

**Division of Air Resources
Permit Review Report**

Permit ID: 8-4532-00075/00029
Renewal Number: 3
11/13/2023

Facility Identification Data

Name: SENECA ENERGY LFGTE FACILITY
Address: 2053 ST RT 414|RENEWABLE RESOURCES PARK
SENECA FALLS, NY 13148

Owner/Firm

Name: SENECA ENERGY II LLC
Address: 2999 JUDGE RD
OAKFIELD, NY 14125, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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**Permit Description
Introduction**

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

Summary Description of Proposed Project

This is an application for a TV Renewal. This application also updates emissions information and current conditions at the facility. The updates to this application include the removal of an 800-KW Diesel Generator and a 2000 scfm enclosed flare.

This application addresses the construction of a second High BTU facility (2-BTUPL) which will treat

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landfill gas to pipeline quality standards as a renewable natural gas and be transferred to the natural gas pipeline adjacent to the facility for distribution to endusers. It is to be located adjacent to the existing Seneca Energy High BTU facility (1-BTUPL) located in Seneca Falls, NY. Along with this planned expansion, Seneca Energy will keep 4 Caterpillar G3516 engines and 4 Caterpillar G3520 engines (removing 10 Caterpillar G3516 engines). These engine-generator units will be upgraded and permitted to be fueled with natural gas. Oxidation Catalyst will be placed on the eight engine stacks and allow for the reduction in engine exhaust emissions for Carbon Monoxide (93% reduction), Formaldehyde (80% reduction) and VOCs (75% reduction). The remaining engine-generator units will be removed from the facility once the conversion is completed.

Attainment Status

SENECA ENERGY LFGTE FACILITY is located in the town of SENECA FALLS in the county of SENECA.

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 existing Seneca Energy Facility consists of the following:

1. High BTU Facility (HBTU Plant #1) designed to process up to 6,000 standard cubic feet per minute (scfm) of Landfill Gas (LFG) to beneficially recover the methane portion of the gas to create renewable natural gas (RNG). The waste gasses off these processes are controlled with a 3,600 scfm Thermal Oxidizer and a backup Emergency Flare.

Seneca Energy is proposing the following changes:

- I. The installation and operation of a second stand-alone High BTU Facility (HBTU Plant #2) designed to accept up to 9,600 scfm of LFG at an assumed methane content of 52%.

1. Raw LFG received at the Facility will be initially treated in accordance with applicable EPA New Source

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Performance Standards (NSPS) requirements as follows:

- a. Filtration-LFG will pass through a series of filters designed to remove particulates and free moisture in the raw LFG.
- b. Dewatering-LFG will pass through a series of moisture knockout vessels as well as a glycol chiller for dewatering.
- c. Compression- Gas blowers/compressors will pressurize the gas as necessary for the subsequent RNG for the gas refining process.

2. Following treatment, gas will undergo an extensive refining process designed to generally refine the gas to pipeline-quality such that it can be transferred to a natural gas pipeline for distribution to end users. The refining process involves the following key steps:

- a. VOC and Siloxane Removal-This step involves media vessels and temperature swing absorption (TSA) to remove impurities from the LFG prior to being sent to the membrane system.
- b. Carbon Dioxide (CO₂) Removal- This step involves in-line gas processing to remove impurities from the gas followed by membrane system removal of CO₂ from the gas stream.
- c. Nitrogen/Oxygen (N₂/O₂) Removal- This step involves vacuum pressure swing absorption (VPSA) for the separation of N₂ and O₂ from the gas stream.

The final product is monitored for gas quality and then transferred to a natural gas pipeline for distribution to end users.

II. As a byproduct of the gas refining processes, various waste gas streams are produced. The High BTU Facility will incorporate a Thermal Oxidizer (Thermal Oxidizer #2) unit and a backup candlestick flare (Open Flare #2) as emission control devices to handle these waste gasses. The air emissions associated with these control devices will include criteria air pollutants such as carbon monoxide (CO), oxides of nitrogen (NO_x), oxides of sulfur(SO_x), and particulate matter (PM) along with volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

III. The plant will also include a 324 HP standby emergency diesel-fired generator (205 kW) to be used only in emergency situations; assumed to total up to 500 hours per year.

IV. Remove ten (10) existing Caterpillar G3516 engines (emission sources ENG05-ENG14).

V. The remaining four (4) 4SLB Caterpillar G3516 engines (emission sources ENG01-ENG04) and the four (4) 4SLB Caterpillar G3520C IC gas engines (emission sources ENG15-ENG18) connected to individual electricity generators (with an installed nameplate capacity of 9.6 MWs) will be modified and fueled with Natural Gas. Each engine stack will be equipped with an Oxidation Catalyst. Seneca Energy will retain the Ancillary equipment that supports the current electricity generation.

- a. Each of the IC engines is equipped with a stand-alone fan cooled radiator.
- b. Engine radiator coolant (new and used) will be stored in separate aboveground storage tanks (ASTs) each having a design capacity of 1000 gallons.
- c. Engine lube oil (new) is stored in separate ASTs having capacities of 8000 gallons, 6000 gallons, and an

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AST with a capacity of 2000 gallons for used oil.

d. A standby emergency generator (100 ekW), which is operated to supply the facility with limited temporary power for emergency lighting when utility outages occur. The diesel fired emergency generator is supplied from a 275 gallon AST.

Permit Structure and Description of Operations

The Title V permit for SENECA ENERGY LFGTE FACILITY

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.

SENECA ENERGY LFGTE FACILITY is defined by the following emission unit(s):

Emission unit 1BTUPL - 1. The emission unit consists of a landfill gas to pipeline grade natural gas conversion plant (High BTU Plant). The landfill gas (LFG) received by the High BTU plant is produced by the decomposition of municipal solid waste in a nearby landfill. A LFG treatment system (initial filtration, compression, cooling and dewatering) will be utilized in accordance with 40 CFR 60.752(b)(iii)(C). Components of the specified gas treatment system are not equipped with atmospheric vents. Therefore, all of the LFG received and treated by the system is directed to the enclosed flare during “upset” conditions or on to the refining process designed to recover the methane from the LFG. The gas treatment and refining processes are installed in building BTUPLANT. The product gas will be sold and delivered to customers via a natural gas transmission line. Waste gas from the refining process will be controlled using a thermal oxidizer. In general, the gas refining process consists of the following major unit operations:

- a. Sulfur Removal
- b. Activated Carbon for NMOC adsorption
- c. Membrane separation for CO2 removal
- d. Pressure swing adsorption for nitrogen and oxygen removal (as needed)

All pumps and gas compressors in the gas refining process are electricity driven.

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2. Ancillary equipment with insignificant emissions [exempt pursuant to 6NYCRR Part 201-3.1(b)] that supports the High Btu Plant operations.

a. A 200 kW IC engine generator, which is operated to supply the facility with limited temporary power when utility outages occur. The emergency generator is powered with diesel fuel that is supplied from a 400 gallon above ground storage tank.

Emission unit 1BTUPL is associated with the following emission points (EP):
EMG02, FLR03, OXD01

Process: E10 is located at Ground, Building BTUPLANT - Process E10 consists of an outdoor Caterpillar Model D100-6 packaged, Diesel-Fired Standby Generator Set, rated for 100 KW standby power (156.7 HP) equipped with a 200 gallon diesel fueled storage tank. The unit provides limited temporary power. The storage tank is exempt under 6NYCRR Part 201-3(c)(21).

The generator will operate no more than 250 hours per year.

Process: GAS is located at Building BTUPLANT - Landfill gas treatment and refining process that converts up to 6,000 scfm of landfill gas to pipeline quality (high Btu) fuel. Emissions are controlled using a thermal oxidizer rated for approximately 3,600 scfm.

Emission unit 3STAGE - This emission unit will consist of four (4) 4SLB Caterpillar G3516 (01ENG-04ENG) and the four (4) SLB Caterpillar G3520C (15ENG-18ENG) IC gas engines connected to individual electricity generators (with an installed nameplate capacity of 9.6 MWs). The existing engines are currently fueled with treated landfill gas from TRMT1.

Seneca Energy is proposing to retrofit the eight (8) engine-generator sets to be natural gas-fired, and fit each stack with oxidation catalyst. Ten (10) of the existing Caterpillar G3516 engines, along with TRMT1, would be permanently shutdown and removed from the permit.

Seneca Energy will retain the Ancillary equipment that supports the current electricity generation with no proposed changes.

a. Each of the IC engines is equipped with a stand-alone fan cooled radiator.

b. Engine radiator coolant (new and used) will be stored in separate above ground holding tanks each having a design capacity of 1,000 gallons.

c. Engine lube oil (new) is stored in separate aboveground storage tanks (ASTs) each having a design capacity of 8,000 gallons and 6,000 gallons. The used oil AST has a capacity of 2,000 gallons.

d. A standby emergency generator (100 kW) is operated to supply the facility with limited temporary power for emergency lighting when utility outages occur. The diesel fired emergency generator is supplied from a 200 gallon AST.

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Emission unit 3STAGE is associated with the following emission points (EP):
EMG01, ENG01, ENG02, ENG03, ENG04, ENG05, ENG06, ENG07, ENG08, ENG09, ENG10, ENG11,
ENG12, ENG13, ENG14, ENG15, ENG16, ENG17, ENG18

Process: EMR is located at Ground, Building ENGBLDG - Process EMR consists of one (1) Caterpillar emergency standby generator set rated for 210 KW (359 HP), equipped with a 275 gallon diesel fuel storage tank. The unit provides limited temporary power. The storage tank is exempt under 6NYCRR Part 201-3.2(c)(21).

The emergency generator will operate no more than 250 hour/year.

Process: ST3 is located at Building ENGBLDG - Process ST3 consists of:

1. Four (4) existing CAT G3516 gas IC engine generator sets modified to be fueled with Natural Gas. Each engine will have a maximum heat input rate of 8.1 MMBtu/hr LHV and use approximately 147 cfm of natural gas fuel to generate electricity. (Ten (10) of the CAT G3516s will be permanently shut down and removed from the permit).

2. Four (4) existing CAT G3520C gas IC engine generator sets modified to be fueled with Natural Gas. Each engine will have a maximum heat input rate of 14.1 MMBtu/hr LHV and use approximately 255 cfm of natural gas fuel to generate electricity.

Each engine stack is equipped with an oxidation catalyst.

Process: STP is located at Building ENGBLDG - Process STP consists of the following engine generator sets fueled by landfill gas:

1. 14 CAT G3516 gas IC engine generator sets that have individual maximum heat input rates of 8.6 MMBtu/hr LHV. At the minimum fuel quality utilization value of 420 Btu/cf (LHV), the maximum fuel use rate of each IC engine is approximately 341 cfm.

2. 4 CAT G3520C gas IC engine generator sets that have individual maximum heat input rates of 14.67 MMBtu/hr LHV. At the minimum fuel quality utilization value of 420 Btu/cf (LHV), the maximum fuel use rate of each IC engine is approximately 580 cfm.

3. TRMT1 treats the gas according to 40 CFR 60 Subpart Cf or 40 CFR 63 Subpart AAAAA.

This process will terminate within one year of commencement of the operation of Unit 2-BTUPL. The owner or operator of the facility will permanently shut down and remove from the facility ten (10) of the existing Caterpillar 3516 engines (05ENG through 14ENG) and the TRMT1 source. The engine shut downs and removals are required within 1-year of commencement of the operation of Unit 2-BTUPL.

Emission unit 2BTUPL - This emission unit consists of a landfill gas to pipeline grade natural gas conversion facility (High BTU). The landfill gas (LFG) received at the High BTU Facility is produced by the decomposition of municipal solid waste in the landfill. A LFG Treatment System (TRMT3), which consists of initial filtration, compression, cooling and dewatering, will be utilized in accordance with 40 CFR 60.752(b)(iii)(C). Components of the specified gas treatment system are not equipped with atmospheric vents. Therefore, all the LFG received and treated by the system is directed to the Emergency Open Flare (SKFLR) during upset conditions or on to the refining processes designed to recover the methane from the LFG. The product gas is sold and delivered to customers via a natural gas transmission

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pipeline. Waste gas from the refining processes are controlled using a Thermal Oxidizer (5KOXD). In general, the gas refining processes consist of the following major unit operations:

- VOC and Siloxane Removal: This step involves temperature swing absorption (TSA) to remove impurities from the gas prior to being sent to the membrane system.
- Carbon Dioxide (CO₂) Removal: This step involves in-line gas processing and membranes for CO₂ removal from the gas stream.
- Nitrogen/Oxygen (N₂/O₂) Removal: This step involves vacuum pressure swing absorption (VPSA) separation of N₂ and O₂ from the gas stream.
- The final product is monitored for gas quality and then transferred to a natural gas pipeline for distribution to end users.

As a byproduct of the gas refining processes, various waste gas streams are produced. The High BTU Plant will incorporate a Thermal Oxidizer unit and a backup Candlestick Flare as emission control devices to handle these waste gasses. The air emissions associated with these control devices will include criteria air pollutants such as carbon monoxide (CO), oxides of nitrogen (NO_x), oxides of sulfur (SO_x), and particulate matter (PM) along with volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

Emission unit 2BTUPL is associated with the following emission points (EP):
EMG03, FLR05, OXD02

Process: E20 is located at Ground, Building 2BTU - Process E20 will consist of one (1) Cummins Model DSGAE Package, an emergency standby generator set, rated for 200 KW (324 HP) equipped with a 376 gallon diesel fuel storage tank. The unit provides limited temporary power. The storage tank is exempt under 6NYCRR Part 201-3.2(c)(21).

The generator will operate no more than 250 hours per year.

Process: PL2 is located at Ground, Building 2BTU - EU 2-BTUPL, Process PL2 will consist of:

A landfill gas to pipeline grade natural gas conversion facility (High BTU Plant #2). The landfill gas (LFG) received at the High BTU Facility is delivered by Seneca Meadows Landfill. A LFG treatment system [TRMT3](initial filtration, compression, dewatering) will be utilized in accordance with 40 CFR 60.752(b)(iii)(C).

Components of the specified gas treatment system are not equipped with atmospheric vents. Therefore, all the LFG received and treated by the system is directed to the Emergency Open Flare (5KLR) during upset conditions, or is sent for further refining processes designed to recover the methane from the LFG (approximately 94% recovery). The product gas is sold and delivered to customers via a natural gas transmission pipeline. Waste gas from the refining processes are controlled using a Thermal Oxidizer (5KOXD).

Title V/Major Source Status

SENECA ENERGY LFGTE FACILITY is subject to Title V requirements. This determination is based on the following information:

The facility is an existing permitted TV facility as a major source of carbon monoxide

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(CO), oxides of nitrogen (NO_x), single hazardous air pollutant (HAP), and greenhouse gases (GHGs). The facility will be limiting emissions of NO_x to less than the major source threshold of 100 tons per year and therefore will not be applicable to NO_x RACT under 6NYCRR Part 227 once the conversion of eight of the engines to natural gas is completed. Additionally, the facility will no longer be a major source of HAPs for single HAP totals greater than 10 tpy. Total HAPs are also below the major source threshold of 25 tpy. The proposed project is not subject to 6NYCRR Part 231 PSD/NSR since potential emissions of CO, SO_x and PM emissions will all decrease as a result of the changes to below 250 tpy and NO_x emissions will be below 100 tpy. The project emission potential for GHGs does exceed 100,000 tpy, however, a BACT review for GHG only is no longer required due to the Supreme Court decision in "Utility Air Regulatory Group vs EPA (2014)."

The facility also discusses applicability to 40 CFR 60 Subpart JJJJ, Subpart IIII and 40 CFR 63 Subpart ZZZZ for the Caterpillar Engines and the emergency generators. Applicable rules are included in the permit. NYS does not have delegation of these rules.

The facility also completed an analysis in accordance with the Climate Leadership and Community Protection Act (CLCPA). The project provides a benefit by recovering landfill gas and converting it into a fuel that can be used in place of traditional fossil fuel natural gas. Based on the changes to the facility (removing some of the IC engines, converting the remaining engines to natural gas fired and adding oxidation catalyst to each engine, and adding another High BTU process), the facility is having an overall reduction of GHGs as well as a reduction of HAPs (including formaldehyde). Retrofitting the engines with oxidation catalysts that have a control efficiency of 80% for formaldehyde and 75% for all other HAPs reduces the overall HAP emissions. Consistent with the reduction in HAP emissions specified in the CLCPA Section 7(3) Analysis submitted as part of the Renewal/modification application, total facility formaldehyde emissions are limited to 9.9 tons/year on a 12-month rolling basis. This limit is met through use of the oxidation catalysts on each of the engines. To demonstrate on-going compliance, the facility will ensure the oxidation catalysts and engines are operating properly through meeting the periodic monitoring requirements for carbon monoxide specified elsewhere in this permit. One condition is for CLCPA (cited under 6NYCRR Part 201-6.5(a)) which is in alignment with the mandated goal of net-zero emissions in the electricity sector by 2040. This condition states that the facility has committed to permanently shutting down the remaining 4-3516 and 4-3520 CAT IC engines firing natural gas by 2040. This would also have a benefit to the local community pursuant to CLCPA Section 7(3) by reducing the overall, localized emissions from the facility.

The thermal oxidizers and flares are designed to remove greater than 98% of non-methane organic compounds (HAPs are a portion of the NMOC in landfill gas). The facility is not located in an Environmental Justice area but is located in a Disadvantaged

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Community Area (DCA).

There will be a transition period within this permit where the facility will continue to comply with the requirements of engines being fueled by landfill gas as well as the previous conditions determined under a 6NYCRR Part 231 analysis while the new High BTU plant is being constructed. Within one year of commencement of operation of the new High BTU plant, the remaining 3516 engines that are not being converted to natural gas will be permanently shut down. The new limit for oxides of nitrogen and formaldehyde will take precedent. The existing limits for NOx and CO will expire as well as any conditions applicable to NOx RACT for engines firing on landfill gas. The treatment system (TRMT1) for 3-STAGE will also be permanently shut down and conditions for that treatment system will expire within one year of commencement of operation of the new High BTU plant.

Program Applicability

The following chart summarizes the applicability of SENECA ENERGY LFGTE FACILITY with regards to the principal air pollution regulatory programs:

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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52.21, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of

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

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

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

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

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

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

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

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

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

Compliance Status

Facility is in compliance with all requirements.

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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 |
| 4925 | GAS PRODUCTION/DISTRIBUTION |
| 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 |
|-----------------|---|
| 2-01-008-07 | INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - LANDFILL GAS RECIPROCATING: EXHAUST |
| 2-02-001-02 | INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Reciprocating |
| 3-10-002-05 | OIL AND GAS PRODUCTION OIL AND GAS PRODUCTION - NATURAL GAS PRODUCTION Flares |

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 for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is

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identified in the list below by the (HAP) designation.

| Cas No. | Contaminant | PTE lbs/yr | PTE tons/yr | Actual lbs/yr | Actual tons/yr |
|-------------|---|------------|-------------|---------------|----------------|
| 000092-52-4 | 1, 1 BIPHENYL | 41 | | 23.8 | |
| 000079-34-5 | 1,1,2,2-TETRACHLOROE THANE | 57.6 | | 33.5 | |
| 000106-99-0 | 1,3-BUTADIENE | 51.7 | | 30.1 | |
| 000542-75-6 | 1-PROPENE, 1,3-DICHLORO- 2-METHYL | 5.1 | | 3 | |
| 000091-57-6 | NAPHTHALENE | 6.4 | | 3.7 | |
| 000108-10-1 | 2-PENTANONE, 4-METHYL | 78.3 | | 45.5 | |
| 000083-32-9 | ACENAPHTHENE | 0.2 | | 0.1 | |
| 000208-96-8 | ACENAPHTHYLE NE | 1.1 | | 0.6 | |
| 000075-07-0 | ACETALDEHYDE | 1618.1 | | 941 | |
| 000107-02-8 | ACROLEIN | 1003.9 | | 583.8 | |
| 000071-43-2 | BENZENE | 420.3 | | 244.4 | |
| 000106-46-7 | BENZENE, 1,4-DICHLORO- BENZENE, 1,2-DIMETHYL | 10.6 | | 6.2 | |
| 000095-47-6 | BENZO(E)PYRENE | 86 | | 50 | |
| 000192-97-2 | BENZO[G,H,I]PERYLENE | 0.1 | | 0.1 | |
| 000191-24-2 | BENZO[G,H,I]PERYLENE | 0.1 | | 0.1 | |
| 0NY750-00-0 | CARBON DIOXIDE EQUIVALENTS | | 343171 | | 199565 |
| 000075-15-0 | CARBON DISULFIDE | 53.7 | | 31.2 | |
| 000630-08-0 | CARBON MONOXIDE | 345600 | | 200977 | |
| 000056-23-5 | CARBON TETRACHLORIDE | 7.1 | | 4.1 | |
| 000463-58-1 | CARBONYL SULFIDE | 75 | | 43.6 | |
| 000108-90-7 | CHLOROBENZENE | 9.2 | | 5.4 | |
| 000067-66-3 | CHLOROFORM | 5.5 | | 3.2 | |
| 000218-01-9 | CHRYSENE | 0.1 | | 0.1 | |
| 000075-09-2 | DICHLOROMETHANE | 46.4 | | 27 | |
| 000071-55-6 | ETHANE, 1,1,1-TRICHLORO | 3.3 | | 1.9 | |
| 000079-00-5 | ETHANE, 1,1,2-TRICHLORO | 6.2 | | 3.6 | |
| 000075-34-3 | ETHANE, 1,1-DICHLORO- | 7 | | 4.1 | |
| 000106-93-4 | ETHANE, 1,2-DIBROMO | 8.6 | | 5 | |
| 000075-00-3 | ETHANE, CHLORO | 4.9 | | 2.8 | |
| 000100-41-4 | ETHYLBENZENE | 181.9 | | 105.8 | |
| 000206-44-0 | FLUORANTHENE | 0.2 | | 0.1 | |
| 000086-73-7 | FLUORENE | 1.1 | | 0.6 | |
| 000050-00-0 | FORMALDEHYDE | 19899 | | 11571.9 | |
| 000110-54-3 | HEXANE | 294.2 | | 171.1 | |
| 007647-01-0 | HYDROGEN CHLORIDE | 9954.8 | | 5789 | |
| 000067-56-1 | METHYL | 387.1 | | 225.1 | |

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| | | | |
|-------------|--|--------|--------|
| 000078-93-3 | ALCOHOL METHYL ETHYL KETONE | 1436 | 835.1 |
| 000091-20-3 | NAPHTHALENE | 14.4 | 8.4 |
| 0NY210-00-0 | OXIDES OF NITROGEN | 199800 | 116190 |
| 000000-23-4 | PAH, TOTAL | 5.2 | 3 |
| 000540-84-1 | PENTANE, 2,2,4- TRIMETHYL- | 48.4 | 28.1 |
| 000085-01-8 | PHENANTHRENE | 2 | 1.2 |
| 000108-95-2 | PHENOL | 4.6 | 2.7 |
| 0NY075-02-5 | PM 2.5 | 25600 | 14887 |
| 0NY075-00-5 | PM-10 | 25600 | 14887 |
| 000107-13-1 | PROPENENITRIL E | 3.5 | 2 |
| 000129-00-0 | PYRENE | 0.3 | 0.2 |
| 000100-42-5 | STYRENE | 21.1 | 12.3 |
| 007446-09-5 | SULFUR DIOXIDE | 15200 | 8839 |
| 000108-88-3 | TOLUENE | 836.9 | 486.7 |
| 0NY100-00-0 | TOTAL HAP | 30000 | 17446 |
| 000079-01-6 | TRICHLOROETH YLENE | 18.4 | 10.7 |
| 000075-01-4 | VINYL CHLORIDE | 28.7 | 486.7 |
| 0NY998-00-0 | VOC | 41600 | 24192 |
| 001330-20-7 | XYLENE, M, O & P MIXT. | 35.6 | 20.7 |
| 00E966-68-9 | XYLENE, META & PARA IN COMBINATION | 496.1 | 288.5 |

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

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- Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item G: Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.
- Item I: Permit Shield - 6 NYCRR Part 201-6.4(g)**
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising 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;

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- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

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

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

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

Item K: Permit Exclusion - ECL 19-0305

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

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

All terms and conditions in this permit required by the Act or any applicable requirement,

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

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

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

The owner or operator of the permitted facility must maintain all required records on-site

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

Regulatory Analysis

| Location Facility/EU/EP/Process/ES | Regulation | Condition | Short Description |
|---|----------------------------|--------------------|--|
| -- FACILITY | ECL 19-0301 | 70 | Powers and Duties of the Department with respect to air pollution control |
| FACILITY | 40CFR 60-A | 33 | General provisions |
| 1-BTUPL/-/GAS/TRMT2 | 40CFR 60-Cf.33f(c) (3) | 44, 45, 46, 47 | Routing Landfill Gas to a Treatment System |
| 2-BTUPL/-/PL2/TRMT3 | 40CFR 60-Cf.33f(c) (3) | 51, 52, 53, 54 | Routing Landfill Gas to a Treatment System |
| 3-STAGE/-/STP/TRMT1 | 40CFR 60-Cf.33f(c) (3) | 65, 66, 67, 68, 69 | Routing Landfill Gas to a Treatment System |
| 1-BTUPL/-/E10/EGEN2 | 40CFR 60-IIII | 42 | Standards of Performance for Stationary Compression Ignition Internal Combustion Engines |
| 2-BTUPL/-/E20/EGEN3 | 40CFR 60-IIII | 49 | Standards of Performance for Stationary Compression Ignition Internal Combustion Engines |
| 3-STAGE/-/ST3 | 40CFR 60-JJJJ | 57 | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines |
| 3-STAGE/-/ST3 | 40CFR 60-JJJJ.4230 (a) (4) | 58 | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines - Applicability |
| 3-STAGE/-/STP | 40CFR 60-JJJJ.4230 (a) (4) | 63 | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines - Applicability |
| FACILITY | 40CFR 60-JJJJ.4233 (f) | 34 | NSPS for Stationary Spark Ignition Internal Combustion Engines - new or modified engines |
| FACILITY | 40CFR 60-JJJJ.4243 (b) (2) | 35 | SI ICE - Maintenance Plan and testing |
| FACILITY | 40CFR 60-JJJJ.4244 | 36 | Test methods and procedures |
| FACILITY | 40CFR 60-JJJJ.4245 (a) | 37 | Notification, reporting and |

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| | | | |
|---------------------|-----------------------------|-------------------|---|
| FACILITY | 40CFR 60-JJJJ.4245 (c) | 38 | recordkeeping requirements |
| FACILITY | 40CFR 60-JJJJ.4245 (d) | 39 | Initial notification for engines > 500 HP |
| 3-STAGE/-/EMR/EGEN1 | 40CFR 63-ZZZZ | 56 | Performance test requirements |
| 3-STAGE/-/STP | 40CFR 63-ZZZZ | 64 | Reciprocating Internal Combustion Engine (RICE) NESHAP |
| FACILITY | 40CFR 68 | 17 | Reciprocating Internal Combustion Engine (RICE) NESHAP |
| FACILITY | 40CFR 82-F | 18 | Chemical accident prevention provisions |
| FACILITY | 6NYCRR 200.6 | 1, 19, 20, 21, 22 | Protection of Stratospheric Ozone - recycling and emissions reduction |
| 3-STAGE/-/STP | 6NYCRR 200.6 | 59, 60 | Acceptable ambient air quality. |
| FACILITY | 6NYCRR 200.7 | 9 | Acceptable ambient air quality. |
| FACILITY | 6NYCRR 201-1.4 | 71 | Maintenance of equipment. |
| FACILITY | 6NYCRR 201-1.7 | 10 | Unavoidable noncompliance and violations |
| FACILITY | 6NYCRR 201-1.8 | 11 | Recycling and Salvage |
| FACILITY | 6NYCRR 201-3.2 (a) | 12 | Prohibition of reintroduction of collected contaminants to the air |
| FACILITY | 6NYCRR 201-3.3 (a) | 13 | Exempt Activities - Proof of eligibility |
| FACILITY | 6NYCRR 201-6 | 23, 40, 41 | Trivial Activities - proof of eligibility |
| FACILITY | 6NYCRR 201-6.4 (a) (4) | 14 | Title V Permits and the Associated Permit Conditions |
| FACILITY | 6NYCRR 201-6.4 (a) (7) | 2 | General Conditions - Requirement to Provide Information |
| FACILITY | 6NYCRR 201-6.4 (a) (8) | 15 | General Conditions - Fees |
| FACILITY | 6NYCRR 201-6.4 (c) | 3 | General Conditions - Right to Inspect |
| FACILITY | 6NYCRR 201-6.4 (c) (2) | 4 | Recordkeeping and Reporting of Compliance Monitoring |
| FACILITY | 6NYCRR 201-6.4 (c) (3) (ii) | 5 | Records of Monitoring, Sampling and Measurement |
| FACILITY | 6NYCRR 201-6.4 (d) (4) | 24 | Reporting Requirements - Deviations and Noncompliance |
| FACILITY | 6NYCRR 201-6.4 (e) | 6 | Compliance Schedules - Progress Reports |
| FACILITY | 6NYCRR 201-6.4 (f) | 25 | Compliance Certification |
| FACILITY | 6NYCRR 201-6.4 (f) (2) | 26 | Operational Flexibility |
| | | | Operational Flexibility - |

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| | | | |
|-----------------------------|------------------------|-----------------------------------|---|
| FACILITY | 6NYCRR 201-6.5 (a) | 72 | Protocol |
| 3-STAGE/-/ST3 | 6NYCRR 201-6.5 (a) | 73, 74, 75, 76, 77, 78, 79, 80 | State Enforceable Requirements |
| FACILITY | 6NYCRR 201-7 | 27 | State Enforceable Requirements |
| FACILITY | 6NYCRR 202-1.1 | 16 | Federally Enforceable Emissions Caps |
| FACILITY | 6NYCRR 202-2.4 (a) (3) | 29 | Required emissions tests. |
| FACILITY | 6NYCRR 202-2.5 | 7 | Emission statement methods and procedures |
| FACILITY | 6NYCRR 211.2 | 30 | Emission Statements - record keeping requirements. |
| FACILITY | 6NYCRR 212-1.6 (a) | 31 | General Prohibitions - visible emissions limited. |
| 1- BTUPL/OXD01/GAS/3KOXD | 6NYCRR 212-1.7 (b) (1) | 48 | Limiting of Opacity |
| 2- BTUPL/OXD02/PL2/5KOXD | 6NYCRR 212-1.7 (b) (1) | 55 | The exhaust gas temperature from thermal or catalytic oxidizer |
| 1-BTUPL/-/GAS/3KFLR | 6NYCRR 212-1.7 (b) (5) | 43 | The exhaust gas temperature from thermal or catalytic oxidizer |
| 2-BTUPL/-/PL2/5KFLR | 6NYCRR 212-1.7 (b) (5) | 50 | The monitoring of other parameters required by conditions for the process emission source. |
| FACILITY | 6NYCRR 215.2 | 8 | The monitoring of other parameters required by conditions for the process emission source. |
| FACILITY | 6NYCRR 227-1.4 (a) | 32 | Open Fires - Prohibitions |
| 3-STAGE/-/STP | 6NYCRR 227-2.4 (f) (2) | 61 | Opacity Standard |
| 3-STAGE/-/STP | 6NYCRR 227-2.6 (c) | 62 | Emission limit for engines running on landfill gas. |
| | | | Stack Test Requirements. |

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

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device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.4 (a) (4)

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

6 NYCRR 201-6.4 (a) (7)

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

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6 NYCRR 201-6.4 (a) (8)

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

6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

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

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

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

6 NYCRR 201-6.4 (d) (4)

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

6 NYCRR 201-6.4 (e)

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

6 NYCRR 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 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 215.2

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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, SENECA ENERGY LFGTE FACILITY has been determined to be subject to the following regulations:

40 CFR 60.33f (c) (3)

This citation states the control option to route landfill gas to a treatment system.

40 CFR 60.4230 (a) (4) (i)

Owners and operators of stationary spark ignited internal combustion engines (SI ICE), that commence construction after June 12, 2006, where the stationary SI ICE are manufactured on or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 HP (except lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP) are subject to the requirements of 40 CFR 60 Subpart JJJJ.

40 CFR 60.4233 (f)

This citation states the requirements for modified and reconstructed engines.

40 CFR 60.4243 (b) (2) (ii)

This regulation requires the owner or operator of a stationary SI internal combustion engine greater than 500 HP to keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.

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40 CFR 60.4244

This regulation specifies the test methods and procedures to be used by owners or operators of spark ignited internal combustion engines.

40 CFR 60.4245 (a)

This regulation sets forth the notification, reporting and recordkeeping requirements for 40 CFR 60 Subpart JJJJ, for owners and operators of stationary spark ignited internal combustion engines.

40 CFR 60.4245 (c)

This regulation sets forth the notification requirements for engines larger than 500 horsepower.

40 CFR 60.4245 (d)

Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed.

40 CFR Part 60, Subpart A

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

40 CFR Part 60, Subpart IIII

Subpart IIII applies to new and reconstructed compression ignition reciprocating internal combustion engines. Sources subject to Subpart IIII must comply with emission standards for hydrocarbons, nitrogen oxides, carbon monoxide, and particulate matter.

40 CFR Part 60, Subpart JJJJ

Subpart JJJJ applies to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in §60.4230, paragraphs (a)(1) through (6). Sources subject to Subpart JJJJ must comply with emission standards for nitrogen oxides, carbon monoxide, and volatile organic compounds.

40 CFR Part 63, Subpart ZZZZ

Subpart ZZZZ applies to reciprocating internal combustion engines. Sources subject to Subpart ZZZZ must limit emissions of carbon monoxide and formaldehyde. Sources must also comply with work practice standards and operating limits.

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6 NYCRR 201-6.4 (f)

This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 201-6.4 (f) (2)

This section describes the requirements for operational flexibility protocols included in Title V permits. The facility owner or operator may make certain changes to the facility that have been reviewed and approved pursuant to the protocol without first obtaining a permit modification for those changes.

6 NYCRR 201-6.5 (a)

This subdivision states that the Department shall include state enforceable conditions in Title V permits. State enforceable conditions related to regulations developed pursuant to the Climate Leadership and Community Protection Act (CLCPA) and Article 75 of New York State Environmental Conservation Law may be included in future versions of this permit, as applicable.

6 NYCRR 202-2.4 (a) (3)

Once a facility is required to submit annual emission statements electronically, emission statements must be submitted to the department per the specified schedule, in this regulation beginning the reporting year that a Title V permit containing a condition mandating electronic submittal is issued.

6 NYCRR 212-1.6 (a)

This provision requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-1.7 (b) (1)

This paragraph requires the source owner to monitor the exhaust gas temperature of the thermal oxidizer to demonstrate on-going compliance.

6 NYCRR 212-1.7 (b) (5)

This paragraph requires the source owner to monitor specific stack parameters to demonstrate on-going compliance.

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6 NYCRR 227-1.4 (a)

This subdivisions sets the opacity standard for subject stationary combustion installations.

6 NYCRR 227-2.4 (f) (2)

6 NYCRR 227-2.6 (c)

This citation states the emission test requirements for sources that are not utilizing CEMs.

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 less than 99.9 tpy NOx.

Compliance Certification

Summary of monitoring activities at SENECA ENERGY LFGTE FACILITY:

| Location Facility/EU/EP/Process/ES | Cond No. | Type of Monitoring |
|---|-----------------|---|
| --- | | |
| 1-BTUPL/-/GAS/TRMT2 | 44 | monitoring of process or control device parameters as surrogate |
| 1-BTUPL/-/GAS/TRMT2 | 45 | monitoring of process or control device parameters as surrogate |
| 1-BTUPL/-/GAS/TRMT2 | 46 | monitoring of process or control device parameters as surrogate |
| 1-BTUPL/-/GAS/TRMT2 | 47 | record keeping/maintenance procedures |
| 2-BTUPL/-/PL2/TRMT3 | 51 | monitoring of process or control device parameters as surrogate |
| 2-BTUPL/-/PL2/TRMT3 | 52 | monitoring of process or control device parameters as surrogate |
| 2-BTUPL/-/PL2/TRMT3 | 53 | monitoring of process or control device parameters as surrogate |
| 2-BTUPL/-/PL2/TRMT3 | 54 | record keeping/maintenance procedures |
| 3-STAGE/-/STP/TRMT1 | 65 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/STP/TRMT1 | 66 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/STP/TRMT1 | 67 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/STP/TRMT1 | 68 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/STP/TRMT1 | 69 | record keeping/maintenance procedures |
| 1-BTUPL/-/E10/EGEN2 | 42 | record keeping/maintenance procedures |
| 2-BTUPL/-/E20/EGEN3 | 49 | record keeping/maintenance procedures |
| 3-STAGE/-/ST3 | 57 | record keeping/maintenance procedures |
| 3-STAGE/-/ST3 | 58 | record keeping/maintenance procedures |
| 3-STAGE/-/STP | 63 | record keeping/maintenance procedures |

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| | | |
|-------------------------|----|---|
| FACILITY | 34 | record keeping/maintenance procedures |
| FACILITY | 35 | record keeping/maintenance procedures |
| FACILITY | 36 | record keeping/maintenance procedures |
| FACILITY | 37 | record keeping/maintenance procedures |
| FACILITY | 38 | record keeping/maintenance procedures |
| FACILITY | 39 | record keeping/maintenance procedures |
| 3-STAGE/-/EMR/EGEN1 | 56 | record keeping/maintenance procedures |
| 3-STAGE/-/STP | 64 | record keeping/maintenance procedures |
| FACILITY | 19 | monitoring of process or control device parameters as surrogate |
| FACILITY | 20 | work practice involving specific operations |
| FACILITY | 21 | work practice involving specific operations |
| FACILITY | 22 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/STP | 59 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/STP | 60 | intermittent emission testing |
| FACILITY | 5 | record keeping/maintenance procedures |
| FACILITY | 6 | record keeping/maintenance procedures |
| FACILITY | 26 | record keeping/maintenance procedures |
| FACILITY | 72 | record keeping/maintenance procedures |
| 3-STAGE/-/ST3 | 73 | work practice involving specific operations |
| 3-STAGE/-/ST3 | 74 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/ST3 | 75 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/ST3 | 76 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/ST3 | 77 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/ST3 | 78 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/ST3 | 79 | intermittent emission testing |
| 3-STAGE/-/ST3 | 80 | intermittent emission testing |
| FACILITY | 28 | work practice involving specific operations |
| FACILITY | 31 | monitoring of process or control device parameters as surrogate |
| 1-BTUPL/OXD01/GAS/3KOXD | 48 | monitoring of process or control device parameters as surrogate |
| 2-BTUPL/OXD02/PL2/5KOXD | 55 | monitoring of process or control device parameters as surrogate |
| 1-BTUPL/-/GAS/3KFLR | 43 | record keeping/maintenance procedures |
| 2-BTUPL/-/PL2/5KFLR | 50 | record keeping/maintenance procedures |
| FACILITY | 32 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/STP | 61 | monitoring of process or control device parameters as surrogate |
| 3-STAGE/-/STP | 62 | intermittent emission testing |

Basis for Monitoring

6NYCRR Part 200.6: There are a number of monitoring conditions under this rule requiring ongoing compliance as follows:

- 1) The facility requires ongoing compliance with the 1-hr NAAQS for sulfur dioxide. The facility will take a yearly gas sample from the outlet of TRMT2 and TRMT3 which are the treatment systems for the High BTU Plants to confirm total reduced sulfur compounds and hydrogen sulfide concentrations as being less than 20 ppm. Additionally,

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the facility will use colorimetric gas detection tubes or a handheld monitor weekly at the inlet and outlets of the treatment systems to show proper operation of the systems. The outlets need to remain compliant with the 20 ppm hydrogen sulfide concentration limit. Corrective action will be taken if there is any reason to believe the NAAQS is being exceeded. The facility will note in a log the flow through the system and the colorimetric gas tube readings (or handheld monitor) as well as any corrective action taken (such as media changeouts).

2) The sum of emissions of oxides of nitrogen (NO_x) is required to be less than 214.4 tpy calculated on a 12 month rolling total (this is the previous permit's limit based on a Part 231 analysis). This limit will expire one year from commencement of operation of the new second High BTU plant. This allows for a transition period where 8 of the engines are converted to natural gas with oxidation catalysts. This limit ensures that NAAQS are not exceeded. Monthly emissions from engines will be calculated using daily individual engine bHp production data based on the amount of electricity that is generated and the use of emission factors from the most recent stack test report. Within one year of commencement of operation the new limit for NO_x will be less than 99.9 tpy and this condition will be expired. Applicable conditions for this new limit are found elsewhere in the permit.

3) The sum of emissions of carbon monoxide (CO) is required to be less than 522.9 tpy calculated on a 12 month rolling total (this is the previous permit's limit based a Part 231 analysis). This limit will expire one year from commencement of operation of the new second High BTU plant. This allows for a transition period where 8 of the engines are converted to natural gas with oxidation catalysts. Ten of the existing Caterpillar G3516 engines will be permanently shut down and be removed as will TRMT1. This limit ensures that NAAQS are not exceeded. Monthly emissions from engines will be calculated using daily individual engine bHp production data based on the amount of electricity that is generated and the use of emission factors from the most recent stack test report. Within one year of commencement of operation the this condition will be expired. The facility will remain major for carbon monoxide but the calculated PTE is less than 250 tpy and therefore will not require a limit.

4) The facility is required to perform a stack test on each type of engine firing landfill gas no later than 5 years from the previous stack test for carbon monoxide. This condition will expire within one year from commencement of operation of the second High BTU plant or when the 8 engines have been converted to natural gas and the other 10 engines have been permanently removed. The converted engines have testing requirements elsewhere in the permit.

5) The facility is required to maintain its current monitoring requirement for monthly monitoring of CO emissions at the outlet of each engine running on landfill gas using a

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portable analyzer. This will ensure compliance with the limit of 522.9 tpy of CO. This will ensure that the engines running on landfill gas will not exceed the permitted emission factor of 2.17 g/bHp-hr for CO which shows compliance with the NAAQS for CO. The facility will take a measurement, monthly, at each stack while the engine is operating using a properly calibrated portable gas analyzer approved by the Department. The facility will take an average of 3 instantaneous readings that are obtained over a period of 3 minutes. The 3 readings will be recorded and the average will be calculated. This average must not exceed the threshold established in the most recent stack test. If monthly monitoring shows an exceedance, corrective action will be taken. If the engine can not be brought back under this threshold, a new stack test will be required to verify that current operating conditions can meet the permitted emission rate of the engines. This condition will expire no later than one year from commencement of operation of the second High BTU plant (or when 8 of the engines have been converted to natural gas and the remaining 10 engines have been permanently removed).

6) The facility is required to do visible emission observations for the flares at the High BTU Plants weekly while they are in operation. Opacity can not exceed 20% and if visible emissions are observed the facility is required to investigate and perform corrective action.

6NYCRR Part 201-6.5(a): There are a number of conditions under this rule citation as requiring ongoing compliance as follows:

A. As per the CLCPA analysis, the limiting of Formaldehyde to 9.9 tons/year is required to ensure the facility meets the goals the facility's CLCPA Section 7(3). This will be achieved through various monitoring requirements. These include limiting of formaldehyde concentrations, monitoring of catalyst temperature and pressure and performance testing. Please see items 1-5 below:

1) The facility is required to stack test the engines firing on natural gas with oxidation catalysts to show compliance with the 1.60 g/bHp-hr. This limit is one part in ensuring the reduction of formaldehyde emissions by 80% specified in the facility's CLCPA Section 7(3) analysis to less than 9.9 tpy. Emission testing is required to be completed every 5 years unless the engine is subject to more frequent testing under 40 CFR 60 Subpart JJJJ which may qualify as testing under this condition.

The other part in ensuring that formaldehyde is reduced is as follows:

The facility is required to calculate monthly CO emissions as a surrogate for formaldehyde to show that the facility is limiting formaldehyde emissions to less than 9.9 tpy. This is to be consistent with the HAP emissions reduction specified in the facility's CLCPA Section 7(3) Analysis where total facility formaldehyde emissions are limited to

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less than 9.9 tpy on a rolling 12 month basis.

2) The facility is required to monitor the pressure of the oxidation catalyst at the inlet and outlet of the engines firing natural gas and to do corrective action if the differential pressure is more than 55 mm water (2 inches of water) higher than the initial differential pressure. Based on corrective action taken, a new stack test may be required. This is to be consistent with the HAP emissions reduction specified in the facility's CLCPA Section 7(3) Analysis where total facility formaldehyde emissions are limited to less than 9.9 tpy on a rolling 12 month basis.

3) The facility is required to monitor the temperature at the inlet and outlet of the oxidation catalyst to ensure that the inlet remains above 752 degrees F. Based on corrective action taken, a new stack test may be required. This is to be consistent with the HAP emissions reduction specified in the facility's CLCPA Section 7(3) Analysis where total facility formaldehyde emissions are limited to less than 9.9 tpy on a rolling 12 month basis.

4) The facility is required to monitor the temperature at the inlet and outlet of the oxidation catalyst to ensure that both the inlet and outlet does not exceed 1112 degrees F. Based on corrective action taken, a new stack test may be required. This is to be consistent with the HAP emissions reduction specified in the facility's CLCPA Section 7(3) Analysis where total facility formaldehyde emissions are limited to less than 9.9 tpy on a rolling 12 month basis.

5) The facility is required to perform periodic monitoring of the exhaust stacks for the engines fired on natural gas for CO by using a handheld monitor to ensure they are meeting the threshold for CO (ppm) established in the most recent stack test that showed compliance with the 1.60 g/bHp-hr emission rate for CO. This condition specifies how the reading will be taken and the corrective action. Based on corrective action taken, a new stack test may be required. This is to be consistent with the HAP emissions reduction specified in the facility's CLCPA Section 7(3) Analysis where total facility formaldehyde emissions are limited to less than 9.9 tpy on a rolling 12 month basis.

B. Additionally, the facility is required to confirm that the facility is remaining at or below 99.9 tpy of NO_x in order to cap out of the requirements for the engines running on natural gas:

1) The facility is required to perform periodic monitoring of the exhaust stacks for the engines fired on natural gas for NO_x by using a handheld monitor to ensure they are meeting the threshold for NO_x (ppm) established in the most recent stack test that showed compliance with the 0.50 g/bHp-hr emission rate for NO_x. This condition specifies how the reading will be taken and the corrective action. This is to meet the limit

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of less than 99.9 tpy NO_x which caps the facility out of NO_xRACT.

2) Emission testing is required to be completed on each engine type (one CAT 3516 and one CAT 3520 IC engine) every 5 years unless the engine is subject to more frequent testing under 40 CFR 60 Subpart JJJJ which may qualify as testing under this condition. The facility is required to meet the emission rate of 0.50 g/bHp-hr of NO_x.

6NYCRR Part 201-6.5(a): This condition is for CLCPA which is in alignment with the mandated goal of net-zero emissions in the electricity sector by 2040. The facility has committed to permanently shutting down the remaining 4-3516 and 4-3520 CAT IC engines firing natural gas by 2040.

6NYCRR Part 201-7: This condition establishes a new limit for NO_x which is based on 4-CAT 3516 and 4-CAT 3520 IC engines being fueled with natural gas and with oxidation catalysts, as well as the permanent removal of the remaining 10-3516 IC engines, the existing thermal oxidizer and flare and the new oxidizer and flare as well as miscellaneous sources of NO_x. This limit of 99.9 tpy caps the facility out of NO_xRACT and takes effect no later than one year after commencement of operation of unit 2-BTUPL. This is to allow a transition period while the facility is constructing the new plant. Once constructed and operating, the facility will calculate monthly NO_x emissions and show the 12 month rolling total. The facility will also submit a NO_x emission cap certification report semi-annually.

6NYCRR Part 212-1.6(a): Conditions under this citation are for various sources to make an opacity observation on a weekly basis while the emission source is operating. Corrective action must be taken if emissions are noticed. These conditions are established for the thermal oxidizers 3KOXD and 5KOXD. Weekly records will be kept at the facility and be provided to the Department upon request.

6NYCRR Part 212-1.7(b)(1): Conditions under this citation are established for thermal oxidizers 3KOXD and 5KOXD which states that continuous monitors must be installed on these units to monitor the exhaust temperature. Corrective action shall be taken if the temperature falls below 1450 degrees F and records shall be kept of corrective action taken.

6NYCRR Part 212-1.7(b)(5): Conditions under this citation are established for 3KFLR and 5KFLR in that the facility is required to make sure that there is a flame present at all times that gas is vented through these sources. The facility will continuously monitor the presence of a flare pilot flame by use of a thermocouple or other device as well as monitor the flow to the flares.

6NYCRR Part 227-1.4(a): The condition under this citation are established under

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facility level for processes STP and ST3 under 3-STAGE for visual emissions from the exhausts of the engines running on either landfill gas or natural gas. The facility is required to perform a Method 9 test on each engine type once a year (on a rotating schedule that is acceptable to the Department). The facility will submit the schedule within 60 days of permit issuance and submit results of the Method 9 test annually. The facility must keep records for 5 years in a format and place that is acceptable to the Department.

6NYCRR Part 227-2.4(f)(2): This condition requires the facility to perform periodic (monthly) monitoring through the use of a handheld monitor on the engine exhausts to show compliance with the threshold established (in ppm NO_x) during the latest performance test that showed compliance with the NO_x RACT standard of 2.0 g/bHp-hr for engines firing landfill gas. Corrective action will be taken if required and data and actions will be recorded. Once the engines have been converted to natural gas, this condition will expire.

6NYCRR Part 227-2.6(c): This condition requires the facility to perform a stack test for each type of engine being fueled by landfill gas once every 5 years from the previous stack test in order to show compliance with the NO_x RACT standard of 2.0 g/bHp-hr. Once the engines have been converted to natural gas, this condition will expire.

40 CFR 60.33f(c)(3): These conditions are for the treatment systems for the landfill gas (TRMT1, TRMT2, TRMT3). Currently the MSW landfill from which this facility is purchasing gas from is subject to 40 CFR 60 Subpart Cf. If the MSW landfill is permitted for an expansion during the term of this permit, the facility will become subject to treatment of the landfill gas under 40 CFR 63 Subpart AAAA. Conditions for monitoring parameters for each treatment system are given for compression, dewatering and filtering. The facility is required to perform observations of the treatment system and perform corrective action as required. Since each plant (3-STAGE, 1-BTUPL, 2-BTUPL) has a treatment system, the downstream control equipment at each facility are not subject to the testing requirements for control of non-methane organic compounds. The facility is required to keep records of observations and corrective action taken.

40 CFR 60 Subpart IIII, 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ: Conditions have been added to engines applicable to these rules for monitoring, recordkeeping and emission testing as applicable.

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