



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 STE 400
OMAHA, NE 68131, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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Permit Description

Introduction

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

Summary Description of Proposed Project

Following expiration of the current power sales agreement, the Saranac Power Partners facility will become a merchant facility, selling power to the grid based on market conditions. In effect, the plant will cycle on and off with limited advance notice. Steam requirements of the Georgia-Pacific facility, therefore, will be needed to be met entirely by the auxiliary boiler, since steam cannot be provided reliably by the combustion gas turbine HRSGs. The Saranac facility will, however, maintain the capability of providing steam from the HRSGs to Georgia-Pacific as conditions warrant.



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Title V permit modifications required to accommodate this new operating mode include removing the original restrictions on auxiliary boiler use. Specifically, it will be necessary to allow simultaneous operation of one or both combustion gas turbines in conjunction with unrestricted operation of the auxiliary boiler. No changes to current restrictions on duct burner use or standby/emergency generator use are proposed.

New Source Review Requirements - The proposed modification is characterized as a minor modification under EPA's Prevention of Significant Deterioration (PSD) regulations, since projected actual emissions will not exceed baseline actual emissions by a significant amount. The modified permit will include ongoing monitoring, record keeping and reporting requirements (including annual emissions) as per 40 CFR 52.21(r)(6). In addition, NO_x and VOC emissions will be capped at the facility's current potential to emit (PTE) in order to avoid NYSDEC Part 231-2 applicability. Compliance will be demonstrated using monitoring, record keeping and reporting procedures currently required in the permit.

Baseline and projected emissions for the Saranac facility are presented in Table 1 for the pollutants of interest. Calculations and other assumptions used in determining baseline actual emissions and projected actual emissions are presented in Attachment 1.

Additional Applicable Requirements - The expiration of the current steam and power sales agreements will result in the applicability of additional regulatory requirements that the facility currently does not fall under. In particular, the facility will no longer have a "qualifying power purchase commitment" immediately upon expiration of the current power sales contract and, therefore, the combustion gas turbines HRSGs will become affected units under the federal Acid Rain Program (40 CFR Part 72). Applicability to the federal program triggers its NYSDEC counterpart (6 NYCRR 238) until superseded by Part 245 CAIR.

Additional new regulations have come into effect since the facility Title V permit was last renewed, specifically CAIR (6 NYCRR Part 243, 244 and 245) and RGGI (6 NYCRR Part 242).

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*	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 Facility consists of two General Electric Frame 7EA combustion gas turbines with a nominal electrical output of 80 MWe, each. Each turbine is equipped with a heat recovery steam generator (HRSG) with supplemental firing provided by duct burners. Steam generated by the HRSGs is passed through a single steam turbine (80 MWe, nominal). Electricity generated by the facility is sold to the grid. Low pressure steam exiting the steam turbine is passed through an air cooled condenser or, alternatively, is delivered to a neighboring industrial facility (Georgia Pacific) for process and/or heating use. The turbines and duct burners are fired exclusively on natural gas. 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 (HRSGs).

Also at the facility is an auxiliary boiler which is used to provide steam to Georgia-Pacific. The auxiliary boiler is capable of burning either natural gas or liquid propane gas, and utilizes low NOx burners for emissions control

Emergency power capability is provided by two natural gas/liquid propane gas-fired standby generators (1500kw each), a 1500 kw diesel-fired generator and a 400 kw diesel generator. Electricity generated by this equipment is used on-site and is not exported from the facility.

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, 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 NO_x, 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, and when the usual source of power is unavailable.

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, and when the usual source of power is unavailable.

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, and when the usual source of power is unavailable. 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, and when the usual source of power is unavailable.

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.

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 NO_x, 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.

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.

Process: AXN is located at GROUND, Building B2 - Auxiliary boiler burns natural gas to generate steam for Georgia-Pacific.

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 usual source of power is unavailable.

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 when the usual source of power is unavailable.



Process: 1NG is located at GROUND, Building B2 - 1500 kw standby generator which burns natural gas to provide electricity to building B2 when the usual source of power is unavailable.

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

NOx > 250 TPY

VOC > 100 and < 250 TPY

Formaldehyde > 10 TPY

Hexane > 10 TPY

PM-10 > 100 and < 250 TPY

PM-2.5 > 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	YES
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, 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 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

4911
4931

Description

ELECTRIC SERVICES
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

1-02-006-01

Description

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - NATURAL GAS
Over 100 MBtu/Hr

1-02-010-01

EXTERNAL COMBUSTION BOILERS - INDUSTRIAL
INDUSTRIAL BOILER - LIQUEFIED PETROLEUM GAS (LPG)
Butane

2-02-001-02

INTERNAL COMBUSTION ENGINES - INDUSTRIAL
INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE
OIL (DIESEL)
Reciprocating

2-02-002-02

INTERNAL COMBUSTION ENGINES - INDUSTRIAL
INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL
GAS

2-02-002-03

Reciprocating
INTERNAL COMBUSTION ENGINES - INDUSTRIAL
INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL
GAS

2-02-010-02

Turbine: Cogeneration
INTERNAL COMBUSTION ENGINES - INDUSTRIAL
INDUSTRIAL INTERNAL COMBUSTION ENGINE - LIQUEFIED PETROLEUM
GAS (LPG)
Butane: Reciprocating

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is



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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. ONY100-00-0. 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		> 0 but < 10 tpy
000079-34-5	1,1,2,2-TETRACHLOROETHANE		> 0 but < 10 tpy
000106-99-0	1,3-BUTADIENE		> 0 but < 10 tpy
000542-75-6	1-PROPENE, 1,3-DICHLORO-		> 0 but < 10 tpy
000075-07-0	ACETALDEHYDE		> 0 but < 10 tpy
000107-02-8	ACROLEIN		> 0 but < 10 tpy
007664-41-7	AMMONIA		>= 100 tpy but < 250 tpy
007440-38-2	ARSENIC		> 0 but < 10 tpy
000071-43-2	BENZENE		> 0 but < 10 tpy
000106-46-7	BENZENE, 1,4-DICHLORO-		> 0 but < 10 tpy
007440-41-7	BERYLLIUM		> 0 but < 10 tpy
007440-43-9	CADMIUM		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 250 tpy
000056-23-5	CARBON TETRACHLORIDE		> 0 but < 10 tpy
000108-90-7	CHLOROBENZENE		> 0 but < 10 tpy
000067-66-3	CHLOROFORM		> 0 but < 10 tpy
007440-47-3	CHROMIUM		> 0 but < 10 tpy
007440-48-4	COBALT		> 0 but < 10 tpy
000075-09-2	DICHLOROMETHANE		> 0 but < 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO		> 0 but < 10 tpy
000106-93-4	ETHANE, 1,2-DIBROMO		> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE		> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE		>= 10 tpy
ONY100-00-0	HAP		>= 2.5 tpy but < 10 tpy
000110-54-3	HEXANE		>= 10 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
007439-96-5	MANGANESE		> 0 but < 10 tpy
007439-97-6	MERCURY		> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL		> 0 but < 10 tpy
000091-20-3	NAPHTHALENE		> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS		> 0 but < 10 tpy
ONY210-00-0	OXIDES OF NITROGEN	714000	
ONY075-00-0	PARTICULATES		>= 50 tpy but < 100 tpy
000540-84-1	PENTANE, 2,2,4-TRIMETHYL-		> 0 but < 10 tpy
ONY075-02-5	PM 2.5		>= 100 tpy but < 250 tpy
ONY075-00-5	PM-10		>= 100 tpy but < 250 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS		> 0 but < 10 tpy
007782-49-2	SELENIUM		> 0 but < 10 tpy
000100-42-5	STYRENE		> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE		>= 25 tpy but < 40 tpy
007664-93-9	SULFURIC ACID		>= 2.5 tpy but < 10 tpy
000108-88-3	TOLUENE		> 0 but < 10 tpy
000075-01-4	VINYL CHLORIDE		> 0 but < 10 tpy
ONY998-00-0	VOC	122000	
001330-20-7	XYLENE, M, O & P MIXT.		> 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;



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(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 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 - 6NYCRR

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



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

Item 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.

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

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.

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.

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

Prohibits open fires at industrial and commercial sites.

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 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 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.

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)

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.

40CFR 72-A.6 (a) (3) (vi)

Was an exempt IPP under 40 CFR 72.6(b)(6) but, at any time after the later of November 15, 1990 or the date the facility commences commercial operation, fails to meet the definition of independent power production facility.

- (b)(6) An independent power production facility that:
- (i) Has, as of November 15, 1990, one or more qualifying power purchase commitments to sell at least 15 percent of its total planned net output capacity; and
 - (ii) Consists of one or more units designated by the owner or operator with total installed net output capacity not exceeding 130 percent of its total planned net output capacity. If the emission rates of the units are not the same, the Administrator may exercise discretion to designate which units are exempt.

6NYCRR 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

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 NO_x 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.

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 227-2.4 (f) (4)

Emergency use generators which operate less than 500 hrs/yr are exempt from NO_x RACT requirements.

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 NO_x 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 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

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 NO_x 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 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.

6NYCRR 238-1.6 (a)

This condition requires the applicant to submit a SO2 budget application for a permit and to operate in compliance with that permit.

6NYCRR 238-1.6 (c)

This Item requires the owners and operators of each SO2 budget source and each SO2 budget unit to hold SO2 allowances available for compliance deductions under 6 NYCRR 238-6.5; and how such allowances will be managed.

6NYCRR 238-1.6 (e)

This item requires the owners and operators of the SO2 budget source to keep on site at the source pertinent documents for a period of 5 years from the date the document is created.

6NYCRR 238-1.6 (f)

This subdivision outlines the liability of an affected source.

6NYCRR 238-1.6 (g)



This subdivision outlines the liability of an affected source as subject to other requirements.

6NYCRR 238-2.1

This section outlines the authorization and responsibilities of the SO₂ authorized account representative.

6NYCRR 238-3.2

The SO₂ budget authorized account representative is required to submit a complete SO₂ budget permit application at least 12 months before the SO₂ budget unit commences operation.

6NYCRR 238-4.1

This section lists all of the requirements for the submission of the compliance certification report.

6NYCRR 238-7.1

This section outlines the requirements for the submission of SO₂ allowance transfers.

6NYCRR 238-8

This condition requires the owner or operator of the facility to comply with the reporting and record keeping requirements of 40 CFR Part 75.

6NYCRR 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.

6NYCRR 243-1

The facility must have enough CAIR NO_x allowances at the end of the NO_x Ozone Season to cover its emissions. Records must be maintained on site for five years.

6NYCRR 243-2

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

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.

6NYCRR 243-8

This citation of the Clean Air Interstate Rule (CAIR) NO_x Ozone Season Trading Program explains that CAIR NO_x 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.

This citation of the Clean Air Interstate Rule (CAIR) NO_x Ozone Season Trading Program explains what to do when an emission monitoring system fails quality assurance, quality control, or data validation requirements.

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

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

6NYCRR 244-1

This subpart explains the general provisions of the Clean Air Interstate Rule (CAIR) Nitrogen Oxide (NO_x) Annual



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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.

6NYCRR 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.

6NYCRR 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.

6NYCRR 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.

6NYCRR 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.

6NYCRR 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..

Compliance Certification

Summary of monitoring activities at SARANAC POWER PARTNERS COGENERATION FAC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	2-14	record keeping/maintenance procedures
FACILITY	2-15	record keeping/maintenance procedures
FACILITY	2-16	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	intermittent emission testing
FACILITY	42	intermittent emission testing
FACILITY	43	continuous emission monitoring (cem)
FACILITY	44	intermittent emission testing
FACILITY	46	intermittent emission testing
FACILITY	47	intermittent emission testing
FACILITY	48	intermittent emission testing
FACILITY	50	intermittent emission testing
FACILITY	51	intermittent emission testing
FACILITY	52	intermittent emission testing



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FACILITY	53	intermittent emission testing
FACILITY	54	intermittent emission testing
FACILITY	55	intermittent emission testing
FACILITY	56	intermittent emission testing
FACILITY	57	intermittent emission testing
FACILITY	58	intermittent emission testing
FACILITY	59	intermittent emission testing
FACILITY	60	intermittent emission testing
FACILITY	61	intermittent emission testing
FACILITY	62	intermittent emission testing
FACILITY	63	record keeping/maintenance procedures
FACILITY	64	intermittent emission testing
FACILITY	65	record keeping/maintenance procedures
FACILITY	66	intermittent emission testing
FACILITY	67	continuous emission monitoring (cem)
FACILITY	69	intermittent emission testing
FACILITY	70	intermittent emission testing
FACILITY	71	intermittent emission testing
FACILITY	72	intermittent emission testing
FACILITY	73	intermittent emission testing
FACILITY	74	continuous emission monitoring (cem)
FACILITY	75	intermittent emission testing
FACILITY	76	intermittent emission testing
FACILITY	77	intermittent emission testing
FACILITY	78	intermittent emission testing
FACILITY	79	continuous emission monitoring (cem)
FACILITY	80	intermittent emission testing
FACILITY	81	intermittent emission testing
FACILITY	82	intermittent emission testing
FACILITY	83	record keeping/maintenance procedures
FACILITY	84	intermittent emission testing
FACILITY	85	intermittent emission testing
FACILITY	86	intermittent emission testing
U-00001/-/GD1	116	record keeping/maintenance procedures
U-00001/-/GT1	123	record keeping/maintenance procedures
U-00002/00002	134	record keeping/maintenance procedures
U-00003/00003	143	record keeping/maintenance procedures
U-00001/-/3DG	100	intermittent emission testing
U-00001/-/3DG	101	intermittent emission testing
U-00001/-/3DG	102	intermittent emission testing
U-00001/-/3DG	103	intermittent emission testing
U-00001/-/3DG	104	intermittent emission testing
U-00001/-/3DG	105	intermittent emission testing
U-00001/-/3DG	106	intermittent emission testing
U-00001/-/3DG	107	intermittent emission testing
U-00001/-/4DG	108	intermittent emission testing
U-00001/-/4DG	109	intermittent emission testing
U-00001/-/4DG	110	intermittent emission testing
U-00001/-/4DG	111	intermittent emission testing
U-00001/-/4DG	112	intermittent emission testing
U-00001/-/4DG	113	intermittent emission testing
U-00001/-/4DG	114	intermittent emission testing
U-00001/-/4DG	115	intermittent emission testing
U-00003/00003	144	intermittent emission testing
U-00003/00003	145	continuous emission monitoring (cem)
U-00003/00003	146	continuous emission monitoring (cem)
U-00003/00003	147	continuous emission monitoring (cem)
U-00003/00003	148	continuous emission monitoring (cem)
FACILITY	91	continuous emission monitoring



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FACILITY	92	(cem) continuous emission monitoring
FACILITY	93	(cem) record keeping/maintenance procedures
FACILITY	94	record keeping/maintenance procedures
U-00003	140	record keeping/maintenance procedures
U-00003	141	record keeping/maintenance procedures
U-00003	142	record keeping/maintenance procedures
FACILITY	95	work practice involving specific operations
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	2-3	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
FACILITY	37	monitoring of process or control device parameters as surrogate
FACILITY	2-4	work practice involving specific operations
FACILITY	155	record keeping/maintenance procedures
FACILITY	160	record keeping/maintenance procedures
FACILITY	162	record keeping/maintenance procedures
FACILITY	2-19	record keeping/maintenance procedures
FACILITY	2-25	record keeping/maintenance procedures
FACILITY	2-29	record keeping/maintenance procedures
FACILITY	2-30	record keeping/maintenance procedures
FACILITY	2-10	record keeping/maintenance procedures
FACILITY	2-13	record keeping/maintenance procedures

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 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.

This facility is also subject to both, the Acid Deposition requirements for NOx and SO2 under Parts 237 and 238, and the CAIR rules under 243, 244 and 245, until the courts make a final ruling on the CAIR rules.



This facility is also subject to the CO2 Budget program under Part 242.

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.

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