

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 9-2911-00152/00025

Renewal Number: 1

03/26/2010

Ozone*	MARGINAL 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:

THIS FACILITY IS A COGENERATION FACILITY. THE FACILITY UTILIZES A CIRCULATING FLUIDIZED BED BOILER ("CFB") TO PRODUCE PROCESS STEAM AND ELECTRICITY WHICH ARE SUPPLIED TO INDUSTRY AND SOLD TO A POWER COMPANY, RESPECTIVELY.

Permit Structure and Description of Operations

The Title V permit for NIAGARA GENERATING FACILITY

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

NIAGARA GENERATING FACILITY is defined by the following emission unit(s):

Emission unit UCFB01 - A CIRCULATING FLUIDIZED BED BOILER. THE FUEL (E.G. COAL, PETROLEUM COKE, CLEAN UNTREATED WOOD CHIPS, UP TO 30%, BY WEIGHT TIRE DERIVED FUEL (TDF), USED LUBRICATING OILS AND/OR A COMBINATION OF THESE FUEL(S) IS INTRODUCED INTO THE FLUIDIZED BED AND COMBUSTED. THE FLUIDIZATION IS ACHIEVED BY BLOWING AIR INTO MEDIUM (ASH AND LIMESTONE). THIS TYPE OF COMBUSTION OFFERS FUEL FLEXIBILITY, HIGH COMBUSTION EFFICIENCY, AND LOW NOX AND CO-EMISSIONS. CONTROL OF SOX EMISSIONS IS BY DESULFURIZATION DURING COMBUSTION. THIS IS ACHIEVED BY INJECTING LIMESTONE INTO THE BED FOR 90% SULFUR CAPTURE BASED ON COAL ANALYSIS. MAXIMUM EMISSION RATE POTENTIAL FOR SO2 IS 0.5 LBS/MMBTU. THE UNIT CANNOT OPERATE WITHOUT THE LIMESTONE INJECTION SYSTEM OPERATING, THUS PRECLUDING HIGHER SO2 LEVELS. THE CFB ALSO ACTS AS A CONTROL DEVICE FOR



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BACK TO THE COMBUSTOR TO COMBUST UNBURNED PARTICLES.

NOTE: TDF FEED RATE MAY BE MODIFIED BASED UPON SUCCESSFUL COMPLETION OF OPERATIONAL TEST BURNS AND PERFORMANCE STACK TESTS AUTHORIZED ELSEWHERE IN THIS PERMIT.

Emission unit UCFB01 is associated with the following emission points (EP):

00101

Process: CKE CIRCULATING FLUIDIZED BED BOILER USING ANY COMBINATION OF COAL, CLEAN UNTREATED WOOD CHIPS AND PETROLEUM COKE FOR FUEL.

Process: COL is located at POWERHOUSE, Building #1 - CIRCULATING FLUIDIZED BED BOILER USING COAL AS A FUEL.

Process: GAS is located at POWERHOUSE, Building #1 - NATURAL GAS IS USED FOR STARTUP. THE GAS IS COMBUSTED BY THE 4 BURNERS USED TO PROVIDE INITIAL HEATING OF THE BOILER. NATURAL GAS MAY ALSO BE COMBUSTED CONCURRENT WITH THE USE OF SOLID FUEL TO ACHIEVE FULL UNIT OPERATING CAPACITY.

Process: OIL CIRCULATING FLUIDIZED BED BOILER USING ANY COMBINATION OF THE PRIMARY FUELS (COAL, PETROLEUM COKE AND CLEAN UNTREATED WOOD CHIPS) AND USED LUBRICATING OIL (GENERATED ON SITE) AS A FUEL. THE USED LUBRICATING OIL WILL BE MIXED INTO THE PRIMARY FUELS PRIOR TO BEING FED TO THE BOILER.

Process: TDF CIRCULATING FLUIDIZED BED BOILER BURNING ANY COMBINATION OF THE PRIMARY FUELS (COAL, PETROLEUM COKE AND CLEAN UNTREATED WOOD CHIPS) A MAXIMUM OF 30%, BY WEIGHT, TIRE DERIVED FUEL (TDF). THE 30% BY WEIGHT TDF FEED FOR COMBUSTION IS BASED ON A 6-DAY ROLLING AVERAGE WITH A MAXIMUM 1-DAY FEED OF 33% BY WEIGHT TDF.

NOTE: TDF FEED RATE MAY BE MODIFIED BASED UPON SUCCESSFUL COMPLETION OF OPERATIONAL TEST BURNS AND PERFORMANCE STACK TESTS AUTHORIZED ELSEWHERE IN THIS PERMIT.

Emission unit UCOLPL - COAL IS BROUGHT IN BY RAILCAR AND/OR TRUCK. THE COAL IS STORED IN THE COAL PILE STORAGE AREA. COAL IS TRANSFERRED VIA A CONVEYOR SYSTEM. THE CONVEYOR BELT OVERLAPS THE COAL AS IT IS TRANSFERRED TO THE FURNACE FEED.

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

FUGIT

Process: MHL MATERIAL HANDLING INCLUDING PROCESSING, STORAGE, TRANSFERRING AND LOADING OF APPROVED FUELS FOR USE IN THE CIRCULATING FLUIDIZED BED BOILER.

Title V/Major Source Status

NIAGARA GENERATING FACILITY is subject to Title V requirements. This determination is based on the following information:

Facility is a major source of emissions for NO_x, CO and SO₂ Facility emits greater than 250 tons/yr for each contaminant Facility also emits between 50 and 100 tons per year of Particulate Matter (PM) and PM₁₀.

Program Applicability

The following chart summarizes the applicability of NIAGARA GENERATING FACILITY with regards to the principal air pollution regulatory programs:

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

NOTES:

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

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

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

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

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

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

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that



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apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

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

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

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis

of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

Description

4911	ELECTRIC SERVICES
4939	COMBINATION UTILITY 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

1-01-002-17	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - BITUMINOUS COAL ATMOSPHERIC FLUIDIZED BED COMBUSTION - BUBBLING BED (BITUM COAL)
1-01-005-01	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - DISTILLATE OIL Grades 1 and 2 Oil
1-01-006-01	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION

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1-01-006-02	ELECTRIC UTILITY BOILER - NATURAL GAS Boilers > 100 MBtu/Hr except Tangential EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION
1-01-008-01	ELECTRIC UTILITY BOILER - NATURAL GAS Boilers < 100 MBtu/Hr except Tangential EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION
1-01-012-01	ELECTRIC UTILITY BOILER - COKE All Boiler Sizes EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION
1-01-013-02	ELECTRIC UTILITY BOILER - SOLID WASTE Specify Waste Material in Comments EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION
3-03-003-09	ELECTRIC UTILITY BOILER - LIQUID WASTE Waste Oil PRIMARY METAL PRODUCTION PRIMARY METAL PRODUCTION (BY-PRODUCT COKE MANUFACTURING) Coal Conveying

Facility Emissions Summary

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

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN	100	
007440-36-0	ANTIMONY	2000	
007440-38-2	ARSENIC		> 0 but < 10 tpy
000071-43-2	BENZENE	2000	
000050-32-8	BENZO (A) PYRENE	100	
007440-41-7	BERYLLIUM	100	
007440-43-9	CADMIUM	100	
000630-08-0	CARBON MONOXIDE		>= 250 tpy
007440-47-3	CHROMIUM	100	
007440-48-4	COBALT	100	



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0NY064-29-0	COPPER (CU 064)	100	
000206-44-0	FLUORANTHENE	100	
000050-00-0	FORMALDEHYDE	2000	
007647-01-0	HYDROGEN CHLORIDE		>= 10 tpy
007664-39-3	HYDROGEN FLUORIDE		> 0 but < 10 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
007439-96-5	MANGANESE	2000	
007439-97-6	MERCURY	100	
007439-98-7	MOLYBDENUM	100	
000091-20-3	NAPHTHALENE	100	
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	100	
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy
0NY075-00-0	PARTICULATES		>= 50 tpy but < 100 tpy
000085-01-8	PHENANTHRENE	100	
0NY075-00-5	PM-10		>= 50 tpy but < 100 tpy
000129-00-0	PYRENE	100	
007782-49-2	SELENIUM	100	
007704-34-9	SULFUR	100	
007446-09-5	SULFUR DIOXIDE		>= 250 tpy
000108-88-3	TOLUENE	2000	
007440-62-2	VANADIUM	100	
0NY998-00-0	VOC		>= 250 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

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

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 26 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

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

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

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

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

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

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

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

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

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

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

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

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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.



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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	ECL 19-0301	66	Powers and Duties of the Department with respect to air pollution control
U-CFB01	40CFR 52-A.21	56, 57, 58, 59	Prevention of Significant

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FACILITY	40CFR 60-A.7 (b)	41	Deterioration
U-CFB01	40CFR 60-A.7 (c)	60	Notification and Recordkeeping
FACILITY	40CFR 60-A.8 (c)	42	Notification and Recordkeeping
FACILITY	40CFR 60-Da.40a	43	Performance Tests
U-CFB01	40CFR 60-Da.47a	61	Utility steam generators over 250 million Btu per hour
U-CFB01	40CFR 60-Da.48a	62	Emission Monitoring. Compliance Determinations, Procedures, and Methods.
U-AUX01	40CFR 60-Dc.42c (d)	52	Standard for Sulfur Dioxide Firing Oil. (see narrative)
U-AUX01	40CFR 60-Dc.42c (g)	47	Averaging requirements.
U-AUX01	40CFR 60-Dc.42c (h)	48	Exemption from Averaging Requirements
U-AUX01	40CFR 60-Dc.43c (d)	49	Time Period Requirements for Opacity
U-AUX01	40CFR 60-Dc.46c (e)	50	Exemption from Emission Monitoring for Sulfur Dioxide.
U-AUX01	40CFR 60-Dc.48c	51	Reporting and Recordkeeping Requirements.
U-COLPL	40CFR 60-Y.252 (c)	65	Standards of Performance for Coal Preparation Plants - standards for particulate matter
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
U-CFB01/-/TDF	6NYCRR 200.6	63	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	67	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 44, 45	Title V Permits and the Associated Permit Conditions



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U-CFB01/-/TDF	6NYCRR 201-6	64	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	15	General conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	2	General conditions
FACILITY	6NYCRR 201-6.5 (a) (8)	16	Fees
FACILITY	6NYCRR 201-6.5 (c)	3	General conditions
			Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	17	Compliance schedules
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5 (f) (6)	18	Off Permit Changes
FACILITY	6NYCRR 202-1.1	19	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 204-1.6	24	Standard Requirements
FACILITY	6NYCRR 204-2.1	25	Authorization and Responsibilities of the NOx Authorized Account Representative
FACILITY	6NYCRR 204-4.1	26, 27, 28	Compliance Certification Report
FACILITY	6NYCRR 204-7.1	29	Submission of NOx Allowance Transfers
FACILITY	6NYCRR 204-8.1	30, 31, 32	General Requirements
FACILITY	6NYCRR 204-8.2	33	Initial Certification and Recertification Procedures
FACILITY	6NYCRR 204-8.3	34	Out of Control Periods
FACILITY	6NYCRR 204-8.4	35	Notifications
FACILITY	6NYCRR 204-8.7	36	Additional Requirements to Provide Heat Input Data for Allocations Purposes
FACILITY	6NYCRR 211.2	68	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 215	9	Open Fires
FACILITY	6NYCRR 225-1.2 (d)	37	Sulfur-in-fuel limitations - Table 2
FACILITY	6NYCRR 225-1.7 (c)	38	Emission and fuel monitoring.
FACILITY	6NYCRR 225-1.7 (e)	39	Emission and fuel



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U-CFB01	6NYCRR 225-2.3 (b) (1)	53	monitoring.
FACILITY	6NYCRR 227-1.3 (a)	40	Eligibility to burn waste fuel A.
U-CFB01	6NYCRR 227-2.4 (a) (2)	54	Smoke Emission Limitations.
U-AUX01	6NYCRR 227-2.4 (d)	46	This is the control requirements for very large boilers not listed in 227-2.4(a) (1).
U-CFB01	6NYCRR 227-2.6 (a) (1)	55	RACT for Oxides of Nitrogen - small boilers.
FACILITY	6NYCRR 237-1.4 (a)	69	Testing, monitoring, and reporting requirements for very large boilers.
FACILITY	6NYCRR 237-1.6 (a)	70	Generators equal to or greater than 25 MWe
FACILITY	6NYCRR 237-2	71	Standard permit requirements
FACILITY	6NYCRR 237-4.1	72	NOx Authorized account representative for NOx budget sources
FACILITY	6NYCRR 237-7.1	73	Compliance certification report.
FACILITY	6NYCRR 237-8	74	Submission of NOx allowance transfers
FACILITY	6NYCRR 238-1.4	75	MONITORING AND REPORTING
FACILITY	6NYCRR 238-1.6 (a)	76	Applicability
FACILITY	6NYCRR 238-1.6 (c)	77	Permit Requirements
FACILITY	6NYCRR 238-1.6 (f)	78	Sulfur Dioxide requirements
FACILITY	6NYCRR 238-1.6 (g)	79	Liability
FACILITY	6NYCRR 238-2.1	80	Effect on Other Authorities
FACILITY	6NYCRR 238-4.1	81	Authorization/responsibilities of the authorized account representative
FACILITY	6NYCRR 238-7.1	82	Compliance certification report
FACILITY	6NYCRR 238-8	83	Submission of SO2 allowance transfers
			Monitoring and Reporting

Applicability Discussion:

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.5 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine



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compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.5 (a) (7)

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

6 NYCRR 201-6.5 (a) (8)

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

6 NYCRR 201-6.5 (c)

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

6 NYCRR 201-6.5 (c) (2)

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

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

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

6 NYCRR 201-6.5 (d) (5)

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

6 NYCRR 201-6.5 (e)

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

6 NYCRR 201-6.5 (f) (6)

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

6 NYCRR 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.



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6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 211.3

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

6 NYCRR Part 215

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

40 CFR Part 68

This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, NIAGARA GENERATING FACILITY has been determined to be subject to the following regulations:

40 CFR 52.21

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

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

40 CFR 60.252 (c)



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This regulation sets a maximum opacity of 20% for coal processing and conveying equipment at coal processing plants.

40 CFR 60.40a

This regulation sets standards of performance for electric utility steam generating units for which construction is commenced after September 18, 1978.

40 CFR 60.42c (d)

This regulation requires that on or after the date on which the initial performance test is completed or required to be completed under section 60.8 of 40 CFR 60 Subpart A, no owner or operator of an affected facility that combusts oil, shall combust oil with a sulfur content in excess of 0.5 percent by weight.

40 CFR 60.42c (g)

This regulation requires that compliance with emission limits, percent reduction, and fuel oil sulfur limitations be based on a 30 day rolling average

40 CFR 60.42c (h)

This regulation requires that compliance with emission limits and/or fuel oil sulfur limitations be based on a certification from the fuel supplier as stated in paragraph 40 CFR 60-Dc.48c(f)(1), (2), or (3) as applicable

40 CFR 60.43c (d)

This regulation requires that the particulate matter and opacity standards of section 40 CFR 60-Dc.43c apply at all times, except during periods of startup, shutdown, and malfunction.

40 CFR 60.46c (e)

This regulation allows facilities subject to paragraphs 40 CFR 60-Dc.42c(h)(1), (2), or (3) who show compliance through vendor certification, to be exempt from the monitoring requirements of section 40 CFR 60-Dc.46c

40 CFR 60.47a

This regulation requires the owners or operators, subject to the emission limits of Subpart Da, to install, calibrate, maintain, and operate CEMs for oxides of nitrogen, sulfur dioxide, opacity, and either oxygen or carbon dioxide

40 CFR 60.48a

This regulation requires the owner/operator of a facility conducting emission tests required under section 60.8 to use the test methods located in Appendix A of this Part 40 CFR 60

40 CFR 60.48c

This regulation requires that the facility maintain reports and records in accordance with the provisions of this section 40 CFR 60-Dc.48c.

40 CFR 60.7 (b)

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

40 CFR 60.7 (c)



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This requirement details the information to be submitted in excess emissions and monitoring systems performance reports which must be submitted at least semi-annually for sources with compliance monitoring systems.

40 CFR 60.8 (c)

This condition contains the requirements for operating conditions, of the emission source, during performance testing.

6 NYCRR 204-1.6

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

6 NYCRR 204-2.1

This condition states the submission requirements for the NOx Budget Trading Program. The Program is designed to mitigate the interstate transport of ground level ozone and nitrogen oxides, a ground level ozone precursor.

6 NYCRR 204-4.1

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

6 NYCRR 204-7.1

This condition lists the requirements for transfer of allowances in the NOx Budget Program.

6 NYCRR 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.

6 NYCRR 204-8.2

This condition covers the procedures for initially certifying and recertifying the monitoring systems of the unit meet the requirements of the NOx Budget Program

6 NYCRR 204-8.3

This condition states the requirements for data substitution during times when the monitoring systems do not meet applicable quality assurance requirements.

6 NYCRR 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.

6 NYCRR 204-8.7

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

6 NYCRR 225-1.2 (d)

The sulfur-in-fuel limitations for residual and distillate oil and for solid fuel are listed in Tables 1,2 and 3 or 6 NYCRR Part 225-1.2(c), (d) and (e)

6 NYCRR 225-1.7 (c)



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

6 NYCRR 225-1.7 (e)

This regulation requires source owners subject to 6 NYCRR Part 225-1 to submit a written report of the fuel sulfur content exceeding the applicable sulfur-in-fuel limitation, or of measured emissions exceeding the applicable equivalent emission rate, and the nature and cause of such excesses if known, for the calendar quarter

6 NYCRR 225-2.3 (b) (1)

This regulation requires that each piece of equipment which fires Waste Fuel A demonstrate, at a minimum, 99% combustion efficiency in burning Waste fuel A

6 NYCRR 227-1.3 (a)

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

6 NYCRR 227-2.4 (a) (2)

This condition lists the emission limitations for very large boilers.

6 NYCRR 227-2.4 (d)

This rule specifies that the reasonably available control technology (RACT) requirement for small boilers (< or = 50 million BTUs/hr) at Title V facilities consists of an annual tune-up.

6 NYCRR 227-2.6 (a) (1)

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

6 NYCRR 237-1.4 (a)

This condition specifies that any emission unit or facility with a unit; that at any time on or after January 1, 1999, serves a generator with a nameplate capacity equal to or greater than 25 MWe, and sells any amount of electricity, is a NOx budget unit and subject to the requirements of NYCRR 237

6 NYCRR 237-1.6 (a)

This condition requires the applicant to submit a NOx budget application for a permit and to operate in compliance with that permit.

6 NYCRR 237-4.1

This item specifies the requirements of the compliance certification report.

6 NYCRR 237-7.1

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

6 NYCRR 238-1.4

This citation identifies the facility as having one or more SO2 budget units as defined by Federal Law, and as such is subject to the requirements of 6 NYCRR 238

6 NYCRR 238-1.6 (a)



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This condition requires the applicant to submit a SO2 budget application for a permit and to operate in compliance with that permit.

6 NYCRR 238-1.6 (c)

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

6 NYCRR 238-1.6 (f)

This subdivision outlines the liability of an affected source.

6 NYCRR 238-1.6 (g)

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

6 NYCRR 238-2.1

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

6 NYCRR 238-4.1

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

6 NYCRR 238-7.1

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

6 NYCRR Subpart 237-2

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

6 NYCRR Subpart 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.

6 NYCRR Subpart 238-8

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

Compliance Certification

Summary of monitoring activities at NIAGARA GENERATING FACILITY:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-CFB01	56	continuous emission monitoring (cem)
U-CFB01	57	intermittent emission testing
U-CFB01	58	intermittent emission testing
U-CFB01	59	continuous emission monitoring (cem)



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U-CFB01	60	record keeping/maintenance procedures
FACILITY	43	record keeping/maintenance procedures
U-AUX01	52	work practice involving specific operations
U-COLPL	65	monitoring of process or control device parameters as surrogate
U-CFB01/-/TDF	63	record keeping/maintenance procedures
U-CFB01/-/TDF	64	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	work practice involving specific operations
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
U-CFB01	53	record keeping/maintenance procedures
FACILITY	40	monitoring of process or control device parameters as surrogate
U-CFB01	54	continuous emission monitoring (cem)
U-AUX01	46	record keeping/maintenance procedures
FACILITY	72	record keeping/maintenance procedures
FACILITY	74	record keeping/maintenance procedures
FACILITY	77	record keeping/maintenance procedures
FACILITY	81	record keeping/maintenance procedures
FACILITY	83	record keeping/maintenance procedures

Basis for Monitoring

Facility uses CEMS for NOx, CO, SO2 and COMS for opacity.