



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-0499-00046/00005
Effective Date: 12/14/2015 Expiration Date: 12/13/2025

Permit Issued To: HOLIMONT INC
6921 RTE 242
PO BOX 279
ELLCOTTVILLE, NY 14731-0279

Contact: DAVID RILEY
HOLIMONT SKI RESORT
FISH HILL RD
ELLCOTTVILLE, NY 14731
(716) 699-2320

Facility: HOLIMONT SKI RESORT
FISH HILL RD
ELLCOTTVILLE, NY 14731

Contact: DAVID RILEY
HOLIMONT SKI RESORT
FISH HILL RD
ELLCOTTVILLE, NY 14731
(716) 699-2320

Description:

Holimont Ski Resort uses three large internal combustion engines to generate electricity for all of the ski and snowmaking operations. Only the ski lodge and office are connected to the electric grid.

This permit modification is for the conversion of the diesel generator engine to a dual fuel (diesel and natural gas) engine, and the addition of oxidizing catalysts to the three engines as required by the RICE NESHAP (Reciprocating Internal Compression Engine, National Emission Standards for Hazardous Air Pollutants, 40CFR63 subpart ZZZZ). The emissions of oxides of nitrogen (NOx) are still capped below the major source applicability level of 100 tons per 12-months.

The RICE NESHAP requires the reduction of carbon monoxide (CO) emissions from each of the three engines by installing oxidizing catalysts. After installation, the engine emissions will be tested to ensure that the CO emissions are reduced by at least 93% from each natural gas engine (engines 1 & 2) and at least 70% from the dual fuel engine (engine 3). Holimont choose to comply with the percent reduction requirements instead of the concentration requirements because the vendor was guaranteeing the percent reduction values. The RICE NESHAP requires ongoing temperature monitoring of each catalyst, monitoring of the pressure drop on the dual fuel engine's catalyst, periodic testing of the catalyst percent reduction efficiency on each engine

New York State Department of Environmental Conservation
Facility DEC ID: 9049900046



and semiannual reporting. All reporting and notification required by the RICE NESHAP must be sent to EPA's Region 2 office and the Buffalo DEC Office.

In the RICE NESHAP each engine is considered existing RICE greater than 500 horse power at an area source. The two natural gas engines (engines 1 & 2) are four-stroke lean-burn (4SLB) engines, and the dual fuel engine (engine 3) is considered a compression ignition (CI) engine. The dual fuel engine (engine 3) does not meet the definition of spark ignition in 40CFR63.6675 of subpart ZZZZ, so it is considered a CI engine.

The RICE NESHAP compliance date for the natural gas engines (engines 1 & 2) was April 17, 2014 (180 days after 10/19/2013). The compliance date for the dual fuel engine (engine 3) was October 30, 2013 (180 days after 5/3/2013). This permit calls for the initial compliance demonstrations to be completed within 45 days of installation of the catalysts.

The facility will limit emissions of oxides of nitrogen (NOx) below the major stationary source applicability threshold for NOx, of 100 tons per year, and by doing so will not be subject to Title V permitting under 6NYCRR Part 201-6, NOx Reasonably Available Control Technology (RACT) under 6NYCRR Part 227-2 and applicability of New Source Review (NSR) under 6NYCRR Part 231-2. They must keep actual emissions below 100 tons for each 12 month rolling period. NOx emissions were capped in the previous permit too.

The emission cap requires the facility to track, on a monthly basis, the hours of operation of the two natural gas engines and the dual fuel engine, along with the diesel oil and natural gas burned in the dual fuel engine. If emissions reach 100 tons per year this is an exceedance of the emission cap and shall be reported to the Department within 3 working days of occurrence. On an annual basis, beginning one year after the granting of an emissions cap, the responsible official must submit a certification that the facility has operated all emission units within the limits imposed by the emission cap, along with the monthly and 12-month rolling NOx emissions.

Within 45 days of adding the catalysts to each engine, the facility is required to emission test each engine to confirm the accuracy of NOx and CO emission factors used in the permit application and for NOx emission tracking.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator:

LISA M CZECHOWICZ
NYSDEC - REGION 9
270 MICHIGAN AVE
BUFFALO, NY 14203-2915

Authorized Signature: _____

Date: ____ / ____ / _____





Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
 - Applications for permit renewals, modifications and transfers
 - Applications for permit renewals, modifications and transfers
 - Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.



Condition 4: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 4.1:

The permittee must submit a renewal application at least 180 days before expiration of permits for both Title V and State Facility Permits.

Item 4.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 5: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 5.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 6: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 6.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-0499-00046/00005

Facility DEC ID: 9049900046



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: HOLIMONT INC
6921 RTE 242
PO BOX 279
ELLCOTTVILLE, NY 14731-0279

Facility: HOLIMONT SKI RESORT
FISH HILL RD
ELLCOTTVILLE, NY 14731

Authorized Activity By Standard Industrial Classification Code:
7997 - MEMBERSHIP SPORTS & RECREATION CLUBS

Permit Effective Date: 12/14/2015

Permit Expiration Date: 12/13/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-7.1: Facility Permissible Emissions
- *2 6 NYCRR 201-7.1: Capping Monitoring Condition
- 3 6 NYCRR 211.1: Air pollution prohibited
- 4 6 NYCRR 225-1.2 (g): Compliance Demonstration
- 5 6 NYCRR 225-1.2 (h): Compliance Demonstration
- 6 40CFR 63.9, Subpart A: Compliance Demonstration
- 7 40CFR 63, Subpart ZZZZ: Compliance and Enforcement
- 8 40CFR 63.6665, Subpart ZZZZ: General provisions

Emission Unit Level

EU=1-COGEN

- 9 6 NYCRR Subpart 202-1: Compliance Demonstration
- 10 40CFR 63.6612(a), Subpart ZZZZ: Compliance Demonstration
- 11 40CFR 63.6625(b), Subpart ZZZZ: Compliance Demonstration
- 12 40CFR 63.6625(h), Subpart ZZZZ: Compliance Demonstration
- 13 40CFR 63.6630(a), Subpart ZZZZ: Compliance Demonstration
- 14 40CFR 63.6630(a), Subpart ZZZZ: Compliance Demonstration
- 15 40CFR 63.6635(b), Subpart ZZZZ: Continuous monitoring requirement
- 16 40CFR 63.6635(c), Subpart ZZZZ: Data that cannot be used for continuous compliance demonstration
- 17 40CFR 63.6640(a), Subpart ZZZZ: Compliance Demonstration
- 18 40CFR 63.6640(c), Subpart ZZZZ: Compliance Demonstration
- 19 40CFR 63.6645(a), Subpart ZZZZ: Compliance Demonstration
- 23 40CFR 63.6650(b), Subpart ZZZZ: Compliance reports
- 20 40CFR 63.6650(b), Subpart ZZZZ: Compliance Demonstration
- 21 40CFR 63.6650(c), Subpart ZZZZ: Contents of compliance reports
- 22 40CFR 63.6650(e), Subpart ZZZZ: Deviation reporting to be included in compliance reports

EU=1-COGEN,EP=00003

- 24 40CFR 63.6604, Subpart ZZZZ: Compliance Demonstration
- 25 40CFR 63.6625(g), Subpart ZZZZ: Requirements for crankcase ventilation and filtration systems
- 26 40CFR 63.6630(a), Subpart ZZZZ: Compliance Demonstration
- 27 40CFR 63.6640(a), Subpart ZZZZ: Compliance Demonstration
- 28 40CFR 63.6640(a), Subpart ZZZZ: Compliance Demonstration
- 29 40CFR 63.6640(a), Subpart ZZZZ: Compliance Demonstration
- 30 40CFR 63.6650(b), Subpart ZZZZ: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 31 ECL 19-0301: Contaminant List
- 32 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 33 6 NYCRR Subpart 201-5: Emission Unit Definition
- 34 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits



- 35 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 36 6 NYCRR 211.2: Visible Emissions Limited
Emission Unit Level
- 37 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 38 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,



required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: 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 F: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item H: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Item J: Required Emission Tests - 6 NYCRR 202-1.1



An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item K: Open Fires Prohibitions - 6 NYCRR 215.2

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.

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.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Facility Permissible Emissions



Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 1.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY210-00-0

PTE: 199,999 pounds per year

Name: OXIDES OF NITROGEN

Condition 2: Capping Monitoring Condition

Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 2.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1

6 NYCRR 227-2.1

6 NYCRR Subpart 231-2

Item 2.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 2.3:

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.

Item 2.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 2.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.



Item 2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

1.) The facility shall limit NO_x emissions to less than 100 tons for each 12 month period. By complying with this emission cap, the facility will maintain emissions below major facility thresholds and will stay below the applicability requirements for Title V permitting (6NYCRR Part 201-6), NO_x Reasonably Available Control Technology (RACT) (6NYCRR Part 227-2) and New Source Review (NSR) (6NYCRR Part 231-2).

2.) The facility shall track NO_x emissions for each 12 month period by computing the NO_x emissions from the two (2) natural gas and one (1) dual fuel (diesel and natural gas) internal stationary combustion engines used to generate electricity. Emissions shall be calculated by summing NO_x emissions during each calendar month and adding these emissions to the previous 11 calendar months. This computation shall be completed by the 15th day of each calendar month following the 12 month period.

3.) In order to compute NO_x monthly emissions, the facility shall use the timer on each natural gas fired engine and record the number of hours each engine operates during a calendar month. The dual fuel engine emissions shall be monitored by tracking the hours it operates, its fuel oil use, and natural gas use. The NO_x emissions from all three engines shall in turn be summed for each month. The owner or operator must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request during normal business hours.

The NO_x emission rates shall be confirmed by conducting an emission test according to the requirements of this permit. The highest emission rate from the multi-load emission testing on each engine shall be the emission rate used for the respective engine at all loads. In the event the emission test results using the portable test instruments are determined unreliable, the department may request retesting according to appropriate EPA test



methods.

4.) If emissions reach 100 tons per year this is an exceedance of the emission cap and shall be reported to the Department within 3 working days of occurrence. The day of occurrence would be the day the monthly and 12 month total emissions are calculated.

5.) On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit.

6.) All submittals to the Department shall be certified by a responsible Company Official, as to truth, completeness, and accuracy of information recorded and reported.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 100 tons

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 12 calendar month(s).

Condition 3: Air pollution prohibited
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 3.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 4: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:6 NYCRR 225-1.2 (g)

New York State Department of Environmental Conservation

Permit ID: 9-0499-00046/00005

Facility DEC ID: 9049900046



Item 4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of a stationary combustion installation that fires distillate oil other than number two heating oil are limited to the purchase of distillate oil with 0.0015 percent sulfur by weight or less on or after July 1, 2014. Compliance with this limit will be based on vendor certifications.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.0015 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 5: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:6 NYCRR 225-1.2 (h)

Item 5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of a stationary combustion installations that fire distillate oil are limited to the firing of distillate oil with 0.0015 percent sulfur by

New York State Department of Environmental Conservation

Permit ID: 9-0499-00046/00005

Facility DEC ID: 9049900046



weight or less on or after July 1, 2016. Compliance with this limit will be based on vendor certifications.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 0.0015 percent by weight
Monitoring Frequency: PER DELIVERY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 6: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.9, Subpart A

Item 6.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All reporting required by 40CFR63 subpart A (general provisions) and subpart ZZZZ (RICE) shall be submitted to:

EPA Region II, Director, Air and Waste Management
Division, 21st Floor, 290 Broadway, New York, NY
10007-1866

Copies of the required reports shall be submitted to the
New York State Department of Environmental Conservation,
270 Michigan Ave., Buffalo, NY 14203

The facility is responsible for complying with
recordkeeping and reporting requirements in 40CFR63
subparts A and ZZZZ.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

New York State Department of Environmental Conservation

Permit ID: 9-0499-00046/00005

Facility DEC ID: 9049900046



DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 7: Compliance and Enforcement
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 7.1:

The Department has not accepted delegation of 40 CFR Part 63 Subpart ZZZZ. Any questions concerning compliance and/or enforcement of this regulation should be referred to USEPA Region 2, 290 Broadway, 21st Floor, New York, NY 10007-1866; (212) 637-4080. Should the Department decide to accept delegation of 40 CFR Part 63 Subpart ZZZZ during the term of this permit, enforcement of this regulation will revert to the Department as of the effective date of delegation.

Condition 8: General provisions
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.6665, Subpart ZZZZ

Item 8.1:

Table 8 of 40 CFR 63 Subpart ZZZZ shows which parts of the General Provisions 40 CFR 63.1 through 40 CFR 63.15 apply to this facility. Facility is responsible for ensuring they comply with all General Provisions contained in Table 8.

****** Emission Unit Level ******

Condition 9: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:6 NYCRR Subpart 202-1

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



The facility shall monitor NOx emission rates from the two (2) natural gas and one (1) dual fuel (diesel & natural gas) internal combustion engines to confirm that emissions are within manufacturer published emission rates and similar to those used in the application. The facility shall accomplish this by conforming to the following:

- 1.) The facility shall retain a certified Caterpillar dealer to properly tune the engines to ensure they meet manufacturer published emission rates and minimize opacity.
- 2.) Within 45 days of operation of the catalysts, the facility shall submit a test protocol for using a portable monitoring instrument to measure the concentration of NOx in the exhaust. The measured NOx concentrations and the gas flow rate obtained during each performance test shall be used to determine mass emission rates - in pounds per hour. The test shall be conducted at low, medium and high load. Each load shall have 3 test runs at the length of time called for CO emission testing in 40CFR subpart ZZZZ. The test protocol shall describe all appropriate QA/QC procedures to be used to ensure acceptable data quality. In the event the stack test results using the portable test instruments are determined unreliable, the department may require retesting according to appropriate EPA test methods. In the event the facility wishes to export power off site, it must first retest each engine according EPA test methods according to a department approved test protocol to confirm the accuracy of previously determined emission factors for establishing compliance with the NOx emission cap.
- 3.) Stack testing shall be completed within 45 days after receiving Department approval.
- 4.) The stack test report shall be completed within 45 days of the completion of stack testing. In the event the source owner/operator can demonstrate to the Department such time is not sufficient, he may request in writing and may be granted an extension. In the event the Department determines there are problems with the stack report or procedures used in stack testing, corrective action shall be taken and the stack test report shall be revised accordingly. Corrective action could include retesting the source(s) if identified problems cannot be otherwise resolved.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 10: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.6612(a), Subpart ZZZZ

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

You must conduct any initial performance test or other initial compliance demonstration according to Tables 4 and 5 to 40CFR63 subpart ZZZZ that apply to you within 180 days after the compliance date that is specified for your stationary RICE in §63.6595 and according to the provisions in §63.7(a)(2).

Where, §63.6595(a)(1) states:

a.) If you have an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than May 3, 2013. (Engine 3)

b.) If you have an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than October 19, 2013. (Engines 1 & 2)

Initial compliance monitoring requirements are listed in permit conditions cited under 40CFR 63.6630.

Reporting requirements are specified in 40CFR 63.6645.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 11: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.6625(b), Subpart ZZZZ

Item 11.1:

The Compliance Demonstration activity will be performed for:



Emission Unit: 1-COGEN

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities required to install a continuous parameter monitoring system (CPMS) as specified in Table 5 of subpart ZZZZ must install, operate, and maintain each CPMS according to the requirements in paragraphs (1) through (6). For an affected source that is complying with the emission limitations and operating limitations on March 9, 2011, the requirements in this paragraph are applicable September 6, 2011.

(1) The owner or operator must prepare a site-specific monitoring plan that addresses the monitoring system design, data collection, and the quality assurance and quality control elements outlined in paragraphs (i) through (v) and in 40 CFR 63.8(d). As specified in 40 CFR 63.8(f)(4), the owner or operator may request approval of monitoring system quality assurance and quality control procedures alternative to those specified in 40 CFR 6625(b)(1) through (5) in the site-specific monitoring plan.

(i) The performance criteria and design specifications for the monitoring system equipment, including the sample interface, detector signal analyzer, and data acquisition and calculations;

(ii) Sampling interface (e.g., thermocouple) location such that the monitoring system will provide representative measurements;

(iii) Equipment performance evaluations, system accuracy audits, or other audit procedures;

(iv) Ongoing operation and maintenance procedures in accordance with provisions in 40 CFR 63.8(c)(1)(ii) and (c)(3); and

(v) Ongoing reporting and recordkeeping procedures in accordance with provisions in 40 CFR 63.10(c), (e)(1), and (e)(2)(i).

(2) The owner or operator must install, operate, and maintain each CPMS in continuous operation according to the procedures in the site-specific monitoring plan.



- (3) The CPMS must collect data at least once every 15 minutes (see also 40 CFR 63.6635).
- (4) For a CPMS for measuring temperature range, the temperature sensor must have a minimum tolerance of 2.8 degrees Celsius (5 degrees Fahrenheit) or 1 percent of the measurement range, whichever is larger.
- (5) The owner or operator must conduct the CPMS equipment performance evaluation, system accuracy audits, or other audit procedures specified in your site-specific monitoring plan at least annually.
- (6) The owner or operator must conduct a performance evaluation of each CPMS in accordance with the site-specific monitoring plan.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement: 40CFR 63.6625(h), Subpart ZZZZ

Item 12.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN

Item 12.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:
For operation of a new, reconstructed, or existing stationary engine, the engine's time spent at idle must be minimized during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to 40 CFR 63 Subpart ZZZZ apply.

Parameter Monitored: DURATION OF START UP
Upper Permit Limit: 30 minutes
Monitoring Frequency: CONTINUOUS
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED PER OCCURRENCE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.



The initial report is due 1/30/2016.
Subsequent reports are due every 6 calendar month(s).

Condition 13: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement: 40CFR 63.6630(a), Subpart ZZZZ

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Engines 1 & 2 (natural gas) – Initial Compliance
Demonstration – CO Percent Reduction

You must demonstrate initial compliance with each emission limitation, operating limitation, and other requirement that applies to you according to Table 5 of subpart ZZZZ. Item 13 in table 5 requires the installation of an oxidation catalyst. To demonstrate initial compliance with item 13(i) in table 5 you must have conducted an initial compliance demonstration as specified in §63.6630(e) to show that the average reduction of emissions of CO is 93 percent or more.

Where §63.6630(e) specifies:

- 1) The compliance demonstration must consist of at least three test runs.
- 2) Each test run must be of at least 15 minute duration, except that each test conducted using the method in appendix A to 40CFR63 subpart ZZZZ must consist of at least one measurement cycle and include at least 2 minutes of test data phase measurement.
- 3) If you are demonstrating compliance with the CO percent reduction requirement, you must measure CO emissions using one of the CO measurement methods specified in Table 4, item 1 or appendix A to 40CFR63 subpart ZZZZ.
- 4) If you are demonstrating compliance with the CO percent reduction requirement, you must measure CO emissions and O₂ emissions simultaneously at the inlet and outlet of the



control device.

5) Submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in §63.7(b)(1).
[63.6645(g)]

6) Submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th day following the completion of the performance test according to §63.10(d)(2).
[63.6645(h)(2)]

Parameter Monitored: CARBON MONOXIDE

Lower Permit Limit: 93 percent reduction

Reference Test Method: see table 4 item 1 in 40CFR63 subpart ZZZZ

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 14: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.6630(a), Subpart ZZZZ

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Engines 1 & 2 (natural gas) – Initial Compliance Demonstration – Catalyst Temperature

You must demonstrate initial compliance with each emission limitation, operating limitation, and other requirement that applies to you according to Table 5 of subpart ZZZZ. Item 13 in table 5 requires the installation of an oxidation catalyst. To demonstrate initial compliance with item 13(ii) in table 5 you must have installed a continuous parameter monitoring system (CPMS) to continuously monitor catalyst inlet temperature according to the requirements in §63.6625(b), or you have installed equipment to automatically shut down the engine if the catalyst inlet temperature exceeds 1350 °F.

For each initial compliance demonstration required in



Table 5 to this subpart that does not include a performance test, you must submit the Notification of Compliance Status before the close of business on the 30th day following the completion of the initial compliance demonstration. [63.6645(h)(1)]

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 15: Continuous monitoring requirement
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.6635(b), Subpart ZZZZ

Item 15.1:

This Condition applies to Emission Unit: 1-COGEN

Item 15.2:

Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the owner or operator must monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Condition 16: Data that cannot be used for continuous compliance demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.6635(c), Subpart ZZZZ

Item 16.1:

This Condition applies to Emission Unit: 1-COGEN

Item 16.2:

The owner or operator may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The owner or operator must, however, use all the valid data collected during all other periods.

Condition 17: Compliance Demonstration



Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement: 40CFR 63.6640(a), Subpart ZZZZ

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Engines 1 & 2 (Natural Gas) - Continuous Compliance
for Temperature of Catalyst

1.) A facility complying with the requirement to install
and use an oxidation catalyst to reduce HAP emissions per
item 9 in table 2d, will demonstrate continuous compliance
if each of the following is met in option A or

B:

Option A

i) Collecting the catalyst inlet temperature data
according to §63.6625(b);

ii) Reducing these data to 4-hour rolling averages;

iii) maintain the 4-hour rolling average temperature of
your stationary RICE exhaust so that the catalyst inlet
temperature is greater than or equal to 450 °F and less
than or equal to 1350 °F. [table 6, item 14 ii]

OR

Option B

Immediately shutting down the engine if the catalyst
inlet temperature exceeds 1350 °F. [table 6, #14
iii]

2.) Keep records readily accessible in hard copy or
electronic form for at least 5 years after the date of
each occurrence, measurement, maintenance, corrective
action, report, or record, according to 40 CFR
63.10(b)(1).

New York State Department of Environmental Conservation

Permit ID: 9-0499-00046/00005

Facility DEC ID: 9049900046



3.) Report the compliance status semiannually as specified in 40CFR 63.6650(a), (b), (c) and (e).

Manufacturer Name/Model Number: IAC Acoustics Catalyst Monitor

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 450 degrees Fahrenheit

Upper Permit Limit: 1350 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 4-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

Condition 18: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement: 40CFR 63.6640(c), Subpart ZZZZ

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Engines 1 & 2 (natural gas) – Continuous Compliance
– CO Percent Reduction

An ANNUAL compliance demonstration is required for engines 1 & 2 which must be conducted according to the following requirements:

- 1) The average reduction of CO emissions shall be 93 percent or more. [table 6, item 14]
- 2) The compliance demonstration must consist of at least one test run.
- 3) Each test run must be of at least 15 minute duration, except that each test conducted using the method in appendix A to 40CFR63 subpart ZZZZ must consist of at least one measurement cycle and include at least 2 minutes of test data phase measurement.
- 4) Measure CO emissions using one of the CO measurement



methods specified in Table 4 or using appendix A to 40CFR63 subpart ZZZZ.

5) You must measure O₂ using one of the O₂ measurement methods specified in Table 4 of 40CFR63 subpart ZZZZ. Measurements to determine O₂ concentration must be made at the same time as the measurements for CO concentration.

6) You must measure CO emissions and O₂ emissions simultaneously at the inlet and outlet of the control device.

7) If the results of the annual compliance demonstration show that the emissions exceed the levels specified in item 1 above (from Table 6 of 40CFR63 subpart ZZZZ), the stationary RICE must be shut down as soon as safely possible, and appropriate corrective action must be taken (e.g., repairs, catalyst cleaning, catalyst replacement). The stationary RICE must be retested within 7 days of being restarted and the emissions must meet the levels specified in item 1 above (from Table 6 of 40CFR63 subpart ZZZZ). If the retest shows that the emissions continue to exceed the specified levels, the stationary RICE must again be shut down as soon as safely possible, and the stationary RICE may not operate, except for purposes of startup and testing, until the owner/operator demonstrates through testing that the emissions do not exceed the levels specified in item 1 above (from Table 6 of 40CFR63 subpart ZZZZ).

8) Submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in §63.7(b)(1). [63.6645(g)]

9) Submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th day following the completion of the performance test according to §63.10(d)(2). [63.6645(h)(2)]

Parameter Monitored: CARBON MONOXIDE

Lower Permit Limit: 93 percent reduction

Reference Test Method: see table 4, item 1 in 40CFR63 subpart ZZZZ

Monitoring Frequency: ANNUALLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 19: Compliance Demonstration



Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement: 40CFR 63.6645(a), Subpart ZZZZ

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An existing stationary RICE located at an area source of HAP emissions must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified. The headings for these citations follow:

§63.7 Performance testing requirements

(b) Notification of performance test.

(c) Quality assurance program.

§63.8 Monitoring requirements.

(e) Performance evaluation of continuous monitoring systems.

(f) Use of an alternative monitoring method.

(4) Request to use alternative monitoring procedure.

(6) Alternative to the relative accuracy test.

63.9 Notification Requirements

(b) Initial notifications.

(c) Request for extension of compliance.

(d) Notification that source is subject to special compliance requirements.

(e) Notification of performance test.

(g) Additional notification requirements for sources with continuous monitoring systems.

(h) Notification of compliance status.

Reporting due dates are specified by each referenced citation.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 23: Compliance reports

Effective between the dates of 12/14/2015 and 12/13/2025



Applicable Federal Requirement: 40 CFR 63.6650(b), Subpart ZZZZ

Item 23.1:

This Condition applies to Emission Unit: 1-COGEN

Item 23.2:

Unless the EPA Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the owner or operator must submit each report by the date in Table 7 of subpart ZZZZ and according to the requirements in paragraphs (1) through (9).

- (1) For semiannual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for the affected source in 40 CFR 63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for the source in 40 CFR 63.6595.
- (2) For semiannual Compliance reports, the first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the affected source in 40 CFR 63.6595.
- (3) For semiannual Compliance reports, each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- (4) For semiannual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
- (5) For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), the owner or operator may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (1) through (4) above.
- (6) For annual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for the affected source in 40 CFR 63.6595 and ending on December 31.
- (7) For annual Compliance reports, the first Compliance report must be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date that is specified for the affected source in 40 CFR 63.6595.
- (8) For annual Compliance reports, each subsequent Compliance report must cover the annual reporting period from January 1 through December 31.
- (9) For annual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than January 31.

Condition 20: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025



Applicable Federal Requirement:40CFR 63.6650(b), Subpart ZZZZ

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Engines 1 & 2 (natural gas) – Reporting Requirements

1.) You must submit each report in Table 7 of 40CFR63 subpart ZZZZ that applies to you. Item 3 in Table 7 requires:

a.) The results of the annual compliance demonstration, if conducted during the reporting period.

2.) Each compliance report must contain the information in 40CFR 63.6650(c)

3.) Each compliance report must be submitted semiannually according to the requirements in 40CFR 63.6650(b)(1-5).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 21: Contents of compliance reports
Effective between the dates of 12/14/2015 and 12/13/2025**

Applicable Federal Requirement:40CFR 63.6650(c), Subpart ZZZZ

Item 21.1:

This Condition applies to Emission Unit: 1-COGEN

Item 21.2:

The Compliance report must contain the information in paragraphs (1) through (6).

(1) Company name and address.

(2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.



(3) Date of report and beginning and ending dates of the reporting period.

(4) If the facility had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct a malfunction.

(5) If there are no deviations from any emission or operating limitations that apply to the facility, a statement that there were no deviations from the emission or operating limitations during the reporting period.

(6) If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.

**Condition 22: Deviation reporting to be included in compliance reports
Effective between the dates of 12/14/2015 and 12/13/2025**

Applicable Federal Requirement: 40CFR 63.6650(e), Subpart ZZZZ

Item 22.1:

This Condition applies to Emission Unit: 1-COGEN

Item 22.2:

For each deviation from an emission or operating limitation occurring for a stationary RICE where the facility is using a CMS to comply with the emission and operating limitations in 40 CFR 63 Subpart ZZZZ, the compliance report must include information in paragraphs 40 CFR 63.6650(c)(1) through (4) and (1) through (12) below.

(1) The date and time that each malfunction started and stopped.

(2) The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.

(3) The date, time, and duration that each CMS was out-of-control, including the information in 40 CFR 63.8(c)(8).

(4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period.

(5) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.

(6) A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.



(7) A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period.

(8) An identification of each parameter and pollutant (CO or formaldehyde) that was monitored at the stationary RICE.

(9) A brief description of the stationary RICE.

(10) A brief description of the CMS.

(11) The date of the latest CMS certification or audit.

(12) A description of any changes in CMS, processes, or controls since the last reporting period.

Condition 24: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.6604, Subpart ZZZZ

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN Emission Point: 00003

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Diesel Fuel Requirements

The owner or operator of an existing non-emergency, non-black start CI stationary RICE with a site rating of more than 300 brake HP with a displacement of less than 30 liters per cylinder that uses diesel fuel must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel. Where 80.510(b) subjects all nonroad diesel fuel to:

(1) Sulfur content - 15 ppm maximum for nonroad diesel fuel.

(2) Cetane index or aromatic content, as follows:

(i) A minimum cetane index of 40; or

(ii) A maximum aromatic content of 35 volume



percent.

3.) Records of the above data must be collected for each delivery of diesel fuel. These records must be available for review or submitted upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 15 parts per million by weight
Reference Test Method: Methods acceptable to the department/agency
Monitoring Frequency: PER DELIVERY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 25: Requirements for crankcase ventilation and filtration systems
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.6625(g), Subpart ZZZZ

Item 25.1:

This Condition applies to Emission Unit: 1-COGEN Emission Point: 00003

Item 25.2:

The owner or operator of an existing non-emergency, non-black start CI engine greater than or equal to 300 HP that is not equipped with a closed crankcase ventilation system must comply with either paragraph (1) or (2). Owners and operators must follow the manufacturer's specified maintenance requirements for operating and maintaining the open or closed crankcase ventilation systems and replacing the crankcase filters, or can request the Administrator to approve different maintenance requirements that are as protective as manufacturer requirements.

(1) Install a closed crankcase ventilation system that prevents crankcase emissions from being emitted to the atmosphere, or

(2) Install an open crankcase filtration emission control system that reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates and metals.

Condition 26: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.6630(a), Subpart ZZZZ



on the 60th day following the completion of the performance test according to §63.10(d)(2).
[63.6645(h)(2)]

Parameter Monitored: CARBON MONOXIDE

Lower Permit Limit: 70 percent reduction

Reference Test Method: see table 4, item 3 of 40CFR63 subpart ZZZZ.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 28: Compliance Demonstration

Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.6640(a), Subpart ZZZZ

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN

Emission Point: 00003

Regulated Contaminant(s):

CAS No: 000630-08-0

CARBON MONOXIDE

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Engine 3 (dual fuel) - Continuous Compliance for
Pressure Drop Across Catalyst

A facility complying with the CO concentration limit or CO emission reduction limit using an oxidation catalyst and a continuous parameter monitoring system (CPMS) will demonstrate continuous compliance if each of the following is met:

1) Measure the pressure drop across the catalyst once per month;

2) Demonstrate that the pressure drop across the catalyst does not change by more than 2 inches of water from the pressure drop across the catalyst that was measured during the initial performance test [item 10.v in table 6, and item 2 in table 2b];

3) Keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective



action, report, or record, according to 40 CFR 63.10(b)(1).

4) Report the compliance status semiannually as specified in 40CFR 63.6650(a), (b), (c) and (e).

Manufacturer Name/Model Number: DCL International, Inc. Catalyst Monitor
Parameter Monitored: PRESSURE DROP
Upper Permit Limit: 2 inches of water
Monitoring Frequency: CONTINUOUS
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 6 calendar month(s).

Condition 29: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement: 40CFR 63.6640(a), Subpart ZZZZ

Item 29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN Emission Point: 00003

Regulated Contaminant(s):
CAS No: 000630-08-0 CARBON MONOXIDE

Item 29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Engine 3 (dual fuel) - Continuous Compliance for Temperature of Catalyst

A facility complying with the CO emission reduction limit using an oxidation catalyst and a continuous parameter monitoring system (CPMS) will demonstrate continuous compliance if each of the following is met [item 10 in table 6]:

- 1) Collecting the catalyst inlet temperature data according to §63.6625(b);
- 2) Reducing these data to 4-hour rolling averages;
- 3) Maintain the 4-hour rolling average temperature of your stationary RICE exhaust so that the catalyst inlet

New York State Department of Environmental Conservation

Permit ID: 9-0499-00046/00005

Facility DEC ID: 9049900046



temperature is greater than or equal to 450 °F and less than or equal to 1350 [item 10.iv in table 6, and item 2.b in table 2b]

4) keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1).

5) Report the compliance status semiannually as specified in 40CFR 63.6650(a), (b), (c) and (e).

Manufacturer Name/Model Number: DCL International, Inc. Catalyst Monitor

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 450 degrees Fahrenheit

Upper Permit Limit: 1350 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 4-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

Condition 30: Compliance Demonstration

Effective between the dates of 12/14/2015 and 12/13/2025

Applicable Federal Requirement:40CFR 63.6650(b), Subpart ZZZZ

Item 30.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COGEN

Emission Point: 00003

Item 30.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Engine 3 (dual fuel) – Reporting Requirements

1.) You must submit each report in Table 7 of 40CFR63 subpart ZZZZ that applies to you. Item 1 in Table 7 requires:

a. If there are no deviations from any emission limitations or operating limitations that apply to you, a statement that there were no deviations from the emission limitations or operating limitations during the reporting period. If there were no periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in §63.8(c)(7), a statement that there were not periods



during which the CMS was out-of-control during the reporting period; or

b. If you had a deviation from any emission limitation or operating limitation during the reporting period, the information in §63.6650(d). If there were periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in §63.8(c)(7), the information in §63.6650(e); or

c. If you had a malfunction during the reporting period, the information in §63.6650(c)(4).

2.) Each compliance report must contain the information in 40CFR 63.6650(c)

3.) Each compliance report must be submitted semiannually according to the requirements in 40CFR 63.6650(b)(1-5).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 31: Contaminant List
Effective between the dates of 12/14/2015 and 12/13/2025



(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 33: Emission Unit Definition
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 33.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-COGEN

Emission Unit Description:

The electric power requirements of the Holimont Ski Resort is supplied by 2 natural gas fired 1150 hp (800 kw) and one dual fuel (diesel and natural gas) fired 2288 hp (1600 kw) internal combustion generator sets. The engines all have catalysts to reduce emissions. Excess heat produced will eventually be used by Holimont for comfort heat at the ski resort. The natural gas engines are identified as engine 1 and engine 2. The dual fuel engine is engine 3.

Building(s): 1
2
3

Condition 34: Renewal deadlines for state facility permits
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 34.1:

The owner or operator of a facility having an issued state facility 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.

Condition 35: Compliance Demonstration
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 35.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 35.2:

Compliance Demonstration shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 9-0499-00046/00005

Facility DEC ID: 9049900046



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

Condition 36: Visible Emissions Limited
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable State Requirement:6 NYCRR 211.2

Item 36.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

****** Emission Unit Level ******

Condition 37: Emission Point Definition By Emission Unit
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 37.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-COGEN

Emission Point: 00001

Height (ft.): 12 Diameter (in.): 12
NYTMN (km.): 4686.5 NYTME (km.): 195.7 Building: 1

Emission Point: 00002

Height (ft.): 12 Diameter (in.): 12
NYTMN (km.): 4686.5 NYTME (km.): 195.7 Building: 2



Emission Point: 00003
Height (ft.): 12 Diameter (in.): 12
NYTMN (km.): 4686.5 NYTME (km.): 195.7 Building: 3

Condition 38: Process Definition By Emission Unit
Effective between the dates of 12/14/2015 and 12/13/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 38.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-COGEN
Process: 001 Source Classification Code: 2-01-002-02
Process Description:
Engine 1 is an 1150 hp (820 kw) internal combustion natural gas fired generator set operated to produce power for Holimont ski related equipment. This is a four stroke lean burn (4SLB) engine.

Emission Source/Control: 00001 - Combustion
Design Capacity: 1,150 horsepower (mechanical)

Emission Source/Control: CAT01 - Control
Control Type: CATALYTIC OXIDATION

Item 38.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-COGEN
Process: 002 Source Classification Code: 2-01-002-02
Process Description:
Engine 2 is an 1150 hp (820 kw) internal combustion natural gas fired generator set operated to produce power for Holimont ski related equipment. This is a four stroke lean burn (4SLB) engine.

Emission Source/Control: 00002 - Combustion
Design Capacity: 1,150 horsepower (mechanical)

Emission Source/Control: CAT02 - Control
Control Type: CATALYTIC OXIDATION

Item 38.3:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-COGEN
Process: 003 Source Classification Code: 2-02-004-02
Process Description:
Engine 3 is a 2288 hp (1600 kW) internal combustion dual fuel (diesel and natural gas) fired generator set operated to produce power for Holimont ski related equipment.



Emission Source/Control: 00003 - Combustion
Design Capacity: 2,288 horsepower (mechanical)

Emission Source/Control: CAT03 - Control
Control Type: CATALYTIC OXIDATION

