



Facility Identification Data

Name: RG&E ALLEGANY STATION #133
Address: 11537 ST RTE 19A
FILLMORE, NY 14735

Owner/Firm

Name: ROCHESTER GAS & ELECTRIC CORP
Address: 89 EAST AVE
ROCHESTER, NY 14649, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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11537 ST RTE 19A
FILLMORE, NY 14735
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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 a renewal of the Title five (V) Operating Air Permit for Rochester Gas and Electric's (RG&E) Allegany Station #133. The changes between the previous permit and this renewal follow:

NOx emissions from the combustion gas turbine and duct burner are regulated by several State and Federal regulations. The conditions in this permit are a consolidation of the strictest regulatory requirements. The lesser requirements were removed from the permit to reduce redundancy. Most NOx and all of the CO



conditions are cited under 6 NYCRR Part 201-7 because with these emission limits the facility avoided the regulatory requirements of Prevention of Significant Deterioration (PSD), 40 CFR Part 52.21, and the NOx Reasonably Available Control Technology (RACT), 6NYCRR Part 227-2. The emission limits in the Part 201-7 conditions are stricter than the New Source Performance Standards (NSPS) for combustion Gas Turbines, 40 CFR Part 60 subpart GG, that apply to the turbine, and the NSPS for small Industrial-Commercial- Institutional boilers, 40 CFR Part 60 subpart Dc, that applies to the duct burner. The monitoring of the fuel sulfur and nitrogen content were removed from the permit as allowed by the July 2004 modification to the NSPS for gas turbines. The NSPS applicable to the duct burner still require fuel use monitoring. Other regulations, such as the Acid Rain Program, have separate fuel monitoring requirements.

The previous Air Permit did not contain emission limits during startup or shutdown of the combustion gas turbine. This window provided the time that was necessary to bring the emission control equipment up to its operating temperature and to be functional. A window during shutdown operations allowed the emission control equipment to be shutdown safely which may have allowed emissions above normal operating limits. This permit includes mass emission limits for NOx and CO during a three hour startup window and during shutdown so the plant has emission limits at all stages of operation.

Permit conditions were added to this permit for the applicable requirements of the Acid Deposition Reduction (ADR) NOx Budget Trading Program, 6 NYCRR Part 237, and the ADR Sulfur Dioxide (SO2) Budget Trading Program, 6 NYCRR Part 238. The permit conditions include emission monitoring, record keeping, reporting and certification requirements to limit NOx and SO2 emissions. Permit conditions were also added for: the CAIR (Clean Air Interstate Rule) NOx Ozone Season Trading Program, 6 NYCRR Part 243 which replaces Part 204 in year 2009; CAIR NOx Annual Trading Program, 6 NYCRR Part 244, which replaces the combined Part 237 and Part 204 programs in year 2009; and the CAIR SO2 Trading Program, 6 NYCRR Part 245 which replaces Part 238 in year 2010.

Attainment Status

RG&E ALLEGANY STATION #133 is located in the town of HUME in the county of ALLEGANY. 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 < 10 μ 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

ELECTRIC ENERGY GENERATION FACILITY CONSISTING OF ONE (1) GAS TURBINE WITH ASSOCIATED, DEPENDENT DUCT BURNER (EP0001) EMERGENCY DIESEL GENERATOR, SETS (TWO), AND AN AUXILLIARY BOILER (6.28 MMBTU) FIRING NATURAL GAS FOR SPACE HEATING PURPOSES, IN ADDITION, A DIESEL FIRE PUMP FOR BACK-UP FIRE PROTECTION PURPOSES IS ALSO LOCATED IN THE MAIN GENERATION BUILDING.

Permit Structure and Description of Operations

The Title V permit for RG&E ALLEGANY STATION #133

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.

RG&E ALLEGANY STATION #133 is defined by the following emission unit(s):

Emission unit U1GTDB - This emission unit consists of one (1) combined-cycle gas turbine, equipped with selective catalytic reduction (SCR) and water injection for NOx emissions control. The combustion gas turbine is equipped with a heat recovery steam generator and duct burners. All flue gases generated through the combined combustion gas turbine/duct burners/heat recovery steam generator train are exhausted to the atmosphere through a single 134.5 inch diameter 213 foot tall exhaust stack.

Emission unit U1GTDB is associated with the following emission points (EP):
00001

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

Process: GT1 is located at Building GEN BLDG - Natural gas combustion in the gas turbine without operation of duct burner.

Process: GT2 is located at Building GEN BLDG - Natural gas combustion in the gas turbine and duct burner (simultaneously).

Title V/Major Source Status



RG&E ALLEGANY STATION #133 is subject to Title V requirements. This determination is based on the following information:

This is not a major facility because the NOx emissions are limited to 95 tons per year (tpy) or less and the CO potential to emit is less than 100 tons. Both NOx and CO are below the Title V (major source) threshold of 100 tpy. However, the plant is subject to the EPA Acid Rain Program which requires it to have a Title V Air Permit.

Program Applicability

The following chart summarizes the applicability of RG&E ALLEGANY STATION #133 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)	NO
NSPS	YES
TITLE IV	YES
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:

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

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

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

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source



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

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

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

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

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

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

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

4911
4931

Description

ELECTRIC SERVICES
ELEC & OTHER SERVICES COMBINED

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes



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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
2-01-002-01	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS Turbine
2-01-002-09	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS TURBINE: EXHAUST

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is 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
000075-07-0	ACETALDEHYDE	190000	Y
000107-02-8	ACROLEIN	pteyear	Y
007664-41-7	AMMONIA	pteyear	F
007440-36-0	ANTIMONY	pteyear	Y
007440-38-2	ARSENIC	pteyear	Y
000071-43-2	BENZENE	pteyear	Y
007440-41-7	BERYLLIUM	pteyear	Y
007440-43-9	CADMIUM	pteyear	Y
000630-08-0	CARBON MONOXIDE	pteyear	F
007440-47-3	CHROMIUM	pteyear	Y
007440-48-4	COBALT	pteyear	Y
000050-00-0	FORMALDEHYDE	pteyear	Y
0NY100-00-0	HAP	pteyear	A
007439-92-1	LEAD	pteyear	Y
007439-96-5	MANGANESE	pteyear	Y
007439-97-6	MERCURY	pteyear	Y
000091-20-3	NAPHTHALENE	pteyear	Y
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS		pteyear
0NY210-00-0	OXIDES OF NITROGEN	pteyear	
0NY075-00-0	PARTICULATES	pteyear	E
0NY075-00-5	PM-10	pteyear	E
007782-49-2	SELENIUM	pteyear	Y
007446-09-5	SULFUR DIOXIDE	pteyear	B
000108-88-3	TOLUENE	pteyear	Y



0NY998-00-0
001330-20-7

VOC
XYLENE, M, O & P MIXT.

pteyear
pteyear

B
Y

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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



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

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

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

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

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

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

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

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

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

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

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

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

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



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

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

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after



promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

Item L: Permit Exclusion - ECL 19-0305

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

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

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and



citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY		62	Powers and Duties of the Department with respect to air pollution control
U-1GTDB/00001	40CFR 52-A.21	51, 52	Prevention of Significant Deterioration
U-1GTDB/00001/GT1	40CFR 52-A.21	54, 55, 56, 57	Prevention of Significant Deterioration
U-1GTDB/00001/GT2	40CFR 52-A.21	58, 59, 60, 61	Prevention of Significant Deterioration
U-1GTDB	40CFR 60-A	48	
U-1GTDB/00001	40CFR 60-Dc.48c(g)	53	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 68	21	Chemical accident prevention provisions
U-1GTDB	40CFR 72-A.6(a)(3)(i)	49	The applicability provisions in Title IV for new facilities.
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	
FACILITY	6NYCRR 201-1.4	63	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	
FACILITY	6NYCRR 201-1.8	12	Prohibition of



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			reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 46, 47	Title V Permits and the Associated Permit Conditions
U-1GTDB/00001	6NYCRR 201-6	50	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	15	
FACILITY	6NYCRR 201-6.5 (a) (7)	2	
FACILITY	6NYCRR 201-6.5 (a) (8)	16	
FACILITY	6NYCRR 201-6.5 (c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	17	
FACILITY	6NYCRR 201-6.5 (e)	6	
FACILITY	6NYCRR 201-6.5 (f) (6)	18	
FACILITY	6NYCRR 201-7.1	24, 25	Federally Enforceable Emissions Caps
U-1GTDB/00001	6NYCRR 201-7.1	51, 52	Federally Enforceable Emissions Caps
U-1GTDB/00001/GT1	6NYCRR 201-7.1	54, 55, 56, 57	Federally Enforceable Emissions Caps
U-1GTDB/00001/GT2	6NYCRR 201-7.1	58, 59, 60, 61	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	19	
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 204-1.6	26	
FACILITY	6NYCRR 204-4.1	27	Compliance Certification Report
FACILITY	6NYCRR 204-8.1	28	
FACILITY	6NYCRR 204-8.4	29	
FACILITY	6NYCRR 204-8.5	30	Recordkeeping and Reporting
FACILITY	6NYCRR 204-8.7	31	Additional Requirements to Provide Heat Input Data for Allocations Purposes
FACILITY	6NYCRR 211.2	64	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
U-1GTDB/00001	6NYCRR 212.9 (b)	79, 80	General Process Emission Sources - tables
FACILITY	6NYCRR 215	9	
FACILITY	6NYCRR 227-2.1	25	
FACILITY	6NYCRR 237-1.6 (c)	65	Nitrogen oxides requirements
FACILITY	6NYCRR 237-1.6 (e)	66	Recordkeeping and reporting requirements
FACILITY	6NYCRR 237-1.6 (f)	67	
FACILITY	6NYCRR 237-1.6 (g)	68	Effect on other authorities



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FACILITY	6NYCRR 237-2	69	NOx Athorized account representative for NOx budget sources
FACILITY	6NYCRR 237-4.1	70	Compliance certification report.
FACILITY	6NYCRR 237-8	71	MONITORING AND REPORTING
FACILITY	6NYCRR 238-1.6 (c)	72	Sulfur Dioxide requirements
FACILITY	6NYCRR 238-1.6 (e)	73	Recordkeeping and Reporting Requirements
FACILITY	6NYCRR 238-1.6 (f)	74	Effect on Other Authorities
FACILITY	6NYCRR 238-1.6 (g)	75	
FACILITY	6NYCRR 238-2.1	76	Authorization/responsibilities of the authorized account representative
FACILITY	6NYCRR 238-4.1	77	Compliance certification report
FACILITY	6NYCRR 238-8	78	NOx Ozone Season Emission Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (c)	32	
FACILITY	6NYCRR 243-1.6 (d)	33	Excess Emission Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (e)	34	Recordkeeping and reporting requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-2.1	35	Authorization and responsibilities - CAIR Designated Representative
FACILITY	6NYCRR 243-8.1	36	General Requirements - Monitoring and Reporting
FACILITY	6NYCRR 243-8.3	37	Out of control periods - Monitoring and Reporting
FACILITY	6NYCRR 243-8.5 (d)	38	Quarterly reports re: recordkeeping and reporting - Monitoring and Reporting
FACILITY	6NYCRR 243-8.5 (e)	39	Compliance certification re: recordkeeping and reporting - Monitoring and Reporting
FACILITY	6NYCRR 244-1	40	CAIR NOx Ozone Annual Trading Program General Provisions
FACILITY	6NYCRR 244-2	41	CAIR Designated Representative for CAIR NOx Sources
FACILITY	6NYCRR 244-8	42	Monitoring and Reporting CAIR NOx Allowances
FACILITY	6NYCRR 245-1	43	CAIR SO2 Trading Program General Provisions
FACILITY	6NYCRR 245-2	44	CAIR Designated Representative for CAIR SO2 Sources
FACILITY	6NYCRR 245-8	45	Monitoring and Reporting for CAIR SO2 Trading Program

Applicability Discussion:

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



ECL 19-301.

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

6NYCRR Part 200-6

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

6NYCRR Part 200-7

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

6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)

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

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the



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

6NYCRR 201-6.5(a)(4)

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

6NYCRR 201-6.5(a)(7)

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

6NYCRR 201-6.5(a)(8)

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

6NYCRR Part 201-6.5(c)

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

6NYCRR Part 201-6.5(c)(2)

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

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

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



6NYCRR 201-6.5(d)(5)

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

6NYCRR Part 201-6.5(e)

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

6NYCRR 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 202-1.1

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

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and 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, RG&E ALLEGANY STATION #133 has been determined to be subject to the following regulations:

40CFR 52-A.21

The requirements of Prevention of Significant Deterioration (PSD), 40 CFR Part 51.21, do not apply to this facility because it has accepted emission limits, that are based on emission modeling, that keep the emission impacts below the applicability levels of PSD.

40CFR 60-A

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

40CFR 60-Dc.48c (g)

The company provided records that the facility that burns very low sulfur fuel gaseous fuel with a potential sulfur dioxide (SO₂) emissions rate of 0.32 lb/MMBtu (140 ng/J) heat input or less. The facility has demonstrated that the natural gas they burn meets the definition of natural gas in 40 CFR Part 72.2, which by definition contains 0.060 lb SO₂/MMBtu or less, which allows them to track fuel usage in the duct burner monthly instead of daily, per 40 CFR Part 60.48c(g), subpart Dc.

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

This section identifies which utilities are subject to the requirements of Title IV of the Clean Air Act; the "Acid Rain Program".

6NYCRR 201-7.1

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is 95 tons per year of Nitrogen Oxides (NO_x). The cap keeps NO_x emissions below the applicability levels of the Title V Air Permit program and the NO_x Reasonably Available Control Requirements (RACT) in 6NYCRR Part 227-2. The facility is subject to the EPA Acid Rain Program and thus required to have a Title V Air Permit.

6NYCRR 204-1.6

This condition requires the designated representative of the permittee to make submissions for the NO_x Budget Program. The Program is designed to mitigate the interstate transport of ground level ozone and nitrogen oxides, a ground level ozone precursor.

6NYCRR 204-4.1

This condition covers the compliance certification report requirements for the NO_x Budget Program.

6NYCRR 204-8.1



This condition lists the general requirements for the NOx Budget trading program. They include, but are not limited to monitoring requirements, certification, record keeping and reporting.

6NYCRR 204-8.4

This condition lists the addresses where monitoring plans and their modifications, compliance certifications, recertifications, quarterly QA/QC reports and petitions for alternative monitoring shall be sent.

6NYCRR 204-8.5

This citation lists the recordkeeping and reporting requirements of the NOx Budget Trading Program.

6NYCRR 204-8.7

This condition is a requirement for monitoring and reporting if a particular monitoring scenario is utilized.

6NYCRR 212 .9 (b)

This section refers to Table 2 of 6NYCRR Part 212.9 which specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental Rating of A, B, C or D) and Solid Particulate Emissions (Environmental Rating A or D).

6NYCRR 227-2.1

The requirements of NOx Reasonably Available Control Technology (RACT), 6NYCRR Part 227-2, do not apply to this facility because it has limited its NOx emissions to 95 tons per year (tpy) which are below the 100 tpy applicability level. Regardless, the facility has hourly NOx limits that are more restrictive than the NOx RACT limits that they are avoiding.

6NYCRR 237-1.6 (c)

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

6NYCRR 237-1.6 (e)

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

6NYCRR 237-1.6 (f)

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

6NYCRR 237-1.6 (g)

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

6NYCRR 237-2

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

6NYCRR 237-4.1

This item specifies the requirements of the Acid Deposition Reduction NOx Budget compliance certification report.

6NYCRR 237-8

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



requirements of this item.

6NYCRR 238-1.6 (c)

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

6NYCRR 238-1.6 (e)

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

6NYCRR 238-1.6 (f)

This describes the liability issues regarding the requirements of the ADR SO₂ Budget Trading Program

6NYCRR 238-1.6 (g)

This item states that no provision of the ADR SO₂ Budget Trading Program will exempt or exclude the owners and operators from compliance with any other provisions of applicable State and federal law and regulations.

6NYCRR 238-2.1

This section outlines the authorization and responsibilities of the Acid Deposition Reduction SO₂ Budget authorized account representative.

6NYCRR 238-4.1

This section lists all of the requirements for the submission of the Acid Deposition Reduction SO₂ Budget compliance certification report.

6NYCRR 238-8

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

6NYCRR 243-1.6 (c)

This citation explains the general provisions of the Clean Air Interstate Rule (CAIR) NO_x Ozone Season Trading Program. This ozone season NO_x cap and trade program runs from May 1 through September 30 each year, starting in 2009. Each source shall hold a tonnage equivalent in CAIR NO_x Ozone Season allowances that is not less than the total tons of NO_x emissions for the ozone season.

6NYCRR 243-1.6 (d)

This citation for the Clean Air Interstate Rule (CAIR) NO_x Ozone Season Trading Program explains some of the penalties that can be imposed on a CAIR NO_x Ozone Season source that does not surrender enough CAIR NO_x Ozone Season allowances to cover their NO_x Ozone Season emissions.

6NYCRR 243-1.6 (e)

This citation for the Clean Air Interstate Rule (CAIR) NO_x Ozone Season Trading Program requires that all reports be submitted as required by this program, and that copies of all records and submissions made for this program be kept on site for at least five years.

6NYCRR 243-2.1

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

6NYCRR 243-8.1

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



Ozone Season Trading Program sources must install, certify and operate monitoring systems that meet the monitoring, recordkeeping, and reporting requirements in Subpart 6NYCRR 243-8 and in Subpart H of 40 CFR Part 75.

6NYCRR 243-8.3

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

6NYCRR 243-8.5 (d)

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

6NYCRR 243-8.5 (e)

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

6NYCRR 244-1

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

6NYCRR 244-2

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

6NYCRR 244-8

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

6NYCRR 245-1

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

6NYCRR 245-2

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

6NYCRR 245-8

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

Compliance Certification

Summary of monitoring activities at RG&E ALLEGANY STATION #133:



Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-1GTDB/00001	53	record keeping/maintenance procedures
U-1GTDB/00001	50	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
U-1GTDB/00001	51	continuous emission monitoring (cem)
U-1GTDB/00001	52	continuous emission monitoring (cem)
U-1GTDB/00001/GT1	54	continuous emission monitoring (cem)
U-1GTDB/00001/GT1	55	continuous emission monitoring (cem)
U-1GTDB/00001/GT1	56	continuous emission monitoring (cem)
U-1GTDB/00001/GT1	57	continuous emission monitoring (cem)
U-1GTDB/00001/GT2	58	continuous emission monitoring (cem)
U-1GTDB/00001/GT2	59	continuous emission monitoring (cem)
U-1GTDB/00001/GT2	60	continuous emission monitoring (cem)
U-1GTDB/00001/GT2	61	continuous emission monitoring (cem)
FACILITY	7	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures
U-1GTDB/00001	79	intermittent emission testing
U-1GTDB/00001	80	continuous emission monitoring (cem)
FACILITY	65	record keeping/maintenance procedures
FACILITY	70	record keeping/maintenance procedures
FACILITY	71	record keeping/maintenance procedures
FACILITY	72	record keeping/maintenance procedures
FACILITY	77	record keeping/maintenance procedures
FACILITY	42	record keeping/maintenance procedures
FACILITY	45	record keeping/maintenance procedures

Basis for Monitoring

1. The majority of the permit conditions at the facility level are based on citations from 6 NYCRR Parts 200, 201, 202, 211, 215 and 217 and are conditions that are in every Title V (five) Operating Permit. These conditions generally reiterate rules that apply to most facilities and some require the permittee to monitor or



take actions.

2. Permit conditions that list 6 NYCRR Part 201-7 as the applicable requirement are limiting emissions so the facility can avoid otherwise applicable regulatory requirements. Nitrogen Oxide (NO_x) emissions are limited on an annual basis to avoid the requirements of the NO_x Reasonably Available Control Technology (RACT) program, 6 NYCRR Part 227-2. NO_x and carbon monoxide (CO) emissions are limited on an hourly basis to avoid the requirements of the Prevention of Significant Deterioration (PSD) program, 40 CFR Part 52.21. The previous permits did not limit NO_x or CO emissions during startup or shut down, however this permit does limit the mass emissions during startup and shutdown in Part 201-7 permit conditions. Startup emissions were not limited because it took some time for the emission control equipment to reach operating temperature and until that time the emissions may have been higher than hourly limits.

3. Permit conditions that list 6 NYCRR Part 204 (NO_x Budget Trading Program) or one of its subparts as the applicable requirement, limit emissions of NO_x from the gas turbine emission unit U-1GTDB, during the ozone season, which is between May 1 and September 30. A NO_x continuous emission monitoring system (CEMS) that is certified according to 40 CFR Part 75 (Acid Rain Emission Monitoring) is used to monitor and calculate emissions. The monitoring procedures are prescribed by the regulation.

4. Permit conditions that list 6 NYCRR Part 227-2 (NO_x Reasonably Available Control Technology) as the requirement being capped out are found in the 6 NYCRR Part 201-7 permit conditions that limit NO_x in parts per million. The NO_x RACT emission limits for the gas turbine and duct burner are less restrictive than the PSD capping limits so only the PSD limits are included in the permit.

5. Permit conditions that list 40CFR60 subpart A (New Source Performance Standards (NSPS) - General Provisions) as the applicable requirement, requires the facility to comply with notification, monitoring, record keeping, and reporting requirements that all NSPS sources are subject to.

6. Permit conditions that list 6 NYCRR 237 (Acid Deposition Reduction NO_x Budget Trading Program) as the applicable requirement, limit the emissions of NO_x from the gas turbine emission unit, U-1GTDB, during the non-ozone season (October 1 to April 30). The emissions are monitored with a NO_x CEMS in the stack. The record keeping and monitoring requirements are prescribed by the regulation.

7. Permit conditions that list 6 NYCRR 238 (Acid Deposition Reduction SO₂ Budget Trading Program) as the applicable requirement, limit the emissions of Sulfur Dioxide (SO₂) in tons per year from the gas turbine emission unit U-1GTDB. The emissions are monitored through fuel use and fuel analysis for sulfur content. The record keeping and monitoring requirements are prescribed by the regulation.

8. The duct burner is subject to permit conditions that list 40CFR60 subpart Dc (New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 10 to 100 million Btu per hour) as the applicable requirement. Since the duct burner only fires natural gas Subpart Dc only requires that the amount of fuel burned in the duct burner be recorded.

9. The combustion gas turbine is subject to 40 CFR Part 60 subpart GG (New Source Performance Standards for Stationary Gas Turbines) which regulates the NO_x emissions from the turbine. Some of the 6 NYCRR Part 201-7 permit conditions cap the NO_x capping conditions to avoid PSD and contain the most stringent requirements from all the applicable requirements to reduce duplication. Therefore, no subpart GG permit conditions are in the permit even though it is applicable.

10. The ammonia emission limit from the PSD capping permit is included in this permit. The ammonia limit in the previous permit was less detailed. A CEMS is used to monitor ammonia emissions as nitrogen oxide (NO).



A permit condition was added that requires a once per permit term ammonia emission compliance test which includes an accuracy test of the ammonia monitoring system. A permit condition was added that details the requirements of the continuous ammonia monitoring CEMS along with the emission limit.

11. This facility is exempt from the requirements of Continuous Assurance Monitoring (CAM), 40CFR Part 64, because this permit requires the use of NO_x CEMS, which provide continuous compliance determinations for NO_x emissions. The potential to emit NO_x before the control devices is over 100 tons per year and control devices are used to reduce emissions.

12. Duplicate or overlapping permit conditions were either removed or consolidated into one condition for this permit. This primarily affects sulfur in fuel and NO_x ppm and lb/hr conditions that came from different regulations. Now the most stringent requirements from all applicable conditions are incorporated in one condition where possible