



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

**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

**Facility Identification Data**

Name: SYRACUSE ENERGY CORPORATION

Address: 56 INDUSTRIAL DR

SYRACUSE, NY 13204-1091

**Owner/Firm**

Name: SYRACUSE ENERGY CORPORATION

Address: 56 INDUSTRIAL DR

SYRACUSE, NY 13204-1091, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:

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SYRACUSE, NY 13204-2400

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Address: SYRACUSE ENERGY CORP

56 INDUSTRIAL DR

SYRACUSE, NY 13204-1091

Phone:3154874473

**Permit Description**

**Introduction**

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

**Summary Description of Proposed Project**

Application for renewal of Air Title V Facility.

**Attainment Status**

SYRACUSE ENERGY CORPORATION is located in the town of GEDDES in the county of ONONDAGA.

New York State Department of Environmental Conservation  
Permit Review Report



Permit ID: 7-3132-00052/00020

Renewal Number: 1

09/02/2009

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
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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
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\* 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 FACILITY IS A COAL FIRED STEAM AND ELECTRICAL PRODUCTION FACILITY CONSISTING OF FIVE PULVERIZED COAL BOILERS, ONE STEAM TURBINE GENERATOR, ONE BACK-PRESSURE GENERATOR AND ONE FABRIC FILTER BAGHOUSE FOR PARTICULATE CONTROL OF COMBINED BOILER EMISSIONS. NUMBER 2 FUEL OIL IS USED FOR BOILER STARTUP, FLAME STABILIZATION, AND/OR LOW LOAD OPERATION.

THE FACILITY HAS APPLIED TO INSTALL A SPRAY DRY SCRUBBER. THIS PERMIT AUTHORIZES CONSTRUCTION AND OPERATION OF SUCH FACILITY.

**Permit Structure and Description of Operations**

The Title V permit for SYRACUSE ENERGY CORPORATION

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.



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

**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

SYRACUSE ENERGY CORPORATION is defined by the following emission unit(s):

Emission unit U00ASH - THE FLY ASH CONVEYING SYSTEM INCLUDES TWO PNEUMATIC SYSTEMS THAT TRANSFER FLY ASH FROM THE BOILER EXHAUST BAGHOUSE AND BOILER GAS PASSES TO THE ASH SILO.

Emission unit U00ASH is associated with the following emission points (EP):

0005A, 0005B

Process: MIS THE FLY ASH CONVEYING SYSTEM INCLUDES TWO PNEUMATIC SYSTEMS THAT TRANSFER FLY ASH FROM THE BOILER EXHAUST BAGHOUSE TO AN ASH SILO.

Process: ALT is located at Building BLR HS -

Emission unit U00BLR - FIVE PULVERIZED COAL BOILERS, EACH WITH A DESIGN CAPACITY OF 275 MM BTU/HR. THE FLUE GAS EXHAUST IS DRAWN THROUGH A LIME SPRAY DRY ABSORBER (SDA) AND A FABRIC FILTER BAGHOUSE PRIOR TO DISCHARGE. EACH PULVERIZED BOILER IS A NOX BUDGET UNIT AS DEFINED IN 6 NYCRR PART 227-3. NOX MASS EMISSIONS ARE DIRECTLY MONITORED BY USE OF A FLOW MONITOR AND NOX CONCENTRATION MONITOR.

Emission unit U00BLR is associated with the following emission points (EP):

00001

Process: ALT is located at Building BLR HS - Boilers #3, #4 and/or #5 combusting up to 30% by weight alternative fuel fluff processed from pre-consumer, non-recyclable, non-reusable, non-contaminated plastic coated paper, wax coated paper, paper, fibrous material and low chlorine content (less than 1% dry weight as received) plastic film. Demonstration that this is the only type of alternative fuel fired shall be in accordance with the Alternative Fuels QA/QC Plan approved by the Department.

Process: BIO is located at Building BLR HS - Burning of boigas generated from the Solvay Paperboard wastewater treatment facility. The biogas is scrubbed at the wastewater treatment plant for removal of H2S prior to combustion at the Trigen facility.

Process: CCA is located at Building BLR HS - Boilers #4 and/or #5 combusting up to 30% by weight alternative fuel fluff in conjunction with bituminous coal with a sulfur content less than or equal to 0.60 lb/MMBTU, or that achieves a stack emission rate less than or equal to 1.20 lbs SO2 per million BTU without the spray dryer operating. The alternative fuel fluff is processed from pre-consumer, non-recyclable, non-reuseable, non-contaminated plastic coated paper, wax coated paper, paper, fibrous material and low chlorine content (less than 1% dr weight as received) plastic film. Demonstration that this is the only type of alternative fuel fired shall be in accordance with the Alternative Fuels QA/QC Plan approved by the Department.

Process: CCO is located at FIRST, Building BLR HS - ANY NUMBER OF SIX BOILERS FIRING PULVERIZED BITUMINOUS COAL WITH A SULFUR CONTENT LESS THAN OR EQUAL TO 0.60 LB SULFUR PER MILLION BTU, OR THAT ACHIEVES A STACK EMISSION LIMIT LESS THAN OR EQUAL TO 1.20 POUNDS SO2 PER MILLION BTU WITHOUT THE SCRUBBER OPERATING.

Process: COA is located at FIRST, Building BLR HS - ANY NUMBER OF SIX BOILERS FIRING PULVERIZED BITUMINOUS COAL THAT CONTAINS SULFUR IN EXCESS OF 0.60 POUNDS PER MILLION BTU, OR THAT WOULD RESULT IN A STACK EMISSION RATE IN EXCESS OF 1.20 POUNDS PER MILLION BTU IN THE ABSENCE OF SCRUBBING. THE FLUE GAS EXHAUST PASSES THROUGH A SPRAY DRY ABSORBER AND A FABRIC FILTER BAGHOUSE.

Process: OIL is located at FIRST, Building BLR HS - ANY NUMBER OF SIX BOILERS FIRING #2 FUEL OIL FOR BOILER STARTUP, LOW LOAD OPERATION AND/OR FLAME STABILIZATION. THE FLUE GAS EMISSIONS PASS THROUGH A SPRAY DRY ABSORBER AND FABRIC FILTER BAGHOUSE.

Process: BNK is located at Building BLR HS -

Emission unit U0COAL - CONTROLLED EMISSIONS FROM THE CRUSHING, CONVEYING, AND PROCESSING OF COAL. COAL IS UNLOADED FROM RAILROAD CARS AND EITHER CRUSHED AND CONVEYED TO THE BOILER BUILDING COAL BUNKERS OR CONVEYED TO



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

**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

A STORAGE PILE. COAL IS DIRECTLY FED FROM THE BOILER BUILDING BUNKERS TO THE BOILERS.

Emission unit U0COAL is associated with the following emission points (EP):  
0006A, 0006B

Process: BNK is located at Building BLR HS - COAL BUNKER BAGHOUSE USED TO CONTROL DUST EMISSIONS FROM THE COAL STORAGE BUNKERS. TRAPPED COAL DUST FROM THE BAGHOUSE IS RECYCLED BACK TO PROCESS (COAL BUNKERS).

Process: CRU is located at Building CRSH B - THE COAL CRUSHER/CONVEYING SYSTEM TRANSFERS COAL FROM UNLOADING SYSTEM TO EITHER BOILER BUILDING OR TO COAL STORAGE PILE. AS COAL IS TRANSFERRED TO BOILER BUILDING, IT PASSES THROUGH A METAL REMOVAL MAGNET AND THEN THROUGH A CRUSHER. THE CRUSHER ALSO CONTAINS A WATER/SURFACTANT SPRAYER FOR DUST SUPPRESSION, AS NEEDED.

Process: UNL UNLOADING OF RAILROAD CARS AND TRANSFERRING COAL FROM STORAGE PILE TO CONVEYING SYSTEM. A MIXTURE OF WATER AND SURFACTANT IS USED FOR DUST SUPPRESSION, AS NEEDED.

Process: LHS

Emission unit U0LIME - Lime handling and storage (for spray dry adsorber). Pebble lime is pneumatically unloaded from trucks to a storage silo equipped with a bin vent filter. The lime is mixed with water in a slaker, passed through a grit remover and transferred to the lime slurry storage tank before being mixed with additional water and injected into the spray dry adsorber. All process emissions are fugitive or exempt.

Emission unit U0LIME -

Process: LHS All process operations associated with lime handling and storage.

Process: CTR

Emission unit U0COOL - Six cell mechanical draft tower used to dissipate waste heat from the cogeneration facility.

Emission unit U0COOL is associated with the following emission points (EP):  
00002

Process: CTR condensed steam and boiler blowdown waste heat dissipation using a mechanical cooling tower.

Process: PHS is located at Building Paper -

Emission unit 0PAPER - Alternative fuel handling and storage. Approved non-recyclable paper materials are unloaded, unpacked, inspected, blended and shredded into "fluff." The fluff is pneumatically conveyed to the boilers for combustion. A dust collection system is used to control emissions from shredding and transfer operations as necessary, with cleaned exhaust recirculated to the building. All process emissions are fugitive.

Emission unit 0PAPER -

Process: PHS is located at Building Paper - This process identifies those operations associated with alternative fuel handling and storage.

emis\_process\_desc

#### **Title V/Major Source Status**

SYRACUSE ENERGY CORPORATION is subject to Title V requirements. This determination is based on the following information:

The facility is a major source of SO<sub>2</sub>, CO and NO<sub>x</sub>. The facility was previously a major source of HAPs. The installation of the dry scrubber has reduced emissions of HCl.major\_src\_status

#### **Program Applicability**

The following chart summarizes the applicability of SYRACUSE ENERGY CORPORATION with regards to the principal air pollution regulatory programs:

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



**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

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

**NOTES:**

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

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

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



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

**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

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

**SCC Codes**

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents

a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

**SCC Code**

**Description**

1-01-002-02

EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION

ELECTRIC UTILITY BOILER - BITUMINOUS COAL PULVERIZED COAL: DRY BOTTOM (BITUMINOUS COAL)

1-01-007-01

EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION

ELECTRIC UTILITY BOILER - PROCESS GAS Boilers > 100 MBTU/HR

1-01-012-01

EXTERNAL COMBUSTION BOILERS - ELECTRIC

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



**Permit ID: 7-3132-00052/00020**  
**Renewal Number: 1**  
**09/02/2009**

1-02-005-01	GENERATION ELECTRIC UTILITY BOILER - SOLID WASTE Specify Waste Material in Comments
1-03-002-14	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL Grades 1 and 2 Oil
3-05-009-05	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - BITUMINOUS COAL HAND-FIRED (BITUMINOUS COAL)
3-05-010-11	MINERAL PRODUCTS MINERAL PRODUCTS - CLAY & FLY ASH SINTERING Raw Clay/Shale Transfer/Conveying
3-05-010-43	MINERAL PRODUCTS COAL MINING, CLEANING & MATL HANDLING (SEE 3-05-310 FOR DIFF UNITS) MINERAL PROD - COAL MINING, CLEANING & MATL HANDL: COAL TRANSFER MINERAL PRODUCTS COAL MINING, CLEANING & MATL HANDLING (SEE 3-05-310 FOR DIFF UNITS) Open Storage Pile: Coal

**Facility Emissions Summary**

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000124-38-9	CARBON DIOXIDE		>= 250 tpy
0NY100-00-0	HAP		>= 250 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
007439-97-6	MERCURY		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy
0NY075-00-0	PARTICULATES		>= 250 tpy
0NY075-00-5	PM-10		>= 250 tpy
007446-09-5	SULFUR DIOXIDE		>= 250 tpy
0NY998-00-0	VOC		>= 10 tpy but < 25

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



**Permit ID: 7-3132-00052/00020**  
**Renewal Number: 1**  
**09/02/2009**

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**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: Emergency Defense - 6NYCRR Part 201-1.5**

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

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

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

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

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

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

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

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

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

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

**Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.3(a)(4)**

Owners and/or operators of facilities having an issued Title V permit 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

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



**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

renewal application.

**Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**

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

**Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)**

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

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

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

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

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

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



**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

**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 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.

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



Permit ID: 7-3132-00052/00020  
 Renewal Number: 1  
 09/02/2009

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

**Regulatory Analysis**

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
-- FACILITY		50	Powers and Duties of the Department with respect to air pollution control
U-00BLR	40CFR 60-A.14	45	General provisions - Modification
U-00BLR	40CFR 64	46	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
U-00BLR/00001/COA/0BAGH	6NYCRR 200.7	49	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	51	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12, 23	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities -

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



**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

FACILITY	6NYCRR 201-3.3 (a)	14	Proof of eligibility
FACILITY	6NYCRR 201-6	24, 38, 39	Trivial Activities - proof of eligibility 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)	2	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) (5)	17	Compliance schedules
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5 (f) (1)	25	Alternate operating scenarios
FACILITY	6NYCRR 201-6.5 (f) (6)	18	Off Permit Changes
FACILITY	6NYCRR 201-6.5 (g)	26	Permit shield
FACILITY	6NYCRR 202-1.1	19	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	52	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 212.6 (a)	27	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215	9	Open Fires
U-00BLR	6NYCRR 225-1.5 (b)	40	General Variances Equivalent Emission Rate.
FACILITY	6NYCRR 225-1.7 (c)	28	Emission and fuel monitoring.
U-00BLR	6NYCRR 227-1.2 (a) (3)	41	Particulate Emissions Firing Solid Fuel. (see narrative)
U-00BLR/00001	6NYCRR 227-1.3	47	Smoke Emission Limitations.
U-00BLR/00001	6NYCRR 227-2.4 (a)	48	Control requirements for very large boilers.
U-00BLR	6NYCRR 227-2.6 (a) (1)	42	Testing, monitoring, and reporting requirements for very large boilers.



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

**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

U-00BLR	6NYCRR 231-2.6(a)(7)	43	Certification issuance
FACILITY	6NYCRR 242-1	53	CO2 Budget Trading Program - General provisions
FACILITY	6NYCRR 242-4	54	CO2 Budget Trading Program - Compliance certification
FACILITY	6NYCRR 242-8	55	CO2 Budget Trading Program - Monitoring and reporting
FACILITY	6NYCRR 243-1	29	CAIR NOx Ozone Season Trading Program General Provisions
FACILITY	6NYCRR 243-2	30	CAIR Designated Representative for CAIR NOx Ozone Season Sources
FACILITY	6NYCRR 243-8	31	Monitoring and reporting - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 244-1	32	CAIR NOx Ozone Annual Trading Program General Provisions
FACILITY	6NYCRR 244-2	33	CAIR Designated Representative for CAIR NOx Sources
FACILITY	6NYCRR 244-8	34	Monitoring and Reporting CAIR NOx Allowances
FACILITY	6NYCRR 245-1	35	CAIR SO2 Trading Program General Provisions
FACILITY	6NYCRR 245-2	36	CAIR Designated Representative for CAIR SO2 Sources
FACILITY	6NYCRR 245-8	37	Monitoring and Reporting for CAIR SO2 Trading Program
FACILITY	6NYCRR 246	56	Mercury Reduction Program for Coal-Fired Electric Utility Steam Generating Units
U-00BLR	6NYCRR 257-1	44	Air Quality Standards - general
U-00BLR	6NYCRR 617.11(d)	57, 58, 59	Decision-making and findings requirements

**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



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

**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

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)



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

**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

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



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

**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

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, SYRACUSE ENERGY CORPORATION has been determined to be subject to the following regulations:

40CFR 60-A.14

Trigen added a wet scrubber and now uses higher sulfur coal. When combusting higher sulfur coal, Trigen is subject to a lower emission limit to avoid NSPS applicability.

40CFR 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 7-3132-00052/00020

Renewal Number: 1

09/02/2009

control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6NYCRR 201-6.5 (f) (1)

This regulation defines, in general terms, the operational flexibility provisions associated with alternate operating scenarios. Alternate operating scenarios refer to a range of operating conditions which are defined in the permit and which allow the source the flexibility to make specified changes without requiring a permit revision. These changes cannot violate any applicable requirement and must be tracked and recorded in a log at the source.

There is a condition in the permit under this citation that allows for the burning of alternate fuel (paper waste).

6NYCRR 212 .6 (a)

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

6NYCRR 225-1.5 (b)

This regulation allows the Commissioner of NYSDEC to grant a variance from the sulfur-in-fuel limitations in Tables 1,2 or 3 of 6 NYCRR Part 225-1.2 if the source owner can demonstrate that the emissions of sulfur dioxide will be not be greater than if compliant fuel was used.

6NYCRR 225-1.7 (c)

This regulation requires requires that measurements be made daily of the rate of each fuel burned, the gross heat content and ash content of each fuel burned (determined at least once per week), and the average electrical output (daily) and hourly generation rate.

6NYCRR 227-1.2 (a) (3)

This paragraph only applies to facilities with heat inputs greater than 250 mmBtu/hr which submitted an application for a permit to construct after August 11, 1972.

6NYCRR 227-1.3

This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6NYCRR 227-2.4 (a)

This condition lists the emission limitations for very large boilers.

6NYCRR 227-2.6 (a) (1)

This regulation establishes the monitoring requirements for NOx RACT affected very large boilers (boilers with a heat input of greater than 250 mmBtu/hr).



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

**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

6NYCRR 231-2.6 (a) (7)

This condition establishes an annual NOx limit for the creation of emission reduction credits.

6NYCRR 242-1

The facility is subject to the DEC's CO2 trading rule. The owners must hold enough CO2 allowances to cover the CO2 emissions for a given control period.

6NYCRR 242-4

This citation requires that an Annual Compliance Certification report be submitted by March 1st, on an annual basis, certifying compliance with the CO2 Budget Trading Program.

6NYCRR 242-8

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

6NYCRR 243-1

This rule imposes the DEC's Ozone Season NOx budget rule requirements: to hold enough NOx allowances to cover the facility's emissions.

6NYCRR 243-2

6 NYCRR 243-2 requires each unit subject to the ozone season CAIR NOx rule to have a CAIR designated representative.

6NYCRR 243-8

6 NYCRR 243-8 requires the owners or operators to continuously measure NOx emissions.

6NYCRR 244-1

This rule imposes the DEC's Annual NOx budget rule requirements: to hold enough NOx allowances to cover the facility's emissions.

6NYCRR 244-2

6 NYCRR 244-2 requires each unit subject to the annual CAIR NOx rules to have a CAIR designated representative.

6NYCRR 244-8

6 NYCRR 244-8 requires the owners or operators to continuously measure NOx emissions.

6NYCRR 245-1

This rule imposes the DEC's CAIR SO2 budget rule requirements: to hold enough SO2 allowances to cover the facility's emissions.

6NYCRR 245-2

6 NYCRR 245-2 requires each unit subject to the CAIR SO2 rules to have a CAIR designated representative.



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

**Permit ID: 7-3132-00052/00020**

**Renewal Number: 1**

**09/02/2009**

6NYCRR 245-8

6 NYCRR 245-8 requires the owners or operators to continuously measure SO<sub>2</sub> emissions.

6NYCRR 246

6 NYCRR 246 imposes a mercury emission limit on the facility and requires monitoring and reporting of emissions.

6NYCRR 257-1

The facility is not allowed to start up on more than one pulverizer in order to minimize uncontrolled emissions of sulfur dioxide.

6NYCRR 617.11 (d)

617.11 DECISION-MAKING AND FINDINGS REQUIREMENTS.

(a) Prior to the lead agency's decision on an action that has been the subject of a final EIS, it shall afford agencies and the public a reasonable time period (not less than 10 calendar days) in which to consider the final EIS before issuing its written findings statement. If a project modification or change of circumstance related to the project requires a lead or involved agency to substantively modify its decision, findings may be amended and filed in accordance with subdivision 617.12(b) of this Part.

(b) In the case of an action involving an applicant, the lead agency's filing of a written findings statement and decision on whether or not to fund or approve an action must be made within 30 calendar days after the filing of the final EIS.

(c) No involved agency may make a final decision to undertake, fund, approve or disapprove an action that has been the subject of a final EIS, until the time period provided in subdivision 617.11(a) of this section has passed and the agency has made a written findings statement. Findings and a decision may be made simultaneously.

(d) Findings must:

- (1) consider the relevant environmental impacts, facts and conclusions disclosed in the final EIS;
- (2) weigh and balance relevant environmental impacts with social, economic and other considerations;
- (3) provide a rationale for the agency's decision;
- (4) certify that the requirements of this Part have been met;
- (5) certify that consistent with social, economic and other essential considerations

from among the reasonable alternatives available, the action is one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse environmental impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigative measures that were identified as practicable.

(e) No state agency may make a final decision on an action that has been the subject of a final EIS and is located in the coastal area until the agency has made a written finding that the action is consistent with applicable policies set forth in 19 NYCRR 600.5. When the Secretary of State has approved a local government waterfront revitalization program, no state agency may make a final decision on an action, that is likely to affect the achievement of the policies and purposes of such program, until the agency has made a written finding that the action is consistent to the maximum extent practicable with that local waterfront revitalization program.

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**

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



**Permit ID: 7-3132-00052/00020**  
**Renewal Number: 1**  
**09/02/2009**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Short Description</b>	<b>Regulation</b>
FACILITY	40CFR 72-A	Applicability (no condition)
Reason: In a letter dated May 13, 2004, the US EPA has concluded that none of the five boilers (Boiler #1, #2, #3, #4 and #5) is subject to the Acid Rain Program.		

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

**Compliance Certification**  
**Summary of monitoring activities at SYRACUSE ENERGY CORPORATION:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
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U-00BLR	45	continuous emission monitoring (cem)
U-00BLR	46	monitoring of process or control device parameters as surrogate
U-00BLR/00001/COA/0BAGH	49	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
U-00BLR	40	continuous emission monitoring (cem)
FACILITY	28	record keeping/maintenance procedures
U-00BLR	41	intermittent emission testing
U-00BLR/00001	47	continuous emission monitoring (cem)
U-00BLR/00001	48	continuous emission monitoring (cem)
U-00BLR	43	continuous emission monitoring (cem)
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 7-3132-00052/00020

Renewal Number: 1

09/02/2009

FACILITY	55	procedures record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
U-00BLR	44	record keeping/maintenance procedures
U-00BLR	57	work practice involving specific operations
U-00BLR	58	monitoring of process or control device parameters as surrogate
U-00BLR	59	intermittent emission testing

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**Basis for Monitoring**

The facility is required to operate continuous emission monitors for CO, SO<sub>2</sub> and NO<sub>x</sub> to demonstrate compliance with various emissions limits. The facility also must monitor they source of alternative fuels that it combusts.