

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 8-4638-00011/00020**

**11/28/01 09:33:28**



**Facility Identification Data**

Name: AES HICKLING LLC  
Address: 11884 HICKLING RD  
City: CORNING  
Zip: 14830

**Owner/Firm**

Name: AES CREATIVE RESOURCES LP  
City: ARLINGTON  
State: VA Country: USA Zip: 22209  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:  
Name: ROGER T. MCDONOUGH

Division of Air Resources:  
Name: FRANC GRABAR  
Phone: 7162262466

Air Permitting Contact:  
Name: ANDREW M. CHADWICK  
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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)(2) 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 while the permit review report is based on information found in the accompanying permit, it is not an enforceable document and therefore, has no legal standing.

**Summary Description of Proposed Project**

THIS IS AN INITIAL TITLE V APPLICATION FOR HICKLING STATION, AN EXISTING ELECTRIC GENERATING FACILITY. HICKLING STATION CONSISTS OF FOUR BOILERS FEEDING STEAM TO TWO GENERATORS. BOILERS 1 AND 2 EXHAUST THROUGH A COMMON STACK, AND BOILERS 3 AND 4 EXHAUST THROUGH A COMMON STACK. HICKLING STATION IS PERMITTED TO BURN COAL, WOOD, AND A VARIETY OF ALTERNATE FUELS GOVERNED BY SPECIAL PERMIT CONDITIONS. ASSOCIATED WITH THE BOILERS IS THE WASTE OIL SYSTEM, COAL HANDLING SYSTEM, ALTERNATE FUELS HANDLING SYSTEMS, AND OTHER MISCELLANEOUS SOURCES AND ACTIVITIES RELATED TO THE OPERATION OF AN ELECTRIC GENERATING STATION. NO CHANGES IN

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THE OPERATION OF THE FACILITY ARE CONTEMPLATED AS A RESULT OF THIS PERMIT APPLICATION.

### Attainment Status

AES HICKLING LLC is located in the town of CORNING in the county of STEUBEN. 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* (NON-ATTAINMENT)	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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

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

### Facility Description

HICKLING STATION IS AN ELECTRIC GENERATING STATION CONSISTING OF TWO GENERATOR UNITS. STEAM FOR UNIT 1 IS SUPPLIED BY BOILERS 1 AND 2. STEAM FOR UNIT 2 IS SUPPLIED BY BOILERS 3 AND 4. BOILERS 1 AND 2 EXHAUST THROUGH A COMMON STACK, AND BOILERS 3 AND 4 EXHAUST THROUGH A COMMON STACK. EACH BOILER HAS ITS OWN DUCT ENTERING THE RESPECTIVE STACK. HICKLING STATION IS PERMITTED TO BURN COAL, WOOD AND A VARIETY OF ALTERNATE FUELS GOVERNED BY SPECIAL PERMIT CONDITIONS. ASSOCIATED WITH THE BOILERS ARE COAL HANDLING SYSTEM (UNLOADING, CONVEYING, ETC.), WOOD HANDLING SYSTEM (UNLOADING, CONVEYING, ETC.) WASTE OIL SYSTEM (TANKS AND PIPING), ALTERNATE FUELS HANDLING SYSTEM (UNLOADING, CONVEYING, ETC.) AND OTHER MISCELLANEOUS SOURCES AND ACTIVITIES RELATED TO THE OPERATION OF AN ELECTRIC GENERATING STATION.

### Permit Structure and Description of Operations

The Title V permit for AES HICKLING LLC is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.



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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.

AES HICKLING LLC is defined by the following emission unit(s):

Emission unit H00002 - HICKLING STATION IS AN ELECTRIC GENERATING STATION CONSISTING OF TWO GENERATOR UNITS. THE FOLLOWING IDENTIFIERS WILL BE USED IN RELATION TO THIS EMISSION UNIT: HICKLING UNIT 2, EMISSION UNIT H00002; HICKLING STACK 2, EMISSION POINT 00002, BOILER 3 ELECTROSTATIC PRECIPITATOR, EMISSION SOURCE ESP03; BURNING BITUMINOUS COAL, PROCESS P31; BURNING NO 2 FUEL OIL, PROCESS P32; BURNING WASTE OIL, PROCESS P33; BURNING CLEAN UNADULTERATED WOOD, PROCESS P35; BURNING CREOSOTE TREATED WOOD, PROCESS P36; BURNING COAL T AR SOILS, PROCESS P37; BURNING ANTHRACITE COAL, PROCESS P39; BURNING DIESEL FUEL/10, PROCESS P39, BURNING BUSH WASTE WOOD, PROCESS P3A; INJECTING AMMONIA, PROCESS P3C; BOILER 4, EMISSION SOURCE B0004; BOILER 4 ELECTROSTATIC PRECIPITATOR, EMISSION SOURCE ESP04; BURNING BITUMINOUS COAL, PROCESS P41, BURNING NO2 FUEL OIL, PROCESS P42, BURNING WASTE OIL, PROCESS P43; BURNING CLEAN UNADULTERATED WOOD, PROCESS P46; BURNING CREOSOTE TREATED WOOD, PROCESS P46; BURNING COAL TAR SOILS, PROCESS P47; BURNING ANTHRACITE COAL, PROCESS P48; BURNING DIESEL FUEL 10, PROCESS P49; BURNING BUSH WASTE WOOD, PROCESS P4A, INJECTING AMMONIA, PROCESS P4C. STEAM FOR UNIT 2 IS SUPPLIED BY EMISSION SOURCES B0003 AND B0004 EXHAUST THROUGH A COMMON STACK (EMISSION POINT 00002). EACH BOILER HAS ITS OWN DUCT ENTERING THE RESPECTIVE STACK. EMISSION SOURCE B0003 AND B00004 ARE COMBUSTION ENGINEERING TRAVELING GRATE STOKER BOILERS RATED AT 416 MMBTU/HR MAXIMUM HEAT INPUT. BOTH BOILERS BURN BITUMINOUS COAL AS THEIR PRIMARY FUEL, WITH A VARIETY OF OTHER FUELS (CLEAN WOOD, CREOSOTE TREATED WOOD, COAL TAR SO

Emission unit H00002 is associated with the following emission points (EP):

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00002

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

Process: P31 is located at GROUND, Building BOILER - EMISSION SOURCE B0003 FIRES BITUMINOUS COAL AS ITS PRIMARY BASELINE (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P32 EMISSION SOURCE B0003 USES NO 2 FUEL OIL AS A STARTUP FUEL. IT IS USED ON AN AS NEEDED BASIS. A FIRE ESTABLISHED DURING STARTUP BY PILING WOOD ON THE TRAVELING GRATE, SOAKING IT WITH 5 TO 10 GALLONS OF NO 2 FUEL OIL OR DIESEL FUEL 11, AND LIGHTING IT. THERE ARE NO SPECIFIC FUEL OIL CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSIONS MONITORING SYSTEM ON EMISSION POINT 00002. 11/AES HICKLING USES DIESEL FUEL AND KEROSENE INTERCHANGEABLY FOR THIS PROCESS. IT APPEARS THAT NO 2 FUEL OIL, DIESEL FUEL OIL AND KEROSENE COULD HAVE BEEN GROUPED TOGETHER, BASED ON SCC CODE, RATHER THAN SEPARATED AS AES HICKLING HAS DONE.

Process: P33 is located at GROUND, Building BOILER - EMISSION SOURCE B0003 IS PERMITTED TO FIRE WASTE OIL. IT IS USED ON AN OCCASIONAL BASIS. WHEN WASTE OIL ONLY IS BEING FIRED, THE ELECTROSTATIC PRECIPITATORS ARE NOT ENERGIZED. THE PRECIPITATORS ARE ENERGIZED, HOWEVER, WHEN WASTE OIL IS BEING BURNED ALONG WITH BASELINE FUELS. EMISSION SOURCE B0003 IS LIMITED TO BURNING WASTE OIL AT A MAXIMUM RATE OF 2 GALLONS PER MINUTE. THE WASTE OIL MUST MEET THE SPECIFICATIONS OF 6 NYCRR 225-2. THERE ARE NO SPECIFIC CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P35 is located at GROUND, Building BOILER - EMISSION SOURCE B0003 IS PERMITTED TO FIRE CLEAN UNADULTERATED WOOD AS A PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDE EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P36 is located at GROUND, Building BOILER - EMISSION SOURCE B0003 IS PERMITTED TO FIRE CREOSOTE TREATED WOOD (CTW) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); CTW MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. CTW MAY BE FIRED AT A CONCENTRATION UP TO 45% BY

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WEIGHT OF TOTAL FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDE EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P37 is located at GROUND, Building BOILER - EMISSION SOURCE B0003 IS PERMITTED TO FIRE NON HAZARDOUS COAL TAR CONTAMINATED SOILS (CTS) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); CTS MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUELS. CTS MAY BE FIRED AT A CONCENTRATION UP TO 25% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P38 is located at GROUND, Building BOILER - EMISSION SOURCE B0003 FIRES ANTHRACITE COAL AS ITS PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P39 is located at GROUND, Building BOILER - EMISSION SOURCE B0003 USES DIESEL FUEL/12 AS A STARTUP FUEL. IT IS USED ON AN AS NEEDED BASIS. A FIRE IS ESTABLISHED DURING START UP BY PILING WOOD ON THE TRAVELING GRATE, SOAKING IT WITH 5 TO 10 GALLONS OF NO 2 FUEL OIL OR DIESEL FUEL, AND LIGHTING IT. THERE ARE NO SPECIFIC DIESEL FUEL CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002. 12/AES HICKLING USES DIESEL FUEL AND KEROSENE INTERCHANGEABLY FOR THIS PROCESS. IT APPEARS THAT NO 2 FUEL OIL, DIESEL FUEL OIL, AND KEROSENE COULD HAVE BEEN GROUPED TOGETHER, BASED ON SCC CODE, RATHER THAN SEPARATED AS AES HICKLING HAS DONE.

Process: P3A is located at GROUND, Building BOILER - EMISSION SOURCE B0003 IS PERMITTED TO FIRE THE WASTE WOOD PRODUCT FROM BUSH INDUSTRY'S FURNITURE MANUFACTURING PROCESS (BUSH WOOD) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); BUSH WOOD MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. BUSH WOOD MAY BE FIRED AT A CONCENTRATION UP TO 25% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER.

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TO 45% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES HICKLING'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P3C is located at GROUND, Building BOILER - EMISSION SOURCE B0003 USES AMMONIA INJECTION ON AN "AS NEEDED" BASIS TO HELP CONTROL A BLUE PLUME THAT IS SOMETIMES OBSERVED AT EMISSION POINT 00002. THIS PLUME SEEMS TO BE MORE PREVALENT WHEN THE SULFUR CONTENT OF THE FUEL INCREASES BEYOND A CERTAIN LEVEL. AMMONIA IS INJECTED AT A LOW CONCENTRATION; CONSEQUENTLY, RESIDUAL EMISSIONS ARE LOW.

Process: P41 is located at GROUND, Building BOILER - EMISSION SOURCE B00004 FIRES BITUMINOUS COAL AS ITS PRIMARY BASELINE FUEL (0-100%) BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES HICKLING'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P42 is located at GROUND, Building BOILER - EMISSION SOURCE B0004 USES NO 2 FUEL OIL AS A STARTUP FUEL. IT IS USED ON AN AS NEEDED BASIS. A FIRE IS ESTABLISHED DURING START UP BY PILING WOOD ON A TRAVELING GRATE, SOAKING IT WITH 5 TO 10 GALLONS OF NO 2 FUEL OIL OR DIESEL FUEL/13, AND LIGHTING IT. THERE ARE NOT SPECIFIC FUEL OIL CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002. 13/AES HICKLING USES DIESEL FUEL AND KEROSENE INTERCHANGEABLY FOR THIS PROCESS. IT APPEARS THAT NO. 2 FUEL OIL, DIESEL FUEL OIL, AND KEROSENE COULD HAVE BEEN GROUPED TOGETHER, BASED ON SCC CODE, RATHER THAN SEPARATED AS AES HICKLING HAS DONE.

Process: P43 is located at GROUND, Building BOILER - EMISSION SOURCE B0004 IS PERMITTED TO FIRE WASTE OIL. IT IS USED ON AN OCCASIONAL BASIS. WHEN WASTE OIL ONLY IS BEING FIRED, THE ELECTROSTATIC PRECIPITATORS ARE NOT ENERGIZED. THE PRECIPITATORS ARE ENERGIZED HOWEVER, WHEN WASTE OIL IS BEING BURNED ALONG WITH BASELINE FUELS. EMISSION SOURCE B0004 IS LIMITED TO BURNING WASTE OIL AT A MAXIMUM RATE OF 2 GALLONS PER MINUTE. THE WASTE OIL MUST MEET THE SPECIFICATION OF 6 NYCRR 225-2. THERE ARE NOT SPECIFIC CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

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Process: P45 is located at GROUND, Building BOILER - EMISSION SOURCE B0004 IS PERMITTED TO FIRE CLEAN UNADULTERATED WOOD AS A PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES HICKLING'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P46 is located at GROUND, Building BOILER - EMISSION SOURCE B0004 IS PERMITTED TO FIRE CREOSOTE TREATED WOOD (CTW) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); CTW MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. CTW MAY BE FIRED AT A CONCENTRATION UP TO 45% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES HICKLING'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P47 is located at GROUND, Building BOILER - EMISSION SOURCE B0004 IS PERMITTED TO FIRE NON HAZARDOUS COAL TAR CONTAMINATED SOILS (CTS) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); CTS MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. CTS MAY BE FIRED AT A CONCENTRATION UP TO 25% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES HICKLING'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P48 is located at GROUND, Building BOILER - EMISSION SOURCE B0004 FIRES ANTHRACITE COAL AS ITS PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES HICKLING'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON

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EMISSION POINT 00002.

Process: P49 is located at GROUND, Building BOILER - EMISSION SOURCE B0004 USES DIESEL FUEL/14 AS A STARTUP FUEL. IT IS USED ON AN AS NEEDED BASIS. A FIRE IS ESTABLISHED DURING STARTUP BY PILING WOOD ON THE TRAVELING GRATE, SOAKING IT WITH 5 TO 10 GALLONS OF NO 2 FUEL OIL OR DIESEL FUEL, AND LIGHTING IT. THERE ARE NO SPECIFIC DIESEL FUEL CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002. 14/AES HICKLING USES DIESEL FUEL AND KEROSENE INTERCHANGEABLY FOR THIS PROCESS. IT APPEARS THAT NO 2 FUEL OIL, DIESEL FUEL OIL, AND KEROSENE COULD HAVE BEEN GROUPED TOGETHER, BASED ON SCC CODE, RATHER THAN SEPARATED AS AES HICKLING HAS DONE.

Process: P4A is located at GROUND, Building BOILER - EMISSION SOURCE B0004 IS PERMITTED TO FIRE THE WASTE WOOD PRODUCT FROM BUSH INDUSTRY'S FURNITURE MANUFACTURING PROCESS (BUSH WOOD) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); BUSH WOOD MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. BUSH WOOD MAY BE FIRED AT A CONCENTRATION UP TO 45% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES HICKLING'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P4C is located at GROUND, Building BOILER -

Emission unit H00003 - HICKLING STATION IS AN ELECTRIC GENERATING STATION CONSISTING OF TWO GENERATOR UNITS. THE FOLLOWING IDENTIFIERS WILL BE USED IN RELATION TO THIS EMISSION UNIT: COAL HANDLING SYSTEM, EMISSION UNIT H00003; BELT CONVEYOR 1, EMISSION SOURCE C0001; BUCKET ELEVATOR, EMISSION SOURCE C0002; BELT CONVEYOR 2, EMISSION SOURCE C0003; SCREW CONVEYOR, EMISSION SOURCE C0004; UNLOADING RAIL CAR, PROCESS PC1; UNLOADING TRUCK, PROCESS PC2, CONVEYING COAL, PROCESS PC3. COAL IS DELIVERED TO HICKLING STATION BY TRAIN AND TRUCK. COAL IS DUMPED FROM HOPPER BOTTOM RAIL CARS INTO A HOPPER LOCATED BELOW THE TRACKS IN THE TRACK HOPPER HOUSE. FROZEN COAL IS THAWED THROUGH THE USE OF AIR THAWING SYSTEMS FIRING NO2 FUEL OIL. THE COAL FALLS FROM THE COAL CARS INTO THE TRACK HOPPER. THE TRACK HOPPER DISCHARGES COAL THROUGH FOUR RECIPROCATING FEEDERS TO BELT CONVEYOR 1. COAL DELIVERED BY TRUCK IS DUMPED DIRECTLY ON THE COAL STORAGE PILE. A BULLDOZER IS USED TO SHAPE THE PILE AND RECLAIM COAL FROM THE STORAGE PILE BY PUSHING THE COAL INTO A RECLAIM HOPPER. THE RECLAIM HOPPER DISCHARGES THROUGH A RECIPROCATING FEEDER TO BELT CONVEYOR 1. BELT CONVEYOR 1 DELIVERS COAL TO THE BUCKET CONVEYOR. THE BUCKET CONVEYOR RAISES THE COAL TO THE TOP OF THE BOILER/TURBINE BUILDING AND DISCHARGES INTO A FLOP GATE. THE FLOP GATE DIRECTS THE COAL TO EITHER BELT

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CONVEYOR 2 OR TO THE COAL STORAGE PILE THROUGH A DISCHARGE CHUTE. BELT CONVEYOR 2 CARRIES THE COAL INTO THE BOILER/TURBINE BUILDING AND DISCHARGES TO A SCREW CONVEYOR. THE SCREW CONVEYOR DELIVERS COAL TO THE BUNKERS FOR EMISSION SOURCES B0001, B0002, B0003 AND B0004. THE COAL HANDLING SYSTEM HAS A NOMINAL CAPACITY OF 100 TONS PER HOUR. ALL OUTSIDE CONVEYORS ARE ENCLOSED ON THREE SIDES FOR DUST CONTROL.

Emission unit H00001 - HICKLING STATION IS AN ELECTRIC GENERATING STATION CONSISTING OF TWO GENERATOR UNITS. THE FOLLOWING IDENTIFIERS WILL BE USED IN RELATION TO THIS EMISSION UNIT: HICKLING UNIT 1, EMISSION UNIT H00001; HICKLING STACK 1, EMISSION POINT 00001; BOILER 1, EMISSION SOURCE B0001; BOILER1 ELECTROSTATIC PRECIPITATOR, EMISSION SOURCE ESP01; BURNING BITUMINOUS COAL, PROCESS P11; BURNING NO 2 FUEL OIL, PROCESS P12; BURNING WASTE OIL, PROCESS P13; BURNING CLEAN UNADULTERATED WOOD, PROCESS P15; BURNING CREOSOTE TREATED WOOD, PROCESS P16; BURNING COAL TAR SOILS, PROCESS P17; BURNING ANTHRACITE COAL, PROCESS P18; BURNING DIESEL FUEL/1, PROCESS P19; BURNING BUSH WASTE WOOD, PROCESS P1A; INJECTING AMMONIA, PROCESS P1C; BOILER 2, EM

Emission unit H00001 is associated with the following emission points (EP):  
00001

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

Process: P11 is located at GROUND, Building BOILER - EMISSION SOURCE B0001 FIRES BITUMINOUS COAL AS ITS PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDE EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P12 is located at GROUND, Building BOILER - EMISSION SOURCE B0001 USES NO 2 FUEL OIL AS A STARTUP FUEL. IT IS USED ON AN AS NEEDED BASIS. A FIRE IS ESTABLISHED DURING STARTUP BY PILING WOOD ON THE TRAVELING GRATE, SOAKING IT WITH 5 TO 10 GALLONS OF NO 2 FUEL OIL OR DIESEL FUEL/2, AND LIGHTING IT. THERE ARE NO SPECIFIC FUEL OIL CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001. 2/AES USES DIESEL FUEL AND KEROSENE INTERCHANGEABLY FOR THIS PROCESS. IT APPEARS THAT NO 2 FUEL OIL, DIESEL FUEL OIL, AND KEROSENE COULD HAVE BEEN GROUPED TOGETHER, BASED ON SCC CODE, RATHER THAN SEPARATED AS NYSEG HAS DONE.

Process: P13 is located at GROUND, Building BOILER - EMISSION SOURCE B0001 IS PERMITTED TO FIRE WASTE OIL. IT IS USED ON AN OCCASIONAL BASIS. WHEN WASTE OIL ONLY IS BEING FIRED, THE ELECTROSTATIC PRECIPITATORS ARE NOT ENERGIZED. THE PRECIPITATORS ARE ENERGIZED, HOWEVER, WHEN WASTE OIL IS BEING BURNED

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ALONG WITH BASELINE FUELS. EMISSION SOURCE B0001 IS LIMITED TO BURNING WASTE OIL AT A MAXIMUM RATE OF 2 GALLONS PER MINUTE. THE WASTE OIL MUST MEET THE SPECIFICATIONS OF 6 NYCRR 225-2. THERE ARE NO SPECIFIC CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P15 is located at GROUND, Building BOILER - EMISSION SOURCE B0001 IS PERMITTED TO FIRE CLEAN UNADULTERATED WOOD AS A PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P16 is located at GROUND, Building BOILER - EMISSION SOURCE B0001 IS PERMITTED TO FIRE CREOSOTE TREATED WOOD (CTW) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); CTW MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUELS. CTW MAY BE FIRED AT A CONCENTRATION UP TO 45% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P17 is located at GROUND, Building BOILER - EMISSION SOURCE B0001 IS PERMITTED TO FIRE NON HAZARDOUS COAL TAR CONTAMINATED SOILS (CTS) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); CTS MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. CTS MAY BE FIRED AT A CONCENTRATION UP TO 25% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P18 is located at GROUND, Building BOILER - EMISSION SOURCE B0001 IS PERMITTED TO FIRE ANTHRACITE COAL AS A PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED

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(WHEN REQUEST BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P19 is located at GROUND, Building BOILER - EMISSION SOURCE B0001 USES DIESEL FUEL/3 AS A STARTUP FUEL. IT IS USED ON AN AS NEEDED BASIS. A FIRE IS ESTABLISHED DURING STARTUP BY PILING WOOD ON THE TRAVELING GRATE, SOAKING IT WITH 5 TO 10 GALLONS OF NO2 FUEL OIL OR DIESEL FUEL, AND LIGHTING IT. T HERE ARE NO SPECIFIC DIESEL FUEL CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001. 3/AES USES DIESEL FUEL AND KEROSENE INTERCHANGEABLY FOR THIS PROCESS. IT APPEARS THAT NO2 FUEL OIL, DIESEL FUEL OIL, AND KEROSENE COULD HAVE BEEN GROUPED TOGETHER, BASED ON SCC CODE, RATHER THAN SEPARATED AS AES HAS DONE.

Process: P1A is located at GROUND, Building BOILER - EMISSION SOURCE B0001 IS PERMITTED TO FIRE THE WASTE WOOD PRODUCT FROM BUSH INDUSTRY'S FURNITURE MANUFACTURING PROCESS (BUSH WOOD) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); BUSH WOOD MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. BUSH WOOD MAY BE FIRED AT A CONCENTRATION UP TO 45% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P1C is located at GROUND, Building BOILER - EMISSION SOURCE B0001 AMMONIA INJECTION ON AN "AS NEEDED" BASIS TO HELP CONTROL A BLUE PLUME THAT IS SOMETIMES OBSERVED AT EMISSION POINT 00001. THIS PLUME SEEMS TO BE MORE PREVALENT WHEN SULFUR CONTENT OF THE FUEL INCREASES BEYOND A CERTAIN LEVEL. AMMONIA IS INJECTED AT A LOW CONCENTRATION; CONSEQUENTLY, RESIDUAL EMISSIONS ARE LOW.

Process: P21 is located at GROUND, Building BOILER - EMISSION SOURCE B0002 FIRES BITUMINOUS COAL AS ITS PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICUALTE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES

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EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P22 is located at GROUND, Building BOILER - EMISSION SOURCE B0002 USES NO 2 FUEL OIL AS A STARTUP FUEL. IT IS USED ON AN AS NEEDED BASIS. A FIRE IS ESTABLISHED DURING STARTUP BY PILING WOOD ON THE TRAVELING GRATE, SOAKING IT WITH 5 TO 10 GALLONS OF NO 2 FUEL OIL OR DIESEL FUEL/3, AND LIGHTING IT. THERE ARE NO SPECIFIC FUEL OIL CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001. 3/AES HICKLING USES DIESEL FUEL AND KEROSENE INTERCHANGEABLY FOR THIS PROCESS. IT APPEARS THAT NO 2 FUEL OIL, DIESEL FUEL OIL, AND KEROSENE COULD HAVE BEEN GROUPED TOGETHER, BASED ON SCC CODE, RATHER THAN SEPARATED AS AES HICKLING HAS DONE.

Process: P23 is located at GROUND, Building BOILER - EMISSION SOURCE B0002 IS PERMITTED TO FIRE WASTE OIL. IT IS USED ON AN OCCASIONAL BASIS. WHEN WASTE OIL ONLY IS BEING FIRED, THE ELECTROSTATIC PRECIPITATORS ARE NOT ENERGIZED. THE PRECIPITATORS ARE ENERGIZED, HOWEVER, WHEN WASTE OIL IS BEING BURNED ALONG WITH BASELINE FUELS. EMISSION SOURCE B0002 IS LIMITED TO BURNING WASTE OIL AT A MAXIMUM RATE OF 2 GALLONS PER MINUTE. THE WASTE OIL MUST MEET THE SPECIFICATIONS OF 6 NYCRR 225-2. THERE ARE NOT SPECIFIC CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P25 is located at GROUND, Building BOILER - EMISSION SOURCE B0002 IS PERMITTED TO FIRE CLEAN UNADULTERATED WOOD AS A PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P26 is located at GROUND, Building BOILER - EMISSION SOURCE IS PERMITTED TO FIRE CREOSOTE TREATED WOOD (CTW) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); CTW MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. CTW MAY BE FIRED AT A CONCENTRATION UP TO 45% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDE EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

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Process: P27 is located at GROUND, Building BOILER - EMISSION SOURCE B0002 IS PERMITTED TO FIRE NON HAZARDOUS COAL TAR CONTAMINATED SOILS (CTS) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); CTS MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. CTS MAY BE FIRED AT A CONCENTRATION UP TO 25% BY WEIGHT OF FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P28 is located at GROUND, Building BOILER - EMISSION SOURCE B0002 IS PERMITTED TO FIRE ANTHRACITE COAL AS PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P29 is located at GROUND, Building BOILER - EMISSION SOURCE B0002 USES DIESEL FUEL/5 AS A STARTUP FUEL. IT IS USED ON AN AS NEEDED BASIS. A FIRE IS ESTABLISHED DURING STARTUP BY PILING WOOD ON THE TRAVELING GRATE, SOAKING IT WITH 5 TO 10 GALLONS OF NO 2 FUEL OIL OR DIESEL FUEL, AND LIGHTING IT. THERE ARE NO SPECIFIC DIESEL FUEL CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDE EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001. 5/ AES HICKLING USES DIESEL FUEL AND KEROSENE INTERCHANGEABLY FOR THIS PROCESS. IT APPEARS THAT NO 2 FUEL OIL, DIESEL FUEL OIL, AND KEROSENE COULD HAVE BEEN GROUPED TOGETHER, BASED ON SCC CODE, RATHER THAN SEPARATED AS AES HICKLING HAS DONE.

Process: P2A is located at GROUND, Building BOILER - EMISSION SOURCE B0002 IS PERMITTED TO FIRE THE WASTE WOOD PRODUCT FROM BUSH INDUSTRY'S FURNITURE MANUFACTURING PROCESS (BUSH WOOD) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS); BUSH WOOD MAY NOT BE MIXED WITH ANY OTHER ALTERNATE RULE. BUSH WOOD MAY BE FIRED AT A CONCENTRATION UP TO 45% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM WIDE BASIS ARE ESTABLISHED IN

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AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P2C is located at GROUND, Building BOILER - EMISSION SOURCE B0002 USES AMMONIA INJECTION ON AN "AS NEEDED" BASIS TO HELP CONTROL A BLUE PLUME THAT IS SOMETIMES OBSERVED AT EMISSION POINT 00001. THIS PLUME SEEMS TO BE MORE PREVALENT WHEN THE SULFUR CONTENT OF THE FUEL INCREASES BEYOND A CERTAIN LEVEL. AMMONIA IS INJECTED AT A LOW CONCENTRATION; CONSEQUENTLY, RESIDUAL EMISSIONS ARE LOW.

**Title V/Major Source Status**

AES HICKLING LLC is subject to Title V requirements. This determination is based on the following information:

The facility is major for the following contaminants: Carbon Monoxide, Total Hazardous Air Pollutants (HAPs), Nitrogen Oxides (NOx), Particulates, PM-10 (particulates less than 10 microns in diameter), and Sulfur Dioxide.

**Program Applicability**

The following chart summarizes the applicability of AES HICKLING LLC with regards to the principal air pollution regulatory programs:

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

NOTES:

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

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

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

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

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

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

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

**RACT** Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

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

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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.

p0SIC 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
1-01-002-05	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - BITUMINOUS COAL
1-01-003-04	TRAVELING GRATE (OVERFEED) STOKER_(BITUMINOUS COAL) EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - LIGNITE
1-01-005-01	Traveling Grate (Overfeed) Stoker EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - DISTILLATE OIL
1-01-009-03	Grades 1 and 2 Oil EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - WOOD/BARK WASTE
1-01-012-01	Wood-Fired Boiler EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - SOLID WASTE
1-01-013-02	Specify Waste Material in Comments EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - LIQUID WASTE Waste Oil

### 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

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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
000630-08-0	CARBON MONOXIDE		>= 250 tpy
0NY100-00-0	HAP		>= 250 tpy
007439-92-1	LEAD(HAP)		> 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		>= 2.5 tpy but < 10 tpy

**Regulatory Analysis**

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
H-00001	40CFR 72.	Permits regulation	53
H-00002	40CFR 72.	Permits regulation	64
FACILITY	40CFR 82-F.	Protection of Stratospheric Ozone - recycling and emissions reduction	39
FACILITY	6NYCRR 200.5	Sealing.	1
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	2
FACILITY	6NYCRR 200.7	Maintenance of equipment.	3
FACILITY	6NYCRR 201-1.10(b)	Permitting - public access to records kept for Title V permitting	9
FACILITY	6NYCRR 201-1.2	Permitting - unpermitted emission sources	4
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	5
FACILITY	6NYCRR 201-1.5	Emergency defense	6
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	7
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	8

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FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	10
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	11
FACILITY	6NYCRR 201-5.	State Facility Permit General Provisions	66
FACILITY	6NYCRR 201-5.3(b)	Permit Content and Terms of Issuance - permit conditions	67
FACILITY	6NYCRR 201-6.	Title V Permits and the Associated Permit Conditions	12, 40, 13, 41, 15, 16, 18, 19, 20, 21, 22, 25, 24, 23, 14, 17
FACILITY	6NYCRR 201-6.5(c)(3)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	26
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	27
FACILITY	6NYCRR 201-6.5(g)	Permit shield	28, 29
FACILITY	6NYCRR 202-1.1	Required emissions tests.	30
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	31
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	32
H-00001	6NYCRR 207.3(d)	Episode actions	42
H-00002	6NYCRR 207.3(d)	Episode actions	54
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	68
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	33
123			
H-00003	6NYCRR 212.6(a)	General Process Emission Sources - opacity of emissions limited	65
FACILITY	6NYCRR 215.	Open Fires	34
H-00001	6NYCRR 225-1.2(d)	Sulfur-in-fuel limitations - Table 2	43, 44, 45
H-00002	6NYCRR 225-1.2(d)	Sulfur-in-fuel limitations - Table 2	55, 56, 57
FACILITY	6NYCRR 225-2.3(b)	Eligibility to burn waste fuel A.	35
FACILITY	6NYCRR 225-2.7(a)	Reports, sampling and analysis of waste fuels A and B.	36
FACILITY	6NYCRR 225-2.7(d)	Reports, sampling and analysis of waste fuels A and B.	37
FACILITY	6NYCRR 225-2.7(e)	Reports, sampling and analysis of waste fuels A and B.	38
H-00001	6NYCRR 227-1.2(a)(4)	Particulate Emissions Firing Solid Fuels.	46, 47
H-00002	6NYCRR 227-1.2(a)(4)	Particulate Emissions Firing Solid Fuels.	58, 59
H-00001	6NYCRR 227-1.2(b)	Particulate Emissions from 2 or More Connected Furnaces.	48
H-00002	6NYCRR 227-1.2(b)	Particulate Emissions from 2 or More Connected Furnaces.	60
H-00001	6NYCRR 227-1.3(a)	Smoke Emission Limitations.	49
H-00002	6NYCRR 227-1.3(a)	Smoke Emission	61



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		Limitations.	
H-00001	6NYCRR 227-1.5	Fuel mixtures.	50
H-00002	6NYCRR 227-1.5	Fuel mixtures.	62
H-00001	6NYCRR 227-2.5(b)	System-wide averaging option.	51
H-00002	6NYCRR 227-2.5(b)	System-wide averaging option.	63
H-00001	6NYCRR 231-2.6	Emission reduction credits	52

### Applicability Discussion:

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

#### 6NYCRR Part 200-.5

Allows for the sealing of non-compliant air contamination sources

#### 6NYCRR Part 200-.6

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

#### 6NYCRR Part 200-.7

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

#### 6NYCRR Part 201-1.2

Any existing emission source that is required to be permitted or registered but has not done so, must apply for the necessary permit or registration. The source is subject to all regulations that were applicable at the time the original permit or registration was required as well as any subsequent applicable requirements that came into effect since.

#### 6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable 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 201-1.5

An enforcement action may be avoided if the facility can demonstrate that an emergency situation occurred which resulted in an emission limitation or permit violation. The following information would constitute evidence of an emergency situation: a properly signed operating log recorded during the actual event which; identifies the cause(s) of the emergency, indicates that all equipment was operating properly at the time, the person responsible took all reasonable steps to minimize

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the exceedance or violation, and that the department was notified of the emergency within 2 working days of the event.

#### 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 contaminants to the air

#### 6NYCRR Part 201-1.10(b)

Any permit application, compliance plan, permit, and monitoring and compliance certification report that is submitted as part of the Title V permit process must be made available to the public as per requirements set forth under 6 NYCRR Part 616 - Public Access to Records and section 114(c) of the Clean Air Act Amendments of 1990.

#### 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 201-5

General Provisions - this requirement applies to those permit terms and conditions which are not federally enforceable; specifies that permittees must maintain emission units and control devices in compliance with all rules; authorizes reasonable access for inspections for department representatives; requires that on-site monitoring recordkeeping be made available for review for at least 5 years.

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the

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state-only portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

6NYCRR Part 201-6

General provisions for Title V permits including:

Applicable Criteria, Limits, Terms, Conditions and Standards - requires that facility operations take place in accordance with approved criteria, emission limits, terms, conditions and standards as specified in the permit and that any documents required and by the federally enforceable portion of the permit be certified by a responsible official

Cessation or Reduction of Permitted Activity Not a Defense - specifies that the cessation or reduction of a permitted activity to maintain compliance is not a defense in an enforcement action

Compliance Requirements - lists the information that must be included in any required compliance monitoring records and reports; and requires; compliance with any approved compliance schedule; the submittal of risk management plans as per 112(r) of the Act if necessary; and the submittal of compliance progress reports on a semiannual basis, at a minimum

Federally-Enforceable Requirements - specifies what permit terms and conditions, in general, are federally enforceable

Fees - requires the permittee to pay any required fees

Monitoring, Related Recordkeeping and Reporting Requirements - requires all compliance monitoring and recordkeeping to be conducted according to the terms and conditions of the permit and any Q/A requirements; any monitoring or support information is to be retained for minimum of 5 years.

Permit Revocation, Modification, Reopening, Reissuance or Termination and Associated Information Submission Requirements - specifies that the permit may be modified, revoked, reopened and reissued, or terminated for cause; and the permittee must furnish information regarding the permit to the department upon reasonable request

Permit Shield - sets forth criteria under which the permit shield applies and what authority the department maintains in pursuing violations

Property Rights - specifies that the permit does not convey any property rights

Reopening Cause - sets forth criteria and procedures for reopening a permit

Right to Inspect - establishes authority whereby department representatives may enter and inspect a facility

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Severability - establishes that the permit continues to be valid in instances where any provisions, parts or conditions of the permit are found to be invalid or are the subject of a challenge

6NYCRR Part 201-6.5(c)(3)

Requires that any reports of any required monitoring must be submitted at a minimum frequency of every 6 months.

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 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

Specifies that emissions tests may be required to ascertain compliance with any air pollution codes and rules.

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

Specifies the emission statement records that must be maintained for a 5 year period.

6NYCRR Part 211-.2

General air pollution prohibition

6 NYCRR Part 211.3

Restricts the opacity of visible emissions from any air contamination source.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 82, Subpart F

Requires affected permittees to comply with the recycling and emissions reduction standards specified by this rule when using ozone depleting substances identified

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under Title VI of the Act. Specifically, these regulations apply to the following persons or activities:

- a. Persons opening appliances for maintenance, service, repair, or disposal
- b. Equipment used during the maintenance, service, repair, or disposal of appliances
- c. Persons performing maintenance, service, repair, or disposal of appliances
- d. Persons disposing of small appliances, motor vehicle air conditioners or MVAC's, and MVAC-like appliances
- e. Persons owning commercial or industrial process refrigeration equipment
- f. Owners/operators of appliances normally containing 50 or more pounds.

If applicable, the above persons or activities may be required to comply with certain disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

#### Facility Specific Requirements

In addition to Title V, AES HICKLING LLC has been determined to be subject to the following regulations:

##### 40CFR 72 .

Acid rain provisions of Title IV of the Clean Air Act Amendments, providing for limitations on the emissions of Sulfur Dioxide.

##### 6NYCRR 207 .3 (d)

Required control measures for air pollution episodes, ie. periods of unusually high regional concentrations of air pollutants.

##### 6NYCRR 212 .6 (a)

20% opacity limit for process sources.

##### 6NYCRR 225-1.2 (d)

1.5% sulfur in fuel limit.

##### 6NYCRR 225-2.3 (b)

Limitations on the burning of "Waste Fuel A", as defined in cNYCRR, Part 225-2.2

##### 6NYCRR 225-2.7 (a)

requirements for the reporting, sampling, and analysis of waste fuels.

##### 6NYCRR 225-2.7 (d)

Requirement for the retention of waste fuel records for at least three years.

##### 6NYCRR 225-2.7 (e)

Requirement that the sampling and analysis of waste fuels be done in accord with approved procedures.

##### 6NYCRR 227-1.2 (a) (4)

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Limitations on the emissions of particulates from stationary combustion installations exceeding 250 million BTUs per hour.

6NYCRR 227-1.2 (b)

The total heat input rate for multiple furnaces vented to a common stack must be used to determine the maximum particulate emission rate.

6NYCRR 227-1.3 (a)

Opacity limited to 20%, except for one six minute average (per hour) of 27% (to accomodate soot blowing.)

6NYCRR 227-1.5

Permissible emission rates for contaminant mixtures are calculated in proportion to the their heat input contributions.

6NYCRR 227-2.5 (b)

A weighted average allowable emissions rate, based on the weighted average of actual emissions from all units that are operating at a given time, is permissible. AES has such a (state-wide) system-wide averaging plan in effect.

6NYCRR 231-2.6

Establishment of Emission Reduction Credits (ERCs), as described in permit condtion.

Compliance Certification

Summary of monitoring activities at AES HICKLING LLC:

s20 Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
H-00001	record keeping/maintenance procedures	53
H-00002	record keeping/maintenance procedures	64
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	27
FACILITY	record keeping/maintenance procedures	31
H-00001	continuous emission monitoring (cem)	43
H-00001	continuous emission monitoring (cem)	44
H-00001	continuous emission monitoring (cem)	45
H-00002	continuous emission monitoring (cem)	55
H-00002	continuous emission monitoring (cem)	56
H-00002	continuous emission monitoring (cem)	57
FACILITY	work practice involving specific operations	35
FACILITY	record keeping/maintenance procedures	36
H-00001	intermittent emission testing	47
H-00002	intermittent emission testing	59
H-00001	record keeping/maintenance procedures	49
H-00002	record keeping/maintenance procedures	61
H-00001	record keeping/maintenance procedures	51
H-00002	record keeping/maintenance procedures	63
H-00001	record keeping/maintenance procedures	52

Basis for Monitoring

As described for the "Facility Specific Requirements", above