



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

Permit ID: 5-0942-00106/00018

Renewal Number: 1

Modification Number: 3 02/09/2011

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: 1111 S 103RD ST

OMAHA, NE 68124-1000, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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RAY BROOK, NY 12977-0296

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Air Permitting Facility Owner Contact:

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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.

Summary Description of Proposed Project

This modification is to remove Propane as a permitted fuel for the emergency generators and the auxiliary boiler; clarify that the existing generators (G101, G102, G103 and G104) are for emergency use only and to eliminate the current permit requirement that they be tested once per permit term; add new MACT



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Subpart ZZZZ requirements for the generators; to place all PSD, post 3/5/2003, conditions under a 201-6 citation as NYS no longer had delegation of PSD at this time; and to clean up other minor errors noted in the latest permit review.

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 natural 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



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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 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

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 burns natural gas. Steam from the boiler is sent to Georgia-Pacific.

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

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 emergency generator that burn natural gas. 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):



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00007

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

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), emergency generator (ES G102), emergency generator (G103) and emergency 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. The emergency and maintenance generators fire diesel fuel only.

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

00001

Process: 2NG is located at GROUND, Building B1 - 1500 kw emergency 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 emergency 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.

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
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:

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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - 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.



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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

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

1-02-006-01	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)

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2-02-002-02	Reciprocating 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 Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
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	but < 75,000 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

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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		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 2.5 tpy but < 10 tpy
000110-54-3	HEXANE		> 0 but < 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
0NY210-00-0	OXIDES OF NITROGEN	714000	
0NY075-00-0	PARTICULATES		>= 50 tpy but < 100 tpy
000540-84-1	PENTANE, 2,2,4-TRIMETHYL-		> 0 but < 10 tpy
0NY075-02-5	PM 2.5		>= 100 tpy but < 250 tpy
0NY075-00-5	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
0NY998-00-0	VOC	122000	
001330-20-7	XYLENE, M, O & P MIXT.		> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 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



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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 - 6 NYCRR 201-1.10(b)

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

Item 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 - 6 NYCRR 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 201-6.5(a)(6)

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



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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.

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 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



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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 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.

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Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
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FACILITY	ECL 19-0301	150	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-A.21	39	Prevention of Significant Deterioration
FACILITY	40CFR 52-A.21(j)	43, 47, 51, 52, 53, 55, 56, 57, 59, 62, 63, 64, 65, 66, 67, 69, 71, 75, 76, 77, 83, 84, 3 -12, 3 -13, 3 -14, 3 -15, 3 -16, 3 -17, 3 -18, 3 -19	Best Available Control Technology
U-00001/-/GD1	40CFR 52-A.21(j)	116	Best Available Control Technology
U-00001/-/GT1	40CFR 52-A.21(j)	123	Best Available Control Technology
U-00002/00002	40CFR 52-A.21(j)	134	Best Available Control Technology
U-00003/00003	40CFR 52-A.21(j)	143	Best Available Control Technology
FACILITY	40CFR 52-A.21(j) (1)	87	Control Technology Review
FACILITY	40CFR 52-A.21(j) (2)	3 -24, 3 -25, 3 -26, 3 -27, 3 -28, 3 -29, 3 -30, 3 -31, 3 -32, 3 -33, 3 -34, 3 -35, 3 -36, 3 -37, 3 -38, 3 -39, 3 -40, 3 -41, 3 -42	Best Available Control Technology (BACT) (see narrative)
U-00003/00003	40CFR 52-A.21(j) (2)	144	Best Available Control Technology (BACT) (see narrative)
U-00001/-/GD1	40CFR 60-A.11(d)	119	General provisions - compliance with standards and maintenance requirements
U-00001/-/GT1	40CFR 60-A.11(d)	126	General provisions - compliance with standards and maintenance requirements
U-00002	40CFR 60-A.11(d)	130	General provisions - compliance with standards and maintenance requirements
U-00003	40CFR 60-A.11(d)	137	General provisions - compliance with standards and maintenance requirements

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FACILITY	40CFR 60-A.12	90	maintenance requirements
U-00001/-/GD1	40CFR 60-A.13	120	General provisions - Circumvention
U-00001/-/GT1	40CFR 60-A.13	127	General provisions - Monitoring requirements
U-00002	40CFR 60-A.13	131	General provisions - Monitoring requirements
U-00003	40CFR 60-A.13	138	General provisions - Monitoring requirements
FACILITY	40CFR 60-A.13 (i)	91, 92	General provisions - Monitoring requirements
FACILITY	40CFR 60-A.4	88	General provisions - Address
U-00001/-/GD1	40CFR 60-A.7 (b)	117	Notification and Recordkeeping
U-00001/-/GT1	40CFR 60-A.7 (b)	124	Notification and Recordkeeping
U-00002	40CFR 60-A.7 (b)	128	Notification and Recordkeeping
U-00003	40CFR 60-A.7 (b)	135	Notification and Recordkeeping
U-00001/-/GD1	40CFR 60-A.7 (f)	118	Notification and Recordkeeping
U-00001/-/GT1	40CFR 60-A.7 (f)	125	Notification and Recordkeeping
U-00002	40CFR 60-A.7 (f)	129	Notification and Recordkeeping
U-00003	40CFR 60-A.7 (f)	136	Notification and Recordkeeping
FACILITY	40CFR 60-A.9	89	General provisions - Availability of information
FACILITY	40CFR 60-Da.43a (b) (2)	3 -48	Standard for Sulfur Dioxide for liquid or gaseous fuels
FACILITY	40CFR 60-Da.49a	93	Reporting Requirements.
FACILITY	40CFR 60-Da.51a (b)	94	Reporting Requirements
U-00003	40CFR 60-Db.48b (b)	139	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
U-00003/00003	40CFR 60-Db.48b (f)	149	Emission Monitoring for Particulate Matter and Nitrogen Oxides.
U-00003	40CFR 60-Db.49b (d)	140	Reporting and Recordkeeping Requirements.
U-00003	40CFR 60-Db.49b (g)	141	Reporting and Recordkeeping Requirements.
U-00003	40CFR 60-Db.49b (i)	142	Reporting and Recordkeeping Requirements.



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FACILITY	40CFR 60-GG.334 (h)	95		Fuel Content
FACILITY	40CFR 63- ZZZZ.6595 (a) (1	3	-50, 3 -51	Reciprocating Internal Combustion Engine (RICE) NESHAP - Compliance date for existing sources
FACILITY	40CFR 63-ZZZZ.6605 (a)	3	-52	Stationary Reciprocating Internal Combustion Engines - compliance at all times except startup, shutdown or malfunction
FACILITY	40CFR 63-ZZZZ.6605 (b)	3	-53	Reciprocating Internal Combustion Engine (RICE) NESHAP - operate and maintain air pollution control and monitoring equipment
FACILITY	40CFR 63-ZZZZ.6625 (e)	3	-54	Monitoring, installation, collection, operation, and maintenance requirements
FACILITY	40CFR 63-ZZZZ.6625 (f)	3	-55	Reciprocating Internal Combustion Engine (RICE) NESHAP - non-resettable hour meter for certain existing emergency engines
FACILITY	40CFR 63-ZZZZ.6640 (f)	3	-56	Compliance provisions
FACILITY	40CFR 63-ZZZZ.6655	3	-57	Reciprocating Internal Combustion Engine (RICE) NESHAP - Record keeping requirements
FACILITY	40CFR 63-ZZZZ.6660	3	-58	Stationary Reciprocating Internal Combustion Engines - record retention
FACILITY	40CFR 63- ZZZZ.Table (2) (3	-49	Requirements for Existing Compression Ignition Stationary RICE Located at Area Sources of HAP Emissions
FACILITY	40CFR 68	21		Chemical accident prevention provisions
FACILITY	40CFR 68-A.10 (a)	96		Applicability
FACILITY	40CFR 68-A.10 (e)	97		Applicability
U-00001	40CFR 72- A.6 (a) (3) (vi)	3	-59	IPP no longer exempt.
U-00002	40CFR 72- A.6 (a) (3) (vi)	3	-60	IPP no longer exempt.
FACILITY	40CFR 82-F	22		Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1		Acceptable ambient air quality.



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FACILITY	6NYCRR 200.7	10		Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	3	-61	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11		Recycling and Salvage
FACILITY	6NYCRR 201-1.8	2	-1	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	13		Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	14		Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 98, 99, 3	-4, 3 -5, 3 -6, 3 -7, 3 -8	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	15		General conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	3	-1	General conditions Fees
FACILITY	6NYCRR 201-6.5 (a) (8)	16		General conditions
FACILITY	6NYCRR 201-6.5 (c)	3		Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4		Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5		Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d)	3	-9	Compliance schedules
FACILITY	6NYCRR 201-6.5 (d) (5)	17		Compliance schedules
FACILITY	6NYCRR 201-6.5 (e)	6		Compliance Certification
FACILITY	6NYCRR 201-6.5 (f) (6)	18		Off Permit Changes
FACILITY	6NYCRR 201-6.5 (g)	24		Permit shield
FACILITY	6NYCRR 201-7	2	-2, 2 -3	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 201-7.2	3	-10, 3 -11	Emissions capping using synthetic minor permits
FACILITY	6NYCRR 202-1.1	19, 3	-3	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7		Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8		Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	3	-62	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20		General Prohibitions - visible emissions limited
FACILITY	6NYCRR 215	9		Open Fires
FACILITY	6NYCRR 215.2	3	-2	Open Fires - Prohibitions
FACILITY	6NYCRR 221.2	153		Prohibition.
FACILITY	6NYCRR 225-1.8 (d)	36		Reports, sampling, and analysis



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FACILITY	6NYCRR 227-1.3 (a)	37		Smoke Emission Limitations.
FACILITY	6NYCRR 227-2.4 (f) (4)	3	-11	NOx requirements for other internal combustion engines.
FACILITY	6NYCRR 227-2.6 (b)	38		CEMS requirements
FACILITY	6NYCRR 231-2	2	-3	New Source Review in Nonattainment Areas and Ozone Transport Region
FACILITY	6NYCRR 237-1.4 (a)	154		Generators equal to or greater than 25 MWe
FACILITY	6NYCRR 237-1.6 (c)	155		Nitrogen oxides requirements
FACILITY	6NYCRR 237-1.6 (e)	156		Recordkeeping and reporting requirements
FACILITY	6NYCRR 237-1.6 (f)	157		Liability
FACILITY	6NYCRR 237-1.6 (g)	158		Effect on other authorities
FACILITY	6NYCRR 237-2	159		NOx Athorized account representative for NOx budget sources
FACILITY	6NYCRR 237-4.1	160		Compliance certification report.
FACILITY	6NYCRR 237-7.1	161		Submission of NOx allowance transfers
FACILITY	6NYCRR 237-8	162		MONITORING AND REPORTING
FACILITY	6NYCRR 238-1.6 (a)	2	-18	Permit Requirements
FACILITY	6NYCRR 238-1.6 (c)	2	-19	Sulfur Dioxide requirements
FACILITY	6NYCRR 238-1.6 (e)	2	-20	Recordkeeping and Reporting Requirements
FACILITY	6NYCRR 238-1.6 (f)	2	-21	Liability
FACILITY	6NYCRR 238-1.6 (g)	2	-22	Effect on Other Authorities
FACILITY	6NYCRR 238-2.1	2	-23	Authorization/responsibilities of the authorized account representative
FACILITY	6NYCRR 238-3.2	2	-24	Submission of SO2 Budget permit applications
FACILITY	6NYCRR 238-4.1	2	-25	Compliance certification report
FACILITY	6NYCRR 238-7.1	2	-26	Submission of SO2 allowance transfers
FACILITY	6NYCRR 238-8	2	-27	Monitoring and Reporting
FACILITY	6NYCRR 242-1.5	2	-28, 2 -30	CO2 Budget Trading Program - Standard requirements
FACILITY	6NYCRR 243-1	2	-5	CAIR NOx Ozone Season Trading Program General Provisions



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FACILITY	6NYCRR 243-2	2	-6	CAIR Designated Representative for CAIR NOx Ozone Season Sources
FACILITY	6NYCRR 243-8	2	-7	Monitoring and reporting - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 244-1	2	-8	CAIR NOx Ozone Annual Trading Program General Provisions
FACILITY	6NYCRR 244-2	2	-9	CAIR Designated Representative for CAIR NOx Sources
FACILITY	6NYCRR 244-8	2	-10	Monitoring and Reporting CAIR NOx Allowances
FACILITY	6NYCRR 245-1	2	-11	CAIR SO2 Trading Program General Provisions
FACILITY	6NYCRR 245-2	2	-12	CAIR Designated Representative for CAIR SO2 Sources
FACILITY	6NYCRR 245-8	2	-13	Monitoring and Reporting for CAIR SO2 Trading Program

Applicability Discussion:

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)



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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.

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.5 (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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 201-6.5 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according



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

6 NYCRR 201-6.5 (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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

This regulation 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.



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6 NYCRR 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

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

6 NYCRR 215.2

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

40 CFR Part 68

This Part lists the regulated substances and 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:

40 CFR 52.21

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

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

40 CFR 52.21 (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.

40 CFR 52.21 (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.

40 CFR 52.21 (j) (2)



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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.

40 CFR 60.11 (d)

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

40 CFR 60.12

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

40 CFR 60.13

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

40 CFR 60.13 (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.

40 CFR 60.334 (h)

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

40 CFR 60.4

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

40 CFR 60.43a (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.

40 CFR 60.48b (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.

40 CFR 60.48b (f)

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

40 CFR 60.49a

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

40 CFR 60.49b (d)

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



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40 CFR 60.49b (g)

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

40 CFR 60.49b (i)

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

40 CFR 60.51a (b)

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

40 CFR 60.7 (b)

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

40 CFR 60.7 (f)

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

40 CFR 60.9

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

40 CFR 63.6595 (a) (1)

This condition lists the compliance date for engines that qualify as existing affected sources as having to be in compliance no later than June 15, 2007.

40 CFR 63.6605 (a)

This condition states that the facility must meet all emission limits and operating limits that this rule imposes, except when the engine is starting up, shutting down, or malfunctioning.

40 CFR 63.6605 (b)

This condition requires the facility to operate their engine(s) so that emissions of hazardous air pollutants are minimized during periods when the engine(s) are starting up, shutting down, and malfunctioning.

40 CFR 63.6625 (e)

This regulation requires the owners or operator of an existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions, an existing stationary emergency RICE, or an existing stationary RICE located at an area source of HAP emissions must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written



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instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

40 CFR 63.6625 (f)

This regulation requires the installation of non-resettable hr meters on all applicable reciprocating internal combustion engines (RICE).

40 CFR 63.6640 (f)

This regulation sets forth the compliance provisions for the operation of reciprocating internal combustion engines in emergency situations.

40 CFR 63.6655

This regulation sets forth the record keeping requirements for owners or operators of stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40 CFR 63.6660

This condition specifies how long the facility must keep records of the results of the monitoring that was done to prove that the engine(s) was meeting the emission limits in this rule.

40 CFR 63. Table (2) (d)

This table includes operational and maintenance requirements for emergency stationary reciprocating internal combustion engines (RICE). These are determined to meet Maximum Achievable Control Technology (MACT) requirements.

40 CFR 68.10 (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.



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40 CFR 68.10 (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.

40 CFR 72.6 (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.

6 NYCRR 201-6.5 (d)

This regulation specifies the general provisions in any compliance schedule that is to be included in a Title V permit. These general provisions refer to requirements to achieve compliance as soon as practicable for non-compliant sources, assure that proposed permit conditions demonstrate compliance, certify all appropriate documentation, and to provide progress reports on a specified basis.

6 NYCRR 201-7.2

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

6 NYCRR 221.2

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

6 NYCRR 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.

6 NYCRR 227-1.3 (a)

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

6 NYCRR 227-2.4 (f) (4)

NO_x RACT requirements for stationary internal combustion engines that fire fuels other



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than natural gas, distillate oil, landfill gas, or digester gas.

6 NYCRR 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.

6 NYCRR 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

6 NYCRR 237-1.6 (c)

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

6 NYCRR 237-1.6 (e)

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

6 NYCRR 237-1.6 (f)

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

6 NYCRR 237-1.6 (g)

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

6 NYCRR 237-4.1

This item specifies the requirements of the compliance certification report.

6 NYCRR 237-7.1

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

6 NYCRR 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.

6 NYCRR 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



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allowances will be managed.

6 NYCRR 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.

6 NYCRR 238-1.6 (f)

This subdivision outlines the liability of an affected source.

6 NYCRR 238-1.6 (g)

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

6 NYCRR 238-2.1

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

6 NYCRR 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.

6 NYCRR 238-4.1

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

6 NYCRR 238-7.1

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

6 NYCRR 242-1.5

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

6 NYCRR Subpart 201-7

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

6 NYCRR Subpart 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.

6 NYCRR Subpart 237-2

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

6 NYCRR Subpart 237-8

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



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6 NYCRR Subpart 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.

6 NYCRR Subpart 243-1

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

6 NYCRR Subpart 243-2

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

6 NYCRR Subpart 243-8

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains that CAIR NOx Ozone Season Trading Program sources must install, certify and operate monitoring systems the 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) NOx 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) NOx Ozone Season Trading Program explains the what requirements the quarterly reports must meet.

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

6 NYCRR Subpart 244-1

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

6 NYCRR Subpart 244-2

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

6 NYCRR Subpart 244-8

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



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submitted quarterly.

6 NYCRR Subpart 245-1

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

6 NYCRR Subpart 245-2

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

6 NYCRR Subpart 245-8

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

Compliance Certification

Summary of monitoring activities at SARANAC POWER PARTNERS COGENERATION FAC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	3-12	intermittent emission testing
FACILITY	3-13	intermittent emission testing
FACILITY	3-14	intermittent emission testing
FACILITY	3-15	intermittent emission testing
FACILITY	3-16	intermittent emission testing
FACILITY	3-17	intermittent emission testing
FACILITY	3-18	intermittent emission testing
FACILITY	3-19	intermittent emission testing
FACILITY	3-20	intermittent emission testing
FACILITY	3-21	intermittent emission testing
FACILITY	3-22	intermittent emission testing
FACILITY	3-23	intermittent emission testing
FACILITY	43	continuous emission monitoring (cem)
FACILITY	47	intermittent emission testing
FACILITY	51	intermittent emission testing
FACILITY	52	intermittent emission testing
FACILITY	53	intermittent emission testing
FACILITY	55	intermittent emission testing
FACILITY	56	intermittent emission testing
FACILITY	57	intermittent emission testing
FACILITY	59	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



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FACILITY	71	intermittent emission testing
FACILITY	75	intermittent emission testing
FACILITY	76	intermittent emission testing
FACILITY	77	intermittent emission testing
FACILITY	83	record keeping/maintenance procedures
FACILITY	84	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
FACILITY	3-24	intermittent emission testing
FACILITY	3-25	intermittent emission testing
FACILITY	3-26	intermittent emission testing
FACILITY	3-27	intermittent emission testing
FACILITY	3-28	continuous emission monitoring (cem)
FACILITY	3-29	continuous emission monitoring (cem)
FACILITY	3-30	continuous emission monitoring (cem)
FACILITY	3-31	continuous emission monitoring (cem)
FACILITY	3-32	intermittent emission testing
FACILITY	3-33	intermittent emission testing
FACILITY	3-34	intermittent emission testing
FACILITY	3-35	intermittent emission testing
FACILITY	3-36	intermittent emission testing
FACILITY	3-37	intermittent emission testing
FACILITY	3-38	intermittent emission testing
FACILITY	3-39	intermittent emission testing
FACILITY	3-40	intermittent emission testing
FACILITY	3-41	intermittent emission testing
FACILITY	3-42	intermittent emission testing
FACILITY	3-43	intermittent emission testing
FACILITY	3-44	intermittent emission testing
FACILITY	3-45	intermittent emission testing
FACILITY	3-46	intermittent emission testing
FACILITY	3-47	intermittent emission testing
U-00003/00003	144	intermittent emission testing
FACILITY	91	continuous emission monitoring (cem)
FACILITY	92	continuous emission monitoring (cem)
FACILITY	3-48	record keeping/maintenance procedures
FACILITY	93	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	3-50	record keeping/maintenance procedures
FACILITY	3-51	record keeping/maintenance procedures
FACILITY	3-52	record keeping/maintenance procedures
FACILITY	3-53	record keeping/maintenance procedures
FACILITY	3-54	record keeping/maintenance procedures
FACILITY	3-55	record keeping/maintenance procedures
FACILITY	3-56	record keeping/maintenance procedures
FACILITY	3-57	record keeping/maintenance procedures
FACILITY	3-58	record keeping/maintenance procedures
FACILITY	3-49	record keeping/maintenance procedures
FACILITY	3-4	record keeping/maintenance procedures
FACILITY	3-5	record keeping/maintenance procedures
FACILITY	3-6	continuous emission monitoring (cem)
FACILITY	3-7	continuous emission monitoring (cem)
FACILITY	3-8	continuous emission monitoring (cem)
FACILITY	5	record keeping/maintenance procedures
FACILITY	3-9	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	2-3	record keeping/maintenance procedures
FACILITY	3-11	work practice involving specific operations



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FACILITY	7	record keeping/maintenance procedures
FACILITY	37	monitoring of process or control device parameters as surrogate
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.

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.

Emission caps for oxides of nitrogen and volatile organic compounds were established when they became a demand facility. These caps were set at the existing potential to emit in order to avoid new source review applicability.