45
FACILITY	intermittent emission testing	46
FACILITY	intermittent emission testing	47
FACILITY	intermittent emission testing	48
FACILITY	record keeping/maintenance procedures	49
FACILITY	intermittent emission testing	50
FACILITY	intermittent emission testing	51
FACILITY	intermittent emission testing	52
FACILITY	intermittent emission testing	53
FACILITY	intermittent emission testing	54
FACILITY	intermittent emission testing	55
FACILITY	intermittent emission testing	56
FACILITY	intermittent emission testing	57
FACILITY	intermittent emission testing	58
FACILITY	intermittent emission testing	59
FACILITY	intermittent emission testing	60
FACILITY	intermittent emission testing	61
FACILITY	intermittent emission testing	62
FACILITY	record keeping/maintenance procedures	63
FACILITY	intermittent emission testing	64
FACILITY	record keeping/maintenance procedures	65
FACILITY	intermittent emission testing	66
FACILITY	continuous emission monitoring (cem)	67
FACILITY	record keeping/maintenance procedures	68
FACILITY	intermittent emission testing	69
FACILITY	intermittent emission testing	70
FACILITY	intermittent emission testing	71
FACILITY	intermittent emission testing	72
FACILITY	intermittent emission testing	73
FACILITY	continuous emission monitoring (cem)	74
FACILITY	intermittent emission testing	75
FACILITY	intermittent emission testing	76
FACILITY	intermittent emission testing	77
FACILITY	intermittent emission testing	78
FACILITY	continuous emission monitoring (cem)	79
FACILITY	intermittent emission testing	80
FACILITY	intermittent emission testing	81



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1

07/03/2006

FACILITY	intermittent emission testing	82
FACILITY	record keeping/maintenance procedures	83
FACILITY	intermittent emission testing	84
FACILITY	intermittent emission testing	85
FACILITY	intermittent emission testing	86
U-00001/-/GD1	record keeping/maintenance procedures	116
U-00001/-/GT1	record keeping/maintenance procedures	123
U-00002/00002	record keeping/maintenance procedures	134
U-00003/00003	record keeping/maintenance procedures	143
U-00001/-/3DG	intermittent emission testing	100
U-00001/-/3DG	intermittent emission testing	101
U-00001/-/3DG	intermittent emission testing	102
U-00001/-/3DG	intermittent emission testing	103
U-00001/-/3DG	intermittent emission testing	104
U-00001/-/3DG	intermittent emission testing	105
U-00001/-/3DG	intermittent emission testing	106
U-00001/-/3DG	intermittent emission testing	107
U-00001/-/4DG	intermittent emission testing	108
U-00001/-/4DG	intermittent emission testing	109
U-00001/-/4DG	intermittent emission testing	110
U-00001/-/4DG	intermittent emission testing	111
U-00001/-/4DG	intermittent emission testing	112
U-00001/-/4DG	intermittent emission testing	113
U-00001/-/4DG	intermittent emission testing	114
U-00001/-/4DG	intermittent emission testing	115
U-00003/00003	intermittent emission testing	144
U-00003/00003	continuous emission monitoring (cem)	145
U-00003/00003	continuous emission monitoring (cem)	146
U-00003/00003	continuous emission monitoring (cem)	147
U-00003/00003	continuous emission monitoring (cem)	148
FACILITY	continuous emission monitoring (cem)	91
FACILITY	continuous emission monitoring (cem)	92
FACILITY	record keeping/maintenance procedures	93
FACILITY	record keeping/maintenance procedures	94
U-00003	record keeping/maintenance procedures	140
U-00003	record keeping/maintenance procedures	141
U-00003	record keeping/maintenance procedures	142
FACILITY	work practice involving specific operations	95
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
FACILITY	record keeping/maintenance procedures	7
FACILITY	record keeping/maintenance procedures	28
FACILITY	record keeping/maintenance procedures	34
FACILITY	record keeping/maintenance procedures	35
FACILITY	monitoring of process or control device parameters as surrogate	37
FACILITY	record keeping/maintenance procedures	155
FACILITY	record keeping/maintenance procedures	160
FACILITY	record keeping/maintenance procedures	162

Basis for Monitoring

Continuous emission monitors (CEMs) are used to measure and record emissions of nitrogen oxides, carbon monoxide, opacity and ammonia. Emission limits are established for each process. Quarterly reports are submitted which document instances where emissions exceed permit limits and when the CEMs are not operating.

This permit incorporates requirements of the NOx Budget Trading Program. This program is designed to mitigate the interstate transport of ozone and nitrogen oxides (NOx) and imposes strict control on the

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-0942-00106/00018 Renewal Number: 1



07/03/2006

NOx monitoring system including testing and reporting to both DEC and EPA. It also requires the facility to own emission allowances to cover the amount of NOx emitted.

Sulfur dioxide emissions are controlled by restricting the facility to low sulfur content oil and by quarterly monitoring of sulfur content of the natural gas supply.

Limits have been established for particulate/small particulate (PM/PM-10) and volatile organic compound (VOC) emissions. Stack testing may be required at the Department's discretion and opacity generally serves as a surrogate for compliance with these limits. Compliance with the carbon monoxide limits, which are monitored continuously, are also a strong indicator that VOC emissions are within limits.